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

Monitoring the Education Sector
Fifth Monitoring Report

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Executive Summary

On the 26th of October 2017, MEC released its "Ministry-wide Vulnerability to Corruption Assessment of the Ministry of Education". Based on findings in this assessment, MEC identified key areas of vulnerability 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 approximately every quarter. MEC's First Monitoring Report was published on the 24th of June 2018, Second Monitoring Report on the 12th of November 2018, and Third Monitoring Report on 12th of March 2019. This current Fifth Monitoring Report is divided into two parts: the first part addresses private schools in the form of a Thematic Focus, and the second part details the status of progress against MEC's original recommendations from the MVCA report.

During this fifth active follow-up monitoring period, MEC visited three provinces: Bamiyan, Daikundi and Ghazni.

In its Provincial visits, MEC conducted semi-structured, in-depth interviews and guided Focus Group Discussions to collect information about the status of recommendations. These discussions involved representatives from relevant Provincial Education Departments (PEDs), school principals, education *Shuras*, Civil Society Organizations and Provincial Council members. In addition, MEC conducted direct observations in schools and classrooms.

Thematic Focus: Private Schools

- Private schools have increased notably over the past 15 years. According to figures released by MoE's in 2019, there are 2,218 active private schools across Afghanistan, with the Private Educational Institutions Department having been established to regulate private schools' affairs.
- The "Private Educational Institutions Regulations" constitutes the legal framework for private schools in Afghanistan. However, as MEC found, these regulations are not strictly applied in regards to conditions and standards and are therefore vulnerable to corruption. The findings of MEC's Active Follow-up team show that a majority of private schools do not comply with standards defined in the regulations. Vulnerabilities to corruption include, the potential for MOE private school monitors to collude with private schools in circumventing regulations, and also the process of the granting of certificates to private schools by Private Educational Institutions Department is susceptible to corruption.
- MEC also found that although private schools are liable to pay fees for building and equipment insurance (as determined by insurance company site visits) as a part of the official certification process, in actual practice insurance companies do not always visit the private schools, allowing schools to avoid paying insurance fees. In addition, insurance companies lack capacity in monitoring schools. Further, MEC found that MoE has been forcing private schools to deal with a specific MoE chosen insurance company.

- ## **Status of Recommendations during the Fifth Follow-up Period**

During the fifth follow-up monitoring period, 9 recommendations have been fully implemented by MoE and other relevant entities, including the Independent Administrative Reform and Civil Service Commission (IARCSC), Ministry of Rural Rehabilitation and Development (MRRD) and other Development Partners. During previous periods, 28 recommendations were fully implemented since the main MVCA report was released. In total, out of 113, 37 recommendations have been implemented by abovementioned organizations.

I. **Recommendations fully implemented**

During the previous monitoring period, 16 recommendations were fully implemented. In total, 37 recommendations out of 113 have been fully implemented since the original MoE MVCA was released.

These include:

- The development and release of a comprehensive Reform Plan and Anti-Corruption Plan;
- Improvement in public awareness about MoE's work in reducing vulnerabilities to corruption;
- A 10 percent increase in the number of internal auditors in MoE's Internal Audit Department;
- Increased note-taking and documentation of active School Administrative Councils' meetings;
- The release of a "Community-based Policy Paper", establishing a mechanism for addressing complaints;
- Increased participation of Civil Society Organizations in electronic monitoring of teacher recruitment.

II. **Recommendations 50 per cent implemented**

Out of the 113 recommendations, 33 have been achieved to 50 percent (28 during the fifth monitoring period). These include:

- A review and revision of the general education curriculum;
- Development of a pilot "Teacher Certification and Accreditation of Teacher Training Institutions in Afghanistan" (TCAP) program;
- Review of the Terms of Reference for school administrative councils;
- Establishment of a Working Group to align the general education curriculum with what is taught in Teacher Training Colleges (TTCs);
- Expansion of practical teaching in TTCs;
- Expansion of literacy programs for women;
- Increased digitization of education certification;
- Establishment of a High Level Oversight Committee;
- Expansion of capacity-building programs for teachers and other MoE staff;
- MoE reporting on the implementation of their Anti-Corruption and Reform plans;

III. **Recommendations 25 per cent implemented**

According to MEC's findings, out of 113 recommendations, 18 recommendations have been implemented by 25 percent. These include:

- An increase in the use of electronic payments for teachers' salaries – at the time of MEC's original MoE MVCA, 53 per cent of salaries were paid through electronic payments and this has now increased to 67 percent, with the remaining 33 percent receiving payments through Mpaisa or mobile bank teams;

IV. Recommendations – 'Work has begun'

During this fifth monitoring period, 18 recommendations come under the 'Work has begun' category. These include:

- Conducting Anti-Corruption Forums across the country, although these have, to some extent, been planned, they have not been implemented outside of Kabul;
- Establishment of a network for monitoring reforms at the Provincial level;
- Use of new methods to track teachers' attendance;
- Strengthening reporting to the Internal Audit Department.

V. Recommendations classified as Pending and Not addressed

After five monitoring periods, out of 113 recommendations, 8 are still pending. Pending means that these recommendations either depend on the implementation of other recommendations, or are related to other entities or actions beyond the scope or control of MoE. For example, MEC recommended that MoE begin the accreditation process for private schools, however MoE's perspective is that such accreditation necessitates consultation with the private sector, State agencies, and parents, and therefore requires more time.
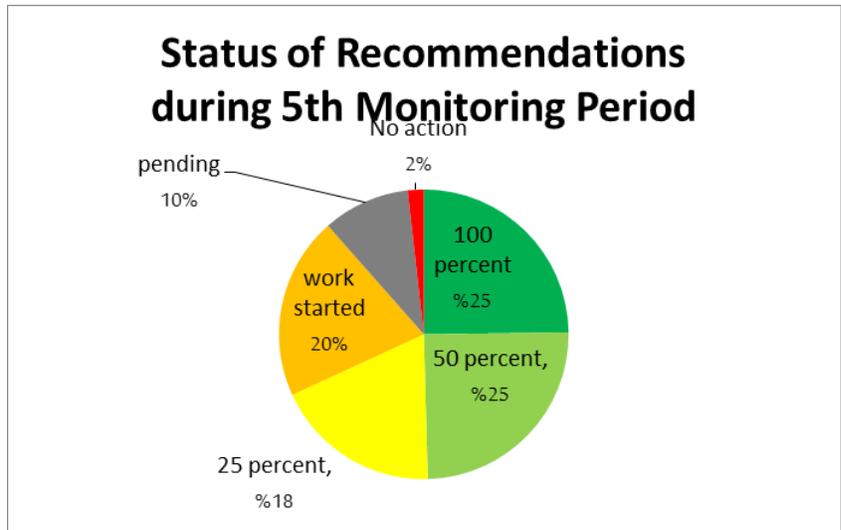
In addition to the 11 recommendations classified as "pending", two recommendations have not yet been addressed by MoE.

VI. Other issues addressed in the fifth quarter monitoring period

During this fifth monitoring period, MEC's team visited PEDs in Bamyan, Daikundi and Ghazni Provinces. Stakeholders consulted in these three provinces reported the following as their most serious challenges: A lack of an adequate organizational structure (*Tashkiel*); a lack of teachers and lack of professional teachers; lack of schools for girls; a lack of school buildings, facilities and material resources (including textbooks, lab equipment and furniture – e.g., chairs); lack of a budget to train school *Shuras*; lack of a budget for capacity-building programs for teachers and Provincial and District MoE staff; illegal interference of MPs and power brokers in the deployment of teachers; inappropriate mobilization of resources by donors. It should be noted that these challenges have also been reported in other Provinces MEC has visited during previous monitoring periods. It is necessary that MoE leadership make greater efforts to address these challenges.

Overall status of recommendations during this third monitoring period is outlined as follows:

Recommendation Status	Numbers
100%	37
At least 50 %	33
At least 25 %	18
Started	17
Pending	8
No Action	0
Total	113

Status of Recommendations during 5th Monitoring Period

pending 10%
No action 2%
100 percent %25
work started 20%
50 percent, %25
25 percent, %18

Taken together, MEC's findings show that there has not been significant progress against the recommendations during this monitoring period. MEC requests MoE and other relevant Ministries, Government entities and development partners to accelerate anti-corruption reforms through increasing the speed and depth of implementation of MEC's recommendations in future.

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.

Further, MoE's structure was reviewed resulting in several structural changes which include:

- The responsibility for school construction was handed over from MoE to MRRD and Ministry of Urban Development (MUDL).
- The Deputy Directorate of Technical, Vocational, and Educational Training (TVET) was removed from MoE to become a separate entity, the TVET Authority (TVETA).
- Recruitment was one of the aspects of MOE deemed most vulnerable to corruption and so responsibility for recruitment of teachers was hand over to the IARCSC after a Presidential Decree was issued.

In connection with the structural changes and shifting responsibilities outlined above, some of MEC's recommendations have been shifted from MoE to other Government entities. Accordingly, MEC now monitors and follows up on recommendations with IARCSC, MoE, Ministry of Higher Education (MoHE), MUDL, MRRD, TVETA and other entities when needed.

