

Independent Joint Anti-Corruption Monitoring & Evaluation Committee (MEC)

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Monitoring the Education Sector Third Quarterly Monitoring Report





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"I am ready for any sacrifice to build education in Afghanistan" Mirwais Balkhi, Acting Minister of Education.

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Executive Summary

On the October 26th 2017, MEC released its "Ministry-wide Vulnerability to Corruption Assessment of the Ministry of Education". Based on findings from this assessment, MEC identified key areas of vulnerability to corruption and issued 113 recommendations for improving different aspects of education provision and bringing much needed reform to the Ministry of Education and the wider sector.

MEC actively monitors the implementation of its recommendations, proposed reforms, and related anti-corruption efforts in the education sector, and develops and releases a monitoring report every quarter. <u>MEC's First Quarterly Monitoring Report</u> was published on the 24th of June 2018 and Second Quarterly Monitoring Report was released on the 12th of November 2018. This Third Quarterly Monitoring Report covers the period from August-November 2018.

MEC has taken the approach of assigning a thematic focus to its quarterly follow-up monitoring periods. During this, latest, 3rd quarter, MEC's thematic focus has been on reform in the education sector.

During this third active follow-up monitoring period, MEC visited three Provinces, Balkh, Jowzjan and Samangan, and conducted interviews, by phone, with representatives from the PED in Nuristan.

In its Provincial visits, MEC conducts semi-structured, in-depth interviews and guided Focus Group Discussions to collect information about the status of recommendations. These discussions involve representatives from relevant PEDs, school principals, education *Shuras*, CSOs and Provincial Council members. In addition, MEC does direct observations in schools and classrooms.

Reforms in MoE

MoE has developed an "Anti-Corruption Plan", which is part of its larger "Education Reform Plans: a Comprehensive Set of Policies, Processes and Functions Guidance", to guide the process of reform, including the crucial fight against corruption.

MoE's Anti-Corruption Plan (ACP) has been developed in line with Afghanistan's Anti-Corruption National Strategy, Presidential Decrees and the approval of the High Council on Law Enforcement and Anti-Corruption.

Further, MoE has established an Anti-Corruption Strategic Committee within MoE to monitor and evaluate implementation of its ACP.

MoE's "Education Reform Plan: a Comprehensive Set of Policies, Processes and Functions Guidance" is the most important document in its institutional reforms. However, this plan has been developed over a short period of time. As the MoE reports, "The MoE Reform Plan has been developed based on H.E. President Ghani's instructions, over a three-month period (Aqrab-Hoot 1396), as result of intensive work done by an MoE working group and comprehensive consultation with experts, in anticipation of deep reforms within the education system."

During the development of its overall reform plan, MoE reviewed education systems in 48 countries and conducted field visits to several of these education systems to get an understanding of lessons learned in other contexts to support Afghanistan's own process of reform. MoE's Reform Plan has 6 chapters and 332 pages. MoE has reported that it established a High Reform Council to oversee the implementation of reforms. Although MEC has expressed its desire to MoE to observe High Reform Council and related committee meetings, unfortunately, at this time, MEC has not been informed of such meetings, or invited to participate, and therefore has limited information about the functioning of the High Reform Council and its activities.

Key areas of MoE reform:

- Currently, as part of its reforms, MoE's main mandate is to directly support the process of education i.e. teaching and learning, and not other areas of education provision in particular, school construction, procurement, recruitment and TVET that MoE had previously been responsible for. However, delegating the functions/responsibilities of school construction, procurement, recruitment and TVET to other organizations has not resolved many of MoE's challenges. While on the one hand, MoE is relieved to have the responsibility for recruitment handed over to IARCSC, on the other hand MoE has concerns that the current process of teacher recruitment is overly time consuming and not meeting its needs. This has resulted in a mismatch between MoE's recruitment needs and IARCSC's recruitment processes.
- MoE leadership says that in addition to the current organizational review and related reforms, there is a plan to conduct a 'functional review', which will be conducted in cooperation with IARCSC and the World Bank. The purpose of the functional review will be to review and study MoE personnel and leadership from the bottom up to determine where there is functional overlap, where organizational structure is aggregated, and where organizational structure is lacking, and where/if there is a need to establish new units within MoE. Although IARCSC has shared a document related to this proposed functional review with MEC, the review has not yet been conducted.
- In order to support decentralization, MoE has given Provincial Directorates of Education (PEDs) authority to control up to Afs 500,000 per year, with the Acting Minister of Education suggesting that Provincial Directorates could be authorized to control up to Afs 1,000,000 per year, however, this increase in budget would first need to be trialed through a pilot project. Alongside this, the MoE has said that it is working to develop administrative competencies at the Provincial level to support decentralization. MoE claims this is being done gradually and carefully, in consideration of Provincial Directorates' capacities.
- MoE has discussed the establishment of a 'Human Resources Pay Roll Management Information System' (HRPRMIS), that if implemented, will be integrated with other systems, including the Payroll System, Human Resource Management Information System (HRMIS), and Education Management Information System (EMIS).
- MoE has begun to implement a Budget Preparation System to facilitate access to financial data in the Provinces. Through the Budget Preparation System, Provincial financial systems will be linked to the central system. This obligates Provincial Directorates to enter their expenditures into the system. MoE is optimistic that this will increase transparency and help MoE at central level observe any changes in Provincial financial systems.
- MoE reported that it would continue expanding the electronic payroll system in cooperation with the Ministry of Finance and Ministry of Information and Technology.
- To address ongoing concerns, the Deputy Ministry for Literacy has developed a new scheme. This involves transitioning literacy teachers from permanent full-time staff positions (as they do not actually work full-time) into contract and short-term positions. The Deputy Ministry for Literacy explained that this plan will be sent to the Human Resources High Council for consideration, once it is finalized. Further, the Deputy Ministry for Literacy has proposed to involve the private sector in literacy development. The proposal involves handing over the implementation of literacy courses to the private

sector (NGOs). The Deputy Ministry for Literacy plans to implement this through a pilot project. However existing regulations and laws will need to be revised before this can be piloted.

- MoE is in a process of reviewing and reforming the current curriculum. A draft of a new curriculum framework has been developed by MoE with support of Development Partners and other Afghan education stakeholders. According to new draft curriculum framework, the number of subjects and related textbooks will be decreased this is in line with MEC's recommendations. As part of the curriculum reform process, MoE has also started developing new textbooks which are meant to be completed by the end of 1398, as stated by the Acting Minister of Education. The finalization and implementation of the new curriculum (including the printing of new textbooks) is meant to be completed within three years. However, MoE acknowledges that it lacks experts in curriculum development. In support of building capacity in this area, MoE plans to deploy Curriculum Department employees abroad to further their relevant education.
- A lack of textbooks is one major challenge for school students in Afghanistan, which MoE has not yet been able to resolve. MEC, through its MoE MVCA, determined that over 70 percent of school students do not have adequate textbooks. MEC noted that this problem is still unresolved in its two previous Quarterly Monitoring Reports.
- MoE has recruited 10 focal points to: facilitate citizens' access to MoE authorities, gather complaints, address complaints, and facilitate access to information. These focal points are tasked with delivering complaints from the public to MoE leadership and to share information with the media.
- New MoE leadership has made some progress in increasing women's participation, including:
 - Specifiying that nine Departments (out of roughly 50 in Kabul MoE) will be led by women;
 - Reserving 11 Directorships of Teacher Training Colleges (TTCs) for women;
 - Planning to assign women as PED Deputy Directors in 34 Provinces;
 - Allocating half of 8,000 newly created teaching positions for women, and;
 - Women will be able to be recruited for leadership roles in MoE Provincial Directorates as well as for other leadership positions, through a competitive process.
- MoE has made positive developments in regards to its ToRs, procedures and policies as noted in previous MEC Quarterly Monitoring Reports. In one such initiative, MoE is publishing the ToRs, procedures, regulations and policies it is revising on its website for a period of two weeks to solicit comments from the public. MEC has been monitoring this and has observed that a variety of related documents have been uploaded onto the MoE website. These include modifications of the content of textbooks. This kind of transparency and openness for consultation is unprecedented for MoE – this is praiseworthy and should be further encouraged.
- One major issue with MoE, as repeatedly reflected in MEC's reports, is the lack of accuracy and integrity of the statistics that affect planning and policy making in the Ministry. Part of the problem is that not all Provincial Education Directorates are linked up to the MoE's Education Management Information System (EMIS). The quality, reliability and comprehensiveness of MoE's EMIS data is still problematic and something which MoE has reported that they are continuing to work on improving.

• TVET was separated from MoE and now acts as an independent entity through Presidential Decree Number 11, 1/2/1397. Although the new TVET entity has begun a process of major reform (in general and specifically in regards to anti-corruption) and has substantial plans for this, at this point it is too early to report on implementation.

Status of Recommendations during the Third Follow-up Period

During the third follow-up monitoring period, August-November 2018, no recommendation is fully implemented by MoE and other relevant entities including, AIRCSC, MRRD and MURD, MOF and other Development Partners. From the start of the monitoring process, until now, out of 113 recommendations, only 16 have been fully implemented by IARCSC and MoE.

In addition, 16 recommendations have been achieved to 50% (14 during the Second Monitoring Period). These include:

- The engagement of Civil Society Organizations to actively monitor the teacher recruitment process through electronic methods;
- A related example in this category of recommendations is IARCSC's digitization of the exam process, particularly for Grades 1 and 2;
- MoE's process of general education curriculum review and revision, based on which the number of subjects/textbooks should be markedly reduced. During this Third Monitoring Period, MoE conducted meetings and workshops with experts and representatives of relevant organizations (e.g., UNESCO, UNICEF, NGOs, INGOs) to collect their ideas regarding the curriculum;
- The development of a "Teacher Accreditation System"; a system has been piloted, but this process is currently in limbo, due to a lack of funding, according to MoE;
- Also, the status of pre-service and in-service teacher education, and related hiring, retention and promotion of teacher educators is still unclear;
- MoE has gone some ways towards establishing a credible system for gathering and addressing complaints. In some ways this is more symbolic (e.g., with setting up complaints boxes in education institutions) than substantive. However, MoE has taken other actions in this regard, such as in PEDs, by allocating Monday afternoons as a time for PED Directors to hear from and address the public directly about complaints. In addition, MoE is using Ma'arif TV, one day a week, to address complaints and related issues and also has assigned focal points to respond to the public's complaints through social media.

According to MEC's findings, out of 113 recommendations, only 15 recommendations (seven in this Third Monitoring Period – notable progress) have been implemented by 25%. These include:

- The construction of schools using locally available materials;
- The expansion of the use of electronic payments for teachers' salaries; this has increased 9% since the original MVCA and is now at 62% the remaining 38% receiving payments through Mpaisa or mobile bank teams;
- Progress in the digitization of 12th Grade diplomas (this has been 100% achieved in Kabul)
 for data collection and verification, MoE is currently deploying staff to 33 Provinces;
- An MoE review of their Internal Audit Department in order to expand the Department by 10% in two years, MoE has requested to the Office of the President to recruit an additional 12 internal auditors.

During this Third Monitoring Period, 38 recommendations come under the 'work has begun' category, which means some, if minimal, progress, has been made. These recommendations include:

- MEC recommended that MoE establish a High Monitoring Committee to monitor reforms in the education sector and the ToR for this Committee has been prepared.
- MoE has developed a draft of regulations for private sector textbook printing.
- MoE is planning to conduct Provincial level anti-corruption forums, but these have not yet taken place.

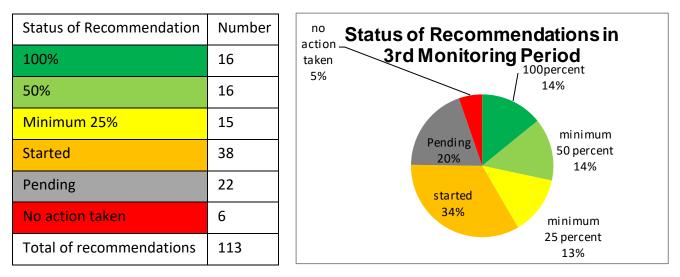
After three monitoring periods, no action has been taken on six recommendations.

Based on information received by MEC during this Third Monitoring Period from MoE and other relevant bodies, 22 recommendations, out of 113 recommendations, are still pending. Pending means that these recommendations depend on other steps and/or actions taking place prior to their implementation. For example:

- MEC recommended that MoE conduct advocacy and dialogue workshops with local school communities to build relationships and trust between school communities and their DEDs and PEDs.
- MEC recommended that PEDs publicly release information about their budgets and the actual expenditures of DEDs annually.

During this Third Monitoring Period, MEC's education team visited Balkh, Jowzjan and Samangan PEDs. It was clear from the Provincial visits that these PEDs and the school communities they support still face many challenges in the provision of education which include: a lack of textbooks, lack of teachers and lack of professional teachers, lack of school construction, lack of coordination between Departments, lack of budget and facilities, lack of potable water for schools, insecurity, student absenteeism, illegal interference from MPs and local powerbrokers in education affairs, and unreliable statistics.

In overall status of recommendations during this Third Monitoring Period is outlined as follows:



Taken together, MEC's findings show that although MoE has begun its anti-corruption reforms, many of these are still more at the planning level, as opposed having been actually implemented. It is important to note that implementation of anti-corruption reforms is complicated by the need for cooperation from other Government and Development Partner stakeholders including: MoF, IARCSC, MoHE, MRRD and MUDL. MEC requests MoE to consider implementation of

recommendations as their top priority in upcoming monitoring periods and to accelerate the implementation process.

Background and Introduction

On the October 26th 2017, MEC released its "Ministry-wide Vulnerability to Corruption Assessment of the Ministry of Education". Based on findings from this assessment, MEC identified key areas of vulnerability to corruption and issued 66 recommendations for improving different aspects of education provision and bringing much needed reform to the Ministry of Education and the wider sector. Subsequently, the original 66 broad recommendations were revised into 113 more specific recommendations. These recommendations have been and will continue to be regularly assessed and revised in relation to MEC's active MoE follow-up process.

MEC actively monitors the implementation of its recommendations, proposed reforms, and related anti-corruption efforts in the education sector, and develops and releases a Monitoring Report every quarter. <u>MEC's First Quarterly Monitoring Report</u> was published on the 24th of June 2018 and Second Quarterly Monitoring Report was released on the 12th of November 2018. This Third Quarterly Monitoring Report covers the period from August-November 2018.

MEC gathers data in a number of ways – through interviews and discussions, observations, and collecting documentation – with a range of key education stakeholders including MoE, IARCSC, MoRRD, MUDH, and Development Partners. As part of the active follow-up process, MEC visits education stakeholders at the Provincial level to conduct interviews and observations and gather other forms of data. MEC's Provincial visits, to date, are as follows:

- 1st Monitoring Period: Kabul, Laghman and Nangahar;
- 2nd Monitoring Period: Herat, Panjsher and Parwan and a phone interview with the Uruzgan PED;
- 3rd Monitoring Period: Balkh, Jawzjan, Samangan and a phone interview with Nooristan PED.

This report is in two sections: the first section addresses MoE's reform agenda and program; and the second section provides detail on MoE's and other entities' progress towards implementation of MEC recommendations.

Monitoring Process, Follow-up with Stakeholders

MEC proposed 113 recommendations through its MoE MVCA, the majority of which are focused on MoE as the main implementing organization. After the release of the MoE MVCA, MoE's organizational structure was reviewed. This review, and related recommendations led to some significant structural changes. These included:

- Shifting responsibility for the implementation of all rural school construction from MoE to the Ministry for Rural Rehabilitation and Development (MRRD).
- Removing Technical Vocational Education and Training (TVET) from MoE TVET now functions as an independent organization.
- Shifting responsibility for recruitment (one of the areas deemed most vulnerable to corruption in the MoE MVCA) from MoE to IARCSC, through Presidential Decree.

Although MoE still works with the Ministries and related entities noted above, corresponding recommendations have shifted from MoE to said Ministries/entities as they now have primary responsibility for fulfilling the functions which were previously under MoE. Accordingly, MEC now follows up with IARCSC, MoHE, MoRRD and MoUD and other relevant entities, which are discussed as follows.

Ministry of Education

MEC has typically released a follow-up report on a quarterly basis. However, MEC's experience in two first two active follow-up periods suggests that progress against recommendations is not rapid or significant enough to warrant measuring in three-month interims.

In addition, each monitoring period's process and subsequent reporting requires MEC to do extensive data collection from different bodies in Kabul, three Provincial trips, data analysis, writing and translation of the report. MEC struggles to do all of this within this relatively limited time-frame without the quality of its research and reporting being adversely affected. Therefore, MEC has decided to release follow-up reports every four months instead of every three months.

For its third follow-up report, MEC requested MoE to provide information regarding the implementation of recommendations on the 20th November, 2018. MoE then provided MEC with the requested information three weeks later. To facilitate MEC's interactions with MoE during the active follow-up period, MoE appointed a number of key staff as focal points with responsibility for collecting data and communicating with MEC in relation to specific recommendations. This innovation has been important in increasing the efficiency of the follow-up period, MoE replaced the previous focal points with new ones, which has slowed down the process.

This relates to an, as yet, unsolved issue within MoE, and that is a lack of coordination between MoE's internal Directorates. Amongst other negative impacts, this has also affected MEC's follow-up since different Directorates are sometimes providing MEC with contradictory information.

Technical Vocational and Educational Training Authority (TVET)

MEC is monitoring TVET's progress against its recommendations. Although initially MEC found that gaining access to TVET was difficult, more recently, with the introduction of a new Planning and Policy Director, communication between MEC and TVET has improved. In addition to the provision of information in relation to 'Recommendation 11' (which specifically relates to TVET), TVET's leadership's views are elaborated in first section of this report.

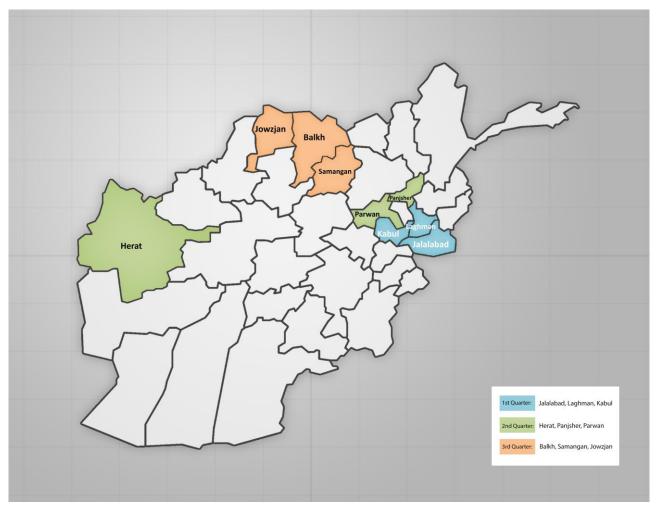
Independent Administration Reform and Civil Services Commission (IARCSC)

Out of the total 113 recommendations, 17 recommendations, which mostly relate to recruitment and human resources, have been directed towards IARCSC. In response, IARCSC has assigned one of its Commissioners as focal point for MEC. Unfortunately, despite repeated enquiries, MEC was unable to conduct an interview with anyone from IARCSC. Also, MEC was not provided with any of the requested information (in relation to the 17 recommendations) during the latest Monitoring Period. MEC will contact IARCSC to discuss this and seek a way forward in the next Monitoring Period.

