



Independent Joint Anti-Corruption  
Monitoring and Evaluation Committee

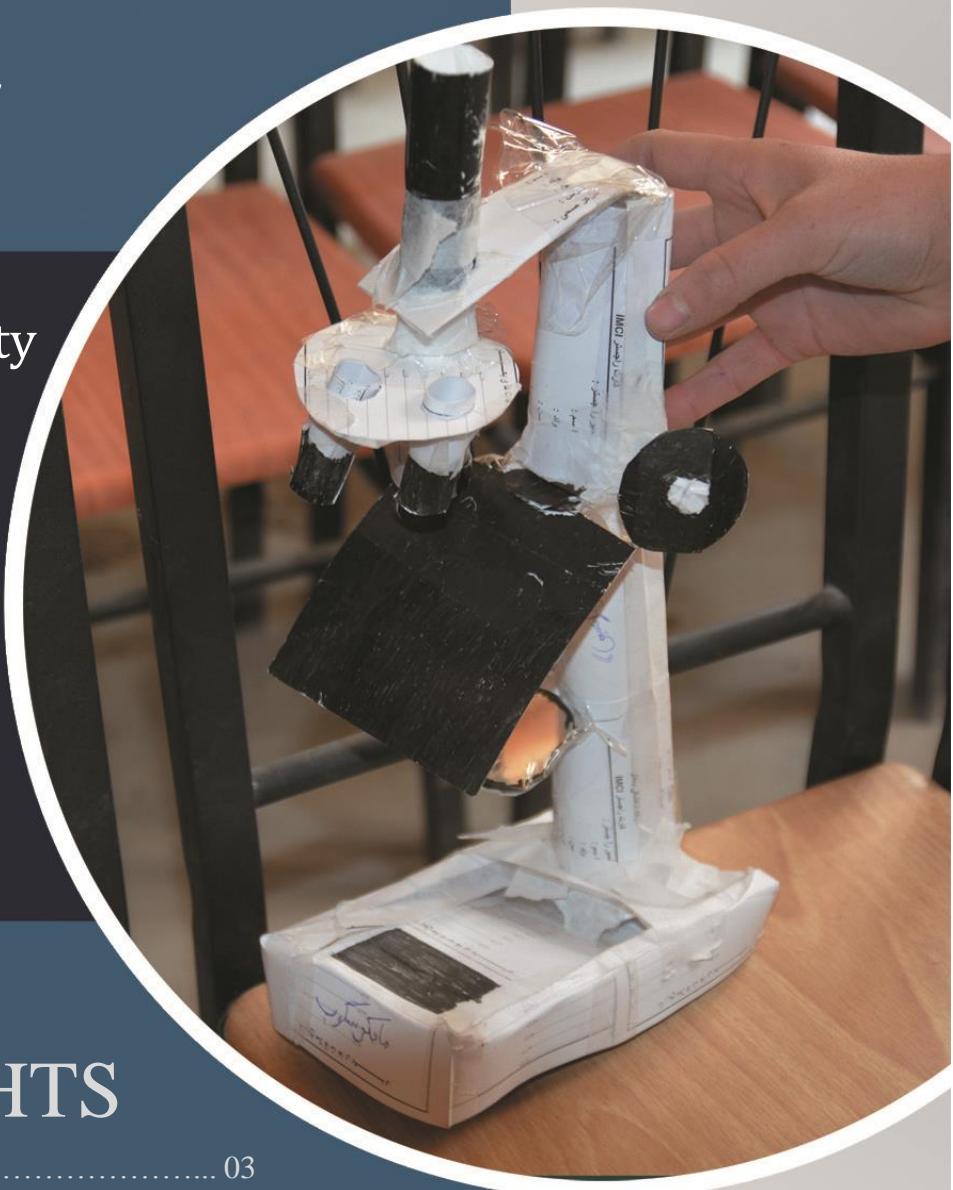
October

2017

Ministry-wide Vulnerability  
to Corruption Assessment  
of the *Ministry  
of Education*

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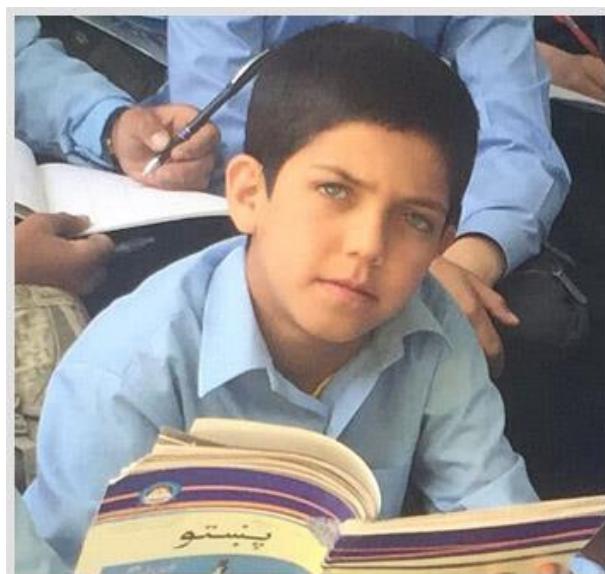
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## LIST OF ABBREVIATIONS AND ACRONYMS

AAN	Afghan Analysts Network
ACCI	Afghanistan Chamber of Commerce and Industry
AFN	Afghani (Afghanistan currency)
AGO	Attorney General Office
ARTF	Afghanistan Reconstruction Trust Fund
AREU	Afghan Research and Evaluation Unit
ASDP	Afghan Skills Development Program
CBA	Capacity Building Activity
CBE	Community Based Education
CBR	Capacity Building for Results
CCNPP	Citizens' Charter National Priority Program
CCP	Citizens' Charter Program
CPD	Continuing Professional Development
CDC	Community Development Council
DAARTT	Danish Assistance to Afghan Rehabilitation and Technical Training
DANIDA	Danish International Development Agency
DED	District Education Department
DFID	Department for International Development (UK)
DoD	Department of Defense (US)
DP	Development Partner
EFA	Education For All
EMIS	Education Management and Information System
EQRA	Education Quality Reforms for Afghanistan (successor to EQUIP)
EQUIP	Education Quality Improvement Program
ESA	Education Sector Analysis
GAC	Global Affairs Canada
GIZ	<i>Deutsche Gesellschaft für Internationale Zusammenarbeit</i>
GPE	Global Partnership for Education
HR	Human Resources
HRDB	Human Resources Development Board
HRMIS	Human Resources Management Information System
IAM	International Assistance Mission
ICT	Information Communication Technology
IGO	Inter-Governmental Organization
INEE	Inter-Agency Network for Education in Emergencies
INGO	International Non-Governmental Organization
INSET	In-Service Teacher Training
MoE	Ministry of Education
MoE-TED	Ministry of Education Teacher Education Department
MoHE	Ministry of Higher Education
MoLSAMD	Ministry of Labor, Social Affairs, Martyrs, and Disabled
MoPH	Ministry of Public Health
MoWA	Ministry of Womens' Affairs

MVCA	Ministry-wide Vulnerability to Corruption Assessment
NAC	Norwegian Afghanistan Committee
NESP III	National Education Strategic Plan III
NGO	Non-Governmental Organization
NUFFIC	Netherlands Organization for International Cooperation in Higher Education
NUG	National Unity Government
OECD	Organization for Economic Cooperation and Development
OS	<i>Ostaz-Shegari</i> – the traditional craft apprenticeship system
PED	Provincial Education Department
SAO	Supreme Audit Office
SCA	Swedish Committee for Afghanistan
School <i>shura</i>	A school <i>shura</i> refers to a school committee typically made up of a combination of parents, community religious leaders, elders and teachers
SIGAR	Special Inspector General for Afghanistan Reconstruction
TA	Technical Assistant – individuals funded by DPs but working at MoE
TAF	The Asia Foundation
Tashkiel	<i>The Tashkiel represents the total number salaried positions that any ministry is permitted to appoint. It is determined by the Ministry of Finance and conveyed to respective ministries to implement</i>
TED	Teacher Education Directorate
TMI	Turquoise Mountain Institute
TTC	Teacher Training Center
TVET	Technical Vocational Education and Training
UNDP	United Nations Development Program
UNESCO	United Nations Educational, Scientific and Cultural Organization
UNICEF	United Nations Children Emergency Fund
USAID	United States Agency for International Development
VCA	Vulnerability to Corruption Assessment



# EXECUTIVE SUMMARY

In July 2016, His Excellency Dr. Asadullah Hanif Balkhi, the Minister of Education, requested MEC to conduct a 'Vulnerability to Corruption Assessment' of the Ministry of Education. This Ministry-wide Vulnerability to Corruption Assessment (MVCA) is the first comprehensive evaluation of corruption vulnerabilities across the entire Ministry.

MEC has examined, in detail, the vulnerabilities to corruption across the Ministry of Education (MoE). MEC has spoken with teachers, head teachers, school principals, school shura members, teacher educators, MoE officials on central, provincial and district levels, donors and other stakeholders, and with many parents and students. **In total, MEC carried out 542 interviews and conducted 160 Focus Group Discussions: in Kabul, in the nine provinces of Badakhshan, Balkh, Faryab, Ghazni, Herat, Khost, Bamyan, Pansjhir and Nangarhar, and in 138 schools.**

What Afghan school community members have described to MEC in their interviews about experience with corruption in education is devastating. It is vitally important to understand these perspectives and acknowledge the corrosive impact of corruption on the country. Using this analysis of the lived experience of service users will enable policymakers to take meaningful steps towards positive, effective and sustainable change.

## Principal finding

MEC analyzed all the interviews according to the specific education corruption vulnerabilities identified. **These vulnerabilities ranged from school-level issues, such as bribes to modify school certificates, through to Ministry-level issues such as corruption in school construction and in textbook distribution. One corruption vulnerability emerged as being the most serious – the widespread, country-wide appointment of teachers on the basis of influence, or nepotism and bribery, not on the basis of merit. In short, teacher appointment is largely corrupted. This is the most damaging issue for the education of students in the country.**

Thus, the heart of the corruption problems at MoE is not primarily issues like procurement corruption or ghost teachers. Rather, it is the children, families, teachers and other school community members who have lost the most from a dysfunctional education system that directly fails the citizens they are mandated to educate at the point of delivery. As a consequence, communities have comprehensively lost faith in the system.

*"A suicide attack isn't the most dangerous thing for us, because a few people will die - Afghan mothers will have other children. It is the unprofessional and unknowledgeable teachers that are most dangerous for us because they kill the future of Afghanistan."*

Parent participant in Focus Group Discussion

## Other major findings

- Such a large, complex Ministry will always be vulnerable to high levels of corruption. The Ministry is the largest public employer in the country, employing some 262,000 people, or 68 percent of government employment. As such, it inevitably becomes a prime target for those wishing to find positions for friends, relatives, colleagues and the children of colleagues. And it has long been unable to resist this pressure.
- There are extreme levels of nepotistic influence. Unless this influence is shut down, or dramatically constrained, it is difficult to see how there will be any improvement in the corruption vulnerability of teachers' appointments.
- The school curriculum is too large, leading to corruption vulnerabilities as teachers try to get ill-prepared students through the Kankor exam.
- There appear to be very few reform-minded officials who are either willing or able to bring reforms within MoE.
- The extreme disconnect between new graduates and teaching places is likely due, in large part, to corruption. Some 75 percent of the graduates of the Teacher Training Colleges are unable to get work as teachers.
- Inspection, audit and oversight systems are ineffective or lacking.
- Regarding the problems with EMIS, MEC compared school enrollment data and attendance data using the schools that it visited. EMIS data very closely matched enrollment data for the years 1392 to 1395, to within two percent. However, when actual attendance data was compared with EMIS data, EMIS data over-estimated actual attendance by 23 percent on average. While this figure may not be generalizable due to the modest sample size, it indicates large remaining corruption vulnerability.

## Next step

MEC proposes that there be a discussion in the country – at Cabinet level, at Education leadership level, and in provinces, districts and school communities – to give broad backing to the MEC findings and to add detail to the major changes that MEC has proposed.

## Recommendations

MEC makes 66 recommendations, broken down into the following ten categories:

1. **Local responsibility.** The principal recommendation is that school communities, not PEDs, should bear the primarily responsibility for selecting their teachers.
2. **Institutional reforms.** The principal recommendations concern the need to reduce the size and scope of the MoE, to make it more manageable and less vulnerable to corruption; to make TVET an autonomous entity outside MoE, to reform the mechanism for selecting teachers, and to reduce the size of the curriculum.
3. **Successfully changing MoE organization.** MEC recommends a two-fold approach: At local level, by moving swiftly to community-led appointment of teachers, and by sponsoring networks of reformers. And, centrally, by setting up a formal change structure, with full-time task force with strong Cabinet backing, and a clear metric by

which to measure success in cleaning up teacher appointments. MEC also recommends expansion of CBR appointments, and expansion of positive support for teachers as outlined in the NESP III strategy.

4. **Legal changes.** MEC recommends that MoE leadership make and implement a new policy of actively challenging and reacting to corruption.
5. **Signals of immediate change.** MEC believes that two measures: immediately making visible local accountability for teacher appointment; and setting up an independent complaints body regarding MoE corruption, can be strong signals of positive change. MEC also recommends that MoE show publicly – through a new anti-corruption strategy, through rejecting influence, and through pushing for prosecutions of corrupt MoE officials – that it is now giving priority towards tackling corruption.
6. **International community actions.** MEC recommends that donors quickly signal their support for a new focus on anti-corruption and on independent oversight as the basis for raising educational quality, as well as expanding successful programs such as CBA.
7. **Improvements to systems and independent oversight.** MEC recommends strengthening of EMIS and the HR administration system module within it. MEC recommends comprehensive improvement of the oversight mechanisms: i) major strengthening of the MoE internal audit function, ii) the establishment of an independent oversight bodies for educational quality and performance, and iii) an independent body to oversee the integrity of teacher appointments.
8. **Increased transparency.** MEC recommends that MoE start a major initiative to make its operations highly transparent; so that it could perhaps become the most open government ministry within three years.
9. **Greater enforcement.** MEC recommends that AGO actively take up the backlog of MoE corruption cases.
10. **Market-based alternatives.** MEC recommends a market solution (vouchers) to the purchase of textbooks by students and parents.

## Appreciation

Everyone who MEC interviewed – officials, parents, teachers and students – gave freely of their time and were eager to contribute to this study. They all made clear that education is of central importance for the future for their families and the country, and therefore a top priority for the nation.

## 1. Introduction

In July 2016, His Excellency Dr. Asadullah Hanif Balkhi, the Minister of Education, requested MEC to conduct a Vulnerability to Corruption Assessment of the Ministry of Education. This Ministry-wide Vulnerability to Corruption Assessment (MVCA) is the first comprehensive evaluation of corruption vulnerabilities across the entire Ministry.

The purpose of the MEC analysis is to gain a comprehensive picture of the corruption vulnerabilities in Afghanistan's school education system, and then to make recommendations for remedial action.

When considering the high-level technical aspects of corruption in education at national, provincial and district levels, it is easy to lose sight of how corruption affects the lives of ordinary Afghans. What Afghan school community members have described to MEC in their interviews about experience with corruption in education is devastating. It is vitally important to understand these perspectives and acknowledge the corrosive impact of corruption on the country. Using accounts of the lived experience of service users will enable policymakers to take meaningful steps towards positive, effective and sustainable change.

*"A suicide attack isn't the most dangerous thing for us, because a few people will die - Afghan mothers will have other children. It is the unprofessional and unknowledgeable teachers that are most dangerous for us because they kill the future of Afghanistan."*

**Parent participant in Focus Group Discussion**

This MEC analysis was specifically designed to include engagement with schools and the communities they serve. This has been achieved through conducting 542 interviews and Focus Group Discussions with stakeholders in over 130 schools and school communities. These community-based interviews are considered throughout the report alongside the interviews with those holding positions of high authority at national and on provincial levels.