MEC monitors implementation of recommendations at MoE and releases a follow-up report, roughly, every 4 months. So far, MEC has released four follow-up Monitoring Reports on implementation of its recommendations. MEC's First Monitoring Report was released on the 24th of June 2018, the Second Monitoring Report on the 12th of November 2018, and the Third Monitoring Report on the 12th of March 2019. This fourth Monitoring Report released on 27th of July 2019. This fifth Monitoring Report covers the period between April-July 2019. MEC requested MoE to share data related to implementation of recommendations by the 30th July, 2019 and MoE fulfilled this request with one month's delay, on 24th of August 2019.
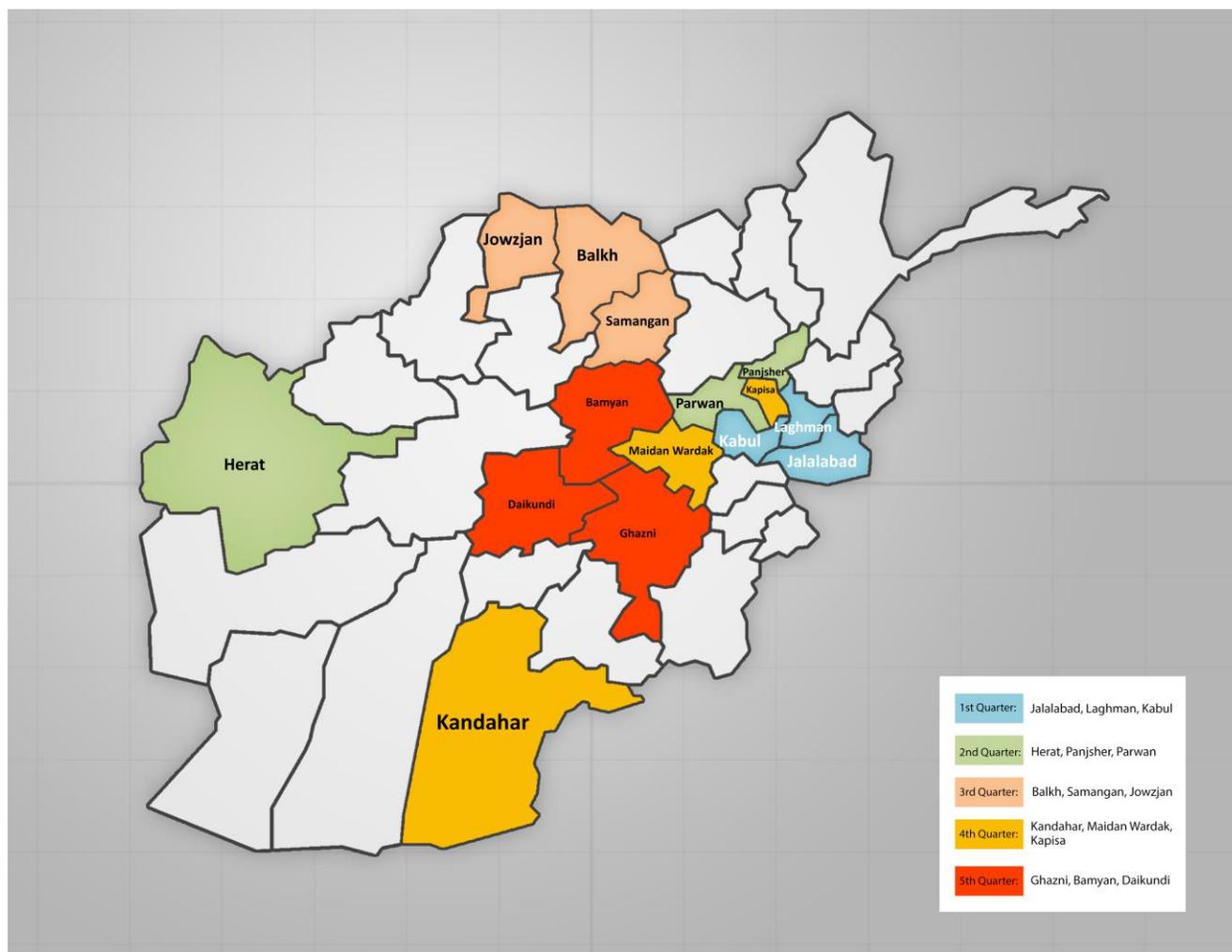
As stated above, in order to produce its follow-up reports, MEC consults with multiple stakeholders including Government entities – such as IARCSC, MoE, MoHE, MUDL and MRRD, donors, multilateral organizations, Civil Society Organizations, and other Development Partners. In addition, in order to verify claims and collect data, MEC's team conducts Provincial field visits to ascertain the 'reality on the ground' at sub-national levels.

During Provincial visits, MEC's team meets with PED and DED authorities, TTC faculty and students, representatives of other Government entities (as noted above), members of Provincial Councils, and representatives of Civil Society Organizations, as well as visiting a sample of schools to observe and consult with school community members. To inform this 5th Quarter Monitoring Report, MEC's team visited PEDs in Bamiyan, Daikundi and Ghazni.

This report is divided into two parts: The first is this quarter's Thematic Focus on 'private schools'; the second part of this Report details progress by MoE and other relevant entities towards implementation of the recommendations. In addition, there are several Annexes at the end of the Report.

MEC's data verification process is not focused exclusively on Kabul and includes trips to three Provinces during each follow-up period. Provincial visits have two goals: (1) to verify claims and check the accuracy of reported data, and (2) to gain a better understanding of the education system 'on the ground' at sub-national levels, specifically in relation to anti-corruption.

During five periods, MEC's Active Follow-up team visited the following provinces;

Acknowledgement

MEC thanks all organizations and individuals who helped in the development of this Report.

Methodology

MEC is actively monitoring and evaluating the anti-corruption efforts, reforms and implementation of its recommendations in the education sector. MEC, in its active follow-up process, engages with

education sector stakeholders, not only relying solely on updates from MoE focal points, but also collecting evidence to support and verify focal points' claims, updates, and other responses.

The MEC Active Follow-Up Team conducts provincial-level field visits to monitor reform and anti-corruption progress 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 implementation status of recommendations. These discussions involve representatives from relevant PEDs, school principals, education *Shuras*, CSOs and Provincial Council members. In addition, MEC conducts direct observations in schools and classrooms.

Thematic Focus: Private Schools

Introduction

The Afghan private schooling sector has developed considerably over the past 15 years. According to figures released by MoE in 2019, there are 2,218 active private schools in Afghanistan currently. MoE has established a Private Educational Institutions Department to regulate private schools' affairs. This department is authorized to issue certificates for private schools and to monitor them. It was established on 2010 with 75 employees. In 2016, the department was integrated into the MoE *tashkil*. Currently, it has only 17 employees and works mainly on the policy level and in issuing certificates for private schools. To inform this thematic focus section of the report, MEC investigated private schools by conducting interviews with stakeholders from a sample of private schools in Bamiyan, Daikundi and Ghazni provinces.

Private Schools Legal Framework in Afghanistan

Private Educational Institutions Regulation (PEIR) (2010) makes the legal framework for private schools in Afghanistan. With four chapters, the regulation explains how a private school should be established, conditions, their ToRs (rights and tasks of teachers and students).

In order to register a private school, first of all, the applicant should write a letter of request to MoE; after approval, the letter will be sent to PEDs; and then PEDs will assess the conditions by assigning a delegation. If the proposed private school complies with all conditions, MoE will issue a certificate for the applicant. It should also be noted that for private schools, a certificate from MoF (previously AISA) should be obtained; and if the private school is a kindergarten, a separate certificate should be obtained from MoLSA. Moreover applicants are also obliged to obtain insurance letters.

Conditions for Establishing a Private School

The conditions for establishing a private school are explained in article 6 of PEIR. Also, MoE has developed a guideline on the criteria for establishing a private school in the same article 6. The criteria include:

- Having an investment permit
- Provision of documents, *tashkil*, educational and financial plans, introducing financial resources and other procedures to MoE
- Payment of 50,000 AFN by an Afghan born or naturalized citizen resident in or outside the country and 25,000 AFN by an Afghan born or naturalized citizen resident in or outside the country as establishment of royalties to a given State bank account;
- Payment of 10% of annual revenue as a bank guarantee an Afghan born or naturalized citizen resident in or outside the country for a non-profit school and payment of 25% of annual revenue by a legal or natural person person resident within or outside the country for a for-profit school;
- Having an appropriate building including standard classrooms
- Books and materials, as required;
- Equipment including chairs, desks, boards and other accessories

- Potable water
- First aid, fire extinguishers and other maintenance tools;
- Sport facilities (sport field);
- There should not be a state school within 500 meters distance, nor another private school within 200 meters distance
- Professional teachers with degrees higher than 12th grade
- Non-profit schools are exempted from needing investment certificates and paying royalties and bank guarantees;
- Clean toilets (one toilet for every 50 students);
- Having a *tashkil*
- Having an organized annual plan and budget including revenues and expenses and sharing these with MoE
- Having teachers and admin employees as per law;
- Paying income tax as per law;
- Collecting fees based on regulations;
- Recruiting teachers and other employees as per regulations and Labor Law;
- Having working fire extinguishers.

Private Educational Institutions Regulations are not being applied

During its investigations, MEC found that PEIR is not being consistently applied according to the abovementioned strict standards and criteria, as private schools are not complying with all standards. As an example, the required distances between a new private school and existing schools are not being followed - there are many private schools in Kabul that are less than 200 meters apart. MEC found a case in which two schools opened a file with the courts on this matter. Other examples of breaches of regulations include private schools not having an appropriate building, library, computer, lab, potable water, sports ground, an appropriate process of collecting fees, professional teachers, fire extinguishers. MEC has found this to be the case with some private schools in Kabul city and in the provinces, the lack of adherence to regulations is even worse.

MEC also found that the MoE's Private Schooling Monitoring Delegation has allowed unacceptable compromises in regards to private schools' adherence to regulations and has in some cases colluded with private school authorities. Private schools interviewed in Kabul, without an exception, expressed that they collude with MoE since they cannot meet the previously stated criteria as defined in the regulations. In addition, the issuance of certificates for private schools is vulnerable to corruption as all schools consulted in MEC's evaluation reported the payment of bribes to get their certificates renewed. These private schools rarely reported to MEC that they resisted the payment of bribes - this is not exclusive to the certification process, as most private schools do not meet all the required regulatory criteria and standards and therefore have needed to pay bribes to acquire and renew certification.

IN 2019, MoE began the process of revising PEIR. Based on the latest draft MEC obtained of the proposed changes to PEIR, many of the aforementioned criteria for private schools have beeb removed, but this has not yet been approved and so the 2010 version of PEIR was still being applied as this report was prepared.

In addition, certificate renewal and school promotion processes can be seen as vulnerable to corruption.

Insurance

Private schools have to pay a fee to insure their equipment and buildings in order to gain MoE certification.

As part of this process, the relevant insurance company should directly observe private schools' buildings and equipment, and determine the appropriate insurance fees based on the value of the buildings and equipment. In practice, this is not generally happening, as schools are self-reporting to the insurance company. In some cases, in order to escape paying the fully applicable fees, private schools provide photos and reports of different buildings/equipment than they actually have to the insurance company.

MEC observed a case in which a private school with a permanent building whose real insurance fee should be over 200,000 AFN obtained the certificate by only paying 15,000 AFN. Also, private schools consulted revealed that insurance fees are determined not by real monitoring, but by the schools' own reports, collusion and bargaining. From private schools' perspective, insurance fees are an illegal income resource.

On the one hand, private schools are able to avoid paying genuine insurance fees, and on the other, the insurance company has no capacity to actually monitor schools. A related issue is that MoE's Private Schools Department (PSD) recommends only one specific insurance company and does not accept others. From the private schools' perspective, this is evidence of collusion between the Private School Department and their chosen insurance company.

Private schools interviewed by MEC mainly stated that they paid insurance fees to one specific company. In some cases, the amount of the insurance fees was determined by PSD employees.

Private schools MEC consulted confessed that they are also part of the problem as they have been actively seeking to avoid paying the genuine insurance fees. Partly this is due to a lack of confidence in the potential provision of insurance, as representatives from private schools MEC consulted expressed their beliefs that if their buildings burn down or are otherwise damaged of destroyed, the insurance company will not actually provide compensation.

Private Schools Monitoring and Evaluation

Monitoring and evaluation of private schools is weak. PSD lacks the capacity to monitor and evaluate private schools in the country. PEDs, particularly in big cities where the number of schools is high, cannot effectively monitor private schools. From the perspective of private schools consulted, MoE has no plans to improve the monitoring and support of private schools. Monitoring and evaluation of private schools faces the following challenges:

- Monitoring private schools is reduced to completing the checklist without qualitative monitoring.

- Private schools believe that MoE does not welcome their creative and constructive ideas; hence, it does not accept reporting on other relevant issues outside of the official checklist.