Other Relevant Bodies

In addition to the previously mentioned bodies, MEC's recommendations are shared with MoRRD, MoUD, MoHE, Civil Society Organizations, NGOs/INGOs

donors and other Development Partners working in education. These recommendations may also need follow-up. MEC team conducted interviews or collected required information from MoRRD, MoUD and MoHE with regards to relevant recommendations.



Acknowledgement

MEC thanks all individuals and organizations who helped in the development of this 3rd Active Follow-up Report.

Methodology

MEC is actively monitoring and evaluating the anti-corruption efforts, reforms and implementation of its recommendations in the education sector. MEC, in active follow-up, engages with the education sector stakeholders, not only relying on updates from MoE focal points, but also collecting evidence to support and verify focal points' claims, updates, and responses.

The MEC active follow-up team conducts Provincial level field visits to monitor reform and anti-corruption in the education sector and also to verify and assess the status of each MoE recommendation 'on the ground'. For example, if a focal point in MoE claims that they have developed an anti-corruption strategy and disseminated this to 34 Provincial Education Departments (PEDs), MEC verifies this claim through Provincial visits to ascertain whether or not PEDs are aware of relevant MoE reforms and have actually received an MoE anti-corruption strategy.

MEC conducts semi-structured, in-depth interviews and guided Focus Group Discussions to collect information about the status of recommendations. These discussions involve representatives from relevant PEDs, school principals, education *Shuras*, CSOs and Provincial Council members. In addition, MEC does direct observations in schools and classrooms.

The content of Quarterly Monitoring Reports is based on evidence, including documents. MEC takes care to avoid a *perception*-based analysis, by actively engaging with focal points, and verifying the data and the updates provided as evidence.

MEC will provide Quarterly Monitoring Reports on the status of recommendations for two years after the release of the original MVCA. These are made publically available and incorporate inputs and feedback from the Government, Development Partners and CSOs.

After the 1st quarterly active follow-up monitoring period, MEC took an approach to providing thematic foci for subsequent monitoring periods. During the 2nd quarterly monitoring period, the thematic focus was on 'human resources'. During this 3rd period, the thematic focus is on 'education reform' as addressed in the following section of the report.

Thematic Focus on Reform Within Ministry of Education

Introduction

The Independent Joint Anti-Corruption Monitoring and Evaluation Committee (MEC), as a part of the "Ministry-wide Vulnerabilities to Corruption Assessment (MVCA) of the Ministry of Education (MoE)" (released Oct 26th, 2017), issued recommendations for fundamental reforms within MoE. The majority of these reform recommendations were welcomed by MoE leadership. The current MoE leadership continues to express its intention to fight corruption as part of a wider process of organizational reform.

Currently, MEC is in the 3rd quarter of an active follow-up of the implementation of anticorruption and related reforms in education.

During the 1st quarter, MEC revised and further articulated the set of recommendations that MoE and other stakeholders are engaged in implementing and reporting on. Alongside this, the 1st Quarterly Follow-up Report detailed specific progress against the recommendations.

During the 2nd quarter, MEC began incorporating a thematic focus to the quarterly followup research and reporting – this will be an ongoing feature of the follow-up process. The thematic focus for this quarter involved a special study on human resource management in MoE. In addition to the thematic work, MEC also reported on the status of implementation of recommendations.

During this, latest, 3rd quarter, MEC's thematic focus has been on reform in the education sector. As part of the research into such reform, MEC conducted in-depth interviews with nine senior level MoE authorities, including the acting Minister of Education, and Deputy Ministers. MEC's follow-up work in this third quarter has been guided by the following questions – 'What challenges does MoE face in bringing reform within the ministry?' and – 'How is MoE addressing these challenges?'.

Acting Minister of Education's letter

Education is the foundation for a sustainable development and a pre-condition for provision of sustainable peace in the country. Development in education means to develop people and nurture cadres to make development in construction and infrastructure. Hence, our goal for development is to create changes in the ethical values, demeanor and behavior of people. Our educational system is responsible for nurturing current and future generations of Afghans to be able to teach every child of the country to become a faithful Muslim, a good and capable Afghan, and so that they will be Afghans with an open mindset, with the capacity to promote tolerance and peace.

The government of the Islamic Republic of Afghanistan recognizes that educational development is its key priority. MoE is committed to providing equal access to quality education for all children of Afghanistan. As well, MoE is mandated to develop human resources to meet existing and future market needs and contribute to the economic development and reconstruction of the country.

Although MoE has enormously improved over the last nine months - thanks to Allah – we Afghans and the international community still have a long, difficult and challenging way ahead to be able to address the challenges and achieve the objectives of MoE, as stated in the Constitution, Afghanistan National Development Strategy and United Nations Millennium

Development Goals.

As acting Minister of Education, I am committed to improving the quality of education and providing access to education to be able to nurture the young populace, and through this, ensure public welfare, economic development, and the provision of sustainable security and peace. I believe that provision of peace in Afghanistan is an essential contribution towards creating jobs and developing the economy of the country.

Wishing for a developed, improved and prosperous education system in Afghanistan!

Mirwais Balkhi, Acting Minister of Education

)http://MoE.gov.af/fa/page/2056(

Developing a program of education sector reform

The Ministry of Education (MoE) is the largest public employer in Afghanistan, employing some 262,000 people, or 68% of Government civil services employees. To introduce reforms in such a huge organization requires careful attention and planning. MoE has developed an "Anti-Corruption Plan", which is part of its larger "Education Reform Plans: a Comprehensive Set of Policies, Processes and Functions Guidance", to guide the process of reform, including the crucial fight against corruption.

MoE's Anti-Corruption Plan (ACP) has been developed in line with Afghanistan's Anti-Corruption National Strategy, Presidential Decrees, and the approval of the High Council on Law Enforcement and Anti-Corruption. This ACP, which addresses concerns raised in MEC's MVCA on the MoE, has been developed in consultation with a range of stakeholders.

Further, MoE has established an Anti-Corruption Strategic Committee within MoE to monitor and evaluate implementation of its ACP. This Committee includes representation from: the Administration and Finance Deputy Minister, Audit Directors, Head of the Minister of Education's Office, the Finance and Accounting Directorate, the Human Resources Directorate, the General Directorate of Education Supervision, the Planning Directorate, and the Communication and Public Relation Directorate. The Committee is tasked to monitor and evaluate implementation of the ACP in central and Provincial levels. According to the ACP, in line authorities are tasked to implement given actions and report to the Committee in a timely manner.

"Education Reform Plan: a Comprehensive Set of Policies, Processes and Functions Guidance" is the most important document of MoE's institutional reforms. However, this plan has been developed over a short period of time. As the MoE reports, "The MoE Reform Plan has been developed based on H.E. President Ghani's instructions, over a three-month period (Aqrab-Hoot 1396), as result of intensive work done by an MoE working group and comprehensive consultation with experts, in anticipation of deep reforms within the education system."

During the development of its overall reform plan, MoE reviewed education systems in 48 countries and conducted field visits to several of these education systems to get an understanding of lessons learned in other contexts to support Afghanistan's own process of reform. MoE's Reform Plan has 6 chapters and 332 pages. MoE has reported that it established a High Reform Council to oversee the implementation of reforms. Although MEC has expressed its desire to MoE to observe High Reform Council and related committee meetings, unfortunately, at this time, MEC has not been informed of such

meetings, nor invited to participate, and therefore has limited information about the functioning of the High Reform Council and its activities.

Review and reform of MoE's Tashkiel

Through its MoE MVCA, MEC noted that MoE's employment structure (*Tashkiel*) is large and complex and not well managed which creates vulnerabilities to corruption. Prior to MEC's release of its MoE MVCA, the Ministry was responsible for school construction, procurement and recruitment. Now, as defined by MoE leadership, MoE's main mandate is to directly support the process of education – i.e., teaching and learning, and not other areas associated with education provision – such as school construction, procurement, recruitment.

To reduce the overly large scope of MoE's *Tashkiel*, MoE leadership attempted to review MoE structures and functions in order to centralize particular MoE functions on education. This is addressed in MoE's reform program. Currently:

- School construction responsibility has been switched from MoE to the Ministry of Rehabilitation and Rural Development and Ministry of Urban Planning.
- Procurement was handed over to the National Procurement Authority.
- The mandate for Technical and Vocational Education and Training has been decoupled from MoE and now acts as an independent authority.
- As reflected in MEC's MoE MVCA, recruitment has been one of the most vulnerable aspects of MoE's functions. Now, recruitment is being handled by the Independent Administrative Reform and Civil Service Commission (IARCSC) (by Presidential Decree).

Although MoE still cooperates with the relevant organizations/authorities in delivering the abovementioned activities, to a large extent, MoE has been freed up to focus on its core function of service delivery - education.

However, delegating these functions/responsibilities to other organizations has not resolved many of MoE's challenges. While on the one hand, MoE is relieved to have the responsibility for recruitment handed over to IARCSC, on the other hand MoE has concerns that the current process of teacher recruitment is overly time consuming and not meeting its needs. This has resulted in a mismatch between MoE's recruitment needs and IARCSC's recruitment processes. For instance, MoE representatives have noted that teacher recruitment was done only one time during this year, while at the same time MoE has authorized the dismissal of almost 100 existing teachers who need to be replaced as soon as possible (not waiting another year), but IARCSC lacks the capacity to do so. To meet MoE's needs, IARCSC would need to conduct the teacher *Kankor* exam every quarter – to resolve existing gaps in teacher placements – and not only once a year.

MoE leadership says that in addition to the current organizational review and related reforms, there is a plan to conduct a 'functional review', which will be conducted in cooperation with IARCSC and the World Bank. The purpose of the functional review will be to review and study MoE personnel and leadership from the bottom up to determine where there is functional overlap, where organizational structure is aggregated, and where organizational structure is lacking, and where/if there is a need to establish new Units within MoE. Although IARCSC has shared a document related to this proposed functional review with MEC, the review has not yet been applied in practice.

Decentralization of the Ministry of Education

MEC, through its MoE MVCA, found that MoE's organizational structure is highly centralized and Kabul-oriented. The issue of decentralization of Government services in Afghanistan has become quite politicized and MEC's recommendation to decentralize MoE was not initially welcomed by some Development Partners, as well as some in Government. Nevertheless, the MoE has begun the process of decentralization (note decentralization is mentioned at least 14 times in the NESP-III) almost one year ago, which the Acting Minister of Education refers to as "De-Kabulification" or "De-Kabulization".

Decentralization, although simple in its basic sense – the shifting of power and authority from central government to local levels – is a complex and somewhat slippery concept in practice, with many facets including, politics, finance, decision-making, accountability, etc.

A main concern with the decentralization of the education process is how Provincial Education Directors should be authorized to, and supported in, taking on more direct responsibility for meeting the needs of their Provinces. For instance, currently, students from across the country have to travel to Kabul to get their high school graduation certificates endorsed by MoE. Aside from the onerous travel demands put on students, MoE representatives in Kabul have also explained that even if they were to endorse 1000 certificates per day, this would not be sufficient to meet existing needs. It follows that the endorsement of high school graduation certificates could usefully be decentralized to the Provincial level. To address this, MoE plans to create a central database system to allow Provinces to issue certificates endorsed by MoE, Provincial Education Directors. Although the certificate template will be developed by MoE, Provincial Directors will be the signatories.

In order to support decentralization, MoE has given Provincial Directorates of Education (PEDs) authority to control up to Afs 500,000 per year, with the Acting Minister of Education suggesting that Provincial Directorates could be authorized to control up to Afs 1,000,000 per year, however, this increase in budget would first need to be trialed through a pilot project. Alongside this, the MoE has said that it is working to develop administrative competencies at the Provincial level to support decentralization. MoE claims this is being done gradually and carefully, in consideration of Provincial Directorates' capacities.

Reform in administration and finance

MoE has discussed the establishment of a 'Human Resources Pay Roll Management Information System' (HRPRMIS), that if implemented, will be integrated with other systems, including the Payroll System, Human Resource Management Information System (HRMIS), and Education Management Information System (EMIS). MoE believes that implementation of HRPRMIS will help them in collecting more valid data. Also, MoE has begun to implement a Budget Preparation System to facilitate access to financial data in the Provinces. Through the Budget Preparation System, provincial financial systems will be linked to the central system. This obligates Provincial Directorates to enter their expenditures into the system. MoE is optimistic that this will increase transparency and help MoE at central level observe any changes in Provincial financial systems.

Another reform measure that is being conducted by MoE's Admin and Finance Department is the implementation of a payroll system through the Capacity Building Activity Project in the seven Provinces of Badghis, Balkh, Bamiyan, Kabul, Kandahar, Paktia and Parwan. In this system, teachers are registered biometrically. This biometric registration has, MoE claims, increased the accuracy of data, particularly in regards to the numbers of teachers in the Provinces.

Before MEC's MoE MVCA report was released, 53% of MoE employees' salaries were paid via bank accounts and other electronic methods, and 47% in cash. One of MEC's recommendations was for MoE to expand the coverage of salary payments through electronic methods. Currently, electronic payments of MoE salaries have increased by 62%.

MoE reported that it would continue expanding the electronic payroll system in cooperation with the Ministry of Finance and Ministry of Information and Technology. In the second quarter of MEC's active follow-up on the MVCA, MoE reported that the registration process of 32,000 employees within M-paisa was completed in Kandahar, Nangarhar and Parwan, and that salaries were soon to be paid through that system. It was reported that M-paisa would then be expanded to Badakhshan, Herat, Kabul, Khost, Laghman, Paktika and Takhar. Currently, relevant contract documents are under development – in the first phase, 120,000 employees would be registered and receive their salaries through mobile services. In this system, teachers can withdraw their salaries from telecommunication agencies near their homes and do not need travel to Provincial centers to access their salaries. MEC has been able to verify the implementation of this system in Parwan Province, where employees' registration has already been completed. However, this has not been implemented without security challenges, in particular, it was reported to MEC that an Armed Opposition Group (AOG) had sent a letter to Parwan PED opposing electronic payments (it is alleged that AOGs have, in the past, taken a cut of teachers' salaries when teachers were being paid in cash). It is expected that as this system is expanded, it will face similar security challenges in some Provinces.

Other progress claimed by MoE regard budget expenditure and implementation. MoE claims that it has consumed over 50% of its annual budget this year so far (the Acting Minister of Education suggested it was 63%), which is unprecedented in MoE history. MoE was optimistic that by the end of the year it would spend by 75% of its budget.

Literacy reform

Although MoE has progressed in terms of its *Tashkiel* review, this has not yet been fully resolved. For example, the Deputy Minister for Literacy pointed out that there are still structural issues within MoE (e.g., literacy teachers are paid year round, but do not work during winter, or that salaries are processed late, often by several months) Clearly, when teachers do not receive their salaries on time, they are likely to lose motivation to work.

To address ongoing concerns, the Deputy Ministry for Literacy has developed a new scheme. This involves transitioning literacy teachers from permanent full-time staff positions (as they do not actually work full-time) into contract and short-term positions. This can, on the one hand, help economize the budget and on the other hand, allow for the creation of more literacy courses because more teachers will be available on a more flexible basis. The Deputy Ministry for Literacy explained that this plan will be sent to the Human Resources High Council for consideration, once it is finalized.

Further, the Deputy Ministry for Literacy has proposed to involve the private sector in literacy development. The proposal involves handing over the implementation of literacy courses to the private sector (NGOs). The Deputy Ministry for Literacy plans to implement this through a pilot project. However existing regulations and laws will need to be revised before this can be piloted. For instance, existing laws/regulations stipulate that only permanent full-time literacy teachers can be employed, and not part-time, or contract teachers. In the Literacy Department's Terms of Reference, it is mentioned that literacy

courses are to be conducted for nine months from the beginning of each year. However the Deputy Ministry for Literacy complained that the budget has not been delivered on time, which has caused many challenges. The Deputy Ministry for Literacy has proposed to reduce literacy courses from nine months to six months if their plan is not implemented.

Monitoring literacy courses through third party monitoring has been conducted as part of a pilot project in five Provinces. The monitoring was done through the use of mobile phones. However this pilot project was considered a failure because it was not costeffective and UNESCO will not be extending the project.

Curriculum review and reform

MoE began developing a new standardized curriculum for Afghanistan - as mandated through Presidential Decree - in 2003. Although a curriculum was developed, this has more recently been determined to be overly complex, impractical and containing content errors, spelling errors and aspects of poor design. As noted in MEC's MoE MVCA report, the large volume of subjects in the curriculum, coupled with the relatively short time available for teaching (both in regards to time per class and teaching days over the year) has made the curriculum vulnerable to corruption, e.g., in encouraging collusion between teachers and students to cheat on exams in the face of an otherwise undeliverable curriculum.

Because of these issues, MoE is in a process of reviewing and reforming the current curriculum. A draft of a new curriculum framework has been developed by MoE with support of Development Partners and other Afghan education stakeholders. According to new draft curriculum framework, the number of subjects and related textbooks will be decreased – this is in line with MEC's recommendations. As part of the curriculum reform process, MoE has also started developing new textbooks which are meant to be completed by the end of 1398, as stated by the Acting Minister of Education. The finalization and implementation of the new curriculum (including the printing of new textbooks) is meant to be completed within three years. However, MoE acknowledges that it lacks experts in curriculum development. In support of building capacity in this area, MoE plans to deploy Curriculum Department employees abroad to further their relevant education.

In a related note - MoE has pointed out two achievements in regards to the literacy curriculum:

- First, the revision of the literacy curriculum which was first revised in 2016, with relevant textbooks developed in 2017. This revised literacy curriculum was implemented as a pilot in 2018 and, according to MoE, requires no revision at this time.
- Second, the development of a "national mobilization plan" to fight against illiteracy. Although this plan has not yet been finalized, it has been sent to the to Human Resources High Council for consideration. Weaknesses, strengths, challenges and opportunities in regards to literacy have been evaluated and MoE has identified and made agreements with relevant Government Ministries and agencies for implementation of the plan.

Printing and distribution of textbooks - an unsolvable puzzle?

A lack of textbooks is one major challenge for school students in Afghanistan, which MoE has not yet been able to resolve. MEC, through its MoE MVCA, determined that over 70 percent of school students do not have adequate textbooks despite massive financial support from Development Partners. MEC noted that this problem is still unresolved in its

two previous Quarterly Monitoring Reports. In interviews during this 3rd quarter of monitoring, MoE leadership has acknowledged that over the past 17 years they have not managed to get a full set of textbooks into the hands of more than 35% of students. Currently, MoE says that they will print 37 million new books by Hamal 1398 (12.2 million of which will be printed inside the country). MoE explained that this book printing initiative, funded by USAID, has taken longer than expected because of legal issues related to the procurement process. In addition, MoE recognizes that the widespread sale of Government textbooks on the black market continues.