The evidence gathering is mostly by anonymous in-depth interview. It is in the very nature of such evidence gathering for such an analysis that people make disclosures to field researchers on condition of anonymity. This very anonymity gives some key respondents license to be truthful about misdeeds that they have witnessed, but it also gives others the opportunity to make wild allegations and fabrications. It is the job of the research team to weigh the evidence, seek corroborating statements from at least two others – so-called triangulation – and assess whether or not each given assertion is plausible. When more than one person from various locations and at different levels of authority and responsibility shares similar disclosures, then a pattern emerges, and the research team takes these matters with more gravity than it would to an occasional off-hand remark from a person with a grudge. In other

words, the research team was not focused on specific individual cases, but how they form an aggregated picture of risks.

In this light, therefore, the reader must be confident that any findings of vulnerabilities reported are well founded and included because many key respondents have shared the same concerns with the team. In the case of this education analysis, MEC found that the main corruption vulnerabilities were shared by large numbers of respondents across all the different types of interviewee. The four types of misconduct that the team heard time and again were in relation to teacher recruitment and appointment, endemic bribery, data falsification, and procurement. Of these, the one that was emphasized most was the large-scale corruption of the teacher recruitment and appointment process. Only five interviewees, one percent out of the total, said that this was not a major problem.

It is clear from the interviews that corruption has been taking place consistently and on a large scale, going back many years. Officials in high authority - and members of the international community - have been aware of this corruption, but little or no effective actions have been taken, and there have been very few prosecutions. This MEC analysis is the first concrete anti-corruption action taken by the Ministry.

*Nonetheless, MEC has met many people within the Ministry who are honest, upright and true. These people are honorable in their work and they are determined to make whatever contribution they can in order to create a society with a population well enough educated to make its way in the world.*

*Even for those who are caught up in the corruption, the vast majority that we have met during our assessment are more victims of the system than they are perpetrators. They too desperately want the current system to change.*

*It is to all these honest people in the Education sector to whom this report is dedicated. It is they who deserve to be selected for positions of responsibility and who can begin to stamp out corruption in the Ministry.*

MEC hopes that the findings in this report will mark a turning point at the Ministry of Education and among its Development Partners in the international community.

*“We can change Afghanistan by a good education system; not by bombs, soldiers and tanks.”*

*Afghan research officer at an international NGO*

## Organization of this report

This report starts with the methodology used (Chapter 2), and a review of other analyses of the Afghan education system (Chapter 3). It then goes on, in Part A, to discuss the heart of the issues relating to teachers – their appointment (Chapter 4), the management of the schools (Chapter 5), teacher training colleges (Chapter 6), the curriculum (Chapter 7), textbooks and resources for learning (Chapter 8) and alternative schools (Chapter 9).

Then, in Part B, the report discusses the findings related to issues in management and leadership at the Ministry (Chapter 10), and in the provinces, districts and *shuras* (Chapter 12), then issues relating to EMIS (Chapter 13), procurement (Chapter 14), payroll and record keeping (Chapter 15) and monitoring and evaluation (Chapter 16).

Finally, in Part C, the report looks at the way forward, with a Chapter on positive signs seen by the MEC field teams (Chapter 17), conclusions and the next step forward (Chapter 18) and recommendations (Chapter 19).



***Shohada Girls High School - Jaghori - Ghazni***

## 2. Methodology

### 2.1 Overview of Methodology

The methodology chosen by MEC is an assessment of the vulnerability to corruption of the education sector. To achieve a comprehensive picture of the vulnerability of the Ministry of Education, the assessment was approached in systematic way, engaging a range of types of individuals with first-hand exposures, in a process of eliciting descriptions of their experiences. The identification of areas of vulnerability to corruption was an exploratory process including discussions with education sector professionals at national and sub-national levels and with school community members; and research into past efforts at defining risks of corruption in the Afghan education sector. The vulnerability to corruption assessment was conducted through four types of information gathering: key informant / in-depth interviews, Focus Group Discussions, observations, and document reviews.

In this assessment, MEC has consulted with a wide selection of stakeholders who are as representative as possible of Afghanistan's diverse population, given security concerns and time and resource limitations. The following diversities are represented in the research:

- *Location* – Central, Northeast, Northwest and Southeast Afghan provinces are represented;
- *Urban/rural* - there is a balanced representation from urban, rural and hard-to-reach communities;
- *Socio-economic status* – communities both with relative wealth, and income poverty are represented;
- *Linguistic* – there is representation of majority language speakers, Dari and Pashtu, as well as minority language speakers, Turkmen and Uzbek;
- *Ethnicity* – there is a balanced representation of Hazara, Pashtun, Tajik, Turkmen, and Uzbek peoples;
- *Religion* – there is representation from Shia (including Ismaili) and Sunni Muslim communities.

Although MEC has utilized a mixture of qualitative and quantitative methods in the assessment, this has predominantly been a qualitative research study and therefore the findings are not intended to be 'generalizable' or 'replicable' as with more quantitative focused research. Nevertheless, MEC is confident that the findings of this assessment are 'transferable' in the sense that, as Lincoln and Guba<sup>1</sup> note, "...by describing a phenomenon in sufficient detail, one can begin to evaluate the extent to which the conclusions drawn are transferable to other times, settings, situations, and people." The weight of 'thick descriptions'<sup>2</sup> of the vulnerabilities to and impacts of corruption elicited in interviews and Focus Group Discussions provide compelling evidence that vulnerabilities to corruption in the Afghan education sector are of a sufficient breadth and depth as to merit serious consideration of significant structural reforms within the MoE.

## 2.2 MEC analysis team

A large team was assembled for this major study. Nine were drawn from the MEC Secretariat, and twenty-four were drawn from MEC's partnership with the Norwegian Afghanistan Committee (NAC), an organization that has 37 years' experience with education across Afghanistan. In addition, MEC engaged one experienced international education expert, and one international consultant experienced in semi-structured interviewing and focus group methodology.

Of the nine MEC team members, three were female and six male, for the NAC, their team of 24 was comprised of sixteen females and eight males.

The entire team was given advanced training in interviewing technique, data codification and conducting Focus Group Discussions. All interviews were recorded and coded according to the various categories below.

## 2.3 Interviews

The primary evidence-gathering tool of this assessment was one-to-one interviews with a very wide range of respondents. In all, 542 interviews and Focus Group Discussions were conducted: 388 face-to-face interviews and 160 Focus Groups.

There were six tiers of interviewees:

- i) Education officials in the MoE in Kabul
- ii) Education officials from Provincial Education Directorates across seven provinces and Teacher Training Colleges
- iii) School principals and other school management team personnel
- iv) Teachers
- v) School *shuras*, parents and students
- vi) Development partners and personnel from Afghan and international NGOs

The number of interviews in each of the six tiers of interviewees was as follows:

Tier	Category of Interviewee	Number
1	Ministry Officials in Kabul	109
2	Provincial Education Directorates and Teacher Training Colleges	126
3	School Principals and Management Team	76
4	Teachers	93
5	Parents and Students	125
6	Development Partners and INGOs, NGOs and IGOs	13
	Other	9
	Total number of interviews	542

### ***Gender Composition of Interviewees***

<i>Type of Interview</i>	<i>Breakdown</i>
<i>Face-to-face</i>	Female 66 / Male 328
<i>Focus Group</i>	Female 69 / Male 87

The provincial interviews (Category 2) took place across nine Provinces, the engagements taking place at district, school and community level, split as follows:

<i>Province</i>	<i>Number of interviews of provincial officials</i>
<i>Badakhshan</i>	21
<i>Balkh</i>	20
<i>Bamyan</i>	5
<i>Faryab</i>	19
<i>Ghazni</i>	24
<i>Herat</i>	12
<i>Khost</i>	10
<i>Nangarhar</i>	8
<i>Pansjir</i>	8

## **2.4 Schools**

The MEC and NAC teams interviewed principals, teachers, parents and pupils in 138 schools in the seven provinces. The schools were the following:

<i>No.</i>	<i>School</i>	<i>Province</i>
1	Mir Fazlullah	Badakhshan
2	Mashhad Girls School	Badakhshan
3	Naw Abad Gandem Qul Girls School	Badakhshan
4	BeBe Asma	Badakhshan
5	Mahdaba Mixed School	Badakhshan
6	Wakhshi High School	Badakhshan
7	Baktash High School (Mixed school)	Badakhshan
8	Halima Sadia High School	Badakhshan
9	Sang Nahr	Badakhshan
10	Saief Shahid High School (Mixed school)	Badakhshan
11	Qara Kamar Secondary School	Badakhshan
12	Sabzi Bahar	Badakhshan
13	Deh Dehi Girls School	Badakhshan
14	Khiradman Shahid	Badakhshan
15	CBS Muslim Abad	Badakhshan
16	Ganda Cheshma	Badakhshan
17	Sum Dara	Badakhshan

18	Khan Aqa	Badakhshan
19	Khulm Male High School	Balkh
20	Khuja Borhan Male High School	Balkh
21	Khuja Borhan Female High School	Balkh
22	Masoud Shahid High School	Balkh
23	Amin Hussain Female High school	Balkh
24	Abdul Raof Khulmi High School	Balkh
25	Tangee Female High School	Balkh
26	Sultan Razia Female High school	Balkh
27	Rahnaward Private High School	Balkh
28	Sultan Ghyasudin High School	Balkh
29	Karte sullh Girls high School	Faryab
30	Karte Sullh Boys Secondary School	Faryab
31	Gawhar Shad Bigum Girls High School	Faryab
32	Jernail Ghuwasuddin Boys Secondary School	Faryab
33	Khurasan Boys High School	Faryab
34	Setara Girls High School	Faryab
35	Kohi Khana Boys High School	Faryab
36	kohi Khana Girls High School	Faryab
37	Abu Obid Jowzjani Boys High School	Faryab
38	Afghan Kot Girls High School	Faryab
39	Tatar Khana Girls High School	Faryab
40	Tokaly Khana Girls High School	Faryab
41	Tokaly Khana Boys Secondary School	Faryab
42	Aiden Private High School	Faryab
43	Arab Khana Boys High School	Faryab
44	Pasha Khani Boys Secondary School	Faryab
45	Pasha Khani Girls Secondary School	Faryab
46	Mowlana Amrullah Girls High School	Faryab
47	Fizia Boys High School	Ghazni
48	Fizia Girls High School	Ghazni
49	Sultany Boys High School	Ghazni
50	Shohada Girls High School	Ghazni
51	Seyed Ahmad Alwdal Girls High School	Ghazni
52	Sabaz Chob Bala	Ghazni
53	Sang Joy Loman Mixid High School	Ghazni
54	Loman Boys High School	Ghazni
55	Loman Girls High School	Ghazni
56	Seyed Jamaludin Girls High School	Ghazni
57	Seyed Jamaludin Boys High School	Ghazni
58	Mohajeren Boys High School	Ghazni
59	Mohajeren Girls High School	Ghazni
60	Khodidad Boys High School	Ghazni
61	Khodidad Girls High School	Ghazni

62	Sanay Grdan Khodidad	Ghazni
63	Mogholan Girls High School	Ghazni
64	Alberoni Girls High School	Ghazni
65	Fatimatzara Girls High School	Ghazni
66	Qala Shada Boys High School	Ghazni
67	Wali Asar Girls High School	Ghazni
68	Khaja Roshnay Girls High School	Ghazni
69	Tawhid Abad Boys High School	Ghazni
70	Qala Amir Moh Khan Girls High School	Ghazni
71	Balol Mixed High School	Ghazni
72	Godal Secondary Mixed School	Ghazni
73	Miradina Boys High School	Ghazni
74	Miradina Girls High School	Ghazni
75	Suka Boys High School	Ghazni
76	Lalchag Girls High School	Ghazni
77	Maknak Boys High School	Ghazni
78	Maknak Girls High School	Ghazni
79	Sabazak Boys High School	Ghazni
80	Sabzak Girls High School	Ghazni
81	Malika Jalai High School	Herat
82	Fakhrul Madares High School	Herat
83	Darul Hefaz	Herat
84	Amir Ali Sher Nawaee Girls High School	Herat
85	Sultan Geyasuddin Ghuri	Herat
86	Amir Ali Sher Nawaee Boys High School	Herat
87	Gawhar Shad Girls High School	Herat
88	Agriculture and Veterinary Institute	Herat
89	Tajrobawee Girls High School	Herat
90	Tajrobawee Boys High School	Herat
91	Jameyat Sarwistan Mixed High School	Herat
92	Sardar Mohammad Dawood High School Engil District	Herat
93	Qwayee Zarah Dar Engil District	Herat
94	Tawheet School (private)	Herat
95	Abdul Rahim Shahd Boys High School	Kabul
96	Zinab Kubra Girl High School	Kabul
97	Abo Qassim Ferdosi High School	Kabul
98	Guldara Girl High School	Kabul
99	Yasra School	Kabul
100	Abdurahim Shahid High School	Kabul
101	Amir Hamza	Kabul
102	Bibi Hanifa	Kabul
103	Ghulam Haider Khan (Day)	Kabul
104	Ghulam Haider Khan (Night)	Kabul
105	Habibia	Kabul

106	Mohammad Hashim Maiwandwal	Kabul
107	Hazari Baghal	Kabul
108	Jalam Mina Number 19 Secondary School	Kabul
109	Khaja Abdullah Ansari	Kabul
110	Khane Noor Number 2	Kabul
111	Shahrak Mohammadnia	Kabul
112	Peshgaman Istiqlal	Kabul
113	Rabia Balkhi	Kabul
114	Sayed Jamaludin Afghan	Kabul
115	Sayed Noor Mohammad Sha Mina	Kabul
116	Sayed Shuhada Girls School	Kabul
117	Sofi Islam	Kabul
118	Zabihullah Esmati	Kabul
119	Mahmood Hotaki	Kabul
120	Zahirudin Farabi	Kabul
121	Totya Girls High School	Kabul
122	Qalae Hashmat Khan High School	Kabul
123	Sayed Noor Mohammad Shah	Kabul
124	Bibi Zainab Kobra	Kabul
125	Ibne-Sina High school	Kabul
126	Ariana High School	Kabul
127	Guzargah Girls School	Kabul
128	Jahan Private School	Kabul
129	Marefat School (private)	Kabul
130	Glory School (private)	Kabul
131	Shahid Dawood, Boys High School	Khost
132	Abdul Hay Habibi, Boys High School	Khost
133	Sediq Rohi, Girls High School	Khost
134	Sediq Rohi, Boys High School	Khost
135	Ser Band, Boys High School	Khost
136	Dargai, Boys High School	Khost
137	Dargai, Girls High School	Khost
138	Perbadsha, Girls School	Khost

The school-based interviews were conducted by experienced field teams from both the NAC and from MEC. The NAC team conducted the school-level engagements in 108 schools as well as many other educational establishments, both government and private, while the Kabul-based MEC team visited 30 schools in Kabul City, both public and private, at all phases. Over the course of the MEC analysis, 542 individual interviews and Focus Group Discussions have been completed. All of these have been logged and coded in accordance with the relevant typologies and solution lenses (See below).

## 2.5 Review of past analyses of education in Afghanistan

An extensive literature search was conducted on relevant anti-corruption in education publications and a review of assessment reports from development partners and agencies, including USAID, SIGAR, Danish International Development Agency (DANIDA), Global Affairs Canada (GAC), Norwegian Agency for Development Cooperation (Norad), Swedish Committee for Afghanistan (SCA), SIGAR, UNESCO and USAID. Supreme Audit Office inspections of MoE were reviewed.

In addition, a search across Afghan media of reports of education corruption was amassed, mostly from 2016 and 2017 (see Annex 1).

## 2.6 Education data and EMIS

The problems of school data verification – with the number of students nationwide varying from six million to 10 million – are well known. While analysis of this problem was not the objective of this study, MEC took the opportunity to compare the EMIS data with the numbers reported to us and observed from the records in each of the 138 schools that were visited.