- As monitoring and evaluation of private schools is more a formality, than substantive process, , some schools were visited only once a year.

- The PSD admits to their being challenges in supervising private schools and PSD representatives confessed to MEC that private schools' monitoring process is an opportunity for collusion and corruption.

- Some private schools believe that the MoE supervision methodology for state schools should not be applied to private schools; for example, the statistics form in which MoE collects data from state schools is not fully relevant to private schools, because private schools' buildings are typically rented and they may change year-to-year.

Contradiction in Fee Collection

Article 1, in the Private Educational Institutions Regulation (PEIR) expressly states "a competent commission will be established to fix grades of private schools from quality and quantity perspective in delivering educational services and to determine admission fees and enrolment fees. As for private educational institutions, the fees are fixed based on terms of reference." Private schools consulted by MEC expressed that they were not aware of any MoE terms of reference or legal document about fees. From the perspective of private schools consulted, the free market should be what determines their fees. MoE leadership admits that they cannot do anything in terms of actually fixing fees because the government of Afghanistan recognizes the free market, and therefore fees should be determined by free market. However, MoE legal documents point out the existence of a commission and "collection of fees based on the ToR". Therefore, there is an obvious contradiction here. MoE is required to communicate and clarify this with the PSD and its employees and then with private schools.

Tax Evasion in Private Schools

According to PEIR article 48, private schools are obligated to report their financial status, revenues on given time and to pay relevant tax. Non-profit private schools are exempted from such a tax. Private schools are tasked to provide a copy of their budget plan to MoE. Also, they are tasked to provide MoF with completed copies of tax statements and financial reports. Private schools are supposed ro pay 2% of their gross revenue and 20% of their gross payments including of teachers, building rents and fees as taxes.

There are many problems in tax payments with private schools. MoF does not audit private schools as per tax payment. MoF counts tax payments of private schools based on schools self-reports. In order to evade tax, private schools report their income and building rents as lower than reality. The same is true for the number of students and their fees. Since there is no private school database, such tax evasion is difficult to find and document.

The same is typically the case for teachers' salaries. In some cases, MoF encourages collusion on tax issues with private schools' authorities – e.g. MoF employees reduce the amount of particular private school's tax as a result of being bribed by said school.

Another issue relates to bank guarantees. Private schools pay an amount to a state bank as a guarantee to become eligible to receive a certificate. Also, at the end of every year, 10% of gross profits from schools will be added (blocked). From private schools' point of view, this is an extra

burden on them. Some private schools, particularly those in a poor financial situation, suggested that paying this 10% is an undue burden and the money should remain with the private schools.

Graduation Certificate Processing Issued by Private Schools

Graduation certificates issued by private schools is a lengthy process and vulnerable to corruption. Private schools consulted by MEC claimed that graduation certificates that they issue are not processed with Kabul PED (as the majority of private schools consulted for this report are located in Kabul). They consider the process challenging, lengthy and vulnerable to corruption.

Diversity of Curriculum in Private Schools

PEIR, Article 8 states that Private Schools':

1. Founders are obliged to organize their curriculum in accordance with the MoE curriculum and education plan.
2. Founders are tasked to distribute and teach established textbooks to students.
3. Founders are tasked to teach Pashto and Dari from grade 1 in compliance with the MoE curriculum and education plan.

Article 9 (a) states:

1. A school can teach extracurricular classes such as computers, science, math, foreign and local languages and lab after MoE acceptance is obtained.

Likewise, article 18 states that a school can purchase MoE books and aid materials for a given price and provide these to their students for the same price. If the school cannot obtain books and aid materials, the founder is tasked to print the books in state or private printing centers and provide them to students after MoE approval is given.

MEC's findings show that private schools use their own curriculum which in some cases contradicts with MoE's established curriculum. In some private schools, religious subjects are taught in place of secular ones, for example, in some schools they have even developed an Islamic version of natural sciences, chemistry, physics and math. However, in other private schools, there are more secular teachings.

In addition, private schools do not use some textbooks developed by MoE as they have found significant errors and have developed their own books accordingly, e.g. with Dari and religious textbooks. Also, they believe that some of MoE textbooks are not developed to meet current needs and would have negative consequences for children.

Difference in Definition of Non-profit Schools

According to article 19 of PEIR, non-profit school cannot ask a new student for admission fees. If a student's financial resources cannot cover educational and admin expenses, the school should officially refer the case to the Commission as mentioned in article 1.

MEC found, however, that non-profit private schools do not accept such a definition. From their perspective, non-profit private schools can collect fees, but the schools' founders/managers cannot

use such fees for their own benefit, but should invest them back into the school. MoE, however, believes non-profit means no fees - free school; hence, non-profit private schools cannot ask for fees. It follows that the non-profit private schools which collects fees face challenges with MoE in their official communication (particularly with regards to document processing with PED and PSD).

Other Findings

- There are private schools which teach at the secondary level, but with only an elementary education certificate. Also, some schools with only secondary level certificates have been found to be teaching high school classes. This indicates poor management by MoE and a related lack of control over private schools.

- There are private schools which have not clarified their taxes with MoF, which indicates corruption.

- In some private schools, teachers are paid for 12 months while some others pay only for 9 months. There is also a notable difference in the salary ranges of private schools.

- In some schools, teachers are not professional – e.g. recruitment based on nepotism. Also, Labor Law terms are not usually complied with in private schools.

- In private schools, there is a common perception that they are business oriented rather than education oriented.

- A majority of private schools have no defined rules/regulations for HR, finance, and codes of conduct. However, there are some exemplary schools which do have such policies and these should be recognized accordingly.

Private Schools Chart by Province

No	Province	Elementary	Secondary	High school	Total
1	Uruzgan	0	0	0	0
2	Badghis	0	2	1	3
3	Bamyan	8	1	4	13
4	Badakhshan	2	5	6	13
5	Baghlan	15	4	8	27
6	Balkh	53	27	31	111
7	Parwan	3	1	7	11
8	Paktika	4	3	1	8
9	Paktia	17	8	13	38
10	Panjsher	1	0	0	1
11	Takhar	3	5	8	16
12	Jowzjan	2	4	5	11

13	Khost	49	45	33	127
14	Daikundi	1	2	2	5
15	Zabul	1	1	0	2
16	Sar-e-Pul	0	1	2	3
17	Samangan	2	1	2	5
18	Kabul City	403	278	363	1044
19	Ghazni	32	21	20	73
20	Ghor	0	0	1	1
21	Faryab	6	1	3	10
22	Farah	5	6	6	17
23	Kapisa	11	2	0	13
24	Kandahar	24	13	13	50
25	Kunduz	20	3	7	30
26	Kunar	8	5	1	14
27	Laghman	8	4	2	14
28	Logar	8	3	10	21
29	Nangarhar	132	23	30	185
30	Nooristan	0	0	0	0
31	Nimroz	7	7	5	19
32	Herat	76	38	84	198
33	Helmand	16	3	4	23
34	Wardak	3	1	1	5
35	Kabul Province	65	23	19	107
/	**Total**	**985**	**541**	**692**	**2218**

Status of Recommendations During Fifth Period of Monitoring

Findings and Analysis

Recommendations which are 100 per cent Achieved

During this fifth follow-up period, 9 recommendations were considered by MEC to be fully implemented. In previous periods of MEC's active follow-up monitoring, 28 additional recommendations were considered as fully implemented (by IARCSC, MoRRD, MUDL, MoF and Development Partners), bringing the total of fully implemented MEC recommendations to 37, detailed as follows:

* **R#1b:** MEC recommended MoE that civil society organizations actively monitor recruitment process as a pilot. As recruitment process is transferred to IARCSC, this recommendation goes to IARCSC. IARCSC says that they provide the chance for CSOs to monitor the recruitment process as applicable. For instance, CSOs monitored application form distribution process.

* IARCSC says that CSOs are not present to monitor their daily activities continuously and there is no such a capacity for them. To build trust and secure transparency of recruitment process, representatives of 12 CSOs visited written test and interviews of IARCSC Tests Center. The Tests Center gives exam for civil servant positions in a computer based way, which is active in 7 zones of the country. Based on IARCSC report, six technologically advanced Tests Centers in provinces of Kandahar, Herat, Khost, Nangarhar, Bamyan and Balkh and one more in Civil Service Institute at Kabul. Meanwhile, the first computerized test was given for grade 3 and 4 positions. The purpose for establishing new test centers is to standardize competitive tests and eliminate human intervention and secure transparency in recruitment process for public service agencies. Computerized Test Centers are connected to a single communication system in Kabul. Test takers in the center of provinces receive their usernames and passwords through Kabul Tests Center few minutes before the test starts. As soon as the test starts in center of provinces, the test questions will be shared with test givers by Kabul HQ. Duration of test in provinces is observed by a control room located in Kabul. Participants will immediately receive their results after the test. IARCSC plans to expand electrocnic test centers in 14 provinces of the country.

* MEC has notified that CSOs have monitored electronic test taking at IARCSC at some occasions. This is IARCSC's claim that there is no limitation or legal and organizational hindrance for CSOs to observe the process.

* **R#1c:** The pilot for CSOs to monitor recruitment process, as indicated in R#1b, should be in accordance with agreed standards at IARCSC and umbrella organizations considering gender equality and etc. As recruitment process is transferred to IARCSC, this recommendation goes to IARCSC. IARCSC says that they provide the chance for CSOs to monitor the recruitment process as applicable. For instance, CSOs monitored application form distribution process.

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Center gives exam for civil servant positions in a computer based way, which is active in 7 zones of the country. Based on IARCSC report, six technologically advanced Tests Centers in provinces of Kandahar, Herat, Khost, Nangarhar, Bamyan and Balkh and one more in Civil Service Institute at Kabul. Meanwhile, the first computerized test was given for grade 3 and 4 positions. The purpose for establishing new test centers is to standardize competitive tests and eliminate human intervention and secure transparency in recruitment process for public service agencies. Computerized Test Centers are connected to a single communication system in Kabul. Test takers in the center of provinces receive their usernames and passwords through Kabul Tests Center few minutes before the test starts. As soon as the test starts in center of provinces, the test questions will be shared with test givers by Kabul HQ. Duration of test in provinces is observed by a control room located in Kabul. Participants will immediately receive their results after the test. IARCSC plans to expand electrocnic test centers in 14 provinces of the country.

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R#3f: MEC recommended MoE to involve community members and representatives of CDC and CSOs in active monitoring of construction. Now, construction of schools through Citizen Charter Program is monitored by CDCs (based on MRRD, there are 36,000 CDCs all around the country). MRRD construct and monitor schools in rural areas through Citizen Charter. In addition, other local mechanisms such as active CDCs and School Administrative Shuras monitor schools construction. MEC's active Follow-up team, during fifth period in its provincial trips, noted that active SASs monitored construction of schools by Citizen Charter Program.