Facilitating public awareness and access to MoE

MoE has recruited 10 focal points to facilitate citizens' access to MoE authorities, gather complaints, address complaints, and facilitate access to information. These focal points are tasked with delivering complaints from the public to MoE leadership and to share information with the media. In addition, MoE claims that the following seven methods are now being used to address complaints:

- 1. Using a complaints box
- 2. Provincial Education Directors allocating every Monday morning to hearing and addressing complaints from the public
- 3. Allocating one day per-week to address complaints on Education TV
- 4. Assigning focal points to respond to public complaints through free media and public awareness campaigning
- 5. Establishing a dedicated public complaints phone line/number and the Telecom Regulation Authority of Afghanistan will cooperate in this regard (MoE has said that it also has plans to establish an internal MoE unit to address complaints)
- 6. Receiving complaints through Facebook and other social media platforms
- 7. Facilitating MoE employees' access to MoE leadership

"My personal phone number is available to the public. If possible, I myself answer and address public complaints. For instance, one night, a student from Jabau Seraj reached me and complained that a teacher had taken money from him. I addressed the complaint of the student and punished the school manager. The student's parents later called and were thankful that their child now had access to the Minister of Education. Also, an employee can send a message to me about their supervisor/director. So, now, some people in MoE are aware that 'nothing can be kept hidden here'". – Acting Minister of Education

Reforms to increase women's inclusion in MoE

New MoE leadership has made some progress in increasing women's participation, including:

- Specifiying that nine Departments (out of roughly 50 in Kabul MoE) will be led by women;
- Reserving 11 Directorships of Teacher Training Colleges (TTCs) for women;
- Planning to assign women as PED Deputy Directors in 34 Provinces;
- Allocating half of 8,000 newly created teaching positions for women, and;
- Women will be able to be recruited for leadership roles in MoE Provincial Directorates, as well as for other leadership positions, through a competitive process.

Private schooling

MoE plans to revise regulations for private schooling. The revision process will take account of the views of Civil Society members and representatives from private schools, alongside those of MoE authorities. MoE aims to modify existing regulations for private schools - for example, in future, private schools managers will be recruited by MoE, to prevent recruitment of family members as managers. Also, in recruiting private school teachers, will be conditions defined to mitigate against the recruitment of unqualified teachers. Likewise, minimum standards for classroom conditions will be determined in the regulations. In addition, new regulations will address teachers' job security and under what conditions a school authority can dismiss a teacher. In other words, recruitment and dismissal of teachers will be more rigid.

In addition, MoE is determined to re-define schools' monitoring indicators to specify what characteristics a private school should have. MoE explained that they cannot fix a specific school tuition fee, since Government promotes and recognizes the free market and therefore competition will determine the fees. However, MoE plans to establish model schools to encourage healthy competition to provide quality education.

In order to support private education, MoE is initiating a program to reduce tax for private schools. Also, there is a plan to regulate private school work certificates; that is, private schools will be obligated to obtain work certificates from the MoE alone and not from any other agency. As well, in the MoE's support package – to encourage the growth of private schooling, it is proposed to exempt private schools for five years from electricity bill payments.

Although there are potential positive benefits to the expansion of private schooling in Afghanistan (in particular low and no-cost private schooling) - e.g. private schools, at this point in time, have more flexibility in innovating teaching and learning than their Government counterparts, MoE will need to take care that a push to expand the private school sector does not come at the expense of Government schools.

Revision of legal documents: Terms of reference, procedures and policies

MoE has made positive developments in regards to its ToRs, procedures and policies – as noted in previous MEC Quarterly Monitoring Reports. In one such initiative, MoE is publishing the ToRs, procedures, regulations and policies it is revising on its website for a period of two weeks to solicit comments from the public. MEC has been monitoring this and has observed that a variety of related documents have been uploaded onto the MoE website. These include modifications of the content of textbooks. This kind of transparency and openness for consultation is unprecedented for MoE – this is praiseworthy and should be further encouraged.

Statistics and planning

One major issue with MoE, as repeatedly reflected in MEC's reports, is the lack of accuracy and integrity of the statistics that affect planning and policy making in the Ministry. Part of the problem, again as noted previously, is that not all Provincial Education Directorates are linked up to the MoE's Education Management Information System (EMIS). Currently, many schools provide their data to their District Education Departments, who then pass this data on to the Provincial Education Directorates, who then enter it into the central database either offline or online – a process which is highly vulnerable to corruption. MoE

plans to develop the EMIS so that schools, in future, will be able to directly upload their data into the System, a process which already takes place in many countries.

Another critique of MoE planning is that MoE planning and programming has tended to be short-term, project-based and not linked with a longer-term strategic vision. This has made it difficult for MoE to resolve their more intractable planning challenges. To address this, MoE's Planning Department is working towards the goal that all MoE programs are planned based on major needs and priorities and in line with a longer-term vision. To achieve this, the Planning Department has trained 500 staff in Kabul center and in the Provinces on planning skills. This planning course was conducted by TVET and graduates were awarded 14th Grade Certificates. MoE believes that educating 500 employees on planning has led to improvements.

MoE accepts that issues still exist in planning with regards to off-budget projects, which can adversely affect their planning efforts.

Barriers and challenges for anti-corruption efforts and other reforms

MoE has identified the following as their main challenges and issues in regards to anticorruption efforts:

1. Politicization of education

MoE admits that one of the major challenges in reform and anti-corruption efforts within MoE is the politicization of education. Some MPs and other politicians regard MoE as providing opportunities for generating votes through the recruitment and mobilization of teachers and therefore interfere in education affairs. In addition, as noted in the original MoE MVCA, some politicians interfere directly in MoE recruitment processes in order to gain jobs for family members or constituents. New MoE leadership has said that they are seeking to change this practice and mentality. They reported that they attempted to keep MoE neutral during the latest Parliamentary election.

Another related challenge is that some positions within MoE have been created based on the demands and orders of political leaders, political parties and politically influential people and not based on actual needs. Therefore, the MoE *Tashkiel* is extremely inflated from what it should be.

2. Lack of capacity and 'brain drain'

Lack of capacity is a major challenge for reform and anti-corruption efforts in MoE. In this sense, a lack of capacity means low human resource capacity within the Ministry, as for example, a great number of teachers do not have basic teaching competencies. This has been an ongoing problem and many capacity building programs have been implemented in recent years to improve the capacities of underqualified teachers and other MoE employees. However, these often ad-hoc and short-term programs and workshops have not been enough to address the breadth and depth of the problem, in part because they have not been linked to a systematic and meritocratic program of professional development.

MoE has also noted that they often lose qualified and talented staff who are either recruited by NGOs/INGOs, migrate to other countries or join the private sector, which contributes to and exacerbates the problem of low capacity within MoE.

3. Status quo

MoE says that due to a dominant conservative culture and lack of capacity/education within Afghanistan, progressive reforms are often resisted (both within and outside MoE). For example, MoE leadership clearly expressed to MEC its concern regarding public resistance to the new curriculum. MoE believes that the new curriculum (currently the new curriculum framework is in draft form), which includes a focus on values such as tolerance, citizens' rights and responsibilities, human rights, and critical thinking, will be resisted. Another potentially contentious issue in curriculum reform regards the teaching of history, given the disparate and often polarized views that different groups (i.e., ethnic and political groups) have on Afghan history. Any curriculum reform process as sweeping as what is being undertaken currently in Afghanistan, would do well to include strategic advocacy planning for countering anticipated resistance.

4. Insecurity and lack of facilities

Security threats have greatly affected MoE. MEC, through interviews with Education Directors in insecure Provinces, has confirmed that authorities cannot monitor education in insecure areas. In addition to security challenges, a lack of facilities and a related insufficient budget are also considered by MoE to be significant challenges. One of the ways that school communities have dealt with the lack of resources has been to raise their own funds locally. This is often done through the School Management *Shuras*. Based on MoE's own estimate, School Management *Shuras* have collected at least Afs 1.5 billion over the last two years.

Reforms in Technical Vocational Education and Training (TVET)

After many attempts, MEC was finally given the opportunity to interview the General Director of Technical Vocational Education Training (TVET) on anti-corruption and other reforms within TVET¹. Although the new TVET, independent of MoE, was established seven months ago, it has yet to introduce a focal point person to report on the implementation of MEC's recommendations.

The separation of TVET from MoE was one of MEC's recommendations, in part, to downsize the structure of MoE, as MEC's MVCA determined that the overly large and complex structure of MoE was a major corruption vulnerability. Accordingly, TVET was separated from MoE and now acts as an independent entity through Presidential Decree Number 11, 1/2/1397.

MEC, as part of tis monitoring activities, intended to monitor the performance of TVET since its establishment as an independent authority and report on any changes within the authority. In speaking to these issues, TVET's leadership described their recent progress and achievements and as follows:

Development of Provincial profiles

TVET has begun a study on the development of Provincial profiles to determine needs of each Province. The purpose of developing Provincial profiles is to identify what professional training coursed are required in each Province to fit their respective needs and contexts. In other words, a Provincial profile aims to specify Provincial market and occupation needs to plan for relevant TVET training courses. So far, pilot Provincial profiles have been developed for Kabul and Baghlan and 12

¹ On 24 Oct, 2018

others will be completed within 2 months (MEC has reviewed a copy of the Baghlan pilot Provincial profile).

TVET plans to develop Provincial profiles for all Provinces. According to TVET's report, it will develop a comprehensive strategic plan after Provincial profiles are developed. GIZ is helping TVET develop its strategic plan. A working team, made of State and private entities, will be established. The reason given by TVET that they not yet been able to develop their strategic plan is due to a lack of quantitative statistics and information related to TVET in Afghanistan, with existing studies being qualitative in nature. TVET's current Information Management System is not linked to the Provinces. TVET admits that it has no accurate information; however, UNESCO will reportedly assist TVET in the process of gathering accurate statistics.

Completion of outstanding work

TVET's General Director has explained that TVET has begun the process of completing outstanding work. For example, there were several outstanding procurement contractual issues, left over from the past administration, which are now being addressed. Also, measures have been taken in relation to development programs for TVET. In addition, TVET conducted a situation analysis study before implementation of reforms to identify weaknesses, strengths, challenges and opportunities. The study included the Provinces as well as Kabul center.

According to the TVET General Director, they later assessed the organization including human resources, administrative and financial systems. Subsequently, the organizational structure and facilities of TVET institutes and schools in Provinces were assessed and capacity improvement programs were developed accordingly. So far, TVET has not shared this study report and other assessments with MEC and therefore MEC is unable to comment on the specific details of their work and findings. As in other areas, MEC cannot verify the claims of Government or other institutions and individuals without evidence.

Developing a system

Another major change TVET claims is happening is that they are developing a new system. The TVET General Director explained that previously TVET had an inadequate and outdated system. Fundamental reforms in system development include the creation of a monitoring and evaluation system. For example, in the past, no practical action was taken in response to TVET's monitoring reports. TVET's leadership claims that now recommendations are implemented and actions are taken accordingly. TVET's General Director said that they plan to use various methods and techniques in monitoring and evaluation, including direct and distance monitoring.

Another aspect of TVET's system development relates to human resources. Previously there was a traditional (either hand writing names, or finger printing) system for measuring TVET employees' attendance. As a new innovation, a biometric attendance system was initially piloted and is now being implemented more widely. In addition, TVET's Director said that they are in the process of implementing an electronic finance system and that all of TVET's systems will be electronic in future.

TVET curriculum development

The last revision of the TVET curriculum in Afghanistan was 20 years ago and so it follows that TVET's curriculum is outdated and does not meet requirements of the current employment market. In addition, the TVET Director explained that the quality of TVET education is generally low, overly theoretical, and cannot meet student and market needs. For instance, in one TVET institute, the German language is taught while all the machinery they use and train students in are made in Russia with Russian instructions/labels. A large number of TVET graduates cannot join the job market due to low quality of education. Currently, TVET has 7129 students across the country.

TVET's General Director explained that they will revise the curriculum based on market research. As a result, classification specification will be revised. Currently, there are 89 specifications in TVET institutes, and according to the TVET General Director, there is no need for all of them. TVET plans to standardize curriculum in cooperation with relevant agencies. An organization called KTW will assist TVET in development. For MEC, it has been apparent that at this point, these are all only plans on paper, and MEC will need to further monitor the implementation of these plans in upcoming reporting periods.

Teacher Capacity Improvement Program

TVET plans to implement a Teacher Capacity Improvement Program after the new curriculum is developed. TVET has 2200 teachers in 301 institutes and schools (only 82 institutes and schools have a building) in 34 Provinces. Capacity Improvement Programs will be divided into two main categories: pedagogy and technical training. TVET's General Director said that India and Kyrgyzstan agreed to contribute 1,000 scholarships. The World Bank is also assisting TVET in increasing the capacity of its teachers. For example, 25 people have already been sent to India and 55 more will be sent in upcoming months. TVET has also requested assistance from the Ministry of Economy and Ministry of Finance.

Anti-Corruption Efforts

As required by its mandate, MEC monitors anti-corruption efforts of Government agencies. Claiming to initiate anti-corruption efforts by reforming organizational structure and re-making its system, TVET's efforts, as stated above, are plans, and so far they are not in place or able to bring reforms and re-make its system. Most claims are oriented towards what TVET intends to do in the future.

TVET has claimed that a new, more open and transparent working culture is being developed. Another claim was the promotion of openness and a new work culture, but this is unmeasurable by MEC – MEC was not provided evidence to show any increased professionalism or that this has been institutionalized. TVET claimed that it resolved challenges that had been known for the last 3 years within the one week timeline specified by Government, but this could not be verified in this monitoring period.

MEC reviewed TVET's request to establish a complaint addressing mechanism. TVET's General Director says that they have trained their Provincial Officers through a 3-day course while their policy in this regard is Open Door. MEC could not verify this claim as TVET was not ready to meet with MEC after continuous attempts over the reporting period. Notably, TVET students and their parents reported difficulties in reaching TVET to raise concerns or make complaints.

Status of Recommendations during Third Quarter of Monitoring

Findings & Analysis

Recommendations which are 100% Achieved

In the third quarter of MEC's active follow-up monitoring, no additional recommendations were considered fully implemented by IARCSC, MoRRD, MoUD, MoF and Development Partners. Since the beginning of MEC's active follow-up process, only 16 recommendations have been fully implemented by IARCSC and MoE (detailed below).

No	Recommendations.	Status
1	R#4: A) MoE should revise Community-Based Education policy.	Fully Implemented
2	R#6: A) Lists of vacancies should be published on MoE/IARCSC websites.	Fully Implemented
3	R#6: B) Lists of applicants should be published on MoE/IARCSC website.	Fully Implemented
4	R#6: C) Lists of shortlisted candidates should be published on MoE/IARCSC websites.	Fully Implemented
5	R#6: D) Recruitment results should be published on MoE/IARCSC websites.	Fully Implemented
6	R#7: MoE, in consultation with NUG leadership, should develop a proposal outlining the steps and measures for restructuring the MoE and reducing the overall size of the Ministry.	Fully Implemented
7	R#8: To ensure guaranteed female participation, a specific percentage of the posts should be allocated to women candidates.	Fully Implemented
8	R#19: Minister and IARCSC should issue public statements: "The lead objective of MoE is to resolve improper appointments of teachers within three years."	Fully Implemented
9	R#22: The Minister should actively engage at a Cabinet-level to obtain resources and support to implement education sector reforms.	Fully Implemented
10	R#27: A) The MoE should amend and revise the current Code of Conduct for all MoE staff to ensure Equity, Integrity, Right to Education, Accountability, Trust (MoPH has such a model in place.)	Fully Implemented
11	R#29: A) Responsibility for the implementation of all rural construction contracts be moved to the Ministry of Rural	Fully Implemented

	Rehabilitation Development.	
12	R#29: B) Responsibility for the implementation of all construction contracts in cities be moved to the Ministry of Urban Development.	Fully Implemented
13	R#40: C) Revise data collection guidelines covering all aspects of the data collection process.	Fully Implemented
14	R#40: E) Within 6 months EMIS data should be accessible to anyone visiting the MoE website.	Fully Implemented
15	R#44: A) Establish an Education Quality Committee within 3 months.	Fully Implemented
16	R#59: Teacher recruitment tests should be changed to include multiple-choice questions and long answer written format.	Fully Implemented

Recommendations which are at least 50% achieved

Out of the full 113 recommendations, 16 have so far been achieved by 50%. These are detailed as follows:

- R1a: MEC recommended involving local Civil Society Organizations (CSOs) in active monitoring and oversight of teacher recruitment for their respective provinces in order to ensure transparency and build trust. The teacher recruitment process has now become mostly electronic. IARCSC stated, "Wherever there is an opportunity for civil society to monitor the process, they can monitor it." For instance, CSOs monitored the process of application form distribution to applicants and also the shortlisting process (performed in Kabul). The next steps of the recruitment process are electronic and therefore, there is no opportunity for CSOs (or other Provincial monitoring entities) to be engaged in those steps. The test is being administered by MoHE's Kankor Department, according to their procedures. MoHE's Kankor Department explained that the reason they have not included CSOs, the media, and any other stakeholders in monitoring the process of teacher recruitment is that they believe such stakeholders will interfere in the process. According to MoHE's Kankor Department, "CSOs and the media do not act professionally" - for example, members of the media take photos in order to support specific candidates in the recruitment process. Although, it is certainly possible for CSOs, media and other stakeholders to be biased and interfere in the process of recruitment, this is not a given, and MEC does not believe this is a credible reason for excluding them - it is MoE's responsibility to find meaningful ways to involve these stakeholders.
- MoHE's *Kankor* Committee consists of university professors and representatives from the National Directorate of Security (who do not allow any other officials to access the sites of the testing). *Kankor* Committee members are also responsible for developing test questions. During this

process, they are in quarantine and all communication tools (e.g., mobile phones, tablets, laptops) are taken from them. During these days they are confined to the Ministry and not allowed to go outside. The doors of the rooms where they work are locked. MOHE's *Kankor* Department has claimed that all vulnerabilities of corruption of the process are mitigated through these preventative measures and based on past experiences opportunities for corruption in the *Kankor* process are minimal. As a member of a Provincial Council told MEC in the 1st quarter of monitoring, "Everyone, including myself, tried to interfere and influence in the recruitment process by IARCSC is reformed and improved. All the ways of corruption are blocked".