## 2.7 Types of corruption in school education

There has been significant global attention paid to identifying the specific corruption issues in secondary education over the last 20 years. The starting point was work by UNESCO in 2001, followed by attention from other international institutions, notably UNDP, OECD, the World Bank, U4 and Transparency International. As a result, there are several good typologies of the specific corruption issues in education. MEC has synthesized these previous typologies in readiness for this analysis, identifying 36 different corruption issues in Education.

The corruption issues split into two major groups: corruption mechanisms that arise at the level of schools and districts, and corruption mechanisms that are affected centrally, usually under the direct control of the Ministry. The full range of specific education corruption issues is shown in the table below:

## Specific corruption risks in education

CENTRAL - POLICY	CENTRAL - FINANCE & CONTROL	AT SCHOOLS - DIRECT IMPACT
Misdirection of education budgets	Diversion of central budgets	Payment to obtain a school place
Misallocation to agencies, projects	Diversion of project budgets	Payment to get good grades
Over-ambitious curriculum	Diversion of education assets	Payment to receive exam results
CENTRAL - TEACHERS & HR	Bribes to auditors and monitors	Payment for school certificates
Teacher appointments, moves	AT SCHOOLS - INDIRECT IMPACT	Payment for exam questions
Teacher licenses & authorisations	Accepting high absence levels	Payment for others to do the exam
Allocation of teacher allowances	Teachers bribe for good postings	Payment from discriminated students
Teacher training (TT) selection	Schools used for private purposes	Requiring use of certain textbooks
TT: grading, exams, graduation	Diversion of school budgets	Duress for private tutoring
CENTRAL - PROCUREMENT	Diversion of locally raised funds	Duress to work for free for teachers
Textbook printing and distribution	Too-high prices for meals, uniforms	Teacher requiring sexual favors
Building & Infrastructure contracts	Food, repair, maintenance contracts	
Commissions on budgets & extensions	Resources allocated to favored schools	

### Coding of the specific corruption issues referenced in each interview:

All 542 interviews were coded into one of ten types of education corruption issue, according to a subset of this typology, as follows:

- 1: Corruption related to culture, policy, procedures and systems
- 2: Corruption in finance, control and audit
- 3: Corruption in human resource management
- 4: Corruption in provincial empowerment and accountability
- 5: Corruption at School level: school management
- 6: Corruption at School level: teachers
- 7: Corruption at school level in other types of schools (private and CBE)
- 8: Corruption in data verification and validation of certification
- 9: Corruption related to textbooks and resources for learning
- 10: Corruption due to donor-related distortions

### 2.8 Types of possible solutions

The methodology also anticipated ten ways in which the assessment team could categorize all possible solutions that might be proposed by interviewees during the course of the interviews. There are ten of these so-called 'Solution lenses':

- **Solution lens A: Citizen actions** and other forms of civil and/or local oversight – actions that could make a difference, e.g., at Community Development Council level, or by civil society monitoring, or by publishing better data.

- **Solution lens B: Institutional reform** – Administrative, organizational and system changes that improve the effectiveness of the institution and at the same time discourage corrupt behavior.
- **Solution lens C: Organizational change leadership** – how the Ministry, teachers, Teacher Training Colleges (TTCs) and Provincial Education Departments (PEDs) can effect change institutionally.
- **Solution lens D: Legal and procedural remedies** – how to remedy failings in law or legal implementation; administrative sanctions; or citizen complaints mechanisms.
- **Solution lens E: Signals of change to the population** – Specific actions, whether modest or substantial, that will indicate to the population that things are changing.
- **Solution lens F: International Community and Development Partner actions.** How can their support be best focused and controlled in future? How and where can they help best?
- **Solution lens G: Information systems, control and inspection systems, and independent oversight.** Using the available information systems, control systems, good reporting and independent external oversight as the key to improvement
- **Solution lens H: Transparency measures** – how transparency of policy, of process and of practice and open publication of policies, standards, plans, budgets, results and reports will contribute to reducing corruption.
- **Solution lens I: Enforcement.** Disciplinary measures, investigations, prosecutions, and addressing impunity.
- **Solution lens J: Market-based alternatives** to monopoly government supply. While there are also well-known problems connected with market-based solutions, they can have a positive effect in raising standards, driving up value-for-money among the state-provided services, and showing where there is corruption by people voting to leave the state system.

This perspective of these ten different approaches for reducing corruption is used at the point of formulating the recommendations in Chapter 19.

### 3. Earlier analyses

While this assessment is the most detailed one undertaken in the country, corruption in the Afghan education system is neither a new, nor an unknown phenomenon. It helps to understand the findings of this MVCA in light of the history of the development of the Afghan education system.<sup>3</sup> Nations like Afghanistan, which have historically had extremely limited access to education for its citizens, are also more likely to experience corruption than those nations with greater education access.<sup>4</sup>

*“I studied to 4th grade in school during the time when Zahir Shah was King and I can read and write, but now my son is in 11th grade, and he can’t read or write.”*

**Parent participant in Focus Group Discussion**

Corruption, like other aspects of education, negative and positive, is deeply affected by the relationships between Afghan citizens and their government and this has historical precedents, which resonate today. As Yazdi<sup>5</sup> explains:

*‘The lessons of Afghan history are informative. History shows that education is a two way street in Afghanistan between the public and the government. During the Zahir Shah era, Afghan society was unprepared to take advantage of or was unaware of the benefits of modern education. Thus, Zahir Shah’s opening up of public freedoms and establishment of schools met with little success. During the Communist era, the government had become ossified and unwilling to compromise its ideology, refusing to acknowledge the reality of Afghan culture and tradition. Finally, the Taliban, in violently attempting to enforce a purist rendition of Afghan traditions, failed to account for the evolution of Afghan culture and the experiences of many returning refugees, the desires of a people that had become more willing to embrace elements of modernity like education. The lesson to be learned is that actively providing Afghans with the kind of education they want has been successful, but forcing them to endure ideological social engineering projects only engenders resistance and resentment.’*

After the fall of the Taliban-controlled government in 2001, Afghanistan’s education system has been going through a substantial process of revitalization. However, this period, defined by a rapid influx of donor money and programs, has also brought with it a serious corruption problem.<sup>6</sup>

As cited in Hall’s 2011 paper on corruption in Afghanistan’s education sector,<sup>7</sup> several reports, including a 2009 INEE report on education and fragility,<sup>8</sup> and a 2009 USAID assessment of corruption,<sup>9</sup> highlight widespread and entrenched corruption in the Afghan education system involving ‘ghost teachers’, bribery, and nepotism.

Since 2001, there has been tremendous progress in Afghanistan school enrollment with millions of children enabled to return to school,<sup>10</sup> however an increase in school enrollment has not been matched by progress in improving the quality of education. Of course enrollment is not independent from quality. Discussing school enrollment in Afghanistan, Guimbert et al, point to the important relationship between school enrollment and education quality, suggesting that past a certain threshold, an increase in supply alone does not lead to an increase in quality.<sup>11</sup>

In addition to the school enrollment numbers, there has been progress on other quantitative measures in regards to education in Afghanistan, but, as Samady notes, “While in quantitative terms and variety of initiatives the developments are significant, the quality and efficiency of education continue to be a challenge for national authorities...”<sup>12</sup>

### **Recent reference to corruption in education**

Although there have been various efforts by the Afghan government in the past 10 years – with support from donors and development partners – to address corruption in the education system, the problems have proven to be deeply entrenched and too difficult to stop. Despite widespread awareness within the MoE, the donor community, and among the Afghan citizenry, of the existence of corruption in education, there is minimal evidence that prior investigations, reports and papers related to corruption in the Afghan education system have led to significant or sustainable positive changes and improvements.

Centner’s comments on corruption, in a 2012 research paper on anti-corruption in Afghanistan’s education system,<sup>13</sup> are still prescient in 2017 according to this analysis’ findings:

***‘Unfortunately, Afghanistan’s national education system is tragically corrupt, depriving millions of school-aged children of the opportunity to learn. Imagine being a teacher and having to pay a bribe for your paycheck. Imagine being a parent and having to pay a bribe for your child to receive a passing grade. Imagine being an employer and being unable to decipher between the authentic Diplomas and the counterfeit replicas. Without suppressing the rampant corruption that currently plagues Afghanistan, its educational goals will continue to go unmet, stripping the country of its most vital resource: educated children.’***

Other examples of more recent reports and papers highlighting the problems of corruption in relation to the Afghan MoE, and its donors and development partners, include:

- A 2017 Afghan Analyst Network (AAN) report on inconsistencies in Afghan education statistics<sup>14</sup> highlighted widespread corruption in education and that damning findings, from a 2015 Afghan government commission which investigated allegations of corruption in the education system, were never made available to the public.<sup>15</sup> As the AAN report noted, “...to the chagrin and frustration of the fact-finding commission, there has been no visible action taken with regard to the charges.”<sup>16</sup>

- A USAID (2016) assessment of textbook development and distribution noted endemic Ministerial corruption in relation to textbooks since 2005 and recommended that “All Ministry of Education, Provincial Education Directorate, and District Education Department (DED) staff involved in textbooks distribution tasks should sign codes of conduct as part of their normal contracts of employment that specify penalties for participating in corrupt practices and for failing to adhere to policies.”<sup>17</sup> This recommendation, as with others made in the assessment, has yet to be followed.
- A comprehensive 2016 report on Norwegian development assistance to Afghanistan between 2011-2014, noted, “a need for close on-going follow-up and monitoring of Afghanistan Reconstruction and Trust Fund (ARTF) and Education Quality Improvement Program (EQUIP) funding, to counter concerns about corruption and inflated student and school numbers, and to ensure continued attention to quality improvement.”<sup>18</sup> The report also noted that, “In education - There is a common concern over the reliability of the data and numbers provided by the MoE.”<sup>19</sup>
- A 2015 UNESCO *Education for All National Review* also flagged concerns about Afghan education data reliability. The review explained, “While there has been improvement in data availability on important education indicators such as enrollment ratios, dropout, primary completion, and literacy rates, the accuracy of collected data is still questionable, and data are not available on time.”<sup>20</sup>
- In regards to teacher recruitment, a 2016 Afghan education sector analysis report noted that, “Nepotism and political interference in the recruitment of teachers is widespread all over the country.”<sup>21</sup>
- In addition, two previous MEC Vulnerability to Corruption Assessment reports on Teacher Recruitment<sup>22</sup> and EQUIP,<sup>23</sup> respectively, reported on widespread corruption in these areas of education and there is little indication of significant improvements in either of these areas since the reports were published.

Of course, the blame for corruption in the education system should not be placed solely on the MoE or its current and past leadership, as donor and development partner complicity is also an issue. The aforementioned report on Norwegian development assistance in Afghanistan (referencing a previous evaluation of Norwegian development cooperation with Afghanistan from 2001-2011) noted that in regards to poor governance and corruption:

***“...donors have known about, tolerated, and in some cases exacerbated these (corruption problems) for many years in spite of simultaneous efforts to bring improvements.”<sup>24</sup>***

Donors and development partners have also contributed to MoE’s challenges in attempting to make positive, sustainable changes to the education system and this can be seen as a corruption enabler. For example, the report on Norwegian development assistance<sup>25</sup> and a review of UNICEF’s Swedish supported Basic Education and Gender Equality in Afghanistan program,<sup>26</sup> both highlight a lack of donor/development partner baselines and systems, which

would allow for accurate measurements of change and progress over time.

As the latter review explained, this has meant that "...factors that lead to change are overlooked and lessons learned are not documented and institutionalized."<sup>27</sup> In addition, the review noted that, "...staff and management are aware of many of the weaknesses and have ideas on how to meet some of the challenges, but these evaluative reflections are not systematized in the monitoring system nor communicated to the involved community members, MoE technical staff, school management or teachers."<sup>28</sup>

Further, as the UNESCO *Education for All National 2015 Review* noted, "Development partners do not fully share the information on their external projects, and joint planning between the MoE and development partners is still negligible."<sup>29</sup>

A related area, which has hindered a systematic appraisal and addressing of corruption in education, has been donor failure in assessing their programs. As a 2016 SIGAR report into U.S. support for education in Afghanistan noted, "Department of Defense (DoD), State, and USAID have not adequately assessed their efforts to support education in Afghanistan."<sup>30</sup> The report continues, "Because the agency relies on Afghan education performance data that is not solely and directly attributable to specific USAID programs and is unreliable, USAID may be portraying an inaccurate picture of what its programs have contributed to the education sector in Afghanistan."<sup>31</sup>

Also noted in the SIGAR report is the problem of a lack of coordination between different U.S. agencies supporting education in Afghanistan.<sup>32</sup> This lack of coordination exists and is problematic between all major donors and development partners and the MoE and causes a litany of problems including: unnecessary program redundancies, mixed and potentially contrary messages and advice, and fragmented planning and program delivery – all of which can be seen as hindering accountability and enabling corruption. Many of these criticisms would be mirrored, almost word for word, in other Ministries, demonstrating the extent of these types of problems faced by the leadership of the Afghan Government and endured by the population.

Arguably, the most wide-ranging and consistent investigations of corruption related to the Afghan education system (and specifically USAID support) have been done by SIGAR. A range of SIGAR assessment reports and correspondence, from 2009-2016, have highlighted key vulnerability to corruption issues including: a lack of reliable, updated information in MoE;<sup>33</sup> a lack of comprehensive assessments by USAID of its support programs to general education in Afghanistan;<sup>34</sup> insufficient planning, poor safety, poor quality control, waste, fraud and abuse of funds, and structural damage soon after construction in school construction projects;<sup>35 36 37 38 39</sup> deficiencies in the construction of Teacher Training facilities;<sup>40</sup> ghost schools, students and teachers;<sup>41</sup> and teacher and student absenteeism.<sup>42</sup>

Finally, MEC reviewed the Supreme Audit Office inspections of MoE for the (Solar) years 1392 and 1393. The inspection results are shown in Annex 5. However, the level of analysis is at the detailed financial transaction level, and so most of the larger issues are not discussed, so they

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are not able to contribute to this analysis. The inspection results for the years 1394 and 1395 were not yet available.

### **Application to this study**

This analysis of past reviews of the Afghan education system was useful to the MEC team in several ways:

- The studies provide ample evidence of the huge and praiseworthy increase in the numbers of children going through the Afghan education system – despite the EMIS measurement problems – over the past 15 years;
- They show a persistent concern about corruption, including awareness of the effect of widespread nepotism, but without making any direct study of the issue. They show that these corruption issues have been well known to both the MoE and the donors
- They note the persistent problems in raising educational quality;

However, they do not make explicit links between corruption and problems of quality in the education system; which is one of the contributions of this analysis.

# PART A

## Teachers & students

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Independent Joint Anti-Corruption  
Monitoring and Evaluation Committee

## 4. Corruption in teacher appointments

Corruption related to the appointment of teachers was the principal issue reported by over 90 percent of the interviewees. This result was replicated across all six tiers of interviewees, all schools and all provinces. The comments all referred to nepotism, favoritism and preference by MoE staff and preference by influential persons, including Members of Parliament (MPs).

Thus, the heart of the corruption problems at MoE are not primarily issues like procurement corruption or ghost teachers. Rather, it is the children, families, teachers and other school community members who have lost the most from a dysfunctional education system that directly fails the citizens they are mandated to educate at the point of delivery. As a consequence, communities have comprehensively lost faith in the system.

The failure to teach citizens due to the appointment of poor or incompetent teachers through nepotism and these teachers' subsequent poor behavior in the schools has been analyzed in this chapter according to the different ways it manifests itself, including:

- Teacher positions as a market for patronage
- Purchase of positions by new teachers
- Corrupted procedures and bureaucratic overlap
- Lack of reliable records of teacher numbers, and easy to cheat the system
- Slow progress in making senior appointments through CBR
- Lack of transparency in filling vacant positions
- Poorly qualified teachers
- Teachers paying to stay on beyond retirement age
- Gender bias and harassment of female teachers
- Absence of performance management
- The proportion of committed teachers is reported to be declining
- Teacher absenteeism and impersonation
- Teachers demanding bribes
- Abuse – physical, verbal, and emotional
- Perspectives from parents and pupils

### 4.1 MoE is a nepotism market for jobs

The Ministry of Education accounts for 68 percent of all of Afghanistan's civil servants. Most of these employees are teachers. According to the MoE Human Resources Department, there are 216,000<sup>43</sup> teachers currently employed by the MoE across Afghanistan. The MoE Payroll Department is unable to provide an accurate figure on the number of people that it has paid over the past three months.