* R#4b: Lessons learned from MoE's analysis about "Community-based Education Policy" should be released publicly. MoE already shared lessons learned from "Community-based Education Policy" in a workshop and a series of meetings with "Community-based Education Working Group" alond with development partners. Recently, analysis about "Community-based Education Policy", conducted by KonTerra Group, is released on MoE's website.

- **R#11:** MEC recommended TVET-A to conduct an organizational review about its management and structure. Separating TVET from MoE's body was a recommendation of MEC, which was implemented during first follow up period. Organizational review for TVET-A will be done by World Bank. TVET-A reported that Organizational Review report, conducted by contract consultants led by WB, is prepared. TEVT-A works on a 3-year implementation plan. Also, new tashkil for TVET-A is based on Organizational Review report and will be approved by IARCSC.

• **R#24c:** MEC recommended MoE {Parliamentary Affairs Office} to collect documents related to any illegal intervention of MPs and then report them in monthly basis. MoE reported MEC that Parliamentary Affairs Office has registered 2,463 requests from MPs between beginning of 1398 to Asad 1398 {5 months}. MEC requests MoE to provide evidence for this claim.

• **R25:** establish a complain addressing mechanism. A mechanism has been introduced as for systematic management of complains related to recruitment by IARCSC Complains Addressing Mechanism, which will be applicable to all aspects of civil service in Afghanistan including MoE. Noteworthy, complains addressing mechanism introduced by MEC to MoE does not only narrow

down to recruitment and appoinments, while MoE is required to have a complain addressing mechanism with such expansive tashkil (70% of civil service employees).

- MoE established a mobile complains addressing mechanism during fifth follow up period. MEC verifies establishment of this mobile mechanism, as the focal point shared his phone contact through Facebook with audiences. Also, MoE established Complains Addressing Unit within HR, which is one of the most crowded departments of the ministry. Meanwhile, MoE uses the following mechanisms to address complains:

  - 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 complains 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[1].
  - Receiving complaints through Facebook and other forms of social media.
  - Facilitating access to MoE leadership for MoE personnel.

- **R#42a:** about establishment of High Audit Committee, MoE reported that this committee is established through letter 276, dated 8 May 2019 and all MoE deputies, directorates and other agencies were formally informed. The members of this committee are made of:
  - MoE Minister as the head of Committee;
  - Literacy Deputy as member of Committee;
  - Educational Supervision General Director, as member of Committee;
  - Admin and Finance Director as member of Committee and financial experts;
  - Minister's Office Director as member and head of committee when Minister is absent
- High Audit Committee's ToR is finalized and approved by MoE Acting Minister. MEC requested consecutively to allow it observe the meetings of High Audit Committee but it has not happened yet.
- **R#42a:** MEC recommended MoE to establish High Audit Committee (R#42a) and the members should be made of MoE leadership, MoE Internal Audit Department, development partners and others.
  - MoE Minister as the head of Committee;
  - Literacy Deputy as member of Committee;
  - Educational Supervision General Director, as member of Committee;
  - Admin and Finance Director as member of Committee and financial experts;
  - Minister's Office Director as member and head of committee when Minister is absent

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[1] MoE has plans to create a Call Center to address complaints; Afghanistan Telecommunications Regulatory Authority has promised to assist in this regard.

All 28 recommendations fully implemented during last four periods are as following:

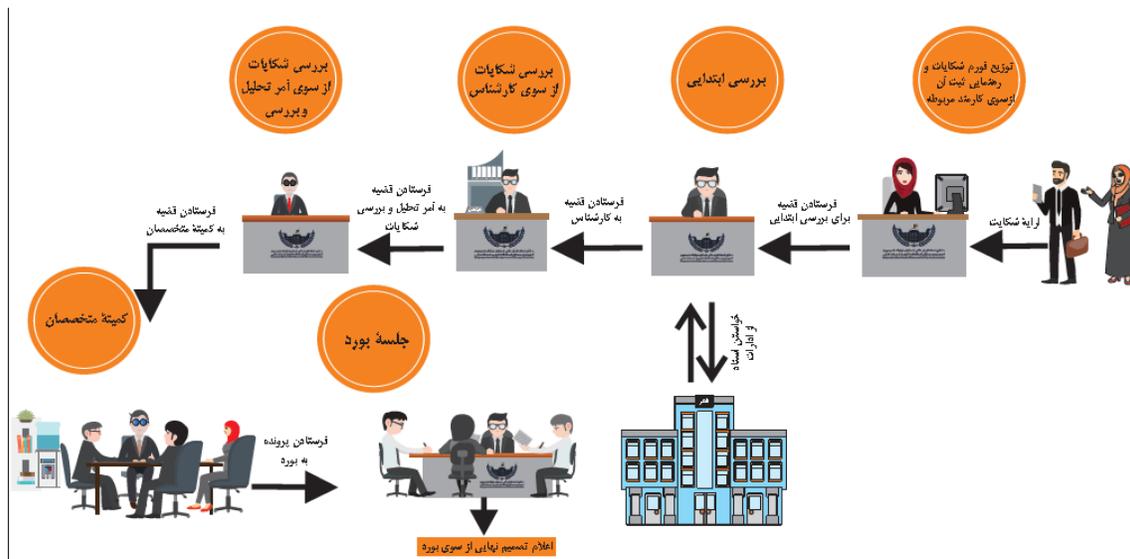| 1	Recommendations.	Status
2	R#1a: contribute CSOs and CDCs to actively monitor recruitment process of teachers in their respective provinces.	
3	R#2c: conduct meetings with School Administrative Shuras and should be formally noted and documented.	
4	R#3c: sign contract with local people to use labor work in construction of schools.	
5	R#4: A) MoE should revise the Community-Based Education policy.	Fully Implemented
	R5: use of electronic recruitment mechanisms in recruitment process is expanded comparing to current status.	
6	R#6: A) Lists of vacancies should be published on MoE/IARCSC websites.	Fully Implemented
7	R#6: B) Lists of applicants should be published on MoE/IARCSC website.	Fully Implemented
8	R#6: C) Lists of shortlisted candidates should be published on MoE/IARCSC websites.	Fully Implemented
9	R#6: D) Recruitment results should be published on MoE/IARCSC websites.	Fully Implemented
10	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
11	R#8: To ensure guaranteed female participation, a specific percentage of the posts should be allocated to women candidates.	Fully Implemented
	R#12a: to adjust Teachers Training Colleges graduates with market conditions: coordination among Teachers Training Colleges, universities and local market instructed by MoE.	
12	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
	R20a: MoE and IARCSC should establish and implement a metric system to be verified to measure successful recruitment of teachers in merit ways.	
	R#20b: metric system information should be shared to measure progress with education sector stakeholders in a continuous manner.	
13	R#22: The Minister should actively engage at a Cabinet-level to obtain resources and support to implement education sector reforms.	Fully Implemented
14	R#27: A) 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
15	R#29: A) Responsibility for the implementation of all rural construction contracts be moved to the Ministry of Rural Rehabilitation Development.	Fully Implemented

16	R#29: B) Responsibility for the implementation of all construction contracts in cities be moved to the Ministry of Urban Development.	Fully Implemented
	R#34: lessons learned from Community-based Education should be applied in MoE schools.	
	R#36: international development partners should fund MoE to outsource some of its services to other companies as needed.	
17	R#40: C) Revise data collection guidelines covering all aspects of the data collection process.	Fully Implemented
18	R#40: E) Within 6 months EMIS data should be accessible to anyone visiting the MoE website.	Fully Implemented
19	R#44: A) Establish an Education Quality Committee within 3 months.	Fully Implemented
20	R#46a: MoE should release its anti-corruption plan by beginning of Jowza 1397.	Fully Implemented
	R49 MoE (PR Department) should post success stories of MoE on its website.	

Recommendations Which Are at Least 50 per cent Implemented

Out of 113 recommendations for MoE, 32 have been implemented by 50 per cent. Details of these recommendations are as follows:

- **R#1f:** IARCSC's complaints handling mechanism for the education sector should let local civil society organizations (CSOs, councils) engage in monitoring recruitment process. IARCSC has a Complaints Handling Board to provide civi society opportunities to support the education sector. If an applicant or CSO has a complaint, s/he can bring up the case with the Board. The process for addressing complaints is depicted in IARCSC's Annual Performance Report as following:
  - IARCSC welcomes monitoring by Civil Society Organizations, but since addressing complaints is to

ساده‌سازی پروسه‌های اجرایی رسیدگی به شکایات

- be done in a daily basis, IARCSC believes that CSOs cannot monitor the work every day. IARCSC has also suggested that national CSOs do not have the capacity to monitor their daily activities transparently and professionally. There are also questions as to whether CSOs will be willing to carry out such a task. CSOs have monitored performance of IARCSC in some cases, particularly the teachers recruitment process. IARCSC received and addressed 9,110 complaints during 1397.

- **R#3a:** This recommendation relates to building schools with locally available materials. MEC recommended that MoE ensure school construction used locally available materials. As mentioned previously, responsibility for school construction was shifted from MoE to MUDL and MRRD following a Presidential Decree. Currently, MRRD is tasked with school construction in rural areas of the country and MUDL in urban areas. MRRD and MUDL agreed that they would use locally available materials and consider that as their priority. Given the shift in responsibility, MoE has not constructed any schools in 1398, however, repair and maintenance of existing schools is still MoE's responsibility. School construction projects are currently funded by EQRA and implemented by MRRD and MUDL, with technical support from the NGO Danish Assistance to Afghan Rehabilitation and Technical Training (DAARTT).

- During this fifth monitoring period, MEC's team spoke with PEDs in Bamyan, Daikundi and Ghazni (Jaghuri District) and verified the use of locally available materials by MUDL in school construction. It has been reported that local labor and locally available materials are used in the schools being constructed by MRRD, and only when necessary, are materials that are not available locally brought in from outside.

- **R#3b:** MEC originally recommended 'Build schools using relevant aspects of indigenous design, adhering to MoE standards and universal design principles'. MoE's Infrastructure Service Department (ISD) reported during the 1st period of monitoring that they are using 'standard designs,' which are approved by the World Bank, and have been discussed with MRRD and MUDL. Also, MRRD reported that they had developed a 'unified design' for building schools in rural areas which was shared with a third-party for their feedback. During this fifth period of monitoring, according to an agreement between MRRD, World Bank and MoE, the NGO DAARTT has been commissioned to develop new school designs which utilize cost-effective materials. MoE's technical team and MRRD, in cooperation with DAARTT, completed 31 different designs for schools which utilize local materials and address safety concerns related to earthquakes and flooding. MoE reported that based on these plans, 2,700 school construction projects would be completed by MRRD within two years.

- **R#10:** MEC's MoE MVCA indicated that the current curriculum was too large and complex and the teaching hours were 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 (although not finalized) 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*.

- **R12f:** MoE has reported that although a teacher accreditation system (TCAP –Teacher Certification and Accreditation Project) has been developed with the support of Canada, there is no budget to implement this beyond the pilot phase. The system was piloted in Teacher Training Colleges (TTCs) in Bamyan, Kabul, and Nangarhar. At present, accreditation of teachers is still pending due to the lack of budget; MoE is exploring solutions to implement this system.