- R2a: The Terms of Reference for School Management Shuras (SMSs) has been revised based on MEC's recommendations (the revised SMS ToR and SMS meeting journal are available at MEC). However, the revised ToR has not yet been disseminated to SMSs. During Provincial visits to Herat, Panjsher and Parwan in the 2nd quarter of monitoring, MEC found that these Provincial SMS Departments were unaware of the changes/revisions related to SMSs. Likewise, the principals of schools (who are the heads of SMSs), that we interviewed were also unaware of the revisions of SMS ToRs. MEC will continue its monitoring to make sure that the revised ToR is disseminated to all SMSs and is being used effectively by them.
- In the 1st quarter of monitoring, MEC interviewed School Management *Shura* (SMS) members in Kabul, Laghman and Nangarhar and found their engagement with education to be extensive, as they provided land, books, money and other types of support to their communities' schools. For instance, in the year 1396, SMSs in Kabul City had donated approximately Afs 61 Million to Kabul City schools. In addition, some of Kabul's SMSs have taken part in repairing schools, building yards and toilets, and equipping schools with furniture, carpets and other material resources. In Herat, Panjsher and Parwan, SMSs have similarly contributed towards building, repairing and equipping schools. In Uruzgan, the PED reported that, SMSs are not active in the Province and exist mostly in name only. According to Uruzgan's PED, the SMSs, where they do exist, create problems and are challenging for the PED to monitor.
- In the 2nd quarter of monitoring, MEC interviewed SMS Members in Herat, Panjsher and Parwan and found that some SMSs are active in schools. For example, alongside donating chairs, solar panels and desks, they had provided technical support to schools. Some SMSs actually conduct monthly meetings and some are SMSs in name only and do not meet or otherwise operate. Some of the SMSs know about their ToRs while others do not. In this period, MEC found there is a different understanding of SMSs' roles in schools in the Provinces. For instance, some school principals told MEC that they do not allow SMSs to monitor their schools. Three school principals in Herat told MEC that they only expect SMSs to solve schools' problems and encourage the local people to send their children to school. They said that

they do not allow SMSs to directly monitor school affairs. However other principals described the monitoring role of SMSs. These differing understandings show that there is still a need to conduct training for SMSs and school management about SMSs roles, responsibilities, and ToRs.

- In Panjsher PED, the SMS Department explained that roughly half of SMSs in the Province are active and conduct regular meetings. In the past, the EQUIP project conducted workshops and trainings for SMSs, however since the project has ended, no training has been conducted. There are roughly 154 SMSs in Panjsher.
- In this 3rd quarter of monitoring, MoE explained to MEC that due to a lack of personnel at the District level, it was not possible to prepare and distribute ToRs to SMSs at school community level. According to MoE, the ToR will be revised for the implementation of the new EQRA (the World Bank managed program which replaces EQUIP) in 2019. During this 3rd quarter period, MEC visited Balkh, Jowzjan and Samangan Provinces. In these Provinces, similar to what MEC found in other Provinces during the previous two periods of monitoring, SMS were unaware of their ToRs and there were still different views regarding SMSs' roles and responsibilities. For some SMSs, the understanding was that they would be limited to supporting the construction, repair, equipping and financing of schools.
- R2c: According to MEC's recommendation, SMS meetings should be documented, and this should include formal minutes. MoE's Directorate of School Management Shuras (DSMS) developed 'SMS Meeting Journals', in both Dari and Pashto languages. In the 2nd quarter of monitoring, MoE reported that they do have a budget line for printing the 'SMS Meeting Journals' in 1397 as part of their 'ordinary budget' and upon allocation and receipt of the budget, the journals will be printed and distributed to schools. For the time being, the SMSs are directed to take minutes of meetings in notebooks and keep these records. MoE's Directorate of School Management Shuras reported that the journals and minutes of meetings from the previous year are prepared and ready for printing. During this 3rd period of monitoring, MEC did follow this up with MoE and information received from MoE suggests that there is further progress in this area.
- **R3b:** Regarding the MEC recommendation to 'Build schools using relevant aspects of indigenous design, adhering to MoE standards and universal design principles', MoE Infrastructure Service Department (ISD) reported during the 1st quarter of monitoring that they are using 'standard designs', which are approved by World Bank, and have been discussed with MoRRD and MoUD. MEC interviewed MoRRD during the 2nd quarter of monitoring and they reported that they have developed a 'unified design' for building schools in rural areas. The design has been shared with a third party for review and comment. MEC will continue its monitoring to verify what is meant by a 'unified design' and to monitor the implementation process. The ISDs 'standard designs' were shared with MEC. MEC will report on progress in this regard in next follow-up report.

- As mentioned previously, based on a Presidential Decree the responsibility for construction of schools in rural areas has been shifted from MoE to MoRRD. MoRRD updated MEC in the 2nd quarter of monitoring that they, in partnership with the Ministry of Education, should build 6,000 schools in rural areas within the next two years (1397-1398). The cost of these projects will be funded by the World Bank through the new EQRA Program. From the MoRRD side, the program will be implemented through the Citizen Charter National Priority Program (CCNPP). MoE was supposed to identify the locations where schools should be built, but according to MoRRD, this identification has not yet been completed MoE has, so far, identified only 2,700 locations for building schools (which requires a budget of USD 175 million). Community Development Councils (CDCs) have a key role in implementation of these projects through CCNPP. Currently, it is estimated that there are roughly 36,000 CDCs across the country. MEC will explore MoUD's progress in the implementation of this task in upcoming quarters.
- **R5:** Another MEC recommendation focused on expanding the use of digital (electronic) methods for candidate examinations in general recruitment (in addition to teacher recruitment.) The IARCSC, as mentioned above, took some steps toward e-recruitment for the entire civil service of Afghanistan, including MoE. The IARCSC provided a software system and allocated one account for each Ministry to post their vacancies. MoE reported that they have been given a user account by the IARCSC to check the progress of the recruitment process. According to IARCSC, an Afghan company together with an Indian company have jointly developed this software system. In this system, IARCSC will be the administrator and the other Ministries will only have user accounts. In this process, the Ministries will announce their vacant positions and the long listing of candidates. The Ministries will also do the shortlisting process and administer the test and interviews. The candidates will also get user accounts to upload their application documents. The IARCSC will only monitor this process. Once the results are announced, any complaints will be addressed through the administrative court. MEC will monitoring regarding the implementation continue its of this recommendation, especially given the potential challenges in regards to several Ministries utilizing the system.
- **R9:** Discussions have taken place between MoE and MoHE to establish a Coordination Working Group among the MoE Curriculum Department, TTCs, and MoHE to better align school curricula and curricula of teacher education programs for primary and secondary levels. Based on these discussions, an MoU for alignment of curricula of schools, TTCs and Universities has been developed and signed². The revision and reform of the general school education curriculum

² MoE clarified that a Curriculum Development Working Group was formed in 2017, under the Quality Coordination Committee of their NESP Steering Committee. The Working Group consists of relevant MoE Departments (Curriculum, Teacher Education, Academic Supervision, General Education), MoHE, DPs (UNESCO, UNICEF), and civil society. *MEC continues to recommend formal*

is still in process, and after completion, the TTC curriculum will also be revised and aligned accordingly. Since the establishment of the Coordination Committee the coordination between the two Ministries has improved. MEC has not received any new information on this during the 3rd quarter of monitoring. It is understood that the new curriculum framework is still in draft form, but likely to be completed and approved by the end of year 1397 (early 2019).

- **R10**: The MoE MVCA indicated that the current curriculum is too large and complex and the teaching hours are too short, all of which open up vulnerabilities to corruption. MEC recommended a reduction in the size of the curriculum, based on findings from the systematic curriculum review. MoE has now revised the curriculum framework, including specification that the textbooks for each grade would be reduced, as follows:
 - 1. Textbooks of grades 1-3 *from 6 to 3*.
 - 2. Textbooks of grades 4-6 *from 14 to 6*.
 - 3. Textbooks of grades 7-9 from 17 to 7.
 - 4. And textbooks of grades 10-12 *from 15 to 12*.

Note: In the 2nd quarter of monitoring, MoE reported that, competencies and syllabi have been drafted based on the new curriculum framework. During this 3rd quarter of monitoring, MEC has been informed by MoE that the curriculum framework and related competencies and syallbuses are still in the process of development.

 During this 3rd quarter of monitoring, MoE conducted two workshops – with funding and facilitation support by UNESCO – where different representatives, including from MoE, university lecturers, school teachers, (I)NGO education specialists, Science Academy members and private sector representatives worked together on developing the new curriculum framework and competencies.

According to MoE, as result of the workshops, it was agreed that the new curriculum will be developed considering students' needs in relation to defined learning outcomes. The new curriculum will focus on subject knowledge, but also key life skills (soft skills), and take account of the age and educational background of students. Also, in order to better support teachers in delivering the new curriculum and in developing professional capacity, specific programs in relation the new curriculum will be managed by different MoE Departments. For instance, the Curriculum Development Directorate has been tasked with developing separate guide books for teachers in different subject areas.

The MoE together with Development Partners is still in the process of finalizing the curriculum framework and developing specific syllabi and related textbooks. However, the development and printing of new textbooks does not address the profound existing challenges of getting textbooks into the hands of learners.

Since the release of the MVCA, MEC has not detected much in the way of improvements in the situation. The students in Kabul, Laghman and Nangarhar

participation in this WG should include representatives from TTCs themselves, as they are engaged directly in the training of teachers.

(First Quarter Provincial visits), Herat, Panjsher and Parwan (Second Quarter Provincial visits) still struggle without appropriate books. In Nangarhar, for example, students in grades seven, eight and nine reported they still face a severe lack of textbooks - students MEC interviewed reported they had not received books from MoE in these grades for the past four years. MEC did observe that the private schools in these locations have enough textbooks. PEDs in Herat, Panjsher, Parwan and Uruzgan informed MEC that the lack of textbooks is still a big challenge in their Provinces. As in the original MVCA, during the active follow-up, MEC has heard reports of textbooks intended for MoE schools being sold to private schools, with some students claiming that they'd bought the MoE textbooks from bazaars. MEC has also observed that MoE textbooks are easily available in book stores in Afghanistan's main cities. Notably, printed on the cover-page of MoE-issued textbooks is: "The selling and buying of MoE textbooks is prohibited." Interviewees also suggested that the textbooks for the coming educational year be distributed to students at the end of the current year, so that students can continue their education and have additional preparation time during the holiday months.

 R11: IARCSC has prepared a new structure for TVET in regards to leadership and managerial positions (grade 3). Within the new structure, three new Deputies (an Administrative and Finance Deputy and Learning/Academic Affairs Deputy) and 11 other new Directorates have been added. The plan of this new structure has been approved by Presidential Administrative Office and shared with the new TVET entity. Based on this plan, TVET has started recruitment and eight new Directors have been hired accordingly.

A functional review of TVET's structure and management has begun and TVET's structure/management will be further refined based on the review's findings. Initially, TVET has adopted a set of internal procedures in relation to the review with support of MoE's Planning and Policy Directorate. Accordingly, all TVET Directorates will assess themselves through a self-review alongside the external functional review. The World Bank is involved in the functional review process and has recruited two consultants who are tasked with supporting this and providing a draft report on the functional review. This draft report has been shared with TVET in January 2019 for comment.

TVET intends to propose its new structure to IARCSC based on the integration of findings from its internal functional review alongside findings from the World Bank's functional review. According to the TVET focal point, the final structure will be adopted in 1398 or 1399, after the functional reviews are finalized.

 R12e: MoE has reported they developed a Teacher Credentialing System. However, MoE also noted that before implementing this, "the financial implications need to be sorted out." In the second monitoring period, MoE shared some details about the Teacher Credentialing System, which, according to MoE, provides a framework for teachers' credentialing which was developed as part of the TCAP program financed by the Canadian government and piloted in schools in three Provinces. Likewise, rules and regulations and frameworks for TTC accreditation have been developed. Three TTCs (Sayed Jamaluddin in Kabul, and TTCs in Bamyan and Nangarhar) have piloted this. It has been reported that due to lack of financial resources, the credentialing system is still pending, but the Teacher Education Department is struggling to attract donor support and apply the system comprehensively in Afghanistan. The Teacher Certification System, Handbook for Accreditation and Quality Assurance, and Resource Guide for Credentialing were all shared with MEC during the second quarter of monitoring. During this third monitoring period, the relevant MoE Departments/focal points have not provided any updates on the status of the teacher credentialing process.

- R12c: MEC recommended an extension of the scope and duration of teacher training courses to achieve an equivalent status to a Bachelor Degree (Diploma). MoE, in the month of Dalw 1396/January 2018, signed an MoU with MoHE to provide opportunities for teachers to upgrade their education level to Bachelor's Degree level and shifting pre-service teacher education from Teacher Training Colleges (TTCs) to universities. The implementation of this MoU requires funding which has not been considered in the 1397 National Budget. During this third period of monitoring, MoE reported that the situation in relation to teacher education is not yet finalized. Effectively, this means that Teacher Training Colleges are in a state of limbo in which the remaining pre-service teacher education students from the last intake period continue to be taught and proceed through to graduation, but no new preservice students are being enrolled. It has been reported to MEC that in some TTC's, lecturers have little teaching to do (one TTC reporting that they only have 17 students) and have taken other jobs (e.g., as private tutors, or contract teachers in schools) outside of the TTC while still collecting their MoE lecturers' salaries. MoE said that they were looking forward to a final decision by the President. MEC will follow the issue with relevant bodies and details will be provided in upcoming quarterly reports.
- R12d: This recommendation called for extending practical teaching experience in classrooms as a component teaching education programs. In this regard, during this third monitoring period, MoE reported that, the "Credit System" which is an active learning system, has been implemented in all TTCs and credit for practical teaching has been increased from 6 to 10 credits. According to MoE, practical teaching has begun in the 2nd semester and the training materials for such practical teachings have already developed. In addition, another MoU was signed with MoHE regarding provision of job opportunities for Teachers Training graduates. However, MoHE is responsible for preparing the guidelines for Practical Teaching for the BA level. However, given the uncertainty around the future of TTCs and teacher education in general (as noted in the point above), it is unclear to what extent innovations in practical teaching are actually being implemented in TTCs MEC will follow-up on this in future quarters.
- R13: MEC recommended that MoE conduct a review of the management and structure of Adult Literacy Programs. MoE was also recommended to conduct an examination of options to expand monitoring of literacy courses. In regards to progress against this recommendation, MoE has reported that:

- An Adult Education Directorate has been established to provide the opportunities of continuing education for the literacy course graduates, especially for women.
- A Special Monitoring Manager role is being established in the Literacy Department.
- The *Manual for Monitoring Literacy Courses* has now been developed and provided to all monitors in the field.
- The implementation procedures to find priority areas and leaners and for Community Development Councils (CDCs) to monitor literacy classes have been drafted. The community participation program in literacy has been piloted and a corresponding manual has also been developed for this purpose. The guidelines and procedures have also been shared with the relevant Provinces. The community participation program has now expanded into eight districts in five Provinces (Balkh, Bamyan, Herat, Kabul and Nangarhar). The Mirbacha Kot DED 12 staff (Manager, monitors and facilitators) were trained for three days on how to implement the community participation program in their Districts. An agreement with UNESCO to assign a third party for monitoring, via GPS, has been agreed. In the second quarter of monitoring, MoE reported that the first special monitoring visits were conducted in several Provinces (Badakhshan, Balkh, Bamyan, Daykundi and Khost) with funding from UNESCO. In addition to Literacy Department officials, there were representatives from the First Lady's office and UNESCO experts, comprising two special monitoring delegations.
- Based on the Literacy Department's current organizational structure (*Tashkiel*), monitoring has been done for improving the quality of teaching and identifying teaching and learning problems/gaps. Two rounds of monitoring visits in 14 Provinces have so far been conducted, funded through the ordinary budget, with monitoring in five additional Provinces funded through UNESCO (off budget).
- To address literacy teacher capacity building, a program under the name of "Facilitators Bi-monthly Seminars" was launched and a related implementation guideline developed and distributed to all Districts. Pilot trainings were conducted for PLC and DLC staff in Herat, Kabul and Nangarhar Provinces on how to use the Facilitator Seminar annual plan and teaching and observation guidelines (with technical and financial support from the LEAF2/JICA project) and a system for assessing facilitator capacity will be developed with support from Enhancement of Literacy in Afghanistan.

Following the progress (noted above) during the second quarter of monitoring, in this third quarter, the Literacy Department has:

1. Followed-up on the results of the structural reform plan and shared this with the *Tashkiel* Directorate through a letter, but the actual state of approvals for the reforms, and the reforms themselves, is unclear.

- 2. Conducted a three-day workshop in five Provinces: Fararh, Kabul, Logar, Panjsher and Parwan, for 50 officers, District Managers, M&E officers and professional members of monitoring teams on the use mobile phones equipped with GPS.
- 3. Purchased mobile phones with GPS and provide distribution lists for Zone Managers, monitoring officers and Directors of the aforementioned five Provinces as well as District Managers and officers.
- Directly monitored 12 Provinces: Badakhshan, Baghlan, Bamyan, Daykundi, Farah, Helmand, Kandarhar, Kunduz, Nangarhar, Paktia, Sar-e-Pul, and Takhar, where 2,897 literacy courses are created and are being regularly monitored.
- **R14:** In order to develop flexible Adult Literacy Programs for women, three specific actions have been taken so far. First, an agreement has now been signed with the Ministry of Women's Affairs (MoWA) to establish special literacy courses for women. During the second quarter of monitoring, a coordination committee with MoWA was established. The implementation procedure and operational plan was prepared and shared with the Provinces and four coordination meetings were held to improve the implementation of the program. Second, the MoE's Deputy Ministry for Literacy signed another MoU with the Ministry of Labor, Social Affairs, Martyrs and Disabled (MoLSAMD) to establish literacy courses for women in its 'Economic Empowerment of Women' program. A proposal has been prepared and sent to MoLSAMD for approving the budget and then followed-up by 'letter No 135' dated 1397/3/9. Third, an agreement is signed with the MoF to include women's literacy education in the Citizen Charter Program. In this regard, a proposal has been prepared and sent to MoF for budgetary approval and followed up by 'letter No 206' dated 1397/2/29. Gathering information on the implementation of all MoUs will require more time and will be followedup in subsequent monitoring periods. During this third monitoring period, the Deputy Ministry for Literacy reported that they had conducted several meetings with MoWA to implement an MoU signed between MoE and MoWA. In addition, women's literacy courses are increasingly being monitored and monitoring reports on literacy courses in four Provinces have been prepared. MEC will follow-up on these activities with MoWA and MoLSAMD in subsequent quarters.
- R18: MoE was asked to establish a system with integrity and transparency to conduct placement tests for returnees who claim to have studied in Madrassas in other countries. MEC has reviewed the guidelines/procedures that MoE has developed in this regard and can verify that these have been fully developed and well designed to support the process of placement tests for returnees who have studied in other countries. Relevant documentation is ready for the Acting Minister of Education's approval. MoE reported that, after approval by the Acting Minister, the system will be implemented and placement test will be conducted accordingly.

During this third quarterly monitoring period, MoE reported that a committee with 23 members has been established by Presidential Decree, and that this committee, in addition to reviewing Islamic Studies documents, will revise the guidelines/procedures related to assessing and verifying the educational levels of returnees. The process of verification of the educational levels of returnees has been halted, pending receipt of the committee's comments on the guidelines/procedures and finalization of related documentation.

 R#25: In relation to systematically addressing complaints related to staff recruitment and appointment, an official system for addressing complaints has been introduced by IARCSC, and will be implementable in all aspects of the civil service including MoE. MoE reported that they have requested for IARSC to share the details of this system with them. The system is designed not only to address teachers recruitment complaints within IARCSC, but also other types of complaints related to MoE.