This means that, of all Afghan ministries, it is MoE that has by far the most scope for using influence to place relatives and friends into jobs.

The MEC interviews found that the pressure for MoE to subvert its procedures to employ relatives, friends and favored individuals is relentless and ubiquitous, reported by literally hundreds of interviewees. The most frequent pressure comes from MPs. Interviewees reported MPs intervening at all levels of hiring and promotion, and in the placing of teachers in desirable locations.

*"I am not afraid of the Taliban's threats, but I am afraid of MPs' threats and blackmailing."*

**Senior MoE official in DMTVET**

Where the HR Department tries to resist this pressure, MEC's team was also presented with evidence that MPs obtain letters of appointment or transfer directly from the Minister or Deputies, effectively sidestepping the HR Department. Once these letters are issued, it becomes effectively impossible for the HR Department to reject an appointment. During data gathering, the MVCA team witnessed two instances of MPs present inside the HR Department interfering in human resource processes.

Interviews with MoE officials resulted in repeated statements that teacher recruitment was not just sometimes corrupt, but was close to 100 percent corrupted. Several HR Heads stated that literally everyone in their area of responsibility was appointed on the basis of nepotism, regardless of whether the official procedures had been used or not.

*"The recruitment of teachers is 100 percent corrupt. No deserving person during the time I have worked in the HR Department has ever got the job of a teacher; they are appointed by high officials' recommendations and I have no choice but to approve them and become part of the corrupt cycle."*

**MoE officer**

Many officials commented that senior MoE staff find themselves enmeshed in a chain of patronage which is very difficult for them to avoid, despite what may be their better intentions. This is not to exonerate such actors, but rather to highlight the way in which the existing system makes it very challenging for individuals, even those in positions of relative power, to act without being complicit in corruption.

## **4.2 Payment to obtain a teaching job is widespread**

The hiring of teachers represents the biggest proportion of recruitment at the MoE.

According to hundreds of interviewees, the novice professionals who graduate from the Teacher Training Colleges (TTCs) find it impossible to obtain work as teachers without first paying a bribe. A widespread practice of payment-for-appointment has now become

entrenched, requiring an average of between AFN 50,000 to 70,000 (about USD 800 to 1,000) from the applicant. The amount varies depending on the attractiveness of the position.

This has also meant that some teachers have been forced to seek additional work outside of school to feed themselves and their families because they have had to pay the equivalent of one or two year's salary to secure a teaching position.

Even women who have been given scholarships to encourage them to attend TTCs report they must save most of their scholarship award on the assumption that a payment will be required to get their first teaching job.

During interviews in the provinces, many interviewees reported that the income generated from the teachers was divided among the School Director, the District Education Manager, and the Provincial Directorate of Education.

### **4.3 Corrupted recruitment procedures**

The MoE follows different kinds of recruitment regulations. In principle, all recruitment should take place according to the Afghanistan Civil Services Law. The MVCA team heard, nonetheless, multiple instances of Afghanistan Civil Service Law being ignored, bypassed, or not fully followed.

Even if positions are announced and advertised, which is a rarity, applicants who are not from among a particular affiliation – family, tribal, political – will generally be unsuccessful in gaining an actual appointment. Unlike the CBR system for senior appointments, there is no independent oversight on the recruitment process for teachers; the MVCA did not detect any cases, so far, of anyone having been punished for violating recruitment policies or otherwise abusing the system.

In a VCA published in 2015, MEC reported in detail about corrupt practices in teacher recruitment in terms of the bribes regularly being paid by teachers to gain positions, and the complete lack of transparency in the recruitment process.<sup>44</sup> It is evident from the findings of this MVCA that little has changed.

Besides the direct corruption, the recruitment problem is exacerbated by duplication and overlap within the Ministry, where human resources are managed by two different Human Resources departments:

1. The Ministry of Education, General Directorate of Human Resources is managing the human resources of MoE and general HR issues. This Department has two Directorates, the Directorate of Recruitment and the Directorate of Development and Monitoring.
2. The Ministry of Education Director of Development Budget Human Resources is responsible for managing the human resources of development projects that are funded by the development partners such as World Bank and other major development partners.

The General Directorate of Human Resources and Human Resources for the Development Budget are working separately and there appears to be little or no coordination between the two. According to the Director of the HR for the Development Budget, this entity functions more like an international organization since its funding comes mostly from development partners.

There are also other types of employees who are working at the MoE, such as Technical Assistants; these are paid directly by the implementing organizations for the Human Resources Development Board (and other functions within the Ministry).

#### **4.4 No reliable records of teacher numbers, and ease of cheating the system**

There are conflicting reports as to the status of a Human Resources Management Information System (HRMIS) in MoE. By one account, the HRMIS is a module being developed with EMIS; by another account, USAID undertook to build an HR database for the Ministry. MEC was told that this consultant resigned and the process has halted. In the absence of a functioning and reliable HRMIS the processing of salaries and other HR functions, such as employees' entitlements, grade changes, salary increases/decreases, all remain paper-based.

The MVCA team learned that the Human Resources section at Kabul City Education Directorate has no computerized record of their staff, nor does it want one, according to several individuals who were interviewed. The lack of a transparent and reliable system for hiring and payroll increases the ease of corruption.

Payroll is initiated at the local school level by general attendance. There is no standardized timesheet used by MoE staff. Attendance data is entered by hand on "Form 41." The "Form 41" hard copies are brought to each district for approval of the District Education Manager. From there they are transferred to the Headquarters of each Province to be sent to Kabul. Kabul then cross-checks against their system and makes the necessary changes if there are discrepancies. This data is sent back to the Headquarters of each Province for further processing. Payroll is then prepared by the Finance Departments of Education in each Province and brought to the Ministry of Finance Provincial *Mostofiat* (Revenue Office) to execute the payment. This laborious system is open to inefficiencies and systematic corruption on several levels, from the initial entry of attendance data at the beginning of the process, to the salary processing, cross-checking and verifications, and payment execution at the end.

MEC interviews indicated that it is accepted as relatively easy to cheat the system and falsify identities; there are no regular biometric checks, for example, on teacher attendance – whereas thumbprint recognition has become commonplace across many other government departments.

#### **4.5 Slow progress in making senior appointments through CBR**

The Capacity Building for Results (CBR) initiative has created a process to ensure that all senior appointments are overseen by an external third-party, a role that is currently being fulfilled by an international implementing partner. This external verifier of fair play ensures that the process is free from corrupt practices and follows agreed and published protocols and

systems, such as requiring accurate and authenticated CVs from the candidates; an open and merit-based shortlisting process; free and fair interview procedures; and, on some occasions, a written test.

The intention of CBR has been to significantly increase the capacity of government to deliver essential services and implement national priority programs, while helping address the over reliance on external technical assistance. The Ministry of Education's quota from the allocated positions amounted to 100 senior posts. To date, the MoE has been able to fill few of these 100 positions through the CBR system. In principle, all General Directorships and the Directors of Provincial Education should have been filled through a CBR process, but MEC was informed that resistance from politicians and, not least, from current post holders, has hampered the process.<sup>45</sup>

#### 4.6 No transparency for filling vacant positions

With such a large workforce there is, inevitably, constant staff turnover, with vacant posts constantly needing to be filled. Although there have been no major changes in the *Tashkie* of the Ministry in recent years, positions become vacant because people retire, leave the job, migrate, or die. The recruitment for replacements for these vacant positions is seldom done in an open and transparent way according to data gathered for this MVCA.

In some cases teachers are working without pay in anticipation of recruitment. For example, members of a school *shura* reported that a teacher in their community had done very well on the placement exam and had initially volunteered as a teacher in their school, without pay, for several years. Ultimately she had to leave the position, as she could not afford to pay the required price for a formal teaching position in the school.



**Boys High School, Badakhshan**

#### 4.7 Poorly qualified teachers

*“Most of the teachers aren’t qualified in our school. In some subjects, we don’t have professional teachers, like we don’t have an English teacher. Our teacher teaches us from a beginners’ book, not an MoE book, and our Arabic subject teacher can’t teach. We have learned just two pages of the book from the start of the school year up to now. When the teachers are informed that the District Inspector will visit the school, they teach us well, but other days there are no lessons in the class. The District Education Supervisor never checks the teachers’ teaching process.”*

**Student at Boy’s Lower Secondary School**

Based on the MEC findings, there appears to be almost no connection between local needs for a particular specialist teacher and what the Provincial Education Departments (PEDs) actually send to the schools. The MEC teams were told of many cases where schools required a particular teacher, such as mathematics, but they were sent a teacher of Islamic studies instead. For new positions requested from the PED, school principals appear to have little influence – hence the regular mismatch between the actual needs of the students in a school and the personnel supplied from the Ministry.

Additionally, principals are able to fill vacancies that arise during the course of a school year using their own personal patronage network; this also allows the principal to find a replacement from which they can extract a payment. As with so many aspects of the Ministry’s operations, teacher appointments are not demand driven, but rather determined by the interests of those in control of various points along the supply chain.

The existence of inappropriate and unqualified people working in schools is not confined to teachers; many of the principals themselves have only limited educational attainment, as many parents were keen to point out during Focus Group Discussions.

*“For more than 10 years, a man who only has only a 12th grade degree has been leading this boys school as a Principal.”*

**Parents Focus Group participant**

#### 4.8 Teachers paying to stay on beyond retirement age

Teachers at the upper grades are often working beyond retirement age and a substantial proportion of them have not completed any level of education beyond Grade 12.

The MEC team found that many teachers who are past retirement age seek to maintain their teaching positions, mainly through nepotism and bribery. This practice blocks new teachers from taking up positions. As a school principal described it, “most teachers think that

retirement is their ‘death ceremony’ because their pensions after retirement are very low. This amount is not enough to cover their daily living expenses and the other thing is that the government sector does not give their pensions on time, or without bribes.” This results in less-qualified, older teachers remaining in classrooms, while their newly-qualified counterparts are kept out of teaching roles.

Committed head teachers reported that they cannot get rid of the teachers past retirement age who have limited skills and little interest in teaching, leaving them unable to improve teaching and learning in their schools with the addition of new, motivated and qualified teachers.

#### **4.9 Gender bias and harassment of female teachers**

Having inherited a legacy of huge gender inequality, the new government of Afghanistan agreed at The Bonn Conference (2001) for specific attention to be paid to the role of women in society. The government established a dedicated entity for this purpose, the Ministry of Women's Affairs (MoWA). This Ministry has achieved many successes and has helped to improve the status of women and girls. Since 2002 there have been many examples of increased opportunities for women and girls to participate in educational, social and cultural activities. However women in urban areas generally continue to enjoy more of these opportunities, compared to those in more rural districts.

Within the MoE’s deputy ministries and directorates, both in Kabul and in the provinces, there are still many barriers and prejudices that prevent women from achieving full parity. In the MoE, for example, there is currently only one woman leading a Directorate. Of the interviews conducted by the MVCA team, which were segmented to feature representative post-holders at all levels of the Ministry, only eight out of more than 100 interviews were with women.

From province to province there are wide variations in the opportunities for women to become teachers. In Kabul City, the proportion of female teachers is in line with international norms: almost three to one in favor of women (19,284 women, compared to 7,511 men). However, across more rural communities in Kabul Province, the opposite is the case, with just 1,766 women teaching, compared to 3,989 men. This discrepancy is replicated across the country as male teachers greatly outnumber females; in six provinces females comprise less than 10 percent of the teaching workforce: in Paktika under two percent of teachers are female, in Uruzgan three percent, Khost four percent, Paktia five percent, and Wardak six percent.

*“Most teachers are getting hired by paying bribes and many are facing sexual abuse and harassments, the ones who are doing this are working like a mafia within the MoE.”*

**MoE officer**

However, in the large urban centers of Herat and Balkh there are approximately equal proportions of female and male teachers, with women only slightly outnumbering men in both cases: Herat 8,407 females and 7,930 males; Balkh 6,595 females and 5,381 males. These figures reflect the urban-rural divide typical of many aspects of life and work opportunities for women in Afghanistan. However, the picture in some rural provinces is not universally male-dominated: in the sparsely populated Province of Nimroz, there are 911 female teachers and 629 male teachers.<sup>46</sup>



*Co-educational elementary school, Khost Province*

It is worth noting that a large proportion of male teachers are Mullahs who have gained their teaching qualifications through the Islamic education route. The MEC teams found in one district that 350 of the 450 male teachers are Mullahs. It is reasonable to suppose that these teachers' capacity with Islamic subjects will be high, though abilities in other disciplines, such as science and mathematics, may be more limited.

At the most senior levels of management in the Provinces, as well as at the Ministry in Kabul, women face a number of challenges:

- Competent and capable women are unable to gain senior posts as they have not been able to attain higher education
- Managerial positions are openly sold and women may not have access to resources to be able to pay for such positions
- An inflexible attitude to the family commitments of women requiring them to play double roles as working women and housewives
- Women are not provided with the opportunities to build their capacities and compete with qualified men
- The security situation has not allowed more women to work in more senior positions
- Women lack the networks of professional support that men have

*“The Ministry is bereft of competent females.”*  
Education Officer from INGO

From the perspective of many families, teaching remains an attractive profession for women; families regard education as a relatively safe opportunity. Programs have been developed to capitalize on this openness, such as one sponsored by NAC, which provides scholarships for female teachers only with a Grade 12 degree to attend a Teacher Training College (TTC) for diploma courses during the winter break and return to their village to teach during the school year. Other programs, such as the Female Teacher Education Program (FTEP), run by International Assistance Mission, support girls from Grades 8-10, to train and become teachers in their own communities after they have graduated from Grade 12.

However, the shortage of female teachers in most of the country is significantly limiting the chances of girls to access an education that their parents deem appropriate and safe. Many families reportedly reject education for their daughters if there are only male teachers in the school. Among school-age students there remains extreme gender disparity with an overall Gender Parity Index (GPI) of 0.66. Across the country, significant regional variations exist and there are areas where particular focus is needed to improve girls' enrollment. For example, while GPI in Herat and Badakhshan is 0.9 (9 girls to 10 boys), GPI in Zabul and Uruzgan is 0.1 (1 girl to 10 boys).<sup>47</sup>

Despite the fact that the 42 Teacher Training Colleges (TTCs) have student populations that are overwhelmingly women – female graduates struggle to obtain teaching positions. Typically, only 25 percent of each graduating cohort from a TTC is able to find a teaching job. The MEC team also recorded numerous stories from women describing sexual harassment in TTCs, PEDs, and in the schools where they eventually obtained a position.

#### 4.10 Absence of performance management

The professional capacity of officers at the MoE to conduct performance management is generally regarded as low, with ongoing dependency on Technical Assistants (TA) recruited and funded by Development Partners. Performance management processes of MoE remain largely subjective. At the school level, Monitors evaluating teachers reportedly visit few actual classes, if any. Without line management responsibilities, school principals themselves have limited input into performance management of teachers. Despite specific calls for such practices in policy documents, such as NESP II and NESP III, mentoring and performance management have not been prioritized at a school level, according to findings of the MEC analysis.

#### 4.11 The proportion of committed teachers is reported to be declining

In education systems the world over there are always individuals who are drawn to teaching through their own strong personal motivation. It is hard to visit a school anywhere and not find at least one or two teachers who are committed to the profession and are in many ways

inspirational to the students who are in their care. These people are drawn to teaching as a personal vocation and they are role models to all those around them. It is certain that many such teachers exist in Afghanistan; the MEC team observed them teaching and talked with them about their passion for the profession.