- **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 shift pre-service teacher education from TTCs to universities. MoE and MoHE have prepared the list of teachers who need to improve their education. Promotion or retention of teachers is not finalized yet. Both ministries discussed the subject in different meetings and ideas were developed, but Teachers Training Colleges Department has sent an alternative idea to the President to pave the ground for teachers to to further their education in bachelor degree. According to the joint plan of MoE, MoHE, MoF and Presidential Decree, TTCs no longer recruits students in pre-service programs and are focused more on in-service teacher education. However, there is still (and has been for two years) a great deal of uncertainty and confusion within MoE, TED and in Teacher Training Colleges about the current state and future of teacher education in Afghanistan.

- **R#12d**: This recommendation called for extending practical teaching experience in classrooms as a component of teacher education programs in all TTCs. According to MoE, the number of credits for practical teaching have been increased from 6 to 10 to provide more opportunities for practical school/classroom experience for pre-service teacher education students and for practicing teachers through in-service teacher education. According to MoE, practical teaching has begun for TTC student's 2nd semester and related training materials have been developed. In addition, another MoU was signed with MoHE regarding the provision of job opportunities for TTC graduates. MoHE is responsible for preparing the guidelines for practical teaching for the Bachelor's 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 monitoring reports.

- **R#13:** 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. During this fifth monitoring period, MoE and IARCSC made an MoU with regards to conducting an organizational review and establishment of Human Resource Information Management Unit. In addition, as indicated in previous monitoring reports, the Deputy Ministry for Literacy has taken some basic measures to review and reform its structure.

- **R#14:** In order to develop flexible Adult Literacy Programs for women, three specific actions have been taken so far:

1. First, an agreement has now been signed with the Ministry of Women's Affairs (MoWA) to establish special literacy courses for women. A coordination committee with MoWA was established to apply terms of the agreement. In order to monitor progress in the implementation of literacy courses, this committee conducts meetings. The implementation procedure and

operational plan has been prepared and shared with the Provinces and eight coordination meetings were held to improve the implementation of the Program. Deputy of Literacy has documented its success stories as some graduates of UNESCO and literacy programs entered into labor market. Also, new girls and women are enrolled in literacy and vocational programs.

2. Second, the MoE's Deputy Ministry for Literacy signed another MoU with the Ministry [previously covering each of] Labor, Social Affairs, Martyrs and Disabled (MoLSAMD) to establish literacy courses for women in its 'Economic Empowerment of Women' program. A proposal had been prepared and sent to the Ministry now covering Labor and Social Affairs for approving the budget and then followed up by 'letter No 135' dated 1397/3/9.

3. Third, an agreement has been signed with the MoF to include women's literacy education in the Citizen's Charter Program. During this fifth monitoring period, the Deputy Ministry for Literacy reported that it had two meetings with Development Partners and MRRD in relation to "inclusion of literacy programs in the Citizen's Charter program," the development of a work plan, and sharing of a new model of a practical approach to literacy has been developed. In addition, the "inclusion of literacy programs in the Citizen's Charter program" was approved by the National Literacy Committee and shared with MoF and MRRD to finalize the budget.

4. Deputy Dept. of Literacy and UNESCO conducted vocational training for graduates of literacy programs. In addition, in 8 provinces of Bamyan, Jowzjan, Parwan, Kapisa, Nimroz, Balkh, Panjsher and Khost, self-capacities appraisal programs were conducted for those who had private education but did not have formal certificates. As the result, 3,642 certificates were distributed after capacities were verified.

- Literacy courses are classified into three categories, in terms of finance: 1) the courses funded and implemented through the State budget (Deputy Ministry for Literacy); 2) the courses funded by Development Partners and implemented by NGOs/INGOs; and, 3) courses established within communities by volunteers (which make a small proportion of the total). Comparing three Provinces, MEC learned that literacy courses implemented by NGOs/INGOs tend to be the most successful of the three categories, due to the following reasons: 1) courses conducted by NGOs/INGOs provide more facilities and incentives; 2) most of these courses are longer than the other courses, allowing teachers to cover more aspects of literacy; 3) these courses can be conducted when and where most needed because their *Tashkiel* is more flexible than the State-funded literacy courses. In State-funded courses, the *Tashkiel* is official, and a literacy teacher can only conduct a class in her/his area of residency. Accordingly, authorities in the Deputy Ministry for Literacy are proposing to shift the status of literacy teachers in the *Tashkiel* from "official" to "unofficial" so that teachers can conduct courses where/when needed. There are notable reasons for this: first, contract-based teachers are recruited where needed and as result duplication is prevented; second, official teachers get paid 12 months of the year (despite teaching only 9 months) while a contract-based teacher is paid only for the 9 months they teach; third, an official teacher can only conduct a course in one area, while unofficial teachers do not have such limitations.

- **R#17:** MEC recommended that MoE should digitalize the issuance of 12th grade Diplomas. In order to digitalize the process, MoE developed a procedure, a format, and revised the process, as well as developing related software. The Kabul City Education Department has now 100 per cent

digitized the process. In addition, MoE has digitized graduation Certificate issuance in Balkh, Herat, Kabul, Kandahar, Khost, Kunar, Laghman, Maidan Wardak, Nangahar, and Paktia Provinces and for graduates from Pakistan and Tajikistan. Also, results of graduates in the years 1396 and 1397 from 10 Provinces have been entered into the electronic system. Graduation Certificates were sent to graduates from Kunar and Laghman Provinces and from Pakistan and Tajikistan. According to the Results and Graduation Department, all staff working on the new system are contract-based or temporary employees and permanent staff are unable to operate this system. According to the Results and Graduation Department, they have between 800 to 1,000 clients making different requests daily, which are addressed by only 15 employees.

- MoE has begun developing an online system to issue graduation Certificates. If this system is implemented, applicants will be able to register online to receive their graduation Certificates which should reduce the bureaucracy involved in the current system and mitigate related vulnerability to corruption. In the online system applicants should be able to electronically send required documents and information and pay the certification fee to a bank or through telecom services, with no need to pay directly to MoE's Results and Certificates Department (replacing the current cash-based process, which is highly vulnerable to corruption). Currently, the issuance of a Certificate takes at least one week, and in Kapisa and Maidan Wardak Provinces, where MEC visited PEDs, the issuance of Certificates is still paper-based and not yet digitized.

- **R#18:** MoE was asked to establish a system with integrity and transparency to conduct placement tests for returnees who claim to have studied in schools in other countries. MEC has reviewed the Guidelines/procedures that MoE developed in this regard. This document is ready for MoE's approval. According to MoE's report, a committee of 23 people has been established following a Presidential Decree to review documents related to Islamic Studies as well as to assess the education level of returnees. The draft procedure for such assessment has been sent to MoE's Academic Council for review.

- **R#21a:** MEC recommended the establishment of a High Level Oversight Committee to oversee, monitor and press for reforms in the education sector. MoE subsequently established a Technical Committee on Reform, which produced a *National Education Reform Paper*, and developed a related set of Guidelines on restructuring the Ministry. IARCSC, in cooperation with an MoE Technical Committee, is in the process of conducting a functional review – and revising the structure of MoE accordingly. The Technical Committee, which according to MoE is conducting regular meetings, is reported to consist of civil society representatives and other relevant stakeholders. MEC has requested MoE to invite MEC representatives to participate in the High Oversight Committee as an observer, but this has not yet happened.

- **R#21b:** MEC has further recommended that the High Level Oversight Committee include MoE leadership, DPs, CSOs, and other stakeholders as members. MoE reported that membership of the High Level Oversight Committee currently consists of MoE leadership, IARCSC and other Departments of MoE. But MEC cannot verify such a structure exists as it has not yet been invited to participate in relevant meetings. So far, MEC has not received the ToR to determine whether or not related recommendations have been implemented.

- **R#21c:** The High Level Oversight Committee coordinates and monitors reforms across the Ministry. In R#21a, 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 continues to press MoE on being invited to attend Committee meetings as an observer.

- **R#24a:** MEC recommended Office of Parliamentary Affairs to register and document all contacts between MoE and MPs. Office of Parliamentary Affairs has registered copies of MPs requests to MoE. For instance, Office of Parliamentary Affairs has registered 2,463 requests from MPs since the beginning of 1398 until Asad 1398. MoE reported that requests of MPs are mainly related to: school construction, transfer teachers and other employees of a school to another, distribution of textbooks, chair, desk and other equipment, enrollment of students in schools and so on. From Office of Parliamentary Affairs' perspective, these are legal. However, MEC recognizes MPs intervention in recruitment and transfer as illegal acts. The question is *why teachers transfer should not be based on MoE's needs and plan?* Through its trip to provinces where MEC team visited, it noted that PEDs face challenges resulted by MPs intervention, while MoE considers this as legal act. Previously, MoE sent a letter to PEDs and secondary education units instructing them to disobey illegal acts.

- **R#32a:** Some of recommendations go to DPs. MEC recommended that DPs set their funds for teachers recruitment merit-based. This was shared with DPs in a coordination meeting. It is pointed out that USAID and Canada were the main participants of the meeting and other DPs did not partake. USAID does that in a policy-making and capacity-building level because it already included such measures (through EQRA which is replaced by EQUIP and funded by WB). In MoE level, Community-based Education Policy addresses recruitment process in merit based. MoE and DPs drafted budget detail for community-based education. Also, MoE reported that it coordinated with DPs to recruit teachers in community-based education in merit-based. DPs, USAID and WB in particular, supports specific projects, as CHANGE and EQRA are funded by them. CHANGE staff are recruited by IARCSC, while EQRA has different components in education sector.

- **#33:** MEC recommended that Development Partners (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. MoE reported that 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 initiative has been expanded and now includes training for staff in the areas of planning, procurement, EMIS, HR and finance, as well as systems development. During this fifth monitoring period, MoE carried out a needs assessment to expand capacity-building programs. Also during this fifth monitoring period, MoE began new capacity-building projects funded by Sweden, Switzerland, UNESCO and UNICEF on curriculum development, literacy, planning and education monitoring. In addition, international experts were recruited to contribute in capacity-building of staff at national and Provincial levels. As noted previously, capacity-building for teachers is included in the EQRA program. Through Change Program (the replacement for the CBR Program), contracts of Directors at central and Provincial levels are extended to take up responsibilities in capacity-

building. Also, CBA, funded by USAID since last year, worked to develop capacity in relevant directorates of MoE (Internal Audit Department, IMIS, Human Resources and Finance). Despite efforts at capacity- building in MoE, a recent UNESCO[2] commissioned (on behalf of the SIDA-supported BESAF project) assessment of capacity-building in MoE and MoHE found many gaps and an overall lack of efficacy in existing capacity-building initiatives – in particular in regards to the use of Technical Assistants (TAs). MEC believes that in the absence of a comprehensive, systematic and realistically implementable professional development plan for the entire MoE, capacity- building initiatives will remain superficial, *ad-hoc*, vulnerable to corruption, and largely ineffective.