During this third monitoring period, MoE has not reported on progress in relation to this issue. In an interview with MEC, MoE reported that it uses seven different methods to address complaints - these are:

- Using a 'Complaints Box' in MoE.
- Directors of MoE Directorates allocating every Monday afternoon to hear and address complaints from the public.
- Allocating one day per week to address complaints through Ma'arif TV.
- Assigning a focal point to respond to public complaints.
- Providing a phone number for the public to call in and submit their complaints (note: MoE has developed plans to create a call center to address complaints and ATRA has promised to assist in this regard).
- Receiving complaints through Facebook and other forms of social media.
- Facilitating access for MoE personnel to MoE leadership.
- As stated above, various Provincial Directorates and Departments have noted the existence of different mechanisms for addressing complaints. For example, a representative from Herat PED told MEC that they receive complaints through letters and phone calls. Another department within the same Directorate pointed out a different mechanism in which they have assigned a focal point to address complaints. Some PEDs reported that they had installed a Complaints Box. The District Education Department (DED) in Injil District, Herat province, stated that they do not have a proper system for soliciting and addressing complaints, however on their Facebook page the public is informed that they can express complaints to the DED via phone calls. MEC's Provincial level follow-up research has found that most teachers, students and parents are unaware of any mechanisms for soliciting and addressing complaints in regards to education. Some MoE authorities seem to regard internal auditing as a mechanism for addressing complaints, but this would seemingly not be in line with the ToR for education Directorates which specifies that Internal Audit Department should be mainly focused on financial transparency and identification of illegality. Although MoE has been mandated to clearly define its mechanisms for soliciting and addressing

complaints and implement related processes at the Provincial level, MEC's research has found that such systems still operate, for the most part, on a superficial level (if at all).

- **R#40d:** in order to improve the quality and validity of information for the MoE's Education Information Management System (EMIS), MEC proposed training for all data collectors in data collection, documentation of information and reporting skills. During the first monitoring period, Kabul data collectors received training in the aforementioned subjects. During the second monitoring period, MoE reported, and provided information to MEC, that after the 1st round of training for MoE, training participants had shared their learning more widely in PEDs. Also, training participants collected school data collectors again.
- During this third quarter of monitoring, MoE reported to MEC that provincial statistics staff in 33 Provinces had received training on six types of research where key data collection indicators have been defined to improve data collection quality and increase the capacity of statistics personnel so that they can better collect, prepare (including data cleaning), and analyze the data and utilize different research methods. As for Nooristan and Uruzgan Provinces, where Kabul MoE staff could not visit, PED staff from these Provinces travelled to Kabul and learned data cleaning skills.
- During this third monitoring period, MEC interviewed representatives from PEDs in Balkh, Jowzjan and Samangan Provinces about collecting EMIS data at school level, amongst other topics. According to these interviews, information forms filled out by school managers in these Provinces still contain many errors, so clearly there is more work to be done on capacity building and support for EMIS data collection at the school level.

i. Recommendations which are at least 25% achieved

According to information MEC received from relevant bodies, out of 113 recommendations, only 15 recommendations were implemented by 25%. As during the second monitoring period, only eight recommendations were implemented by 25%. The details of recommendations achieved by at least 25% are as follows:

- R#1b: MEC recommended that MoE implement active monitoring of recruitment process by civil society, initially, as a pilot project. As the recruitment process and responsibilities have been moved to IARCSC, this recommendation has shifted from MoE to being in the remit of IARCSC. IARCSC has stated that they've provided opportunities for CSO monitoring, where possible. For instance, CSOs observed the process of distribution of teacher recruitment application forms. During this third monitoring period, MEC observed that IARCSC invited CSOs to monitor the testing for DED positions.
- **R#3a:** This recommendation relates to building schools with locally available materials. During the first monitoring period, MoE reported that it designed

each project based on the project funder's (e.g., Indian government, JICA, World Bank) request and the designs are prepared to use local material such as stone, beams, fired bricks and unfired bricks. MoE recently handed over responsibility for school construction to MoUD and MRRD following a Presidential Decree. Currently, MRRD and MoUD have been tasked with building schools in cities and villages. However, some projects (for instance, projects funded by India) are still managed by MoE and the related designs and procurement processes are being handled by MoE.

- MEC has followed up on these issues with MRRD and MoUD during this third quarter of monitoring. These Ministries ensured MEC that there is agreement on these issues between MoE, MUDH and MRRD. During this period, MoE reported that around 45 school construction projects were included in MoE's 1397 budget code, including projects funded by the Indian government according to requests of programs and in consideration of local materials and construction standards. In 1398, MoE will neither design nor implement any construction projects. The projects funded by World Bank will be designed, and relevant construction standards will be supervised, by DART and implemented by MoUD and MRRD.
- As stated previously, MoE's school construction projects have been largely handed over to MoUD and MRRD. Construction projects under supervision of MoE are to be followed by the Constructions Development Directorate (CDD).
- R#3f: MEC recommended that MoE actively engage community members (representatives of Civil Society Organizations, including CDCs) in monitoring school construction. MoE's Procurement Directorate added a clause to contracts which gives permission for local communities and CSOs to monitor MoE contracts. MoUD reported that the Citizen Charter process has engaged local communities in all aspects of school construction projects (based on MoUD information there are 36,000 CDCs throughout the country). During this third period of monitoring, MEC verified that school management *Shuras* have been monitoring construction projects.
- R12a: To improve the alignment of Teacher Training College (TTC) graduates with local market conditions, the MoE signed an MoU with MoHE to prepare a strategic plan to enhance teachers' qualifications. MoE, together with MoHE, made progress in establishing a functional Coordination Group for fulfilling this MoU. During the second quarter of monitoring, the Coordination Working Group developed an action plan and also a list of teachers (candidates) submitted to universities. The next step will be the evaluation and enrollment of candidates in the universities. It is currently planned that pre-service teacher education be shifted from MoE to MoHE, but this process has not yet been finalized and is still awaiting a final decision from the President. MEC will continue to monitor the situation.
- **R#15:** During the MVCA, MEC found that 53 percent of salaries were paid through banks and other electronic means, and 47 percent in cash. MEC recommended that MoE expand the payment of salaries by electronic

means. Using electronic means of paying salaries increased 62 percent during the first monitoring period. MoE reported that it would continue paying personnel via electronic means in cooperation with MoF and MoIT. During the second monitoring period, MoE reported that registration process of 23,000 staff within the Mpaisa system (electronic payment system) was completed in three Provinces (Kandahar, Nangahar and Parwan) and actual payments would begin soon. This system would then be expanded to Badakhshan, Herat, Kabul, Khost, Laghman, Paktia and Takhar Provinces and contract documents prepared. In the first phase, 120,000 personnel will be registered and paid. Through this system, teachers can receive their salaries at their homes and are not required to take a long journey to the District or Provincial centers to receive their salary payments. MEC confirms the implementation of this system has begun at the Provincial level and is particularly well established in Parwan. Some activities including registration of staff has already been done. However, MEC has perceived that this project will face security challenges as 'middle men' (including AOGs), who, when payments are made in cash, take a portion of teachers' salaries in exchange for 'protection', will be cut out of the process.

During this third monitoring period, MoE reported to MEC that, in addition to payment to teachers via mobile phones, the payment process through mobile bank teams has just begun. According to MoE, this payment process has commenced in Badghis and Bamyan Provinces and 3,400 staff have now opened bank accounts with Azizi Bank. Based on MoE reporting, roughly 800 staff will receive their salary payments in the Shibar and Yakawalang districts of Bamyan Province through mobile bank teams (which travel out to schools) by the end of Qows 1397. Herat is a successful example in this regard. MEC visited Herat during the second monitoring quarter and verified that salary payments were 100% done via banks. Electronic payments in Herat were not only being done in relation to teachers' salaries, but for all financial transactions, including the payment of high school graduation fees. In the center of Panjsher and Parwan, only teachers' salaries are being paid through bank accounts. The same is intended to be applied in Uruzgan Province where salaries are still being paid through trustees. According to MoE, in Uruzgan, each teacher pays between Afs 300 to 500 of their salaries to trustees to handle the transaction.

In the Kabul Provincial Directorate, all teachers receive their salaries via bank accounts and, in total, salaries for 30,073 education personnel in the Kabul Directorate are paid through electronic means. As for Laghman province, only teachers' and administrative personnels' salaries in the Provincial center are paid via bank account. In Nangahar, a small portion of staff receive their salary payments via bank account. Nangarhar education personnel who do get salaries via bank accounts reported to MEC that the bank fees were higher than the 'commissions' trustees had taken from their salaries when the transactions were in cash. During this third monitoring period, MEC looked at payments in Balkh, Jowzjan and Samangan Provinces. Payments of salaries via bank accounts in these Provinces are estimated as follows: Balkh – 45 percent; Jowzjan – 50 pecent; and Samangan – 25percent.

- **R16:** MEC recommended that MoE implement teacher professional development initiatives, as outlined in NESP III. Generally, there are two types of capacity building trainings for teachers: Teaching methodology seminars and subject-based seminars; the former is for all teachers, but the latter is more specialized training for subject teachers (e.g., in mathematics.)
- Both long-term and short-term training programs are being implemented to develop teachers' professional capacity, with 7,297 teachers trained in inservice programs (25 percent females). Additionally, 18,250 teachers participated in short-term trainings (38 percent females).

An MoU has also been signed with MoHE to support in-service teachers accessing education universities to enable them to complete higher education.

Nangarhar PED and the Kabul City Education Department have told MEC that they provide capacity building programs annually. Given the likelihood of substantial changes in the way that teacher education (both pre-service and in-service) is provided in Afghanistan – with the impending shift of pre-service teacher education from Teacher Training Colleges (under MoE) to universities (under MoHE) – MEC will be consider this dynamic situation and monitor implementation accordingly.

In the second quarter of monitoring, MoE reported that two-year pre-service and in-service programs have been going on in all TTCs for the professional development of in-service teachers and TTC pre-service students. Due to a lack of funding, the short-term in-service capacity building programs for school teachers and administrators (INSET) have not been implemented this year, but TED reported that they hoped to find a proper solution to this problem. With financial and technical support from SCA, TED has invited 110 lecturers from TTCs and trained them in a nine-month preparatory program; after passing the IELTS test, 40 lecturers out of the 110 were given the chance to enter a Teacher Educator Masters Program (TEMP) which started in August, 2018 (managed by SCA).

In addition, Promote/USAID provided financial support for training 122 lecturers who, once trained, will 'cascade' training to 2,400 newly recruited female and contracted teachers in the Provinces.

It is also worth mentioning that UNICEF has provided a 3-day formative assessment workshop for 25 academics and professional educators. UNICEF also provided another 3-day workshop for 63 in-service teachers and TED staff.

MEC explored other teacher training initiatives at the Provincial level during the second quarter monitoring period. In Herat there is a program entitled 'Afghan Children Read'. In this program, 4,932 professionals including teachers, head

teachers, and members of the PED's M&E department will get training in literacy teaching for children.

• **R17:** To digitize the issuing of 12th grade Diplomas, a new procedure for processing certificates has been devised. During the first quarter of monitoring, software for digitizing certificate data and certificate issuance had been developed and was piloted in Kabul City by the Kabul Provincial Education Department. MoE reported that, after gathering lessons learned from this pilot, MoE would expand it to other Provinces in 2018. In the second quarter of monitoring, MoE reported that the issuing of certificates for grade 12 graduates by the Kabul City Education Department had been 100% digitized.

MoE reported that for other Provinces, facilities have been provided, but not operationalized. In Balkh, Herat, Jowzjan, Laghman, Nangarhar, Panjsher, Parwan, and Samangan, MEC verified that the system in place was still the 'traditional' manual method for issuing certificates. In these Provinces, some individual initiatives have been taken, but not systemic reforms. For instance, Herat PED's Certificate Manager has developed a database for three-years' of certification. The Manager has asked a computer science student to do his thesis on this subject and as a part of this, the student developed a database for the Department which is now being used. The Department has registered all results and certificates in the database. *MEC will continue to monitor progress of expansion of digitizing 12th* grade diplomas across the country in upcoming quarters.

During this third period of monitoring, MoE shared information with MEC that verifies that the process of digitalization of certificates is going well, as results of 30,000 school graduates have been verified and entered in the new electronic system for Kabul PED and certificates have been duly printed and distributed to graduates in Kabul city. In addition, 50 percent of results of 1397 graduates from warmer Provinces such as Kandahar, Laghman and Nangarhar have been verified and entered in the new system and certificates printed. 30% of these certificates have been distributed to the schools where students had graduated. Also, the process of electronic certification is underway in Kunar Province.

To improve the results system, new changes are being brought to the electronic system. In this regard, personnel from PEDs in Balkh, Herat, Kabul, Kandahar, Khost, Kunar, Laghman, Nangarhar, and Takhar, received training in this area.

 R#36: when needed, Development Partners help MoE in outsourcing. According to USAID, this recommendation is being addressed in new development programs such as EQRA. During the second monitoring period, MoE reported that it had outsourced construction projects including EQRA. Printing textbooks – a USAID priority – is being outsourced and the development of new textbooks will be likewise outsourced. After EQRA begins, new items will be outsourced under EQRA. Likewise, MoE has provided a transition plan to print textbooks implemented by EQRA and funded by MoE. ICB, the company that was contracted to print 37 million textbooks, has now been suspended due to failing to comply with the assessment process. Given that, recruitment, procurement, school construction and TVET responsibilities have been shifted from MoE to other entities, MoE potentially will be able to focus more directly on delivering and monitoring quality education in Afghanistan.

• R#40a: Despite concerns regarding the validity and reliability of school data, MEC recommended that MoE send EMIS staff to 20 percent of schools two times per year (once at the beginning of new educational year and once at the end) to verify EMIS data. According to MoE's, reliability assessment and verification plan for five percent of schools has been developed and will be implemented by the Central Statistics Office after data collection is completed for 2018. During the second monitoring period, MoE reported that the MoU with the Central Statistics Office had not yet been signed. However, a technical draft to verify reliability of information by the Central Statistics Office has been developed with the full support of MoE. The Central Statistics Office attempts to obtain required financial support from Development Partners to kick off the project, 'Schools Survey Draft to Assess Reliability of Information' has been shared with MEC.

During this third monitoring period, MoE reported that it assigned staff to address errors on EMIS forms in 33 Provinces, including Kabul, and to collect, clean and verify data from from these Provinces. The process of data collection and correction involves comparing schools' completed EMIS forms with data entered into EMIS – and if there are any errors – the data is checked through a phone call or direct observation by the M&E team.

During the first and second monitoring periods, MEC addressed EMIS issues with Herat, Kabul, Laghman, Nangarhar, Panjsher and Parwan PEDs. Typically, PEDs distribute an eight-page form to schools in Provinces through M&E staff and Educational Departments and request them to return the forms within 20-25 days. MEC has found that forms were rejected several times due to errors. PED Directors in aforementioned Provinces stated that some forms contained many errors which suggests there is a need for further training about EMIS, particularly in DEDs and at school community level.

MEC asked school managers and educational departments staff for clarification regarding differences in EMIS data. One of the school-level interviewees told MEC that school information is dynamic and that the number of students changes each week. This should be considered during data collection. Also, according to the report provided to MEC, the number of students "in school" in Afghanistan has been unrealistically reported at 12 million – a number which, in part, originated with the World Food Program. WFP has been distributing food packages including biscuits, rice and oil, in schools since 2001 (and until relatively recently) and therefore many families have sent their children to school specifically to collect food – so children who were not actually attending school were counted as being in school as they had come to school to pick up food.

R41a: To increase the number of auditors inside MoE by 10 percent within two years, MoE reported in the first quarterly monitoring period, that they had revised the Internal Audit Department structure and made a request to the Office of the President for 12 new auditors. The issue is under discussion between MoE, the

Office of the President and the Independent Administrative Reform and Civil Service Commission (IARCSC). In the second quarter of monitoring, MoE's Internal Audit Department updated MEC that under the direction of MoE's Acting Minister, the General Directorate for Human Resources Development (GDHRD) has issued an official 'letter No 830', dated 13/4/1397, which states that 10 new positions will be added to the Internal Audit Department organizational structure (*Tashkiel*) and out of these, two positions have already been formally announced; the remaining eight positions will reportedly be recruited under the organizational structure of 1397, but are not yet finally approved. MEC has since followed-up on this with MoE in this third monitoring quarter and there has been no further progress in this regard.

- R42a: Regarding the establishment of an Audit Review Committee (ARC), a ToR has now been developed. During this third period, MoE reported that the ToR is finalized and approved by the Acting Minister, and a list of committee participants made of DMs and Directors has been developed. MoE is planning to formally activate the ARC soon. As of the third quarter of monitoring, this proposed ARC has yet to be established. When the ARC is established, MEC will attend meetings as an observer.
- R46a: MEC recommended that MoE develop and publish its Anti-Corruption Strategy. Subsequently, MoE developed an Anti-Corruption Action Plan based partly on findings of MEC's MVCA. MoE has also established an Anti-Corruption Committee to ensure that the Anti-Corruption Action Plan is implemented. In the second quarter of monitoring, MoE reported that the Anti-Corruption Action Plan had been shared with all MoE Departments. When MEC visited Herat, Panjsher and Parwan during the second quarter of monitoring, none of them were aware of MoE's Anti-Corruption Strategy or Anti-Corruption Action Plan. During this current period, MoE reported that it had distributed its Anti-Corruption Strategy to PED Directors through a seminar. Also, in this third quarter of monitoring, MEC's Provincial visits to PEDs in Balkh, Jowzjan and Samangan found that none of them were aware of these Anti-Corruption Action Plans and Strategy.
- R#48: MEC recommended that MoE release all information, including documents and reports, according to the Access to Information Law, and develop a mechanism to provide access for the public to information on request. During the first monitoring period, MoE reported that it worked on a system to enable it to provide access to information when requested. However, during the second period, nothing further was reported about this system. MoE's Public Relations Directorate told MEC that they share information daily with the media. They also said that they share information through the following links:
 - o link: <u>http://MoE.gov.af</u>
 - <u>https://www.facebook.com/ministry-of-education-afghanistan-</u> <u>179138145552114</u>
 - o http://twitter.com/education af

MEC followed this issue with MoE during this third monitoring quarter. According to MoE, a committee has been established to address the issue and conducts regular meetings – with the results of these meetings to be released "as needed."

• **R#49:** It was recommended that the MoE's Public Relations Directorate provide success stories and information about all of its anti-corruption initiatives, in an accessible form, to the public and report on this to MEC. MoE, during the first monitoring period, reported that this was being done on a daily basis. The Public Relations Directorate, during the second monitoring period, reported that it releases information on a daily basis, as described in Recommendation 48, above; MEC confirms that there are some success stories available at the mentioned weblinks.

MEC also visited these links during the third monitoring quarter and can confirm that some MoE success stories continue to be publicized. MEC expects MoE to more actively share its success stories with the public through its website, Maarif Magazine, Maarif TV and other mass media. It is also worth noting that the MoE's Academic Council is currently researching innovative practices in schools and has plans to share these with the public through the media and other means.