However, in interview after interview, and in focus group after focus group, the number, the weight, and the gravity of the negative responses about teachers compiled in the MEC interviews and focus groups far outweighed any positive remarks.

It was a common response from interviewees that strong and dedicated professional educators in Afghanistan are in a minority.

#### **4.12 Teacher absenteeism and impersonation**

As a consequence of weak, corrupted and ineffectual school management, coupled with poor oversight by provincial authorities, teacher absenteeism is rife throughout the system.

*“First, many teachers are not prepared to teach their students because they have lots of work at home and support large families. On the other hand, these teachers are not as well qualified as required; most of these teachers have been recruited based on family relations or connections they have with officials, therefore, the quality of teaching in schools is not sufficient.”*

**Parents Focus Group participant**

Currently, in many parts of both the public and private sectors in Afghanistan, workplace attendance is authenticated through a biometric sign-in/sign-out system – in most cases this is a simple thumbprint reading when an employee arrives for work and leaves at the end of the shift. The technology is tried and tested, it is not expensive, and the system is hard to corrupt. Data can be stored locally or transmitted in real time to a national database using mobile telephone networks. These systems do not require elaborate electrical grids or sophisticated IT skills to operate. Even in locations with limited reliability of electrical supplies and minimal use of other IT devices, these monitoring systems can strengthen management and oversight of teacher and staff attendance.

Such a system is not used in government schools in Afghanistan, though it is not uncommon in other parts of the world. Instead teachers use a manual ledger to sign in and to sign out. This is an inherently insecure system and easily subject to false entry and manipulation.

*“Most of the teachers send letters of excuse on Thursdays. Instead of teaching in school they do their personal work at home.”*

**Parents Focus Group participant**

As there are limited checks and balances, and few people really know what is actually happening in classrooms, it is very easy for teachers to take time off and send along a substitute who may or may not be a qualified or suitable replacement.

*“...here sometimes it happens when the teacher is not coming to school for a week, they send their relatives to replace them during their absence; for instance, one of our female teachers took some personal leave for a week and her husband came to teach instead of her.”*

**Parents Focus Group participant**

The MEC team was told of instances where teachers got sick, moved away, or died, and their salary was still paid for some time before their absence was noted. In other instances, the team learned of completely fictitious or ‘ghost’ schools in those insecure, insurgent controlled, districts where the Ministry is unable to verify data.

#### **4.13 Teachers demanding bribes**

Parents from several provinces noted that students are often pressured to pay to attend teachers’ private teaching ‘centers,’ outside of school hours. Those students who do so receive preferential treatment and higher marks when they are back in school.

*“There is not enough transparency in the process of examinations in school. For instance, once a teacher printed the exam questionnaires in the bazaar, and before the exam day, some students bought the questionnaires from the bazaar.”*

**Student Focus Group Discussion participant**

The MEC team was told of teachers extracting money from students and their families, sometimes for simple supplies like chalk, but on other occasions examination questions and answers are for sale. Some students were reported as working for teachers in their private affairs, like working on agricultural land and house maintenance.

*“Teachers convince students to pay money when they are absent in the class. Also, students pay money for different events, and for buying stationery for the school office. Students also have to pay money for different purposes like printing and photocopying, buying textbooks, internet packages, and exam papers, teachers’ salaries, teachers’ lunches, and some assistance towards school maintenance.”*

**Student Focus Group Discussion**

#### 4.14 Abuse – physical, verbal, emotional

The MEC team noted that, unlike in Kabul, the great majority of teachers in the provinces are men. Many of these are of an older generation that is unfamiliar with a contemporary understanding of children's rights, or positive discipline and classroom management. Even though they may have a theoretical appreciation of the illegality of beating children, in practice, the habits of a lifetime of teaching are hard to change in the light of modern thinking. It is particularly difficult for teachers to change from a system of corporal punishment to one of positive discipline, when they have only ever experienced corporal punishment as students and in their teaching careers.

It is common for teachers to abuse students in other ways. The comment below is typical of those heard repeatedly from students in schools in all of the seven Provinces where the field teams held Focus Group Discussions.

*"We wouldn't dare to complain about teachers, they threaten and hit us with books, iron rulers, and sticks - they punish us; and teachers always encourage intelligent students and repress students who struggle to learn; and teachers love rich students: They attend to the student in the lesson and grade them by favoritism."*

**Student participant in Focus Group Discussion**

#### 4.15 Gender

There is a stark urban-rural divide, with women in urban areas enjoying greater access to opportunities than their peers in rural and hard-to-reach areas of the country.

Female students (girls in schools and women in TTCs), women teachers, education managers and administrators, still face high levels of discrimination and sexual harassment in education and the workplace. For example, MEC heard of many cases of alleged abuses where there were attempts to coerce students (in secondary schools and TTCs) into sexual relationships in exchange for higher marks on exams, or other advantages. In other cases, there were attempts to coerce women teachers into sexual relationships, and in some cases marriage, in exchange for access to career advancement and favorable job placements.

#### 4.16 Teachers as 'victims'

Teachers are paid low salaries and the issue of teachers needing part-time work outside of school has been raised in numerous school communities consulted during the MEC analysis. As school community members have noted, when teachers need to take on extra work outside of school, this impacts negatively on their concentration, teaching planning and preparation, and their energy to teach.

As teachers are required to pay up to a years' wage in bribe to get their positions, they must often take a second job to compensate for the "investment" they made when they were hired. Teachers also lose money from their meager wages in other ways. One District Education Director noted that the armed opposition commanders successfully extort money from teachers in exchange for allowing them to travel to schools and teach and have also tried to extort money from the District Education Department.

#### 4.17 Perspectives from parents and students

Besides the points already made above, corruption in education was reported by parents and students in the following ways:

##### Parents:

- The system has lost the confidence of parents, many of whom are consumed with frustration at the endemically poor provision provided by the government, the shortages of textbooks and simple supplies – even chalk for chalkboards – and the bribes that they have to pay, just to try and get a basic education for their sons and daughters. The remarks below are typical of the disappointment and smoldering resentment that many parents displayed.
- Parents, families and *shuras* were widely concerned about the lack of teacher attendance in schools and participation in classes. Parents in many rural areas complained about teachers who actually live in the city, but technically have teaching positions in the districts. Parents explained that these teachers often pay a portion of their salaries to the Provincial Education Department in exchange for not having to travel to the districts to teach, or that they pay unqualified relatives to take their places in the classroom.
- Parents and families reported concerns about unchecked violence and other abuse from teachers in their children's school,
- Parents and families struggling to pay the costs of textbooks, furniture, and sometimes even subsidies towards teachers' salaries, in what is supposed to be a 'free' education,
- Communities were unable to educate their girls because the schools and Education Departments cannot appoint female teachers, even if hundreds and thousands of female teachers remain unemployed at the same time.

*"The culture of violence and abuse is alive and well in schools. Teachers use their students to work for them at home in exchange for good exam scores."*

**Parent participant in Focus Group Discussion**

### **Students:**

In order better to understand the impact of corruption, it is important to identify why students, in particular, lose their faith and hope in the education system. Here are the main comments from students:

- Many teachers do not show up for class, some do not even bother to come to school, while some who are present in school have limited engagement with their students. Often, class times are shortened from the planned 45 minutes to just half time, or less. Some teachers recruit unqualified relatives to teach in their place.
- Students who have money can often purchase an exam result (AFN 500- 1,000 for a higher mark, reported in several provinces). In another example, a teacher explained that many students in his school are scored as passing exams they have never taken. Some students receive high exam results due to nepotism and favoritism. The unfairness experienced by students who do well because of their hard work and dedication, only to be surpassed by students who bribe their way into good grades and teachers' favor can greatly impact their social and emotional wellbeing, as well as their enthusiasm. Another student reported that she left school due to depression from such an experience and was only able to return with the support of her father and intervention by a medical doctor.
- Some students do not even attend school (some actually live in other countries) but their families are able to pay for them to fraudulently receive certificates and diplomas.
- In general, students who pay or have suitable nepotistic connections can get away with missing classes and being marked as attending, but conversely those students who do not pay, or lack connections, have trouble getting excused for legitimate reasons such as illnesses or family emergencies. For those students with resources, it is easy to purchase faked medical certificates excusing them from missed classes.
- Students from all provinces and districts visited during the MVCA reported being pressured to give money and/or gifts to teachers and/or to do work for them, such as housework and farming, outside of school, in exchange for favorable treatment. The financial pressures faced by students and their families, for example, being asked to pay for school maintenance, materials, textbooks, or teachers' salaries, has caused many to leave school entirely.
- As with students, parents and families were upset about the selling of school certificates to students living outside of Afghanistan – one dimension of the 'ghost student' phenomenon.
- Many teachers lack subject knowledge and are unable to guide or support their students properly in their studies.

- Some teachers also refuse to support students in catching up on what they have missed in class if they have had to be absent.
- The corruption of the student experience also results from an overloaded curriculum. A student from a girls' high school explained that students in local primary schools have to learn six subjects in one day, which she described as very difficult for the younger children. It was also a problem that the primary grade students had to obtain and carry the related heavy load of books.

#### **4.18 Consequence - Communities have lost faith in the system due to corruption**

For school communities, corruption results in a loss of opportunities to access quality education. Worse, through these experiences of corruption, children learn that they need to pay their way through education in order to succeed. This is clearly the wrong kind of citizenship education and serves to weaken the confidence of future generations of Afghans.

## 5. Corruption in school management

*"I had been trying for months to get approval for me to transfer to work in another district, for family reasons. I filled in all the forms and nothing happened. Then one day I was sitting in the Principal's office and she said, 'give me that ring on your finger and I will let you move."*

Teacher

### 5.1 Recruitment and deployment

School Principals are able to exercise a great deal of power through their personal patronage. When posts become vacant they can restrict awareness of the opportunities within their own affinity circles and ensure that they derive a personal benefit from the appointment. While the lack of qualified teachers was often raised in the MEC Focus Group Discussions, the lack of qualified principals and head teachers was raised equally often. For example, a school *shura* member reported that an unqualified principal was running a local school with the support and protection of a particular political party and was also involved in recommending the recruitment of specific groups of people for teaching and support positions in the school.

*"When there is a position announced in school, the powerbrokers propose their relatives and families, although they are not eligible for the announced position."*

Teacher

Local powerbrokers, warlords and MPs were reported to collude routinely with school principals and to interfere with the management of schools. In some cases, this was reported to extend even down to decisions on the hiring of cleaners. Most of the teachers are hired by way of these powerful people in the community. Many school principals are characterized by teachers and other members of the school community as being more concerned with sustaining their own influence within these patronage networks than with overseeing the teaching and learning in their schools. As a consequence, teachers report feeling discouraged because there is no real accountability, and the quality of education is lower as a result.

*"... In our school, eight of our teachers are brothers and sisters, or mothers and sons."*

Teacher from Focus Group Discussion

Another issue that was raised repeatedly in teacher Focus Group Discussions was the lack of transparency in the distribution of overtime. Opportunities are kept secret and it was often reported that a favored few can be engaged to teach two or even three shifts in a school day, while at the same time, other teachers may be short of teaching hours. There was not time to investigate this issue more deeply. It does somewhat contradict an MoE observation that 'it is rare for teachers to be short of teaching hours, and that most of them are teaching more than their teaching time.'

## 5.2 Bribery, favoritism and extortion

Allegations of bribery and favoritism were widespread among parent and teacher Focus Group Discussions in all of the provinces visited for this MVCA. The demands for money related to teachers paying to get a favorable appraisal for their HR records, or teachers wishing to move elsewhere being forced to pay a bribe to the principal of their existing school.

*"Principals are requesting bribes from teachers if they wish to get promotions."*

Teacher from Focus Group Discussion

The exchange of money for favors is not restricted to teachers. Families are seen as a useful source of income: A school principal in a reasonably affluent part of Kabul has reportedly asked parents from professional backgrounds, such as doctors or engineers, for yearly payments of AFN 5,000 for unspecified and unaccountable reasons. In another example of collusion, the MVCA teams came across a practice whereby attendance registers would be falsified so that persistently absent students could be marked present in exchange for a payment of AFN 5,000. A similar payment was reported as being the price demanded for a passing mark in school examinations, allowing for student progression on to the next grade level.

## 5.3 Poor local accountability, supervision, and oversight of teachers

In the most successful schools, principals make a point to know and understand students and their families, to appreciate the learning needs of students, and to oversee the work of teachers. According to respondents in teacher, parent and student Focus Group Discussions, such school leaders are regrettably rare.

Ideally, school management and administrative teams should also have open and positive relationships with their school *shuras* and local Community Development Councils so that schools are reflecting the needs of their local community. Again, there are some good examples of school *shuras* playing an active and important role in ensuring that the schools are accountable to the communities that they serve; this stance is welcomed by school leadership. Sadly, real life examples such as this are rare.

As explored in this MEC analysis, many school principals struggle to relate well to their local communities, and according to teachers themselves, principals provide little support and guidance to teachers in their schools. Instead of working in partnership with local District Monitors to improve the quality of teaching, the visits of Monitors provide an opportunity for nefarious exchanges – from the Monitor seeking financial inducements to report favorably on the school and to get money for their transport costs, and from the principal trying to prevent interference into their monopoly of rent-seeking among the teachers.

*“Students are leaving school one hour before the official time to participate in a Kankor preparation course at the local Bazaar.”*

**Student participant in Focus Group Discussion**

In some cases, teachers are undermined by school administrators and/or the DED and PED due to corruption or nepotism or other forms of corruption; for example, in being forced to re-grade particular students’ exams to give them higher scores. Teachers have few real opportunities to complain about, or address, unfair treatment by other teachers, students, or school administrators, particularly when these individuals are powerful and well connected.

#### **5.4 Poor stewardship of resources**

As Chapter 9 on textbooks and resources for learning later makes clear, there is a long supply chain with many links in the provision of textbooks to schools. The final link in the chain is the school principal, and he or she is able to wield a great deal of power in determining the local supply of textbooks within their school. In some cases, principals are evidently helping to feed a healthy and thriving black market in government-issued textbooks intended to be delivered free to the students.

An audit trail of textbook distribution indicates that there is leakage and loss from the Kabul warehouses right down to the schools themselves. At the schools, many respondents told the MEC field teams that it is common for school Principals to treat the distribution of books to students as a gift. Many respondents – parents, students and teachers – commented that only a few students get a full set of books, but most do not get any books at all and therefore have to resort to the local bazaar to buy the government-issued books, or more often, cheaper, but poor quality photocopies.

The situation is similar in respect to other resources for learning, for example, computers. It is rare to see a school, even in Kabul City, with a fully functional computer suite. More often than not computers can be found still in their cartons in a dusty closet. It is also worth mentioning that many schools, especially in rural and hard-to-reach communities do not have access to electricity, which makes it impossible for them to use computers even if they wanted to. Principals will also plead that they do not have a computer teacher, so it is not possible to run computer classes – though the field teams found that this was often not the case. In the absence of a qualified teacher, it was reported to MEC that a principal will argue that it is

better to keep the equipment in their cartons, as delivered. Over time it is common for the consignment of these unopened computer cartons to dwindle in number, as the equipment finds its way onto the local black market.

## 6. Teacher Training Colleges

There are 42 Teacher Training Colleges (TTCs) in Afghanistan, with at least one in each province. TTCs are under the direction of Teacher Education Department (TED) in Kabul. TTCs in provinces have different branches at district level, operating as sub-centers, known as Supportive Centers (SCs). The TTCs also run in-service programs for serving teachers.