- **R#35b:** MEC recommended MoE to conduct a need assessment to measure what technical skills should be delivered by Technical Assistant to MoE employees. Based on MoE's report, need assessment is conducted as a sample in few units of Curriculum Department, Deputy of Literacy, HR and Planning Department, supported by GIZ and UNESCO, and its report will be released soon. MoE did not share this report with MEC yet.

- **R#39a:** MEC recommended that MoE support community members (CSO representatives and *Shuras*) in actively monitoring school construction. Since responsibility for school construction has been shifted from MoE to MRRD and MUDL, this recommendation relates to both Ministries. Through the Citizen's Charter Project, MRRD engaged local communities in all aspects of projects (according to MRRD, there 36,000 CDCs around the country). Now CDCs implement their own construction projects through Citizen Charter and are engaged in monitoring the projects. In addition, SMSs monitor projects as well, although they lack technical capacity to do so. During MEC's Provincial visits, SMSs were seen to be monitoring school construction projects.

- **R#39b:** School construction projects funded by ARTF should be continuously monitored. World Bank has considered a MSI (Management Systems International) in EQRA. While EQRA is being implemented, MSI will monitor process of school construction and it will share its monitoring reports with MRRD, MoE and WB. In addition, school construction projects are monitored by MoE, MRRD, MUDL through different mechanisms. MRRD monitors Citizen Charter and construction projects through CDCs and School Administrative Councils. Provincial Departments of MoE, MRRD, MUDL are involved in monitoring the projects. In some cases, CSOs and members of Provincial Councils are involved in monitoring construction project, while their technical capacity is low.

- **R#40b:** MEC recommended that MoE consolidate/collate MoE's EMIS, Human Resources Management Information System, and Payroll databases within one year. MoE reported that consolidation of EMIS, HRMIS and Payroll system is now completed. Data from Parwan has been entered into the system as a pilot, and data entry for other Provinces is ongoing. MEC will visit relevant Departments to verify this claim.

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[2] UNESCO (2019). Draft – *UNESCO/BESAF Capacity Needs Assessment Report – May 2019.*

- **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. In order to improve data collection and develop capacity of EMIS staff, MoE reported that they trained all EMIS staff in 34 Provinces in six types of research and determined key indicators for data collection so that they can regularly and consistently clean and sort EMIS data. MEC also recommends that MoE train data collection staff at school level, particularly school management. MoE reported that it plans to provide training for heads of DEDs and schools on how to fill-out data collection forms based on the new system. There were many problems with the previous system and the new system was developed to address and mitigate such issues.
- During the third monitoring period, MEC interviewed representatives from PEDs in Balkh, Jowzjan and Samangan Provinces, and during this fifth period, interviewed authorities from PEDs in Bamyan, Daikundi and Ghazni. According to these interviews, information forms filled-out by school managers in these Provinces still contain many errors.

- **R#41b:** Strengthening internal reporting mechanism by PEDs to Internal Audit Department is another recommendation to MoE. In this regard, MoE reported that the development of Internal Audit Department Regulation, ToR for Audit Committee and Internal Audit Guideline are under work, so the reports will be soon completed by CBA and approved by MoE Minister. Internal Audit Department reported that building coordination and reporting between Internal Audit Department and its provincial departments is officially started in accordance with internal audit charter and Internal Audit Procedures. MoE departments and directorates implement Internal Audit Department's recommendations and coordination is built.
- **R#41d:** To enhance transparency, MEC recommended that Internal Audit Department normal reports should be 100% publicly released by 1 June 2018, but the Internal Audit Department's cases and file referred to AGO are not included. Internal Audit Department reports during each monitoring period, to MEC about its performance in general, but it avoids posting it on MoE website. MEC expects that Internal Audit Department posts the short report it provides to MEC on its website.

- **R#45:** MEC recommended that MoE should publicly release information about its mega-data on teacher positions within 6 months. In response to this recommendation, IARCSC signed an MoU with MoE so that IARCSC would develop and implement a comprehensive single Human Resources Management Information System (MIS) for all civil service entities under MoE. MIS is developed for HR. IARCSC has started data entry of teachers and employees of MoE through biometric devices, which requires longer time for full implementation. Based on MoE report, process of recruiting 8,000 employees is completed. MoE shared information about 11,000 new teachers with IARCSC. Noteworthy, IARCSC started data entry of civil employees of most of ministries and has made notable progress. This will enable IARCSC to provide detailed information about employees and their position including teachers positions.
- **R#47:** MoE should report quarterly on the progress of the implementation of its Anti-Corruption Strategy. During 1397, MoE provided three reports to the High Council for Rule of Law and Anti-Corruption about the implementation of its Anti-Corruption Strategy and other reforms. This is a

positive step towards addressing MEC's recommendation, however MEC also expects MoE to release such reports to the public, online. MoE has not managed to accomplish this yet.

- **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 MEC's first monitoring period, MoE reported that it worked on a system to enable it to provide access to information, when requested. However, during MEC's second monitoring period, nothing further was reported about this system. MoE's Press Directorate told MEC that they share information daily with the media. They also said that they share information through the following links:
  - link: http://moe.gov.af
  - https://www.facebook.com/ministry-of-education-afghanistan-179138145552114
  - http://twitter.com/education_af

  Although this is appreciated, MEC expects MoE to go beyond only sharing information with journalists. MEC expects MoE to *publicly release* information, as mandated in the Access to Information Law. Under this recommendation, MoE recently established a committee led by MoE leadership to regularly conduct meetings with the decisions of the committee to be published, as needed. Also, MoE publishes information regarding its achievements and progress through Ma'arif Magazine.

- **R#51:** To establish a formal relationship with AGO. According to Article 134 of the Afghan Constitution, all criminal cases, should be referred to the AGO. MoE is in contact with the AGO via official correspondence. MoE's Internal Audit Department will report to MEC at each monitoring period with regards to cases referred to the AGO showing improvement in coordination and communication. During fifth period, MoE reported that Internal Audit Department has sent 15 cases to AGO during first and second quarter of 1398. Also, focal points for both entities are introduced.

- **R#52:** MEC recommended that MoE should complete punishment and reward system, punitive measures, prosecution and other disciplinary actions within 6 months after main MoE MVCA report was released. This is now transferred to IARCSC. IARCSC has developed a Code of Conduct for its civil servants. During this period, IARCSC has warned civil servants that if they treat selectively, they will be punished, which includes formal warning, termination and introducing to legal entities[3]. This does not include teachers. MEC expects MoE to define and implement a punishment-reward system.

- **R#53:** Lack of textbooks is one of major concerns for schools which has caused low quality education in the country. MEC recommended that MoE may review different options including engaging private sector to resolve this issue while MEC's report requests MoE to implement this recommendation within 6 months after main MoE MVCA was released. MoE drafted a regulation to print textbooks through private enterprises, which is already sent to Ministers Council and the

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[3] https://iarcsc.gov.af/fa/

President for approval. MoE reported that the regulation would be published online once it's approved. MoE receives a specific budget for printing textbooks through EQRA, based on which 49 million textbooks would be distributed. MoE has contracted print of some textbooks with private companies and its distribution has just started. In provinces, particularly in Bamyan, Ghazni and Daikudi, which were all visited during 5th monitoring period, all lack textbooks.

- **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 MoE's budget, was published online, but this does not contain details of MoE's budget, disaggregated by Province and District. MEC expects MoE to publish the budget (and actual costs, in detail) and disaggregated by Province and District.

Recommendations Implemented to 25 per cent

According to information MEC received from relevant entities, out of 113 recommendations, only 18 recommendations were implemented by 25 per cent. During the fifth monitoring period, there has been notable progress in this category. The details of recommendations achieved to 25 per cent are as follows:

- **R#3d:** MEC recommended implementation of the National Procurement Law, and anti-corruption policies and procedures on procurement and construction. Although such responsibilities have shifted to MUDL 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 order to address complaints and prevent corruption in the Procurement Department, they established a special committee. Procurement tenders and announcements will be published online on the National Procurement Authority's website, MoE's website, through Ma'arif TV, and Afghan Elanat so that interested parties can access all documents electronically. According to the Procurement Law, all relevant documents will be used in to guide the procurement process including standard forms developed by the National Procurement Authority; additionally, a database has been developed to collect thorough and accurate data. MRRD and MUDL have taken into account anti-corruption mechanisms in implementation of school construction projects.

- **R#12b:** To coordinate strategic plans between MoE and MoHE to achieve recommendations in *The Competency Framework for Teachers in Afghanistan,* MoE has made progress in establishing functional coordination between the two Ministries. MoE stated they have signed a MoU with MoHE for alignment of Strategic Plans. There are currently some capacity-building programs for teachers, including in-service 'upgrading' programs in some TTCs for underqualified teachers to achieve Diplomas. However, as noted previously, MoE lacks a comprehensive and systematic plan for professional development for teachers and other MoE staff. MEC will provide more details of the implementation of the MoU between MoE and MoHE in following reports. Unfortunately, during this period, no further detail to support the progress was not achieved.

- **R#15:** During the MVCA, MEC found that 53 per cent of teachers' salaries were paid through banks and by other electronic means, and 47 per cent in cash. MEC recommended that MoE expand the payment of salaries by electronic means. Since that time the use of electronic payment for teachers' salaries has increased to 67.6 per cent which counts as 25 per cent progress towards the goal of 100 per cent electronic payments through bank, Mobile Money and other electronic methods. MoE plans to expand the electronic payment system in cooperation with MoF and MoCT; in order to achieve the remaining 33 per cent, will utilize a combination of payments:
    - through mobile phones (Mobile Money)
    - through mobile bank teams
- **R#16:** 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 2,297 teachers trained in in-service programs (25 per cent female). Additionally, 18,250 teachers participated in short-term trainings (38 per cent female). As mentioned earlier, MoE plans to train over 20,000 teachers in this year through Teachers Training Colleges. MEC has verified, during its Provincial visits, the existence of some programs aimed to improve teachers' capacities at the Provincial level, but these programs are limited and fall far short of being enough either in quantity, duration or quality to meet the real needs for teacher capacity- building in Afghanistan. As mentioned previously, the MoE lacks a comprehensive and systematic professional development plan for teachers and other MoE staff. MoE, during this period, reported that it in cooperation with Swedish Committee, JAICA, GIZ, UNICEF, CREATIVE and other organizations working for education are implementing capacity building programs in Kabul and other provinces.
- **R#26:** 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. IARCSC is also responsible for developing procedures in compliance with the Civil Servants Law. The MoE HR Department's Code of Conduct Unit is responsible for monitoring the implementation of legal documents. Reports from this Code of Conduct Unit show that during 1397: 100 employees received warning letters; 26 faced salary reductions; 14 were transferred; 13,200 were appreciated; 10 received service medals; and 27 received commendations. MoE, during 5th monitoring period, did not hsaer the number of MoE employees who were punished during 2019. MEC will continue to follow and report on the implementation of this recommendation.
- **R#28a:** Donor-funded contracts, including construction, should be regularly monitored by both Development Partners and MoE, following the standardized guidance in the World Bank's *'Best Practices of Contract Procurement'*. Currently, the 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 MEC's third monitoring period, will be monitored by a third party.