R#54: MoF should release the MoE budget and details of its related expenditures to the public. MoE reported that MoF publishes a general budget document every year on the Budget General Directorate website. MoF also produces a quarterly report on Government budgetary units, which is sent to the Afghan Cabinet and National Assembly; a copy of this report is also published on the General Directorate's website. MEC acknowledges that the national budget, which includes MoEs budget, was published online, but this does not contain details of MoEs budget disaggregated by Province and District. MEC expects MoE to publish the budget and actual costs, in detail, and disaggregated by Province and District.

i. Recommendations in which study and/or work have started

During this third monitoring period, 38 recommendations come under the 'work has begun' category. The status of recommendations may change in each monitoring period depending on the steps MoE and other relevant bodies have taken. During the next monitoring period, it is expected that the number of recommendations in this category will decrease. The detailed status of each recommendation is explained below:

 R3c: To contract local communities to provide unskilled local labor in construction of schools, MoE provided engineers to supervise construction work and hired unskilled laborers for school construction projects. MoE reported that they will follow up with MRRD and MoUD to apply the same concepts in Citizen Charter National Priority Program (CCNPP) projects as well. Reportedly, all projects under MoUD are using labor from the local communities, except for the construction of pre-fabricated buildings, which is done by construction companies. Similarly, MoRRD is implementing projects through contracting with Community Development Council (CDCs) which have their own policies and guidelines for implementation of such projects. In addition to that, MoE reported that both MoUD and MRRD use local labor for construction.

 R3d: MEC recommended implementation of the National Procurement Law, and anti-corruption policies and procedures on procurement and construction. Although such responsibilities have shifted to MoUD and MRRD, MoE showed MEC that they have a detailed section on procurement reform in their recently finalized *Reform Plan*. MoE leadership has assigned a support team to the Procurement Department to speed up the process and ensure transparency in all projects. In the second monitoring period, MoE reported that its Procurement Department had recently deployed new Capacity Building for Results (CBR) recruited staff as there had been a total change in the *Tashkiel*. It is anticipated that the new Procurement Team will bring positive changes and reforms in all aspects of MoE procurement. MEC will continue to seek evidence of this.

MoE, in cooperation with MRRD and MoUD, reported to MEC that there is an emphasis on implementation of anti-corruption policies and procedures between these three Ministries. During the third monitoring period, MoE's Procurement Directorate reported that it established a special committee to address complaints and prevent corruption in procurement. Procurement tenders will be published, as legally required, on the National Procurement Authority's website, MoE's website, and on Maari TV and Afghan Elanat websites, so that bidders can obtain the application electronically. MEC will follow this with MoUD and MRRD during the next monitoring period with the relevant focal points.

R#4b: Lessons learned from analysis conducted by MoE on Community-Based Education Policy should be publicly released. MoE stated that lessons learned have been shared with Development Partners during a workshop and in CBE Joint Working Group meetings. Also, in this regard, a report will be produced and made accessible to the public. MEC expects that such a report will be most relevant for Development Partners and emphasizes that lessons learned should be incorporated into a shorter, more accessible report for the public.

The Public Relations Directorate, during the second follow-up period, provided MEC with information on this issue. According to its report, it publicly released lessons learned on revision of the CBE policy through press releases, interviews, relevant websites and social media pages. They claimed that lessons learned are shared with the public through social media, but MEC did not find any evidence supporting this claim. MoE also reported that the revised CBE policy and implementation guidelines had not been finalized or approved by the General Education Directorate. The English version of the policy is now accessible to the public through the MoE website. *Dari* and *Pashto* versions have not yet been prepared. During the third follow-up period, MoE repeated the claim made in the second quarter, that the Communication and Public Relations Directorate released lessons learned to

the public through the media. MEC continues to seek evidence of such claims.

- **R12b:** To coordinate strategic plans between MoE and MOHE to achieve recommendations in *The Competency Framework for Teachers in Afghanistan* (TCAP), MoE made progress in establishing functional coordination between the two Ministries. MoE stated they have signed an MoU with MoHE for alignment of strategic plans. MEC has not received detail on implementation of this MoU during the third follow-up quarter.
- R12f: In order to prevent teachers' absenteeism, MEC recommended the use of IT in recording teachers' attendance in schools/classrooms. To implement IT solutions for tackling teacher and school staff absenteeism, some basic, preliminary discussions have already happened. An initiative which offers a feasible IT solution for teacher and staff absenteeism will be piloted in one Province and then based on lessons learned; a decision will be made concerning its implementation throughout the country. In the second quarter of monitoring, MoE reported that due to a lack of a development budget, no progress has been made in this regard. MoE is also seeking a mobile phone application solution for tackling school staff absenteeism. In this regard, a one-day training was conducted on May 9th, 2018 in Kabul for 21 DLC staff from five Provinces (Farah, Kabul, Logar, Panjsher and Parwan). One of the topics covered in this training was mobile monitoring. In addition to that, MoE plans to upgrade its HRMIS in order to more easily record staff absenteeism. As mentioned above, currently IARCSC is developing a 'holistic' HRMIS for the entire Government which will ultimately be used by all Ministries, including MoE. In this third quarter of monitoring, MEC has not received any further information concerning progress in this regard.

MoE's Literacy Department reported that, a contract has been signed with FASTRACK, a third party company (with technical and financial support from UNESCO) to monitor the literacy courses using GPS. MEC has followed-up on this during this third quarter, and according to the Deputy Department of of Literacy, monitoring through a third party will be excessively expensive, and therefore, UNESCO has decided not to fund this initiative.

 R21a: MEC recommended the establishment of a High Level Oversight Committee to oversee, monitor and press for reforms in the education sector. MoE established a Technical Committee on Reform, produced a *National Education Reform Paper*, and developed a related set of Guidelines on Restructuring the Ministry. In the second quarter of monitoring, MoE reported that a High Level Oversight Committee had been established and that the members of this Committee had conducted regular meetings. MEC asked MoE several times to invite MEC to attend, as an observer, at these Oversight Committee meetings, but so far, this has not happened. During this third period of monitoring, MEC still has not been invited to attend these meetings. MoE reported, during this third period, that the Committee consists of Civil Society representatives and other stakeholders. One responsibility of this Committee is to monitor implementation of MEC's recommendations to MoE. MEC will continue to press for opportunities to attend the HLOC as an observer.

- R21b: MEC has further recommended that the High Level Oversight Committee include MoE leadership, DPs, CSOs, and other stakeholders as members. MoE reported that a number of consultations with DPs and CSOs have been done through the NESP Steering Committee and other MoE Working Groups. So far, MEC has not received the ToR to determine whether or not the recommendations are implemented. During this third period of monitoring, MoE did not provide further detail to MEC.
- R21c: The High Level Oversight Committee coordinates and monitors reforms across the Ministry. In R21a, it was pointed out that MoE has established a technical committee for reforms, developed a National Reform Plan, and prepared guidelines to revise MoE's structure. MEC has not yet been able to review the ToR of the Committee to determine whether obligations of the recommendations are met. During this third period, MoE has not provided further details to MEC.
- R23a: MEC recommended that MoE establish 'reform networks' in each Province to coordinate, monitor, and press for sector-wide reforms. In the second quarter of monitoring, MoE reported that reform networks had been established in each of the PEDs – stating that they meet on a monthly and weekly basis. MEC visited Herat, Panjsher and Parwan PEDs in the second quarter of monitoring, however none of these PEDs were aware of the establishment of such reform networks. During this third period of monitoring, MEC visited Balkh, Jowzjan and Samangan and found that – with the exception of Jowzjan PED, which claimed to have established its own reform committee – the other PEDs in these Provinces were neither aware of the network, nor of the Committee. Although MoE reported that they are regularly conducting reform meetings at the PED- and DED-levels, MEC could not verify this claim.
- **R23b:** Provincial reform networks should be composed of Provincial Education Directors, PED Management, DED Management and DPs. In the first quarter of monitoring, MoE proposed the development of a Provincial NESP III Steering Committee. In the second quarter of monitoring, various information was shared with MEC claiming that MoE has established related reform networks. However, as mentioned previously, MEC visited Herat, Panjsher and Parwan PEDs and none of them were aware of the establishment of such reform networks. *MEC will seek evidence of MoE claims that these meetings are taking place, and being minuted, to establish the level of achievement against this recommendation.*
- R24a: MEC recommended that MoE's Parliamentary Affairs Office document any contact and interactions from MPs with the Ministry. The Parliamentary Affairs Office reported that they have been collecting and recording copies of petitions/solicitations to MoE by MPs. For instance, in the month of July (Saratan) 2018, they reportedly recorded 901 applications to MoE by MPs. These applications covered a number of areas including: Building schools,

moving teachers and other employees from one school to another, distributions of books, chairs, desks and other equipment to schools, enrollment of students to school, etc. The Parliamentary Affairs Office believes that the abovementioned petitions are in accordance with the law. MEC believes that this type of contact constitutes interference from MPs in regards to recruitment, transfers and distributions, has no legal justification and therefore would be considered illegal. During MEC's visits to Balkh, Jowzjan and Samangan in this third quarter of monitoring, MEC figured out that these PEDs still encounter interference by MPs – although MoE in Kabul also seems to consider these types of interference as legal. This contradiction is problematic and MEC will further explore the exact legal terms and understanding in upcoming monitoring periods.

- **R24b:** MEC recommended that MoE's Office of Parliamentary Affairs keep a record of any attempts at illegal interference from MPs. As noted above in the discussion on R24a, the Parliamentary Affairs Office believes that the contents of petitions to MoE by MPs are in accordance with the law.
- R26: MEC recommended that MoE ensure that a transparent system of accountability (punishments and rewards) is in place and functional for MoE staff. Although a system of punishments and rewards is technically in place in MoE, based on the Afghan Education Law and Civil Servants Law, this has not been consistently implemented. During the third follow-up period, MoE reported that from the beginning of 1397, until the end of month of Aqrab, 3,596 MoE employees were rewarded based on the Civil Servant Law and Reward Procedure. The Punishment system is executed based on five levels (according to the Civil Servant Law advice, warnings, salary deductions, transfers and dismissals). Since the beginning of 1397, punishments, according to the law, have been given to only 159 employees and noted in their employment records (out of more than 168806 MoE employees nationwide) which seems a paltry figure.
- R28b: MoE's Procurement Department's revised Tashkiel possess a separate unit under the heading of 'Contract Facilitation Department' which has the role of facilitating contracts through desk monitoring. MoE's other Departments, as relevant, are responsible for monitoring the progress of all awarded contracts. MoE is also following World Bank guidelines for World Bank-funded projects; however with other donors, including on discretionary budget funded projects, MoE follows the Government of Afghanistan's rules and procedures. This recommendation should be also applied to MoUD and MRRD because construction of the majority of new schools is now their responsibility.
- R31a: MEC recommended that PEDs publicly share Provincial budgets and actual expenditures for each Province. In other words, they should report their budget and expenditures to the people. MoE, at the Provincial level, has four budget codes: Code number 21 is for salaries, number 22 is for housing/building rent and services, number 24 is for expenses related affairs, and code number 25 is for other related costs, however, there is no separate

Provincial budget. As a result, schools make requests to their District Education Departments (DEDs) and subsequently report about their expenditures.

In the second quarter of monitoring, MoE reported that the budgeting process for the whole Government was highly centralized and so usually planned at the central level. Therefore, MoE in consultation with the Ministry of Finance, would work on a mechanism to clearly identify the budget for each Province based on their needs and plans and share it publicly for each Province. For the year 1398, it is planned that PEDs' plans and budgets are shared publicly.

During this third period of monitoring, MoE reported that the objective of this recommendation is being met in several ways. First, MoF publishes a general budget document every year on the General Budget Directorate's website. Second, MoE, after assessment of expenditures, has planned to publicly release expenditures, expense indicators, details on the remaining budget (and reasons why it has not been fully spent), disaggregated by Province, program and budget code, through its website and through media/social media by the end of the 1397 fiscal year. MEC appreciates this initiative but is still awaiting its full implementation.

In Herat, CSOs have been advocating for Provincial budgeting in education for years. At the time MEC visited Herat (during the second monitoring period), CSOs launched a project called, 'Citizen Participation for Transparency and Accountability in the Budgeting of Education and Health Sectors in Herat Province'. One of the key components of this project is advocacy for Provincial budgeting in health and education.

R32a: As noted previously, a few of MEC's recommendations involve • Development Partners (DPs). MEC recommended that DPs align donor programs around the meritocratic appointment of teachers. In the first quarter of monitoring, the issue had been discussed with DPs through a coordination group meeting (although it should be noted that this meeting mainly involved participation of USAID, with Canada joining towards the end of the meeting; no other DP's attended). USAID is doing this through the policy level and capacity building level as they have already included these measures in the EQRA program (which replaces the EQUIP program and, likewise, will be overseen by the World Bank). MoE, on this specific recommendation, reported that the recently finalized CBE policy addresses this issue of meritocratic appointment of teachers. In the second monitoring period, MoE stated that the issue was again discussed with DPs and IPs in coordination working group meetings. The DPs and MoE drafted a costing framework for CBE to finalize the framework. The CBE working group assigned a task force to develop a costing framework for the CBE policy implementation, in which the teacher recruitment and salaries are addressed.

During this third period of monitoring, MoE reported that MoE and its Development Partners developed a costing framework for CBE and MoE which will be approved in an upcoming CBE working group meeting. *Donor alignment and donor coordination* will be a topic of the upcoming thematic focus in the next Monitoring Report.

- R32b: MEC also recommended to DPs to coordinate donor programs of meritocratic appointment of teachers. USAID has already focused on coordinating its programs through working groups and other mechanisms. Likewise, the World Bank has coordinated its programs through the EQRA program. During the second quarter of monitoring, MoE reported that, DPs have agreed that based on a developed cost package, the teacher qualifications and salary level for all projects will be coordinated. During this third period, MoE reported that after finalization and approval of the CBE costing framework, MoE and Development Partners will report on the prepared package, usage and related performance in recruitment of teachers.
- R33: MEC recommended that DPs expand the Capacity Building Activity (CBA) initiative. As noted by MoE, the need for capacity development is highlighted in NESP III. DPs were requested, through NESP III Steering Committee meetings, to support capacity development. Donors have expanded development plans. According to an update from MoE during the second quarter of monitoring, an MoU has been signed between SIDA and UNESCO for capacity development of MoE in planning and monitoring, literacy, curriculum and teacher education at national and sub-national levels. The CBA has been expanded and now includes training for staff in the areas of planning, procurement, EMIS, HR and finance, as well as systems development. The list of training participants (attending training in Japan and India) has been shared with MEC in this quarter. Likewise, during this third monitoring period, MoE reported that it conducted a needs assessment, supported by GIZ, to increase capacity of MoE staff. Assessment results and related plans will be shared soon.
- R34: Following MEC's recommendation that MoE apply lessons learned from CBE to MoE schools, MoE is attempting to do this (e.g., more focus on engaging communities in education of children and school support, and recruitment and training of more female teachers) in NESP III. During the second monitoring period, MoE reported that 3,000 female teachers would be hired annually in rural areas. The positions were announced in 1396 and 1397, but no teacher had been recruited at that time due to a lack of budget. During this third monitoring period, 2,764 female teachers were recruited to provide improved access to education in rural areas, particularly for girls.
- R35a: To standardize Technical Assistants' (TAs) ToRs (to explicitly focus on MoE staff skills development as a task), MoE has drafted a basic template for a TA ToR; the standardization of related ToRs was planned to be conducted jointly with related Departments, by May, 2018. USAID said this is already happening. During the second monitoring period, MoE reported that since the EQRA project has not been finalized, and TA staff did not have contracts, this activity was delayed. Now, during the third monitoring period, as EQRA

has commenced, MoE reported that it is revising and finalizing ToRs for relevant Directorates. Positions will be announced accordingly.

• **R35b:** Conduct a formal assessment to determine if MoE staff acquired technical skills with support from their TAs. MoE reported that their General Directorate of Human Resources (GDHR) will develop the assessment tools based on the finalized ToRs and the assessment should be conducted in June 2018, by relevant Departments. MEC did not see any progress during the second quarter of monitoring in compared to the previous period. MoE still reports that discussions have been conducted with relevant Departments. MoE's GDHR is working to develop the template tools which, later, will be customized, based on each Department's needs.

MEC recommended that Development Partners support MoE, particularly in structural reforms and anti-corruption efforts. To support structural and anti-corruption reforms, DPs have been supportive of the MoE's Reform Plan which details all aspects of MoE's intended reforms. However MEC is concerned that this reform plan, which is over 300 pages, has not been widely shared or understood within the MoE and amongst Development Partners. Towards implementation of this Plan, an Anti-Corruption Committee was established by MoE's Deputy Department of Administration and Finance and it holds regular meetings. The Committee's progress report was shared with MEC during the first and second quarters of monitoring. Donors and other Development Partners are committed to supporting reform within MoE. During this third period of monitoring, MEC did not receive any updated information on the Committee.

It should also be noted that MEC is concerned that the sheer scale of education reform in Afghanistan (with everything from HR, to procurement, to the curriculum and beyond being reformed all at the same time) is unprecedented and would be difficult for any country, let alone one facing the challenges that Afghanistan does, particularly in relation to insecurity and weak capacity. MEC is committed to working with the MoE and Development Partners to ensure that MEC recommendations are manageable and aligned with other reform initiatives to better support the reform process.

- R38: To improve organizational experience and knowledge sharing between DPs and MoE, MEC recommended DPs to support MoE in recruiting contracted employees for long-term transfer of organizational experience and knowledge. MoE reported on its attempts in this regard. DPs, particularly the Canadian Embassy, have been working with UNICEF in developing an electronic database to improve organizational knowledge and experience sharing for different aspects of the education sector. This was initiated by UNICEF, but more time is needed to complete this to support improved DP institutional memory. This will be a topic of the upcoming thematic focus in the next Monitoring Report.
- R39a: MEC recommended that MoE support community members (CSO representatives and *Shuras*) in actively monitoring school construction. The Procurement Directorate has added a special clause to contracts based on which local communities and CSOs can monitor MoE contracts. MRRD reported that the Citizen's Charter involves local communities in all aspects

of school construction projects (according to MRRD, there are 36,000 development councils throughout the country). MEC, during Provincial trips in this third monitoring period, was able to verify that school *Shuras* do participate in monitoring school construction projects in the Provinces visited.

- R40b: MEC recommended that MoE consolidate/collate MoE's EMIS, Human Resources Management Information System, and Payroll databases within one year. The work has reportedly begun. In the second monitoring period, MoE reported that the software was fully developed, but the data cleaning process was not yet completed. As a pilot, the Finance Department data has been entered into the newly developed system (HP-MIS) and this was to be tested in upcoming months. Based on the pilot, a report will be shared with MoE management and then decisions will be made regarding the implementation of this system and to focus on the collation of MoE's MISs. MEC followed-up on this matter during this third quarter of monitoring and according to MoE, the work on this database is still ongoing. As result of discussions within MoE, it has been decided that as a first step, names of schools will be corrected in the database, and as second step, data will be cleaned and databases integrated. A working group has been created to oversee the process.
- R40f: Regarding an external review of MoE data and MoE control systems, technical assistance is being provided by the USAID CBA project. CBA established a training center for GDHR which has conducted various trainings for the capacity development of employees. Procurement, Payroll, HR, Internal Audit, Finance and EMIS data and control systems are being reviewed through technical support from the CBA project. MoE reported that actions have been taken to improve the control systems and develop the capacity of staff, however, MoE, as yet, has not shared evidence with MEC for verification of this.
- R41b: MEC recommended that MoE strengthen internal reporting lines of MoE's Departments with MoE's IAD. In this regard, MoE reported that the Internal Audit Charter, Audit Committee ToR, and Internal Audit Guideline development process is ongoing and reportedly will soon be completed by CBA and presented to MoE's Acting Minister for approval. MoE believes that these documents, when approved, will help improve the internal reporting for MoE's Departments. In the first quarterly monitoring period, MoE had reported that IAD planned to share the report draft with respective Departments for their comments, and then the report would be shared with the Internal Audit Committee and from the Audit Committee to MoE authorities for consideration and approval. The final report will be shared with MoE's respective Departments.
- R41c: Strengthen the relationship between MoE's Internal Audit Department and MoF. MoE reported that with the approval of abovementioned documents, the relationship between MoE's Internal Audit

Department and MoF will be strengthened. *MEC will follow-up on this in future monitoring periods.*

R41d: To ensure transparency, MEC asked MoE to publish 100 percent of MoE's Internal Audit Department's (IAD) routine reports from June 1, 2018 (This does *not* include publishing IAD's Incident Reports or case files referred by IAD to AGO). MoE reported that, based on the approved Operational Plan, during the first quarter of fiscal year 1397, (January 2018 until the end of March 2018), nine audits at central and 13 audits at Provincial level were conducted; as a result five cases at central level and two cases at Provincial level were received by IAD – the rest are in progress. The report was not published as they promised by June, 2018.