*“Teacher training is not only under control of the TTC to enroll students – particularly in-service. Powerful community members interfere and force the TTC to enroll students who are not eligible. Some students in teacher in-service teacher training programs are not even teachers. Also, there are some who just have knowledge of religious schools without a certificate of graduation from an ordinary school.”*

**Head of a TTC**

Students are admitted to their Provincial TTC on the basis of their Kankor<sup>48</sup> scores. MEC often heard from respondents that young people with the lowest Kankor scores are often steered towards teaching careers – unlike those with the highest scores, who are admitted to universities. Even though a low Kankor score is all that would be officially required for entry into a TTC, admissions processes are reportedly easily and frequently subverted by pressures from community leaders in their areas or interventions by high-ranking MoE officials.

### 6.1 TTC Curriculum

TTCs provide a two-year diploma program in four semesters, with a curriculum that is developed by the Teacher Education Department (TED). Students wishing to continue their education to bachelor degree level can, if their application is successful, pursue a further two years of study at the education faculty of a university. Students can apply during their final semester at the TTC and sit for an entrance exam.

A major concern with the curriculum at the TTCs is the fact that it is not aligned with the curriculum in schools – the demands for the Grade 12 school curriculum, for example, are greater than what is taught at the TTCs. In theory, TTC graduates should not be teaching up to Grade 12, but in practice, this happens. When the TTC students graduate they are officially registered to teach up to Grade 9, yet some TTC graduates have been observed teaching up to Grade 12.

*“The ‘integral equation’ is now an important subject in 12th Grade at school, but in the TTC we are not teaching this to our students.”*

**Lecturer at a TTC**

In a typical TTC, only about 25 percent of students manage to get teaching jobs after they complete the program. As mentioned previously, some TTC graduates try to join the education faculty of a university for a further two years to gain a bachelor's degree. However, it was widely reported by TTC graduates that these university positions are not gained on the basis of merit – those with the highest scores are not always successful – while poorer performers are able to achieve a university position through connections and various other forms of influence.

## 6.2 Lecturer recruitment and conduct

The recruitment procedures to become a lecturer at a TTC are highly centralized. The Director of TED will make the final decision over all appointments – this process is reportedly sound, so long as the Director is a person of trust and reliability. However, the system is vulnerable to subversion. Also, as this system is so highly centralized, accurate needs analyses of TTCs are often not taken into account. One Provincial TTC that the MVCA team visited had 28 lecturers, while there were only 200 enrolled students; with 'free' time on their hands, some lecturers were reportedly supplementing their income by teaching privately, with students' families paying directly for this private teaching.

*“...Our lecturers are working in other places because we don't have enough classes here at the TTC.”*

TTC Lecturer

## 6.3 Leadership, management and monitoring

*“... The exam results are announced very late, after 3 or 4 days. Some lecturers do not release the scores and tell the students to ask for their results from Heads of Departments. During these days, I am sure there are some corruptions and those who have money, they will pay and increase their marks.”*

Student at a TTC

The Heads of TTCs described having little or no authority in their role, and they are answerable in two directions: to the PED where they are based, and the TED in Kabul. TTC Heads expressed frustration and described feeling disempowered as they see appointments plainly being made on the basis of family or tribal ties.

*“...Our lecturers are working in other places because we don't have enough classes here at the TTC.”*

Head of a TTC

In a MEC Focus Group Discussion, a lecturer said that since the TTC was established in his district, "... no one had come from TED Kabul to visit the college and monitor the procedures." A student added, "Supervisors from outside never come to the TTC to monitor the situation." He also complained about the physical condition of the hostel and its facilities, "...eight students live in one small room where food is also prepared; there are no sport facilities, and the doors, windows and floors are in urgent need of repair."

In those TTCs where monitoring had evidently taken place, there are many complaints about the quality of monitoring; especially that it was conducted by junior officers from the PED.

*"The supervision and monitoring of the lecturers at the TTC is done by youngsters from the PED who only have Grade 12 or Grade 14 graduation – how can they be used to judge the lecturers who are university degree holders?"*

**Head of a TTC**

Issues related to weak coordination between TED and TTCs were also described in the Focus Group Discussion: In terms of certificates, the registration process takes a long time to be finalized by the Ministry of Education in Kabul.

*"Now we have students from our TTC who have graduated in 1395 (2016) but still they have not received their diplomas; even they paid AFN 300 for the process of registration and other related issues, but when they went to check at MoE, still the certificates had not reached to MoE for registration and approval."*

**Head of a TTC**

There were also many reports of non-attending students paying bribes to ensure that they get a graduation certificate, despite failure to attend.

*"I know some districts in this province where all students are absent for the full two years and still TTCs are graduating them – without them attending classes."*

**TTC Lecturer**

## 6.4 Development opportunities for new teachers

This MEC analysis heard from many interviewees that existing professional development opportunities for teachers are seemingly arbitrary and sporadic (and often lack quality and relevance), often unavailable for many teachers, and most often offered to teachers as a perk, based on nepotism. There is nothing currently in place to ensure professional development opportunities are: coordinated, relevant to individual teachers' and the overall education system's needs, part of a systematic approach to developing teachers' capacities (in teaching, classroom management, assessment, etc.), fairly and regularly available to all teachers and linked to opportunities for career advancement and higher salaries; all of which are hallmarks of effective teacher professionalization systems. Note that MoE believes that the system is better than what is described here by MEC interviewees.<sup>49</sup>

Although teacher professionalization which mandates for teachers to obtain higher education degrees might be useful as a future aspiration for the country, Afghanistan's higher education system currently lacks the capacity and quality to provide higher education for teachers which will meaningfully impact their teaching/learning in schools and classrooms, let alone, any of the needed reforms of the education system. This also does not really address the need to work with existing teachers to develop their capacities and help them gain higher qualifications without them having to leave their classrooms.

## 6.5 Control weaknesses

The dual accountability of TTCs, to both the PED and the TED in Kabul, opens opportunity for those seeking to exploit weaknesses.

TTCs are not informed about the annual budget for supplies, services and consumables at their program site. One TTC Head expressed his frustration with a corrupted system that serves the needs of a few corrupt individuals while students suffer. He described a detailed account of how the lack of transparency and weak controls foster risks of corruption:

*"The Work Bank allocated USD 16,000 for capacity building for each year from 1393-1396. A general meeting was held in provincial level and they made the action point to all TTCs to develop a proposal based on their needs. We listed our needful areas and submitted these to the province, so in total the amount added up to USD 48,000. The Provincial TTC, PED and Provincial Governor's Office paid AFN 300,000 as items of goods, not cash, and they provided equipment that we never listed in our proposal. At the same time, they calculated the cost of each item more than double its real cost, like a gas balloon for AFN 500 they had calculated as AFN 3,000; they also provided a motorcycle, the actual cost of which is AFN 48,000, but they calculated its cost as AFN 95,000. The rest of this amount goes to the pockets of high level provincial officials."*

**Head of a Teacher Training College**

## **6.6 Gender**

In teacher education and teaching, despite the fact that the 42 MoE TTCs now have student populations with (increasingly) greater numbers of women than men, only 25 percent of each graduating cohort is able to secure employment as teachers, and women are particularly disadvantaged here.

There are still many barriers to women taking up employment as teachers, particularly in rural and hard-to-reach areas of the country, leading to a critical shortage of female teachers.

There is no clear breakdown of gender statistics among the estimated 215,000 Afghan teachers, however evidence suggests that less than 20 percent of teachers in Afghanistan are women. As a regional comparison, in Iran, 60 percent of teachers are women. Despite the fact that the World Bank spends billions of dollars in girls' scholarship programs for provinces where females have less access to education and employment, there has been a marked inability to place even 40 percent of those females with scholarships in employment as teachers, back in their provinces.

The ongoing shortage of female teachers in most of the country is significantly limiting the chances of girls to access education.

## 7. Corruption arising from the curriculum and short school year

A national curriculum is a nation's expression of what it expects from the education system and is much more than just a list of subjects and series of facts to be learned. The official curriculum consists of not only of what is taught, but core principles and structures. This includes how subjects are taught and what happens in the classroom. In time, not just the content, but also the intent of the curriculum, is conveyed to the students. The purpose of a national curriculum is to provide those who are educated through it to become full and active literate citizens who are economically productive to the best of their ability.

Internationally, national curricula are designed so that students should:

- Have the basic skills of functional numeracy and literacy.
- Understand the nature of their society, their role in it, their rights, and their responsibilities.
- Demonstrate the key skills for employability so that they can join the workforce, support their families, and become active contributors to a country's economy.

In respect to achievement of each of these three fundamental elements, the Afghan Ministry of Education's curriculum is widely seen to be failing by interviewees.

MEC's diagnosis is that the problem is the following:

- The curriculum is greatly overloaded with too many subjects<sup>50</sup>
- The short school year, shortened teaching periods and short school days compounds this problem
- This overload leads to several corruption issues:
  - Teachers are unable to teach the full curriculum, so select what to teach
  - Teachers and principals sell the questions and results in order to get students through their tests
  - This is combined with cramming and corruption to pass the Kankor Examination

### 7.1 Curriculum overload

The curriculum from Grade 1-12 is divided into eight areas as follows:<sup>51</sup>

- i) Islamic studies
- ii) Languages
- iii) Mathematics
- iv) Natural sciences
- v) Social studies
- vi) Life skills
- vii) Arts, practical work and technological education
- viii) Physical education

Each of these eight areas is further sub-divided into specific subjects for particular grades. Students in Grades 1-3 study eight subjects; from Grade 4-6 there are 11; between Grades 7-10 there are 17 subjects; and in Grades 11 and 12 there are 16.

In the time available, it is physically impossible to cover all of the prescribed content in each of the subjects, yet subject experts and special interest groups are resistant to any slimming down in their specialisms for the obvious fear of limiting their spheres of influence. In this, as in other areas of education in Afghanistan (e.g., numbers of students enrolled versus the quality of education they experience), there is an emphasis on quantity over quality.

A comprehensive curriculum review is currently being undertaken, led by MoE with support from UNESCO. Widespread public consultation is taking place during this opening phase of the review process, and the curriculum reform is a strong priority of the Afghan Government. New textbooks based on the revised curriculum are proposed to be in use in classrooms at the earliest possible date, preferably before 2020.

The curriculum review shows that MoE acknowledges the need to review the current time allocation of subjects, and to further integrate similar subjects or contents, as well as to reduce the volume of each learning area. Many stakeholders have commented that the needs are urgent, and the curriculum review is proceeding slowly, and at a time when young people are dropping out of formal education with little to show for their 9 or 12 years of schooling.

However, MEC believes that this review is unlikely to have any positive impact on corruption problems unless the review is directed to come up with significantly reduced curriculum content. It is not part of MEC's competence to speak on the curriculum content, but we believe that the overall curriculum content should be about 50 percent in volume, compared with its current size due to the extreme time limitations of the Afghan education system.

## 7.2 Time constraints

The content-heavy curriculum has to be delivered in a school year that is one of the shortest in the world. There is a winter break of at least 90 days, a summer break of 15 or more days, with tests and examinations taking up a further 52 days. This leaves an effective teaching year of less the 20 weeks, during which school attendance, for most, is less than 20 hours per week, or only 400 hours per school year. The result is that multiple subjects are taught with minimal time, and with topics disconnected from one another.<sup>52</sup>

*“From 8:00 am to 10:00 am students are on the way to school and from 10:00 am to 12:00 pm students are on the way to home.”*

**Member of a School shura**

Many key respondents were concerned with the short duration of the school year, and often, shortened periods when students were actually in school. For example, members of a school *shura* reported that there is weak school management in their area and that full school hours are not adhered to. It was also reported that some teachers are reducing the already short lesson times from 45 minutes to 30 minutes. This is a widespread issue, as noted by many stakeholders in other provinces. Students in one province corroborated this as being an issue, commenting that some teachers have reduced their lessons to 25 or even 20 minutes. The reduction in school hours has also been highlighted as a problem by a School Inspector covering the same province.

The short school year, and truncated teaching time, is less than half of that in comparable education systems regionally. For example, in Pakistan where the schools are open for 34 weeks a year, the weekly teaching time is said to be 34 hours (1,156 hours per school year); in Iran there are 37 teaching weeks per year, and a teaching week of 22.5 hours (833 hours per school year).<sup>53</sup>

### 7.3 Low attainment and test papers for sale

School attendance is low – 50 percent at best in the urban areas, and less than 30 percent in rural areas. Afghanistan's adult literacy rate remains one of the lowest in the world;<sup>54</sup> equally, stark variations in gender parity are evident across the country. Only one in five women in Afghanistan are literate and the women's literacy rate in rural areas is three times lower than in urban areas. With such low participation rates, educational attainment across Afghanistan remains severely depressed.

The estimated adult literacy rate of the country is 38 percent (UNESCO Country Report, 2015)<sup>55</sup> – significantly below that of both the international average of 84 percent, and of neighboring countries such as Pakistan (56 percent) and Iran (87 percent). Participation rates in basic and secondary education are also very low. In 2015, the Netherlands Organization for International Cooperation in Higher Education (NUFFIC) reported that “less than a quarter of the pupils complete the first 9 years of education, while less than 10 percent pursue education until [grade] 12.”<sup>56</sup> In a country where 41.8 percent of the population is under 15 years of age,<sup>57</sup> education quality, equity, and access remain, therefore, urgent national development concerns.

Results from a Learning Assessment study of Grade 6 students<sup>58</sup> indicate that:

- 10 percent of students cannot read simple words
- 14 percent of students cannot name simple shapes in mathematics
- 31 percent of students cannot write a simple word

Afghanistan does not yet have routine standardized performance tests or national examinations for primary or secondary schools. This gap makes assessing learning outcomes a challenge. Each school sets its own examination and testing regime, which self-evidently are not standardized, and subject to wide variations in content and quality.

These school tests, by their very nature, are therefore easily and readily susceptible to corruption. Many student Focus Group Discussion participants vocalized their frustration at the lack of fairness, openness, and transparency in the school testing regimes. Students spoke openly and repeatedly about test papers and model answers being available for sale prior to tests.

#### **7.4 The Kankor Examination**

Annual tests are important, since failure means that students are not allowed to progress onto the next school year, and are required to repeat the grade – a system that is highly demotivating and which seldom results in success in the annual tests, a second time around. Repeated failure at the end-of-year tests leads to the creation of an underclass of school dropouts who have been failed by the education system. The only student testing that is standardized on a national scale is the Kankor Examination, which is taken at the end of Grade 12 by those students wishing to enter university or undertake further study after completing high school.

The Kankor Examination is administered nationally and is taken by students over a period of five months at the end of their formal schooling. Such is the importance of the Kankor Examination that a huge industry has sprung up around Kankor preparation.

In the final year of schooling, the prescribed curriculum is all but abandoned and little else happens in schools and private tutorial sessions, apart from preparation for this national “make or break” test. Since in practice the majority of students leave school at the end of Grade 9, only around 10 percent of any age cohort will make it through to the end of full-time schooling. This places all the more importance upon the development of a coherent curriculum to Grade 9. It also underlines the need for opportunities to be available through a vocational curriculum through which the majority of those 14 and older will obtain the skills needed to get a job. From the MEC fieldwork in schools, there were many reports of teachers seeking bribes to sell the examination papers in advance, or requiring payments to mark and grade papers in a way that is favorable to the students and families who pay.

This means that there is a large and growing market for private lessons, especially around the time of the annual national examinations in preparation for the Kankor Examination for those students who have been able to sustain themselves through the system until Grade 12. A whole industry has built up around the Kankor preparation, the importance of which surpasses all other learning during the whole of the last year of schooling. This, in itself, is a risk of corruption, leaving aside any cheating and other corrupt practices that are taking place during the sitting of the examination itself.

#### **7.5 Result – consequential low quality and corruption**

Given the curriculum overload and shortness of teaching time in the school day, it would be impossible to cover all the required content in the time available.<sup>59</sup> This leads to a range of compromise and corruption problems:

- Teachers sample from the curriculum the bits that they choose, and then ensure that content of the subject tests corresponds to what they have been teaching.
- Under these conditions, teaching tends to be superficial and narrowly focused on end-of-year examinations as the highest priority. Most of these culminating examinations are not centrally mandated, or administered, so it is impossible to verify curriculum coverage.
- There are, therefore, many temptations to falsify data and report on curriculum coverage that would be impossible in the allotted time.
- The erratic nature of this selection process means that testing can become arbitrary and random. The students are required to learn disconnected facts by rote with little or no scope for understanding their meaning or relevance.