  EQRA is a World Bank-administered education program consisting of pooled funds from a variety of donors. EQRA's total budget 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:

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

- Construction projects, implemented by MoE, MRRD or MUDL, are monitored by different mechanisms. MRRD, in implementing the Citizen's Charter Program, monitors construction projects through CDCs and to some extent through SMSs. Provincial Departments of these three Ministries will also be engaged in monitoring the projects. In some cases, CSOs and members of Provincial Councils will monitor construction projects, although their capacity to do so is low according to MoE.

- **R#28b:** MEC recommended MoE that MoF and MoE should monitor the contracts and projects funded by MoF, such as school construction projects, by following the "World Bank Standard Procurement Procedure". Currently, the monitoring of school construction projects is done by several entities, while responsibility for school construction has been shifted from MoE to other Ministries. MRRD monitors school construction projects through CDCs. MUDL has its own monitoring mechanisms. PEDs, and to some extent, Provincial Departments of the Ministry of Economy monitor these projects. Heads of schools and members of SMSs also monitor school construction in some cases, although they are unable to technically engage in projects.

- **R#31a:** MEC recommended that PEDs publicly share Provincial budgets and actual expenditures for each Province. In other words, they should report their budgets and expenditures to the Afghan public. According to MoE, this objective can be met in different ways: First, MoF can publicly publish a general budget every year after it is approved by the General Budget. Second, recently some MoE Departments have taken the initiative to report directly to the Afghan public. Third, MoE has started results-based budgeting which, from MoE's perspective, will provide information regarding budgets and expenditures of PEDs and DEDs. For the year 1398, it is planned that PED plans and budgets are shared publicly as a pilot. It is important to note that publishing budgets or any other information online is not enough to ensure access by the Afghan public. People with internet access still need to be made aware that such information is publicly available online and where to access it. 1398 annual budget is sent through result-based reform budget, which is being implemented. This fund helps obtain further details about costs and implementation.

- **R#32b:** MEC also recommended to DPs to coordinate donor programs related to the 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. 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. DPs, particularly USAID and World Bank, fund specific projects in this regard; Change Program and EQRA are funded by these two entities.

- **R#37a:** MEC recommended DPs support MoE in pursuing organizational structure reform and related anti-corruption reform. DPs, USAID and World Bank in particular, have provided support for organizational structure and anti-corruption reforms to develop a Reform Plan for the Ministry.

MoE's *Comprehensive Reforms Plan* includes plans to reform MoE's organizational structure, as well as anti-corruption efforts. An Anti-Corruption Committee has been established and is being led by MoE's Finance and Administration Deputy. Likewise, IARCSC signed an MoU with DPs to conduct a functional review for MoE. DPs are committed to supporting MoE; USAID is the main donor for MoE, providing support in financial management, recruitment of staff, including teachers, and provision of equipment. USAID's engagement with MoE includes support forthe Ministry, including:

- o Capacity-building for MoE
- o Afghan Child Read (activities to enable Afghan child literacy)
- o Afghan Workforce Development Program

Programs by DFID include:

- o Girls' Education Challenge
- o Community-Based Education
- o Capacity-building programs for TTCs
- o Early Childhood Development
- o Activities which foster literacy development
- o Activities which improve access to education
- o Teacher Training College Management Information System
- o Technical and vocational training institutes
- o Education-related activities to promote sustainable development
- o Re-structuring the education system

World Bank-supported activities include:

- o EQRA
- o Activities to improve educational quality

- **R#38:** 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. 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. MoE also reported that DPs have proposed two solutions with regards to implementation of this recommendation: first, DPs that they would recruit their international employees for longer terms and would consider ensuring longer 'handover' times when staff change; second, in light of ongoing political and security concerns in Afghanistan it seems *highly unlikely* that DPs will extend service periods in Afghanistan for international staff in the near future – indeed these may be reduced.
- **R#40a:** Despite concerns regarding the validity and reliability of school data, MEC recommended that MoE send EMIS staff to 20 per cent of schools two times per year (once at the beginning of new educational year and once at the end) to verify EMIS data. MoE has taken the following measures towards implementation of this recommendation:

- o According to MoE, a reliability assessment and verification plan for five per cent of schools has been developed and will be implemented by the Central Statistics Office after data collection is completed for 2018. The MEC Active Follow-Up Team will verify this status in upcoming Monitoring Reports.
- o MoE reported that the MoU with the Central Statistics Office had not yet been signed based on which CSOs will provide technical assistance. However, a technical draft to verify reliability of information by CSOs has been developed with the full support of MoE. Also, GPS coordinates for 12,000 schools have been provided by CSOs and 6,000 of these have been mapped, 3,000 are considered suspicious and need to be verified using additional information and the locations of the 3,000 remaining schools has yet to be verified through the existing data and information collection system.
- o During the 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 these Provinces. The process of data collection and correction involves comparing schools' completed EMIS forms with data entered into the EMIS system and if there are any errors, the data is checked through a phone call or direct observation by the M&E team. MEC has verified the existence of PED staff in Maidan Wardak to correct and verify information. Authorities in Provinces still complain about errors in filling out EMIS forms due to a lack of training in this area.
- o Biometric registration of MoE staff has begun.
- o In addition, a mobile system to communicate with school managers and provide data verification has been developed and is in a pilot stage.

- **R#40f:** Regarding an external review of MoE data and MoE control systems, technical assistance is being provided through 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 Control, Finance and EMIS data and control systems are being reviewed through technical support from the CBA project. Through this project, information regarding MoE's payment system is being reviewed, and as result, data from seven Provinces regarding HRMIS has been checked (finding a high number of employees who need to be retired). Meanwhile, in order to make records of employees electronic, a 14-member team has been recruited to provide technical assistance, and as result records of 37,000 employees have now been entered into the database. There is a plan to transfer this information to IARCSC's HRMIS. In addition to this technical assistance, one-year English and computer courses are being offered to improve the capacity of MoE employees.
- **R#41e:** MEC recommended DPs to provide technical assistance to MoE's Internal Audit Department (IAD), within one year, based on IAD-DP's assessment of gaps. The assessment of gaps has already been done by MoE and needs and priorities clarified. In this regard, USAID has provided some technical assistance through CBA, as some concepts and legal documents have been revised through this project. In addition, capacity-building programs were conducted through CBA for IAD employees which will continue until 2020. Recently, CBA has committed to donate 20 laptops, copying machines and printer to Internal Audit Department. It is expected that implementation of such capacity-building programs will work to support the professionalization of IAD.

- **R#44b:** MEC recommended MoE to establish High Supervision Committee which may consist of MoE leadership, M&E Department, DPs, representatives of private schools and other stakeholders. MoE held a meeting with representatives of DPs during fifth monitoring period at MoE HQ which relatively relates to the objective of this recommendation. MEC participated in one of its meetings.
- **R#44c:** The matter of assessing all systems and M&E reports and all other relevant reports about quality of education released by other organizations should be included into High Supervision Committee's ToR. Within this ToR, evaluation of all internal audit reports, external audit reports and reports sent by Supreme Audit Office and other audit reports conducted by other organizations should be added. As mentioned above, in a meeting, where MEC participated, reports released by other organizations particularly by DPs were discussed with MoE leadership.
- **R#50a:** MEC recommended MoE to distribute its Anti-Corruption Plan (ACP) to all 34 PEDs. MoE's ACP was elaborated in a meeting with participation of all PEDs in Kabul. MEC presented findings of the MoE MVCA to participants. But MoE has not distributed the ACP to PEDs yet. Most of the policies and plans developed by MoE stay in Kabul and MoE's secondary units in the Provinces are typically not informed. MEC has followed this up in the 12 Provinces visited during monitoring so far, and has confirmed that the PEDs visited have not been informed about the ACP as well as other important policies developed by MoE at the national level. However, PEDs did learn about the existence of an ACP during the previously mentioned meeting in Kabul.
- **R#58:** MEC recommended involving School Students Union in monitoring the education, but before, School Students Union should be established. There are unions such as Students Cultural Union and Students Discipline Union but they are not involved in monitoring school affairs.

Recommendations in which study and/or work has started

During this fifth monitoring period, 17 recommendations come under the 'work has begun' category. The detailed status of each recommendation is explained below:

- **R#2b:** MEC recommended that regular meetings between schools and communities should be conducted with support of school *Shuras*. MoE reported that due to a lack of budget, it could not recruit staff to follow up on this recommendation. The implementation of the EQRA has begun. After recruiting social mobilizers, this has been reported as "under work" after 6 months. MEC has started following up progress against this recommendation at the Provincial level. There have been some meetings conducted, in Provinces MEC has visited, between local residents and PEDs; for example, PEDs share their annual performance reports with school community members. Such initiatives work to improve relationships between MoE and Afghan communities.
- **R#12f:** 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 but has not happened, An initiative which offers a feasible IT solution for teacher and staff absenteeism was planned to be piloted yet due to its high cost. As mentioned above, currently IARCSC is developing a 'holistic' HRMIS system for the entire Government which will ultimately be used by all Ministries including MoE. MoE claimed that this is being followed in a traditional attendance system.

- **R#23a:** MEC recommended that MoE establish 'reform networks' in each Province to coordinate, monitor, and press for sector-wide reforms. MoE reported that reform networks had been established in each of the PEDs – they meet on a monthly and weekly basis. MEC has now visited 12 PEDs and has not found any evidence of the existence of reform networks in these Provinces and none of these PEDs were aware of the establishment of such reform networks. MoE claims that there are reform networks which hold regular meetings at DED and PED levels, but, again, MEC could not verify this claim.

- **R#23b:** Provincial Reform Networks should be composed of Provincial Education Directors, PED Management, DED Management and DPs. MoE claimed that there is a reform network for each PED, and they conduct monthly and weekly meetings. As mentioned previously, MEC has not seen any evidence of the existence of reform network in any of 12 Provinces visited since the beginning of the monitoring process. MEC verifies the claim that there are some reform actions taken by PEDs during last one and a half years, including that 1) 'Open door' policy of PEDs is enacted, 2) Provincial communications have been improved, and 3) PEDs are engaged in active monitoring.

- **R#24b:** 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 R#24a, the Parliamentary Affairs Office believes that the contents of petitions to MoE by MPs are in accordance with the law. MoE's Office of Parliamentary Affairs has registered 2,463 requests from MPs since the beginning of 1398 until Asad 1398. After the release of MEC's MoE MVCA, MoE sent a letter to PEDs and secondary units in Provinces telling them not to carry out illegal requests by MPs or other non-MoE authorities. However as there is confusion over what is legal and illegal, this issue is still far from resolved.