In the second quarter of monitoring, MoE reported that, during the second quarter of he fiscal year 1397 (21 March 2018 until the end of June 2018), 16 audits at central and eight audits at Provincial level were conducted; and four of the audits at central level were passed on to the AGO, while Provincial Audit Departments had not yet sent their reports. In addition to this, 18 audit processes were carried out at central level and were done at Provincial level for extraordinary cases, and the reports were prepared by Provincial Audit Departments and received by MoE at central level. Although the details of such audits and reports have been shared with MEC, the actual reports have still not been shared with MEC.

Likewise, MoE reported that during the third fiscal year of 1397, according to the approved plan, 9 audits in the center and 4 in the Provinces were conducted. In addition, 21 audits in the center and 12 in the Provinces were conducted as for special and extraordinary cases. Internal Audit Directorate earned Afs 2,344,141 in total for conducting audits. Out of that amount, Afs 1,075,713 was transferred to Government accounts and Afs 1,268,428 is still circulating. Also, 36 people were sentenced for punishment, 23 persons advised, eight persons warned, four persons' salaries deducted, and one person removed.

- R41e: MEC recommended DPs to provide technical assistance to IAD, within one year, based on IAD-DP's assessment of gaps. According to an MoE update in the first period, the assessment of gaps has already been done by MoE. As a result, the types of technical assistance needed by IAD have been provided by the Capacity Building Assistance (CBA) program. During the second quarter of the fiscal year 1397, the Technical Committee was able to design draft guidelines for an Audit Charter, an Audit Committee ToR, defined ethics and a Code of Conduct with the support of CBA. Once these documents are finalized they will be sent for official approval by the Acting Minister.
- R45: MEC had recommended that MoE publicly share meta-data on the status of all teacher positions via a database, in detail, within 6 months. MoE has been working with IARCSC on a mechanism for such sharing of metadata. IARCSC has planned to develop a unified HRMIS for all Ministries, including MoE. MoE has said that once the HRMIS is developed the ICT and GDHR will jointly take corrective actions in this regard. In the meantime,

MoE's Publication Directorate told MEC that they will publish meta-data after receiving this from the relevant Departments. MEC will continue to monitor this activity.

• **R47:** MoE should report on the progress of the Anti-Corruption Strategy implementation, quarterly. Suitable reporting mechanisms have also been discussed.

MoE has developed its *Anti-Corruption Action Plan* according to the National Anti-Corruption Strategy and findings of the MEC MoE MVCA. MoE has also considered the Education Sector Analysis and NESP III in this plan. MoE's *Anti-Corruption Action Plan* is in line with the objectives of the National Anti-Corruption Strategy, which includes the following:

- Increasing awareness of students and parents in the fight against corruption;
- Adhering to the principle of transparency and meritocracy in the recruitment of teachers and civil servants of the Ministry;
- Implementing the principle of accountability by ensuring suspects face justice;
- Effectively using financial resources and ensuring accountability in financial and logistics sectors.

During the two last quarters, MoE has submitted two progress reports on implementation of this *Plan* to the secretariat of High Council of Anti-Corruption and Rule of Law. MoE reported that they have been able to fully implement the following activities during the last two quarters:

- Developing a general guide for the reform of the organizational structure of the Ministry of Education.
- Ordering of the *Action Plan* for the implementation of the proposed amendments, registering job applicants' requests in an electronic system, and publishing a list of shortlisted candidates accordingly.
- Reviewing and enhancing the process of sharing financial information between the Ministry at central level and the PEDs.
- Introducing a new monitoring mechanism for classrooms, schools and related education Departments.
- Using reports and research to make decisions and develop policies.
- Reviewing and redefining the basic duties of MoE and its supporting functions, according to legal criteria.

During this third monitoring period, MoE did not respond to MEC's inquiries into the implementation of the *Anti-Corruption Reform Plans*.

• **R50a:** MEC recommended that MoE distribute its *Anti-Corruption Plans* to 34 PEDs. During the first follow-up period, MoE reported that it would distribute *Anti-Corruption Plans* to PEDs, however by the third quarter of monitoring, this has yet to be done. MEC visted Balkh, Jowzjan and Samangan PEDs during this third quarter and found they were not aware of these *Plans*. MoE also reported that *Anti-Corruption Plans* had been shared

with and explained to PED Directors; MEC could not find any evidence to verify this claim.

- **R50b:** MoE, based on MEC's recommendation, should disseminate an *Anti-Corruption Plan* to all 367 District Education Departments (DEDs). MoE reported that they would disseminate the plan to all Departments. During this third period of monitoring, MEC found that this plan (as noted above) had not even been shared at PED-level in Balkh, Jowzjan and Samangan Provinces, let alone at District level.
- R51: MEC recommended that MoE establish a formal relationship with the AGO. MoE reported to MEC that according to procedures, in compliance with Article 134 of the Constitution, IAD is referring all those cases that have criminal elements to AGO and a relationship of correspondence is maintained through the sending and receiving of official letters. In the second quarter of monitoring, MoE reported that, in the first quarter of fiscal year 1397, 29 files were sent to AGO. These cases include misuse of authority. In addition, in order to ensure timely actions regarding the referred cases, two focal points have been introduced between AGO's Supreme Audit Office (SAO), and MoE's IAD. During this third period of monitoring, as stated in the above recommendation, the Internal Audit Directorate has referred several cases to the AGO.
- R53: A lack of adequate numbers of textbooks in schools is a big concern which has contributed to undermining the quality of education in the country. MEC recommended that MoE study options such as 'market-based solutions' for textbooks within six months of the publication of the MoE MVCA. In this regard, MoE drafted a procedural manual. During this third period of monitoring, MoE reported that a draft Bill authorizing the printing of textbooks by private businesses was sent to the Academic Council Directorate on the 20th of July 2018, and this was then changed from a Bill to become a Regulation. As required, Academic Council Department sent this Regulation to MoJ. The regulation has not been finalized yet, but MoE has reported that after finalization, it will be published on its website.
- R55: MEC recommended that MoE conduct Anti-Corruption Forums for the 34 MoE Education Directorates, the media, and other education sector stakeholders, emphasizing MoE's fight against corruption. In the first monitoring period, MoE had provided MEC with an update that action plans for MoE's National and Provincial Departments and Directorates include conducting Anti-Corruption Forums in the PEDs. Provincial visits in the second and third monitoring periods have shown that MoE has not managed to conduct these forums yet.
- MEC recommended that teacher appraisals be conducted on an annual basis. According to MoE's update during the first quarter of monitoring, annual appraisals had been done for 29,499 teachers and PEDs had been instructed to expand appraisals to all teachers by the end of the year. During this third period of monitoring, MEC did not receive any information verifying progress in HR. The nature of this recommendation requires this be

monitored every quarter. MEC will monitor and report on this in upcoming monitoring periods.

i. Recommendations on which no actions have been taken

After three monitoring periods, no action has been taken on six recommendations. These recommendations are detailed as follows:

• **R1e:** The IARCSC complaints mechanism regarding education sector should also engage representatives from local communities (e.g. CSOs, *Shuras*) to monitor and oversee the process of teacher recruitment. No detectable action has been taken in this regard. IARCSC believes that CSOs create problems in this area instead of solving problems. Despite their views on this, IARCSC is planning to engage representatives of CSOs in the complaints handling process. MEC believes that involving CSO representatives in the process of complaints handling will work towards ensuring transparency and strengthening the legitimacy of the Government with Afghan citizens.

PEDs, when MEC interviewed them during the MVCA, complained about MPs' illegal interference. Reported interference from MPs varied and included: Transferring teachers from one school to another, asking PEDs to change specific teachers' shifts (e.g., from morning to afternoon shifts), and interference in students' affairs. PEDs welcomed the leadership's decision on shifting the teacher recruitment process from MoE to IARCSC to help free the process from MP interference. MEC has yet to receive any information concerning actions taken by IARCSC and/or MoE in this regard.

- R24c: MEC also recommended that MoE's Office of Parliamentary Affairs collate the records of any attempts at illegal interference from MPs and report these to MEC monthly. MoE did not provide any consolidated update about illegal interference of MPs to MEC in the second or third quarterly monitoring periods. MoE informed MEC that if illegal interference takes place, it would be reported.
- R52: MEC recommended that MoE conduct a review of all the existing sanctions, disciplinary measures, prosecution options, and other dissuasive mechanisms that are in place in MoE, within six months of release of the MoE MVCA. In the first quarter of monitoring, MoE reported that they would soon start a review. During the second and third quarters, MoE reported that this task had been transitioned to IARCSC.
- R56: To empower School Management Shuras to receive, and act on, complaints and grievances from parents and students, the Directorate of School Management Shuras (DSMS) has planned to include these issues in SMS capacity building training and related materials. During the third monitoring period, DSMS reported that it had included the topic of complaints and grievances in 20 workshops funded by UNICEF and conducted in 2017 and 2018. According to their report, the workshops were conducted for 5,000 members of school Shuras. MEC did not receive any

validating evidence during the first, second, or third periods of monitoring and therefore cannot verify the claims.

MoE has also stated that they, together with MoRRD, have been working through the National Citizen Charter Program (NCCP) to improve complaint procedures for addressing grievances on education service delivery at the community level. *MEC will consult with MoRRD and the NCCP for more details and evidence of this in upcoming monitoring quarters*.

- **R57**: MEC recommended that MoE engage school *Shuras* in oversight and monitoring of literacy courses. To empower School Management *Shuras* to conduct monitoring and oversight of adult literacy courses; MoE has reported that the Directorate of School Management *Shuras* (DSMS) will include this task in the revised SMS's ToR. During the third monitoring period, discussions over the engagement of SMSs in oversight of literacy courses is still ongoing.
- R58: MEC recommended that MoE engage Student Unions in monitoring and oversight. MoE initially reported that it will review this recommendation. MoE reported in the second quarter that, this recommendation has legal implications. MoE is still trying to do internal and external consultation on this issue and during this third monitoring period, MoE reported that how to proceed with this recommendation has not yet been decided.

ii. Recommendations which are pending

Based on information received by MEC during this third monitoring quarter from MoE and other relevant bodies, 22 recommendations, out of 113 recommendations, are still pending. Pending means that these recommendations depend on other steps and/or actions must take place prior to their implementation. In other words, unless a series of actions are taken, these recommendations cannot be implemented. These recommendations are described as follows:

- **R1c:** The pilot implementation of R1b should include recruitment criteria agreed between IARCSC and CSO umbrella organizations (e.g., gender balance, etc.)
- **R1d:** Lessons learned regarding engagement of CSOs in monitoring and oversight should be documented and shared with education sector stakeholders.
- **R2b:** MEC recommended that regular meetings between schools and communities should be conducted with support of School Management *Shuras*. MoE reported that due to a lack of budget, it could not recruit staff to follow up on this recommendation. It should be noted that MEC does not believe this recommendation requires funding for additional staff as what it required is the mobilization of existing school/*Shura* staff.
- **R20a:** MoE and IARCSC should set forth measurable criteria to measure these two bodies' success in teacher recruitment and placement. According to MoE, during the first period of monitoring, a mechanism was created to measure the success in this regard and results would be released after the

recruitment process was completed. IARCSC reported that it would soon send its report on collective recruitment of teachers to the President. This recommendation will be followed up after the teacher recruitment process is completed by IARCSC.

During this third period of monitoring, MoE reported that the recruitment process is still ongoing. IARCSC is also meant to share final results with MoE. However, MoE has sent three follow-up letters to IARCSC, but it has not yet received any response. MEC, during this third period, did not receive any information or report regarding this matter from IARCSC. This metric, which is about teacher recruitment based on merit, should be shared with education sector stakeholders on an ongoing basis to demonstrate improvements. As the recruitment process is not yet completed, this recommendation is still pending.

- **R27b:** MEC recommended to MoE that it should inform all staff of the amended and revised Code of Conduct. MoE reported that they 'will do it'. The HR Directorate sent an official letter to IARCSC to request that they share the revised version of the Code of Conduct. IARCSC has not yet shared the revised version of the Code of Conduct with MoE or MEC.
- **R27c:** The amended and revised Code of Conduct should be publicly posted in all MoE facilities, including schools. IARCSC has not yet shared the revised Code of Conduct with MoE. MoE reported to MEC that as soon as the revised Code of Conduct is shared by IARCSC, MoE will publish it and post it in all MoE facilities.
- R28a: Donor-funded contracts, including construction, should be regularly monitored by both DPs and MoE, following the standardized guidelines in the World Bank's 'Best Practices of Contract Procurement'. MoE affirms that they were responsible for monitoring past projects implemented by MoE. They also admitted that due to a lack of engineers, there were challenges in properly monitoring their past school construction projects. Currently, responsibility of monitoring implementation of construction projects has shifted from MoE to MRRD and MUDL, along with the responsibility for monitoring such projects. School construction under EQRA, which began during this third monitoring period, will be monitored by a third party. MEC will follow this up with MRRD and MUDL.

Note - EQRA is a World Bank-administered education project. The total cost of this project is USD 298 million. The Project Development Objective (PDO) is "To increase equitable access to primary and secondary education, particularly for girls, in selected lagging provinces, and to improve learning conditions in Afghanistan". EQRA has four main components as listed below:

- Increasing equitable access to basic education especially for girls in selected lagging provinces
- o Improving learning conditions
- Strengthening education sector planning capacity and transparency

- Technical assistance and capacity building³
- R30a In order to build the trust of local communities in the education system, PEDs and DEDs were recommended to organize monthly dialogues with their local communities. It was recommended that participants represent the diversity of their communities (e.g., male and female, varied range of ages, different ethnicities, etc.). MEC, during this third monitoring period, through Provincial trips to Balkh, Jowzjan and Samangan, observed school *Shuras* which are genuinely active conduct meetings with community representatives to address their school-related issues. MEC believes that this relates more to their motivation and interest towards education than their budget. PEDs and DEDs and school managers can conduct a half-day meeting with no- or minimal- budgetary implications to build trust and engage communities more deeply in education. They can report their progress and listen to communities' issues. *MEC will follow up on this in upcoming monitoring quarters.*
- **R30b:** Participants in monthly dialogues with local communities should be drawn from diverse members of the community (e.g., male and female, varied range of ages, cross section of groups, etc.). This is pending on the implementation of recommendation 30a. *MEC will follow up on this in upcoming monitoring quarters.*
- **R31b:** PEDs should publicly share District spending plans and actual expenditures for each District, each year. MoE reported that they are working with MoF to establish a mechanism based on which the approved budgets for the Provinces are clearly broken down to District-levels and shared publicly. Currently budgeting in MoF is centralized which does not allow for the disaggregation of District-level budgeting and expenditure. *MEC will follow up on this in upcoming monitoring quarters.*

During this third monitoring period, it was reported to MEC that PEDs, after the beginning of the new fiscal year (when the budget is approved at the Provinciallevel according to the Guidelines sent by MoE Kabul), are tasked with breaking down their budgets District-wise and sharing them publicly in consideration of the needs of each District. MoE reported that they plan to consider budget break down District-wise and expenditures according to their budget as PED priorities and to publicize related information on their website, and through local media, social media, and to Civil Society Organizations and Provincial Councils. For now, MoF has no mechanism to break-down budgets by District. MoE reported that they can publicly share District-wise expenditures.

• **R31c:** MEC recommended to MoE that PEDs should publicly share individual school spending plans and actual expenditures for each school, at each school site, each year. MoE reported that they have planned to start a School Grants Program in 17 Provinces under the upcoming EQRA program. This will help MoE to rollout similar mechanism for other types of budgets in the

³ World Bank's Website: <u>http://documents.worldbank.org/curated/en/524491531734125263/Project-Information-Document-Integrated-Safeguards-Data-Sheet-EQRA-P159378</u>

future, such as O&M. MEC did not receive any evidence in this regard and could not verify it at the Provincial level. MEC's expectation is for policy change to allow for the sharing of *all* individual school spending plans and actual expenditures and not just a few of these in relation to short-term projects.

During this third monitoring period, MoE reported that a mechanism for budget preparation and break-down has not yet been developed by MoF. However, there is a plan to open separate bank accounts for each school in 17 Provinces under EQRA, for 1398. Through that, allocated budgets will be spent by school *Shuras*.

MoE developed and finalized a School Grants Guideline in cooperation with MoF, World Bank and relevant Departments where, after EQRA is initiated, bank accounts will be opened and operationalized for schools. Implementation of this will be a good experience for MoE in budget preparation and allocation to schools in Provinces and MoE will be able to publicly share actual budget expenditures and related indicators.

- R35c: MEC recommended that MoE shift operational responsibilities from TAs to full-time MoE staff. MoE reported that these responsibilities will be transferred to full-time staff during the EQRA project's implementation period. In the second quarter of monitoring, MoE reported that after completion of a formal assessment, a clear plan and timeline will be developed in order to shift operational responsibilities from TA's to full-time MoE Staff. The HR Directorate reported that according to the HR needs assessment and Capacity-Building Plan, operational responsibilities, currently carried out by TA staff, will be transferred to full-time staff. MEC will follow up and provide further detail in upcoming monitoring periods.
- R37b: MEC recommended that MoE provide technical support for education sector reformers in each Province. According to MoE, PED Directors are recruited through CBR and have Reform Plans for the Provinces. EQRA has included technical support components for reforms. MoE reported in the second quarter of monitoring that based on the CBR procedure, Directors are responsible for developing and implementing the Reform Plan in their respective Departments. Reform Plans are shared with those who have been hired in the first round of CBR recruitment and the next step will be to collect reports on the implementation of said Reform Plan. In the third monitoring period, MoE reported that the HR Directorate sent an official letter to all PEDs so that PEDs can send their Reform Plans to the HR Directorate. MEC has not yet received any evidence to verify this claim.
- **R39b:** 100 percent of school construction sites should be regularly monitored and overseen by the Afghanistan Reconstruction Trust Fund (ARTF). According to the World Bank, third party monitoring is considered in the design of EQRA for school construction. EQRA was initiated during this third monitoring period. MEC will follow up in future monitoring periods as EQRA gets further into its implementation period.
- **R42b:** MEC recommended that MoE establish a High Level Audit Committee (R42a) and its members be composed of MoE leadership, MoE IAD, DPs, and

other stakeholders. According to MoE, based on the ToR, the Audit Committee consists of at least three and a maximum of five members of MoE leadership.