In the current conditions where the curriculum covers too many subjects, with a corrupted testing regime, and poor progression opportunities beyond high school, there is a corruption of the very ideal of education. The nature of school organization – where socialization skills are seen as low priority and where the regular witnessing of minor corrupt practices is commonplace – reinforces among the citizens of tomorrow, that corruption is an inevitable way of life in Afghanistan.

## 8. Technical Vocational Education & Training (TVET) and Adult Literacy

Issues:

- **TVET curriculum outdated and not related to the employment market**
- **TVET teachers have same corruption issues and incompetence issues as school teachers**
- **TVET provision from NGOs and INGOs is of much higher quality than MoE programs**
- **Adult literacy program is substantially corrupted and ineffectual**

One of the most important functions of an effective education system is to provide students with the skills that they need to get a job. A well-conceived and structured TVET system has the potential to provide the skills for employability that young people need to create the workforce of tomorrow. Yet the government's TVET system in Afghanistan was seen by interviewees as doing little to address the needs of the almost 40 percent of the labor force that is unemployed or underemployed.

*"The formal TVET system has 3 severe flaws: the TVET target groups are not inside the system; about 85% of the teachers are incompetent; non-binding attitudes on all system levels. The outcome: about zero."*

Senior Official from a Development Partner

One of the greatest dangers of not having a viable, worthwhile, coherent and purposeful education and training provision for these young people aged 14 years plus, is that their idleness and disaffection is recognized and exploited by anti-government forces – making these vulnerable young people prone to being seduced into becoming unwitting combatants. At present, those who progress into TVET, find themselves in vocational schools where there may be little or no equipment to develop practical skills;<sup>60</sup> where the curriculum has not been updated for many years, or where the teachers have little acquaintance with the current working practices in the TVET specialist trades for which schools are supposed to be preparing their students.

To the credit of MoE, the Ministry has been taking steps recently to remedy this problem.<sup>61</sup>

### 8.1 TVET Curriculum

There is no standardized TVET curriculum, but rather a number of different curricula employed by different providers across Afghanistan – MoE has its own curriculum for their TVET schools, while the Ministry of Labor Social Affairs, Martyrs and the Disabled (MoLSAMD) uses a different set of curriculum standards for its Vocational Training Centers (VTCs) which, for the most part, run shorter courses. Private providers, NGOs, and INGOs may use materials from either Ministry, but such practice is not uniform. Until recently, the National Skills Development Programme (NSDP) had been involved in DMTVET, including regarding development of National Occupational Skills Standards (NOSS), which in turn provided the

basis for its own curriculum development work. However, utilization of these materials is not yet widespread. UNESCO is currently supporting the Government in revising TVET curricula, however to what extent this is aligned with the ongoing curriculum revision in general education remains unclear.

*"We went to a TVET school that was funded by the Afghan Skills and Development Program (ASDP) and found that all the staff were relatives of the Principal."*

**Senior official at an NGO**

The World Bank has funded two successive tranches of awards in the form of the Afghan Skills and Development Programs (ASDP I & II). The majority of students in TVET programs, from Grades 10, 11, 12 and the equivalent of Grades 13 and 14, follow curricula used in 240 technical and vocational schools that interviewees reported as being outdated, poorly taught, and meeting neither the needs of the students nor the national economy.

The curriculum for TVET has not been included in the ongoing MoE, UNESCO supported curriculum review.

## 8.2 Alternative TVET provision from DPs and NGOs

At the end of their TVET program, students and stakeholders reported to us they have few practical skills that they can bring to the workplace. For example, students who graduated in car mechanics had little idea about the workings of modern vehicles, with their computerized engine management systems. Alternatively, the informal economy represents the vast majority of realistic and available work opportunities, yet it has been largely unengaged by the formal TVET system.

In recognition of this opportunity, the German development partner GIZ has recently introduced a new TVET training scheme that fully embraces the informal economy and offers on-the-job training (and college day-release) for young people who are already working in the informal sector. The scheme is modeled on the traditional *Ostaz-Shagari* system where apprentices have learned "at the knee of master craftsmen" for many generations.

The GIZ initiative, among other interventions from Afghan NGOs and INGOs, provide practical learning opportunities in terms of the industrial relevance and the numbers of students completing the programs compared to the formal MoE TVET system. These trainings are focused on delivering practical outcomes, employability, or 'up-skilling' to enhance earning potential.

*"Ostaz-Shagari has been self-sufficient for about 500 years; lots of problems, and rent-seeking, but it does work to a degree."*

**Senior Officer from a Development Partner**



*Boys School, Keshem District, Badakhshan*

### **8.3 Alternative TVET providers, licensed by the MoE**

In recent years there have been alternative TVET models endorsed by the MoE to revitalize the sector.

- It is estimated that about 90 percent of the economic activity in Afghanistan is in the informal economy.<sup>62</sup> In recognition of this, GIZ has implemented the OS2 apprenticeships, based on the German Dual Track system. This enables apprentices to hold a paid job while simultaneously following the structure of a vocational training program. In practice, the participants learn at the TVET program during half of their working week, and undertake paid employment at a complementary skill or trade in the other half of the week.
- Afghan Technical and Vocational Institute (ATVI) was conceived as public private partnership between MoE and an American conglomerate. At its peak in 2012, ATVI had more than 1,200 students. Reliance upon Development Partner (DP) funding led to establishment of tuition fees for participants and enrollment drastically dwindled by 2014.
- Turquoise Mountain Institute (TMI) was founded in the *Ostaz-Shagari* tradition, pairing trainees with master craftsmen from carpentry, jewelry making, ceramics, and calligraphy. Trainees spend half of their time as craft apprentices, and half following the MoE curriculum. TMI has a business incubator scheme to help participants start fledgling companies, in contrast with the MoE-run TVET institutes that lack connections to viable markets.

*“Trainees in our projects need more than skills and tools: they need pride, dignity and confidence. These aren’t in a curriculum from the authorities. We have found that these are the other parts of the gap in the background of our Trainees. We cannot only teach the technical skill and expect that they will have the ability to take their certificate after the ceremony and become part of the economy...”*

**Training Manager from an INGO**

Below are several more examples of effective vocational training being provided by both local and international NGOs, in many different provinces as well as Kabul City. A common feature of all these programs is their immediate relevance, their highly practical nature, and their proximity to the marketplace where the program graduates can expect to get jobs.

The MVCA team explored the experience of providing and receiving TVET services across more than 40 types of programs covering 16 provinces. Management and staff from five Afghan NGOs and three INGOs contributed to this section of the assessment in one-on-one interviews. Eight TVET program participants attended Focus Group Discussions and one-on-one interviews. Many of these projects are run in high-risk parts of the country, so to maintain the participants' safety and security, the contributions in this section are mostly anonymous.

### **1. Skill/Topic Selection**

Determining which skills to focus on in TVET programs has been largely left to the implementers. Methods of settling on topics to offer to trainees range from formal Market Survey Research and Needs Assessments, to Labor Market Assessments, Community Awareness sessions, Consultations with Elders, Stakeholder Focus Group Discussions, and Informal Needs Assessments.

*“What kind of skills do our people need? This is what we should be asking. What skills will give the Trainees the best possible future and the most chance for supporting their families? These are the requirements. This should be the focus when we make our plan for the training sessions... In our organization, we are making the decision from the need of the community, from what we see and hear from the people in these places.”*

**Manager of a TVET program run by a local NGO**

Excerpts from interviews with management from Afghan and International NGOs:

- **Afghan NGO 1** implements TVET activities in 10 Provinces. Their skill/topic selection reflects attention to DP's priorities, structured Community Awareness Sessions to provide information and identify priorities, localized Market Needs Assessment of targeted areas, and Participatory Rural Assessment techniques to assess community interests and priorities.

- **Afghan NGO 2** has implemented vocational trainings mainly for vulnerable groups in six provinces. Their approach to skill/topic selection relies upon informal assessments, consultations with elders, guidance from MoLSAMD and MoE; MoPH in cases of disability-focused TVET programs. The NGO also assesses unmet needs in local bazaars, and carries out second-tier realism tests of shortlisted skills/topics after an experience of unrealistic expectations from local authorities led to disappointment. ‘Testing’ takes into account local access to raw materials and existing or potential market chain linkages.
- **Afghan NGO 3** focuses on TVET programs for persons with disabilities, and other socially and economically vulnerable groups, through a relational approach to selecting skills/topics for their training: informal assessments of conditions in the local bazaar are collated with findings from consultations with Disabled Peoples’ Organizations and community elders; the relations between observations and feedback assures the most relevant skills/topics are selected.
- **Afghan NGO 4** implemented apprenticeships and technical trainings to support small and medium enterprise developments. The approach to selecting skills/topics for courses integrates the goals of District Development Plans with consultations from their own Social Auditors (focused on conducting local observations of bazaars), community elders, and male and female youth beneficiaries of the courses.
- **International NGO 1** approach to selecting skills/topics for their programs is based on comprehensive annual Labor Market Assessments across the public and private sectors, with a heavy emphasis on private sector opportunities. Youth are also questioned, since they are the intended beneficiaries of these programs. Additionally, the organization now routinely incorporates assessment of existing and potential market linkages in the targeted community with the goal of enhancing the chances for success of female beneficiaries with little or no experience in developing market chain resources.
- **International NGO 2** selects skills/topics based on a combination of informal assessments of local communities, and specific requests of community members. The organization conducts a value chain assessment and examines access to market when making a determination. The main objective of their TVET programs is to identify unskilled workers and up-skill them; this assures graduates will be more likely to succeed, based on prior experience, rather than hopefulness.
- **International NGO 3** emphasizes balance between structured District-level Market Surveys, with eliciting feedback from the local community about their priorities within their TVET programs.

## 2. Trainee/Participant Selection

The process of identifying and selecting suitable trainees varies widely among implementers. The experience of being selected or rejected was linked to the goals and objectives of implementing organizations and DPs, with certain vulnerable or disadvantaged subpopulations specified for enrollments by DPs.

*“Our Instructors have also a focus on each trainee’s preparedness for their life after the skills test is finished; the trainees themselves do not say to us, ‘I need pride in myself. I want my dignity.’ But from many years of doing these courses, we know this is how to support best success. We are looking for trainees that want skills and who will benefit from our support, in all ways.”*

Director, Afghan NGO

**Afghan NGOs:** Strategies for identifying and selecting trainees included contacting individuals from registries (e.g., MoLSAMD), community consultation at the village level, lists of past service or support recipients, and recruitment campaigns.

**International NGOs:** Strategies described by INGOs included placing advertisements to notify the community of training opportunities, selecting trainees based on prior association in other courses, and community selection of candidates combined with external vetting to ensure competitiveness.

## 3. Outputs, Outcomes, and Assessing the “Staying Power” of Interventions

Practices for documenting outputs and outcomes were similar across all the Afghan and international organizations.

Outputs included counting the number of trainees on a course, specified targets of enrollment for certain groups or subpopulations, the types of courses each trainee begins, the length of time each trainee remains in the course (e.g., number and percent of days in attendance), and completion rates.

Outcomes described a range of sensitive indicators including the change expected as a result of the course or participation in the training program (new skills or enhanced skills), market linkages established or enhanced, new or improved literacy, new or improved numeracy, job placement, creation of a new enterprise, improved socioeconomic status from utilization of new skills or enhanced skills, and “voice,” empowerment, and influence within households.

- **Afghan NGO 1** implements several strategies to promote successful outcomes, including actively developing local and regional market linkages with their trainees, literacy and numeracy, exposure visits and learning tours to expand thinking on ways to develop opportunities, Business Planning modules as an element of courses, sign

boards and business name cards, and soft skills as required such as business development, customer care, bookkeeping, and marketing.

- **Afghan NGO 2** routinely incorporates literacy and numeracy (whether required by development partners or not) into their technical courses in order to achieve their organizational goals of promoting pride, dignity, and self-confidence as outcomes. The organization also emphasized that they have evolved over many course cycles to the belief that the correct subject range of the topic must drive the course duration; generally, this means all courses cover a skill, literacy, numeracy, and repair.
- **Afghan NGO 3** focuses on socioeconomic empowerment as an outcome of their courses; this has been realized in a central focus of the organization on suitable job placements for all graduates. Availability of suitable job placements drives the organization's recruitment goals and the expected outcomes for all course participants.
- **Afghan NGO 4** actively seeks to support achievement of District Development Plans when planning courses and settings targets of outcomes. The organization includes several types of instruction in addition to the core skill of the course, including literacy and numeracy, promotion of job placements, soft skills for small and medium businesses, and formal apprenticeships.
- **International NGO 1** described conditions for determining successful immediate outcomes, including limiting the distribution of "kits" to those graduates completing 90-95 percent of the scheduled sessions, and longer-term outcomes in securing a job in an established shop (50 percent) versus creating their own new shop. The organization also described the difficulty in assessing status of graduates at middle-to-long range time scale to assess impact.
- **International NGO 2** has relied on typical outcome measures for their courses, but also includes assessment of the development of "voice" and/or influence in the household, rather than only accounting for earnings linked to new or enhanced skills learned on their courses.
- **International NGO 3** checks similar output and outcome measures as other Afghan and International NGOs, including obtaining a job in an existing business, starting a new business, improved economic status, and increased empowerment in the family. The organization emphasized the need for "sensitive indicators for unique outcomes."

## 8.4 The adult literacy program

*"It is widely known that 50% of the literacy programs are ghost programs."*  
Senior Official at a PED

The literacy program is an initiative to tackle weak adult literacy through fixed-term, short courses at a community level in all provinces. The program is intended to be monitored at the start, during implementation, and at the end of the program. However, Program Officers report that they have received the budget for monitoring 'very late' and have been unable to oversee much of the program delivery at the community level.

Feedback from interviewees was widespread that these programs were often non-existent in the Provinces. Officers in the Deputy Ministry for Literacy themselves acknowledged many challenges and vulnerabilities in the implementation of the programs and poor coordination between MoE and MoLSAMD. Weak oversight led to problems in multiple locations, including improper implementation, collusion to hide the absence of any implementation, inappropriate and fraudulent participants, and numerous 'ghost' program sites.

## 9. Textbooks and resources for Learning

*“Every development partner except USAID has abandoned textbook procurement because of the problems and perceptions of corruption.”*

**Senior USAID Official**



*Girls High School, Faryab Province*

### 9.1 Textbooks

The MoE relies entirely upon DP support to print and deliver textbooks to schools across Afghanistan. Since 2002, USAID has provided support to print and distribute more than 130 million primary and secondary grade textbooks for students in Afghanistan; an equal number has been provided by DANIDA. As the parts of the curriculum have undergone several revisions, each revision has required new textbook specifications.

In 2009, the MoE initiated a revised curriculum for general and Islamic education including accompanying Teacher Guides for Grades 1-9. Based on that framework, new textbooks for basic education were printed and distributed with the support of USAID and other development partners such as DANIDA and the World Bank. Textbooks printed under the USAID Basic Education Learning and Training project were designed to reflect the latest revisions. Despite improvements upon previous curricula, the 2014 draft NESP III elicited critical comments from UNESCO, including “there are some content problems and typo errors in textbooks; teachers have not been given the necessary professional development in preparation for the teaching of the new curriculum; many textbooks are stocked in district education offices and are not distributed among schools due to a lack of budget. Distribution of textbooks proved to be very challenging. Despite printing enough textbooks, many students have not received textbooks or have bought copies of textbooks from market.”<sup>63</sup>

Parents commented that government textbooks were being sold by PED officials, teachers and students. One school *shura* noted that the MoE sends more textbooks to the schools where they have good connections and relationships, compared to other schools.