- **R#30a** 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.). Due to lack of budget, this has not happened at the school community level yet. Under the EQRA program, MoE has recruited 21 social mobilizers and related recruitment has begun. This has been reported as "under work" after 6 months. MEC has followed this up at the Provincial level. MEC's findings suggest that some SMSs are active and have conducted meetings with community representatives and Elders to address their school-related issues. MEC believes that this shows communities' motivation and interest in improving education and is not something that needs a high level of 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.

- **R#30b:** 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.). Due to lack of budget, MoE has not managed to implement this recommendation in schools; MEC also followed this up in the Provinces visited during monitoring. MEC's findings show that some SMSs are active and conduct regular meetings with community representatives to address their issues.

- **R#31b:** 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.

MoE has started implementing result-based budget reform based on which it will be able to distribute expenses by province and district.

- MoE reported to MEC that PEDs, after the beginning of the new fiscal year (when the budget is approved at the Provincial level 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 a breakdown of the budget and expenditures at Provincial and District level by the end of the 1398 fiscal year and to publicize related information on their website, and through local media, social media, and share this directly with COSs and Provincial Councils. For now, MoF has no mechanism to break down budgets/expenditures by District. MoE reported that, technically, they can publicly share District-level budgets/expenditures if they have the information.

- **R#31c:** MEC recommended to MoE that PEDs should publicly share (or post it on announcement board) individual school spending plans and actual expenditures for each school, at each school site, each year. MoE has started implementing result-based budget reform based on which it will be able to distribute expenses by province and district. MoE reported that they have planned to start a School Grants Program in 17 Provinces under the EQRA program. This will help MoE to rollout similar mechanism for other types of budgets in the future, such as O&M. MoE has developed and finalized the School Grants Program in cooperation with MoF, and the World Bank. As EQRA progresses, bank accounts will be opened for schools. Implementation of this program, should provide useful experience for MoE to decentralize funding to the school community level and should enable MoE to publicly share expenditures and indicators. Meanwhile, MoE's Finance Directorate is working on developing a results-based Reform Action Plan; to do so, data from EMIS is being collected. It will be implemented as pilot by end of fiscal year in PEDs and the budget will be shared with PEDs, DEDs and schools.

- **R#35a:** 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 ToR and the standardization of related ToRs, was planned to be conducted jointly with related departments. In order to have capacity building of employees as its task, it reviews ToRs of TAs in coordination with WB through EQRA. According to MoE report, standardization of ToRs for TAs in cooperation with DPs is going on. So far, no progress is made in this regard. MoE considers revisions and standardization of ToRs to be dependent on recruitment of TAs through EQRA.

- **R#35c:** 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. Implementation of EQRA has only just started. Implementation of this recommendation will be pending until the EQRA recruitment process is completed. This has not been applied to Development Partner contract-based employees recruited by other projects at MoE. Although the HR Department, during the previous monitoring period, reported that based on the needs assessment report and capacity-building plan of HR, operational responsibilities have been shifted from TAs to full time MoE staff, there is no evidence to support this claim. During fifth period, MoE without any detail claimed that responsibilities were being transferred from TAs to MoE employees.

- **R#50b:** MoE, based on MEC's recommendation, should disseminate an anti-corruption plan to all 367 District Education Departments (DEDs). MoE has thus far shared it's Anti-Corruption Plan with heads of PEDs through a workshop, however there is no evidence that this Plan has been shared more widely within PEDs, or at the DED and school community levels.

- **R#55:** 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 all monitoring periods have shown that MoE has not managed to conduct these forums yet. However, some heads of PEDs, when consulted by MEC, discussed the intention to conduct these Forums although, as far as MEC is aware, no such Forums have actually been conducted yet.

- **R#56:** 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 in this regard during the first, second third and fifth periods of monitoring and therefore cannot verify such claims.

- **R#57:** MEC recommended that MoE engage School *Shuras* in oversight and monitoring of literacy courses. MoE's the Deputy Ministry for Literacy has developed in which literacy programs will be added to citizen's oversight responsibilities as part of Citizen's Charter project that directly relates to CDCs. During Provincial visits, MEC found that some SMSs monitor literacy courses in their areas. In addition, literacy courses are monitored by MoE's own monitors and remotely through phone calls. MEC reviewed the role of SMSs, CDCs and local *Shuras*. MEC firmly believes that these *Shuras* play a key role in building relationship between people and educational entities – including trust building, and in monitoring education programs.

- MEC recommended MoE to annually appraise the performance of teachers. During this fifth monitoring period, MoE reported that the Performance Appraisal Department of the HR Directorate assessed 143,692 employees at central and Provincial levels as follows:

  - 52,319 teachers

  - 10,920 employees

  - 1,899 short term workers [*Ajir*]

  - 78,344 employees were promoted

  - 205 employees were introduced for educational opportunities

  - And 5 positions were announced

The difficulty with performance appraisal of MoE employees is to ensure they are assessed realistically and accurately. During the second monitoring period, MEC learned that appraisal process is more of a formality than a substantive activity. MEC studied this problem in 15 provinces and PEDs

authorities in these Provinces consider it as a formality. Some authorities said that they do not assess teachers because there is no budget to fulfill the outcome of the appraisal when an increment is warranted, and, if they are recommended for dismissal, they would face with a lack of teachers. During fifth follow-up period, new information was not provided to MEC.
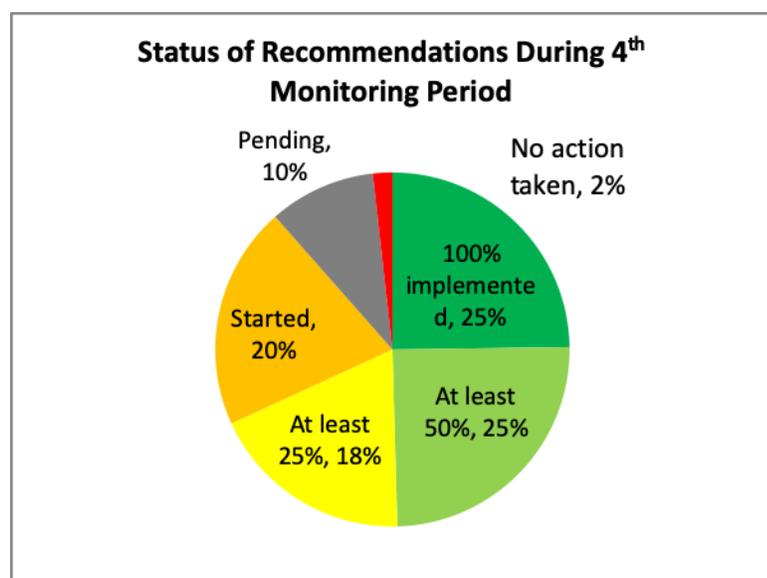
Recommendations which are pending

Based on information received by MEC during this fifth monitoring period from MoE and other relevant bodies, 8 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. In other words, unless a series of actions are taken, these recommendations cannot be implemented. These recommendations are described as follows:

- **R#1d:** Lessons learned regarding engagement of CSOs in monitoring and oversight should be documented and shared with education sector stakeholders.
- **R#27b:** 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 finalized and shared the revised version of the Code of Conduct with MoE or MEC.
- **R#27c:** 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.
- **R#37b:** 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 period 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.
- **R#42c and R#42d:** The High Level Audit 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 High Level 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 quarter reports to ensure that information is updated, completed and accurate.
- During this fifth monitoring period, no information or evidence has been received by MEC to verify such claims. MEC has been requesting to be invited to partake in High Level Audit Committee meetings as an observer, but this has not yet happened.
- **R#43:** MoE should develop a standardized accreditation process for private schools. MoE had reported, in the first period 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.
- In order to standardize and accredit private schools, MoE monitors 206 private schools in Kabul City and two districts of Kabul Province, out of which 38 schools which prepared their admin, curriculum and financial papers in accordance with Private Education Institutions Regulation (2019) were admired by MoE's Grievance Addressing Commission, and 36 more schools were punished which did not follow the regulation. Also, 132 schools in Kabul City and Kabul Province were instructed by MoE. Private Schools Department, due to lack of personnel, cannot monitor private schools in all around the country.
- **R#44d:** The Education Quality 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. MoE recently said that Joint Working Group's report will be published, but it has not been done yet.

Overall Status of Recommendations of 5ᵗʰ Follow-up Period

Recommendation Status	Numbers
100%	37
At least 50 %	33
At least 25 %	18
Started	17
Pending	8
No Action	0
Total	113

Status of Recommendations During 4ᵗʰ Monitoring Period

Pending, 10%
No action taken, 2%
100% implemented, 25%
Started, 20%
At least 25%, 18%
At least 50%, 25%

Related success stories in education during the fifth monitoring period

During each monitoring period, MEC attempts to reflect success stories and challenges facing the education sector during the period. The following are successful MoE initiatives documented by MEC during this fifth monitoring period:

- Biometric registration of MoE employees, including teachers, has begun.
- Implementation of Mobile Money and registration of teachers data has begun.
- Electronic issuance of 12ᵗʰ grade graduation Certificates is being expanded to all Provinces.
- Improvement in monitoring schools by PEDs at District level.
- Extensive enrollment of female students in some Provinces, particularly Kapisa.
- Re-opening of closed schools, particularly in Kandahar and Maidan Wardak.
- Volunteer literacy courses in Maidan Wardak.
- Anti-corruption and reform as a focus at the leadership level within the education sector.
- Improved access to education, compared to previous periods.
- Improvement in the monitoring of school construction projects and contracting, in comparison with previous years
- Greater transparency in teacher recruitment through electronic testing done by IARCSC.
- Contribution and engagement of local community members and some SMSs in school construction projects.

- Strengthen coordination between educational institutions, MoE, TVET-A and Teachers Training Colleges Department
- Secure transparency in recruiting wage teachers out of tashkil in Daikundi
- Build close relationship between MoE and local population at Bamyan
- Build school by local population of Jaghuri
- Recrtui teachers in some schools by local population of Jaghuri
- Pay benefit salary to attract capable teachers by local population of Jaghuri
- Create mobile complain addressing mechanism by MoE
- Distribute textbooks in some provinces of the country by MoE
- Secure transparency in payment for teachers at Bamyan
- Expand social monitoring of schools by public engagement
- Sign MoU with district governors to monitor Bamyan PED payments
- Install complains box and review complains about education at Daikundi
- Foster internal audit and improve coordination between internal departments
- Accelerate works in a timely manner by PEDs

Challenges in Education (during fifth monitoring period from Kandahar, Kapisa, Maidan Wardak)

During this fifth monitoring period, MEC identified a range of ongoing problems and challenges, the most serious of which include:

- Lack of textbooks.
- Lack of teachers and lack of professional teachers and related lack of a *Tashkiel*.
- Lack of admin tashkil
- Issue 12th grade graduation certificate
- Lack of building
- Inaccurate resource mobilization by donors.
- Cultural barriers for girls to attend school, particularly in Kandahar and Maidan Wardak.
- Lack of a budget for training school *Shuras* and conducting school *Shura* meetings.
- Lack of a budget for capacity-building programs for teachers and other MoE employees.

Note: These are some of the major, persistent challenges for education in the country that MEC has found during its monitoring.

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