- R42c and R42d: The Committee's ToR should include reviewing all internal MoE audit reports, external MoE audit reports from SAO, and all other MoE audit-related reports from external bodies. The Committee's ToR should also include publishing an annual review of the quality of education in Afghanistan. In the second monitoring period, MoE reported that, the Internal Audit Committee's ToR had been prepared with the support of USAID's CBA project on the 27th of March 2018. One of the responsibilities of the High Level Audit Committee is to provide financial audit reports. In addition, the Audit Committee is also responsible for providing the following reports:
 - Review of annual financial (*Qateeya*) and audit reports to ensure that reports are in full alignment with the information available from the Committee and reflect the principles and objectives of accounting and auditing.
 - Review of financial and audit quarterly reports to ensure that information is updated, completed and accurate.

During this third monitoring period, no information or evidence has been received by MEC to verify such claims.

• **R43:** MoE should develop a standardized accreditation process for private schools. MoE had reported, in the first quarter of monitoring, that they started discussions on this issue. According to MoE, this needs a lot of consultation with the private sector, Government entities and parents, so it will take time to come up with a clear plan for an accreditation design. According to MoE data, provided in the second quarter of monitoring, 3,034 private schools had been registered and licenses have been issued to all of these schools under the rules and regulations of the Government of Afghanistan.

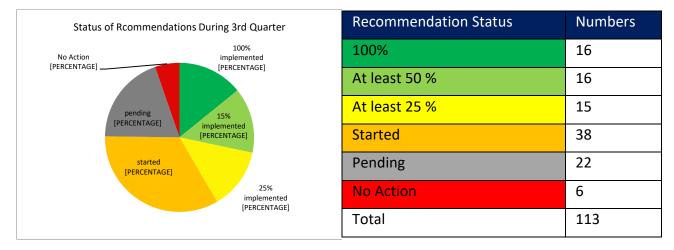
During this third monitoring period, MoE reported that, in order to standardize and accredit private schools, Private Educational Institutes and the General Educational Supervision Directorate, monitored 206 private schools in Kabul and two other Districts of Kabul, out of which 38 schools provided administrative documentation, lesson plans and financial documents in compliance with relevant regulations. 36 schools acted in contrary to private schooling Regulations and disciplinary actions were taken against them. It is also worth mentioning that 132 schools in Kabul Province were issued warnings by the Board, as required. The Private Educational Institutes Directorate, due to lack of professional monitoring staff, could not oversee and monitor all private schools in Afghanistan. MEC appreciates MoE's actions in this regard, but accreditation of private schooling should be more robust than merely ticking off a checklist, as is the current MoE practice.

• **44b:** MEC recommended that MoE establish a Quality Committee. The Education Quality Committee should be composed of MoE leadership, MoE's M&E Department, DPs, representatives from private education, and other

stakeholders. During this third monitoring period, MoE reported that the Quality Committee was established at the beginning of the year, its ToR developed and recommended Directorates will be included as members of the Committee. In addition, MoE claimed that MEC would be invited as an observer to Committee meetings, but this has not yet happened.

R44c: The Committee's ToR should include reviewing all internal M&E systems and reports, and MoE quality-related reports from external bodies. The Committee's ToR should also include reviewing all internal MoE audit reports, external MoE audit reports from SAO, and all other MoE audit-related reports from external bodies. The Committee has been established. Regarding reviewing the reports and related functions, no update was provided to MEC from MoE during the second quarterly monitoring period. MEC has not been invited to observe the meetings of the Education Quality Committee and has no information in this regard.

R44d: The Committee's ToR should also include publishing an Annual Review of the Quality of Education in Afghanistan. So far, no such report has been published by the Committee. Also, as noted previously, MEC has not been invited to observe the meetings of Education Quality committee and has no information in this regard.



7. Overall Status of Recommendations

Anti-Corruption and related success stories in education during the third quarter

- Unofficial recruitment was one of the most common forms of corruption in education institutions in Afghanistan. Currently, all positions including those for contracted teachers are announced.
- Some school Shuras have been observed as being effective in Balkh, Jowzjan and Samangan and Jowzjan PEDs. Some school Shuras in these Provinces, which have been contributing to the repair and reconstruction of schools, remarkably, were found to have enabled the re-opening of schools which had been closed due to conflict and insecurity. For instance, in Jowzjan, 63 schools, which faced acute security challenges,

either remained active during that time, due in part to the support of their *Shuras*, or were re-opened.

• Note: A success story from Kabul PED, in the first section of this current report, is detailed in the Thematic Focus section on education reform.

Challenges and concerns in education, from interviewees' perspective, during the third quarter

- Lack of adequate school construction is a major challenge for education in Afghanistan. PEDs in Balkh, Jowzjan and Samangan identified this as a major challenge. In Jowzjan and Samangan, they need an increase in school construction of 45 percent to meet their education needs. Lack of school construction in Nuristan is evidently more acute than other Provinces, as 70 percent of schools in this Province have no buildings at all.
- A lack of potable water in schools is another challenge mentioned by PEDs in Balkh, Jowzjan and Samangan. In Balkh, 113 schools lack potable water. PEDs in Samangan and Jowzjan stated that over 50 percent of schools in their Provinces lack potable water.
- The issue of a lack of PED authority to recruit and place permanent teachers, based on need, is still a problem. Balkh, Jowzjan, Nuristan and Samangan PEDs consider this to be one of their most pressing challenges. This has led these PEDs to recruit contract teachers, in place of permanent teachers, to fill the gaps and this opens up vulnerabilities to corruption. Jowzjan PED recruited 1,040 contract teachers during 1397. Samangan Province recruited 572 contract teachers.
- Insecurity is a challenge affecting all aspects of life in Afganistan, and education in particular. The three aforementioned PEDs identified insecurity as a major challenge for the development of education. Samangan PED stated that schools in their Province need security guards.
- Negative cultural attitudes against women in some Provinces have created issues in female teacher recruitment. For example, Jowzjan PED stated that they are not able to recruit female teachers in some Districts of the Province, because some communities do not allow women to be teachers.
- Intervention of MPs and other, local powerful people in education is a challenge that MEC regularly finds and reports on. PEDs in Balkh, Jowzjan and Samangan reported that MPs and other powerful people interfered in all aspects of education. One major example was shared by Jowzjan PED – They reported that bank accounts were initially opened for all of the Province's official teachers, but as result of MPs' interference, teachers in three Districts still receive their salaries in cash through trustees.
- In addition: The low capacity of teachers and related low quality of teaching; lack of adequate budget and facilities; lack of coordination; lack of accurate and comprehensive oversight of education; and lack of reliable EMIS statistics, are among the other challenges that these PEDs reported.





100 %	At least 50%	At least 25%	Work/Study Started	Pending/ Future	No Act	ion
Annex A: Recommendations Status by Color						
between MoHl	E and MoE. Reco	mmendations st	atus by color			Status
	: Involve local r their Province.		monitoring an	d oversight of	teacher	
R#1: B) Pilot a for a period of		g and oversight o	of recruitment i	n four diverse Pr	rovinces	
	should include (e.g., gender bala	_	ed among IAR(CSC and CSO u	mbrella	
•	ns learned at all n sector stakehol	-	ilot should be c	locumented and	shared	
R#1: E) The IARCSC complaints mechanism regarding education sector should also engage representatives from the local community (e.g., CSOs, <i>Shuras</i>) to monitor and oversee the process.						
R#2: A) Standardize the School Management <i>Shuras</i> (SMS) Terms of Reference.						
R#2: B) Ensure SMS Terms of	-	een schools and	communities tak	ke place accordin	g to the	
R#2: C) SMS meetings should be documented with formal minutes.						
R#3: A) Build schools using locally available materials.						
R#3: B) Build schools using relevant aspects of indigenous design, adhering to MoE standards and universal design principles.					to MoE	
R#3: C) Contract local communities to provide unskilled local labor in construction of schools.						
R#3: D) Strictly enforce anti-corruption procurement policies and procedures in school construction, according to the National Procurement Law.						
	y involve memb d oversight of scl			, CSOs, <i>Shuras</i>) i	n active	
R#4: A) MoE t	o carry out a po	olicy review on I	essons learned	from Communit	y Based	

100 %	At least 50%	At least 25%	Work/Study Started	Pending/ Future	No Acti	ion
Education.						
R#4: B) Lessons learned to be shared publicly.						
	general recruitm minations, comp	-		electronic) meth	ods for	
R#6: A) Lists of	f vacancies shoul	d be published o	n MoE/IARCSC	websites.		
R#6: B) Lists of	applicants shou	ld be published o	on MoE/IARCSC	websites.		
R#6: C) Lists of	shortlisted canc	lidates should be	e published on N	10E/IARCSC webs	ites.	
R#6: D) Recruit	tment results sho	ould be publishe	d on MoE/IARCS	SC websites.		
R#7: MoE, in consultation with NUG leadership, should develop a proposal outlining the steps and measures for restructuring the MoE and reducing the overall size of the Ministry.						
R#8: To ensure guaranteed female participation, a specific percentage of the posts should be allocated to women candidates.						
R#9: Establish a Coordination Working Group among the MoE Curriculum Department, TTCs, and Ministry of Higher Education to better align school curricula, and curriculum of teacher education programs for primary and secondary levels.						
R#10: Reduce the size of the curriculum, based on a systematic review.						
R#11: Conduct a Functional Review TVET's management and program structure.						
R#12: A) To align TTC graduates with local market conditions: Strengthen formal links between TTCs, universities, and local employment markets by establishing a Provincial Teacher Employment Task Force in each Province, by direction of MoE (Kabul).						
				nd MOHE to s in Afghanistan.'	achieve	
-	d duration of tea egree (Diploma).	-	urses to achieve	e an equivalent si	tatus to	

100 %	At least 50%	At least 25%	Work/Study Started	Pending/ Future	No Action	
R#12: D) Extend practical teaching experience in classrooms as a component teaching preparation programs.						
R#12: E) Implement the teacher credentialing system.						
R#12: F) Implement IT solutions for tackling teacher and school staff absenteeism						
	the management ons to expand mo			t Literacy Prograi se quality.	ms, and	
R#14: Develop MOWA.	o flexible adult	literacy progra	ms for women	, in collaboratic	on with	
R#15: Expand p	payment of salar	ies through the u	use of electronic	means.		
R#16: Impleme III.	ent the teacher p	professional deve	elopment initiat	ives, as outlined i	in NESP	
R#17: Digitalize	e the issuing of (2	12 Grade) Diplor	nas			
	R#18: Establish a system with integrity and transparency to conduct placement tests for returnees who have studied in Madrassas in other countries.					
	R#19: Minister and IARCSC should issue public statements: "The lead objective of MoE is to resolve improper appointments of teachers within three years."					
	R#20: A) MoE and IARCSC should jointly establish a verifiable metric of the success rate of appointing teachers on merit.					
R#20: B) This should be shared with education sector stakeholders on an ongoing basis to demonstrate improvements.						
R#21: A) MoE should establish a High Level Oversight Committee to oversee reforms of the education sector.						
R#21: B) The Committee should be composed of MoE leadership, DPs, CSOs, and other stakeholders.						
R#21: C) The High Level Oversight Committee coordinates, monitors, and press the reforms across the Ministry in Kabul.						
R#22: The Minister should actively engage at a Cabinet-level to obtain resources and support to implement education sector reforms.						
R#23: A) MoE should establish 'reform networks' in each province to coordinate, monitor, and press the sector-wide reforms.						
R#23: B) Provincial Reform Networks should be composed of Provincial Education Directors, PED Management, DED Management and DP.						
	E [Office of Pa om MPs with the] should docu	ment any conta	ict and	

100 %	At least 50%	At least 25%	Work/Study Started	Pending/ Future	No Actio	on
R#24: B) MoE [Office of Parliament Affairs] should keep a record of any attempts at illegal interference from MPs.						
	R#24: C) MoE [Office of Parliament Affairs] should collate the records of any attempts at illegal interference from MPs and report these to MEC monthly.					
R#25: Establish	n a general comp	laints handling n	nechanism for tl	ne education sect	tor.	
R#26: Ensure t in place for Mo	-	nt system of acco	ountability (pun	ishment and rew	vards) is	
	e Equity, Integrit			of Conduct for a bility, Trust (MC		
R#27: B) MoE s	should inform all	staff of the ame	nded and revise	d Code of Condu	ct.	
	mended and rev including schools		onduct should t	pe publicly poste	d in all	
R#28: A) Donor-funded contracts, including construction, should be regularly monitored by both DPs and MoE, following the standardized guidelines in the World Bank's Best Practices of Contract Procurement.						
regularly moni	R#28: B) Ministry of Finance-funded contracts, including construction, should be regularly monitored by both MOF and MoE, following the standardized guidelines in the World Bank's Best Practices of Contract Procurement.					
R#29: A) Responsibility for the implementation of all rural construction contracts be moved to the Ministry of Rural Rehabilitation Development.						
R#29: B) Responsibility for the implementation of all construction contracts in cities be moved to the Ministry of Urban Development.						
R#30: A) PEI communities.	R#30: A) PEDs and DEDs organize monthly community dialogues with local communities.					
R#30: B) Participants should be drawn from diverse members of the community (e.g., male and female, varied range of ages, cross section of groups, etc.)						
R#31: A) PEDs should publicly share Provincial budgets and actual expenditures for each Province each year.						
R#31: B) PEDs should publicly share District spending plans and actual expenditures for each District each year.						
R#31: C) PEDs should publicly share individual school spending plans and actual expenditures for each school, at each school site, each year.						
R#32: A) DPs teachers.	should align d	lonor programs	around merito	ocratic appointm	nent of	

100 %	At least 50%	At least 25%	Work/Study Started	Pending/ Future	No Acti	ion
R#32: B) DPs should coordinate donor programs of meritocratic appointment of teachers.						
R#33: DPs shou	R#33: DPs should expand the Capacity Building Activity initiative.					
R#34: Apply lessons learned from CBE to MoE schools.						
· · · · · ·	hould standardi Ils development		istants' (TAs) To	Rs to explicitly fo	ocus on	
R#35: B) Cond skills from thei		sessment to det	ermine if MoE	staff acquired te	echnical	
R#35: C) Shift o	operational resp	onsibilities from	TAs to full time	MoE staff.		
R#36: DPs shou	uld fund MoE to	outsource servic	es where appro	priate.		
R#37: A) DPs s reform structu		E to support the	national anti-c	orruption organiz	zational	
R#37: B) Fund	education sector	r reformers in ea	ch Province.			
R#38: Improve	institutional me	mory among DP	s and within Mo	E.		
R#39: A) Standardize local CSOs and Shura active monitoring and oversight of schools construction.						
R#39: B) 100% of school construction sites should be regularly monitored and overseen by ARTF during the construction phase.						
	R#40: A) MoE should send EMIS enumerators to 20% of schools twice per year (beginning and end of the school session) to verify entries in EMIS.					
R#40: B) Cons year.	R#40: B) Consolidate/collate MoE's EMIS, HRMIS, and Payroll databases within one year.					
R#40: C) Revis process.	e data collectio	n guidelines cov	ering all aspect	s of the data co	llection	
R#40: D) 100% of data collectors should be trained in each area of data collection, documenting, and reporting techniques.						
R#40: E) Within 6 months EMIS data should be accessible to anyone visiting the MoE website.						
R#40: F) An external entity should review MoE data and MoE control systems.						
R#41: A) Increase the number of auditors inside MoE by 10% within two years.						
R#41: B) Stren Audit Departm	-	reporting lines o	f MoE Departm	nents with MoE	Internal	
R#41: C) Stren	gthen relationsh	ip between MoE	Internal Audit D	Department and N	MOF.	

100 %	At least 50%	At least 25%	Work/Study Started	Pending/ Future	No Action	
R#41 :D) Publish 100% of MoE Internal Audit Department's routine reports from June 1, 2018 (please note: This does not include publishing IAD's Incident Reports or case files referred by IAD to AGO)						
R#41: E) Development Partners should provide technical assistance to IAD within one year based on IAD-DP assessment of gaps.						
R#42: A) Estab	lish an Audit Rev	iew Committee	within 3 months	•		
R#42: B) The C other stakehol		ld be composed	of MoE leaders	ship, MoE IAD, D	Ps, and	
	audit reports fr		-	ernal MoE audit i dit-related repor		
				de publishing an aken within MoE.		
R#43: MoE sho	ould develop a st	andardized accre	editation proces	s for private scho	ols.	
R#44: A) Establish an Education Quality Committee within 3 months.						
R#44: B) The Committee should be composed of MoE leadership, MoE M&E Department, DPs, representatives from private education, and other stakeholders.						
R#44: C) The Committee ToR should include reviewing all internal M&E systems and reports, and MoE quality-related reports from external bodies.						
R#44: D) The Committee ToR should also include publishing an annual review of the quality of education in Afghanistan.						
	R#45: MoE should publicly share meta-data on the status of all teacher positions via database, in detail, within 6 months.					
R#46: A) MoE s	should publish it	s Anti-Corruptior	n Strategy by Jur	ne 1, 2018.		
R#47: B) MoE should report progress of Anti-Corruption Strategy implementation Quarterly.						
R#48: MoE should publish all documentation and reports according to the Access to Information Law and provide a mechanism to make data accessible to the public upon request.						
R#49: MoE [Department of Public Relations] should share positive stories and innovations in education related to anti-corruption reforms.						
R#50: A) MoE should disseminate its Anti-Corruption Strategy to all 34 PEDs.						
R#50: B) MoE s	should dissemina	ate its Anti-Corru	ption Strategy t	o all 367 DEDs.		
R#51: MoE sho	ould establish for	mal liaison to AG	60.			

100 %	At least 50%	At least 25%	Work/Study Started	Pending/ Future	No Action	
R#52: MoE should complete a review of all the existing sanctions, disciplinary measures, prosecution options, and other dissuasive mechanisms that are in place in MoE within 6 months.						
R#53: MoE sho	ould study option	is for a market so	olution for textb	ooks within 6 mo	onths.	
R#54: Ministry for each year.	of Finance shou	Ild publicly share	e MoE's budget	and actual expen	ditures	
R#55: MoE should conduct an Anti-Corruption Forum for the 34 MoE Education Directors, media, and education sector stakeholders, emphasizing the fight against corruption in MoE.						
R#56: Empower school shuras to receive, and act on, complaints and grievances from parents and students.						
R#57 : Empower school shuras to conduct monitoring and oversight of Adult Literacy Courses.						
R#58 : Explore role and remit of Student Unions as contributors to monitoring and oversight.						
R#59: Teacher recruitment tests should be changed to include multiple-choice questions and long answer written format.						
R#60: Teacher	appraisals shoul	d be conducted	formally on an a	nnual basis.		



Independent Joint Anti-Corruption Monitoring and Evaluation Committee