*“...there are kids who are not coming to school regularly or being punctual, the main reason is lack of textbooks and school learning resources. Kids who are coming from a poor family background are not able to pay AFN 500-800 for purchasing textbooks from the market.”*

**Parent participant from Focus Group Discussion**

A stark reality which consistently confronted the MVCA researchers in the field, has been the absence of textbooks in classrooms. It was common to observe very few textbooks at all, and those present were often of poor quality, old and shabby, or poorly produced photocopies of long-lost originals. Therefore many of these textbooks are not aligned to reflect the curriculum modifications and frequently for many subjects, a single book was observed being shared among three students.

MoE's response to this observation that 'Books are stocked in school and registered by the school's *Mutamed* (*the school's stock keeper*) and only distributed to students not to teachers. Therefore it is impossible that books are sold by teachers' was not supported by feedback from multiple interviewees.



***The absence of authentic textbooks (and use of photocopied textbooks from the market) was observed by the MVCA team in all parts of the country.***

*“...this year, I only received 5 books from the school and I have to buy the rest from the market.”*  
Grade 9 student

Usually the books that students receive from school are old black and white versions whereas new books, of good quality, and full-color, are available in the local bazaar. In some schools, or in places where students have a close relationship with teachers or the school principal, they get a complete set of books – while other students in the same classes and schools have to buy their books.

*"I'm sure that corruption and favoritism is in the process of book distribution in the education department, because I know some of the schools that are located in other parts of the city have received most of the books, while here in our area, we didn't receive those books and every year it is like this."*

**Teacher**

In the cities, all the books are usually available in the market, but in the villages and rural areas, some books are not available, so the students ask the school administration to provide the books for them, reportedly to no avail.

*"This year we paid AFN 1,000 to the school administration to provide books from the center of the Province for us which definitely can lead to corruption.*

*But on the other hand, most families who are living in the remote areas have lots of children with poor economic conditions, so most of those families cannot afford the expenses of purchasing books for their children and they have to pass the year without books which definitely affects the quality of their education and their interest in education."*

**Grade 12 student**

In recent history there have been many problematic issues related to textbook procurement at the central Ministry level. For example, a single Afghan publishing company won five out of six textbook procurement tenders between 2004 and 2010, despite not meeting the contractual obligations to print the books in-country.<sup>64</sup> The DPs most involved in textbook procurement – USAID and DANIDA – have implemented measures to improve procurement procedures and minimize corrupt practices at the highest level, though further problems have emerged down the supply line.

Books initially delivered to Kabul are not being effectively distributed to provincial and district warehouses and then on to schools. Several key respondents said that no budget exists for these distributions forcing school principals to collect books themselves from a distribution point for transfer to their schools. This last link in the supply chain clearly being the most easily corruptible as it is wholly dependent on the resourcefulness and integrity of the school principals. A thriving and highly lucrative secondary market exists in the supply of books to students, and those families who are able to buy books on the market gain an advantage over poor and rural families with meager resources and limited access.

Shortages exist for textbooks in minority languages. For example, in a province where many people speak Uzbek as a first language, there are very few books available in Uzbek. One

school *shura* explained that they needed textbooks in Uzbek, but there was only a single book available in their community's school in the Uzbek language to teach all the students from Grades 6-12.

Cases of discrimination have also been reported with regard to certain provinces receiving no textbooks at all. A province in the central highlands reported that they have not received any textbooks for the past five years, yet, according to the central Ministry in Kabul; books have been regularly distributed to that province.

## 9.2 Equipment and Resources for Learning

Inequality of access to textbooks and resources for learning aggravates provincial, ethnic and tribal divisions and exacerbates the differences between groups.<sup>65</sup> Corruption is rife in relation to both delivering materials and employing contractors. Sometimes, NGO- and DP-funded education programs have promised equipment, but find that delivering equipment in environments with minimal supervision carries significant corruption risks. As quoted here:<sup>66</sup>

*"USAID were insistent that we give [the schools] IT equipment—photocopiers, computers, printers and stuff like that.... [We] sent an external monitor, unrelated to the program, to check on some of the schools, to make sure what we had paid for was actually there... Well there was a 'goods received note' signed by the Principal saying that he had received equipment, but there was nothing there. This happened in a number of schools, not just one school, but probably 8 or 9 schools.*

*The driver, we contacted the driver, 'Yes, yes, I did deliver all those things...' He rang back two days later, and said, 'Actually, look, it's Ramadan, we have to be telling the truth... and this is the time for us to be honest and actually, well, I didn't deliver that stuff at all. They paid me to tell you that I delivered that stuff, but I didn't deliver that stuff.' Ok, ok, so then we said to the Principal, 'So why did you sign the 'goods received note' on these items if you didn't receive them?' 'Oh they paid me to sign off on this stuff. They gave me a bit of money so I would sign the form.' Now where that equipment is, I have no idea.*

*Whether the Principal received it and then sold it? Whether he took it home to his family? Whether the shop sold it to somebody else? No one knows where that equipment is, but it's not in the schools and we paid for it. It's just so ridiculous ... to give people in the middle of [a Province] a brand new photocopier with color cartridges. Like who's going to use that? Do they even have sufficient electricity? You know, they get one paper jam or finish the cartridge and that's the end of it."*

### 9.2.1 Science laboratories

Based on MEC team observations and school community interviews, ambition to support science education has so far out-paced the available resources. In most schools science laboratories are there 'by name alone' since the facilities do not have the necessary equipment or supplies. This was observed and reported in Kabul as well as remote provinces.

Often science-teaching materials were not available in the laboratory and for those few schools that did have some consumable resources, these were found to be beyond their safe usable date. Science teachers acknowledged they could not conduct (or demonstrate) experiments since they do not have the necessary skills and technical knowledge for these tasks. As a result, even where school laboratories exist, students rarely get the chance to use them and engage in practical work.

The MEC team visited a TTC and observed a development partner-built laboratory facility with six laboratories – two each for biology, chemistry and physics. The labs were equipped to a level of science experimental work established for activity levels well above the curriculum content for which these TTC students are being trained (up to Grade 9). None of the TTC staff had themselves been trained in the sciences and they acknowledged they were forced to consult YouTube videos for ideas about how to teach the material. In this case, there was an obvious disconnect between the ambition to deliver science curricula, appropriate learning resources, and local conditions.

### 9.2.2 Computer Suites

Very few of the 138 schools visited for this MVCA were found to have a computer suite; in the few that did the suite was locked and unused by students. Upon questioning, one principal cited the absence of a qualified computer teacher as the reason why the school's suite was idle. However, the MEC team found schools where teachers of math or science were present and apparently capable of teaching computer classes, but they were not scheduled to do so. The MEC team also heard reports of schools where the administration itself used the computers, the computer suite would only be opened for teachers, or the school did not have reliable electrical supplies to allow for use of the equipment.

During data gathering the MEC team learned of provinces where computer science is an accepted element of the curriculum, but there are no computer classes in the local schools. According to an interview respondent at MoE in Kabul, about 7,000 computers were purchased under the EQUIP project, but they were distributed to locations without computer teachers, computer classes, and/or reliable electricity. He reported that he had personally visited a school in one district where he found the computers were stored in a dusty room and had never been used.

### 9.3 Furniture

*“...Once we witnessed a large number of chairs that came to our school and it was under the tent for a while but we didn’t see their distribution and suddenly they disappeared.”*

**Teacher in a Remote District**

The majority of schools, both in the big cities and more remote areas, continue to face a lack of chairs and tables in their classrooms. The MEC team observed two-person benches that were being used by four students at once on account of limited furniture, and in some locations students were expected to sit on the ground.

In principle, furniture repairs are only supposed to be undertaken by the Ministry itself, so individual schools have no discretionary budget to arrange for repairs using local craftsmen and labor. As a consequence, in some areas the school management collects money from the students for the repair of chairs and desks, but there is no monitoring as to how the money is spent, and reportedly in many cases the repairs are never made. The MEC team also heard accounts from village locations of school administration using the facility's chairs and tables for meeting their personal or family needs.



***Girls High School, Jaghori, Ghazni Province***

## 10. Alternative schools – Community-Based Education (CBE) and Private schools

### 10.1 Community Based Education (CBE)

*“Many of the development partners are in love with CBE, but the outcomes are very variable and sometimes we just don’t know what is happening as the programs are run off-budget, by NGOs. There is a danger of them developing a parallel system alongside the Ministry of Education.”*

**Senior Official at the MoE**

Community Based Education (CBE) is a general term that encompasses all forms of learning such as in primary education, lower secondary (Grades 1-9), coaching classes for girls/women who have dropped out of their secondary education, and Kuchi classes.<sup>67</sup> CBE currently provides education services for around 68,000 children (62 percent girls), though this number may be higher.<sup>68</sup> This includes children with disabilities, taught by around 2,500 teachers.<sup>69</sup> In the village-based schools, students are taught the official national curriculum. The schools are designed to cater for students who live more than three kilometers from the nearest MoE school; students study for a minimum of 2.5 hours a day, six days a week (excluding Fridays).

*“This school is very important for our people because in public schools there are not female educated teachers and also they are very far from this village and it is very difficult for children to go there”*

**Head teacher, village primary school**

#### 10.1.1 School management – NGOs and local communities

The CBE centers are mostly supported by NGOs and INGOs in rural and hard-to-reach geographic areas where the public schools are not easily accessible, especially for younger children and girls. Monitoring and oversight responsibility belongs to the associated DED and monitors from the implementing agencies.

Based on MEC team interviews, Focus Group Discussions, and observations, the CBE centers are valued and respected by the communities where they exist. As they are close to the families they serve, there is a greater sense of ownership, compared to more distant MoE schools. The operation and management of the centers were described as effective. In addition, parents are able to visit and monitor the CBE classes due to the proximity of the sites.

### 10.1.2 The learning environment

The MVCA team observed teachers that appeared motivated and utilized learned-centered teaching approaches to engage students, including group work.

*"The Principal of our school regularly monitors the classes and school environment. She has regular meetings with teachers and also parents. We have an active shura and parents are regularly visiting the CBE."*

**Teacher at CBE Secondary School**

*"... the CBE class is monitored by the village shura especially in terms of kids' absenteeism, and we are having enough textbooks, stationery and other learning resources."*

**CBE Teacher**

CBE classes reportedly experience regular monitoring by both the sponsoring NGO/INGO and village *shuras*. Rates of absenteeism were much lower in CBE settings when compared with public schools, according to observations by the MEC team. Additionally, the classrooms were notably clean and the students appeared well disciplined.

*"... kids' attendance is good because school is located in the heart of this village and I'm visiting this class from time to time; and on the other hand kids are getting much encouragement from receiving tools and equipment like bags, color pencils and local made materials. This makes kids punctual and also, the shura is active in this village and the CBE class is a better place for small kids, especially for girls as they are able to get to CBS classes without any risk."*

**Parent of CBE Student**

In these CBE settings, where community ownership is strong and there is regular monitoring and oversight of the operations by both managers of the site and officials from the sponsoring agencies, there are few opportunities for teachers to be absent without reason. According to stakeholder interviews from these settings, resources for learning are less likely to go astray through negligence or corrupt practices. The CBE learning center resources and equipment were reportedly received on time, and with sufficient quality and quantity.

*"The [implementing agency] brings new books for school every three years. The books are one of the most important teaching materials for students."*

**Teacher at a CBE school**

In these small and informal settings (predominantly primary education), teachers need to be able to teach across several subject disciplines and to improvise with equipment and materials, especially, for example, in science classes. This is in contrast with many public schools where specialist science facilities are observed to be idle for want of the correct equipment and supplies.

### **10.1.3 The Learning outcomes**

Independent research has confirmed that the learning outcomes for children who have attended CBE settings are significantly better than comparable children in government schools. A study conducted by Save the Children found that while 73 percent of Grade 3 children from CBE could read with comprehension, this figure dropped to 43 percent of the sample of age-matched children from public schools.<sup>70</sup>

*“I am chemistry and physics teacher. For some lessons, I bring local materials and sometimes I ask the students to bring simple materials, and students are satisfied. I would like to run training session about the use of local materials for all public school teachers, because most of the teachers don’t know about how to use local materials.”*

**Teacher in village CBE center**

Another larger study examined CBE provision in 31 villages where 1,490 children were being educated in rural communities in Northwest Afghanistan.<sup>71</sup> The study found significantly increased enrollment and improved test scores among all the children, compared with government primary schools. There was an overall 42 percent increase in enrollment and the 21 percent gender disparity was eliminated; test scores were significantly enhanced compared to the control schools and the benefits were seen to accrue disproportionately to girls.

## **10.2 Private schools**

The number of private schools is small, representing less than 10 percent of schools nationally. These schools are educating less than two percent of the school-age population. In the major urban areas such as Kabul and Herat, the proportion of education in private schools has notably increased (Annex 3 provides a summary of the number and type of private schools across the country). In Kabul, the proportion of school-age privately-educated rises to five percent, more than two and half times the national average; though this is still considerably below international averages in comparable education systems. The data from EMIS indicate that Kabul City has by far the largest number of private schools at 599, followed by Herat (142), Khost (93), Nangarhar (84), and Balkh (51).

The MEC team observed relatively low-fees (USD 250 per year) not-for-profit private schools which report they are able to pay their teachers wages at rates significantly above those of teachers in MoE schools. Parents from these private schools reported to the MVCA team that

the perceived higher quality of teaching, and available resources had persuaded them to move their children out of government schools and into these private settings.

A complicating factor in several private schools is the use of 'Oxford textbooks' to support an 'Oxford curriculum' alongside the standard national curriculum. Parents reported that use of this additional, English language content was an appealing feature of private school education. Another distinguishing feature of private sector schools is the lack of disruption from an extensive 'winter break,' compared to the three-month break for state schools.

Alongside the provision of private schools, a thriving market exists to supplement school lessons with private tutorial classes. These classes are especially attractive for lower-income parents who are unable to afford the fees for full time attendance at a private school. The private tutorial classes are often taught outside regular school hours by teachers from government schools. The existence of these classes means that teachers may be incentivized to teach sub-optimally at the government school classes to maximize their potential for rent-seeking through saving their 'best' teaching for the out-of-hours classes. In any case, when government teachers offer private classes on the side, this distracts their focus and draws their energy away from their government teaching responsibilities.

Questions continue to be raised about MoE's capacity to monitor the quality of private schools. There are occasional instances of schools being threatened and closed, particularly in Kabul City, but actions by MoE have been relatively infrequent (see Annex 1). In January 2017, there were media reports that 52 private schools in Kabul City had been closed by MoE due to lack of business licenses, tax evasion, or low quality of teaching. Principals and proprietors of private schools, who the MVCA team interviewed, described 'unfair and unreasonable tax demands' in relation to MoE threats and closures of their schools.

### **10.2.1 Motives for attending private schools**

Parents have described to the MEC team a range of reasons for transferring their children into a private school, including desperation with the perceived poor quality of the teaching at government schools and persistent teacher absenteeism. While there is a great variation across the private sector, the private schools visited during this assessment were observed by the MEC team as being more physically comfortable than MoE schools, with books and other learning resources present for the students; and most critically, there were teachers in the classrooms. Observations also pointed to private schools providing more time for learning, with a longer average school day, and in most cases, a longer school year, owing to their approach to a shortened winter break compared with MoE schools.

There is a wide variation in the fees charged by private schools, but there are several not-for-profit establishments that are considered relatively affordable, at least to those families with at least one wage earner. Having a 'market orientation,' private schools were described by parents as focused on service and satisfaction; complaints to principals were seen as being taken seriously, and shortcomings usually addressed.

From the teacher perspective, they are generally well satisfied with their work in the private sector according to information gathered by the MEC team. For many of the young graduates who have been unable to find a job in government schools, or are unwilling to pay the customary USD 1,000 to secure employment in the public sector, the private sector offers them access to employment. A particular disadvantage that the MVCA team heard from private school teachers is the longer teaching hours in private schools, though this is offset somewhat by the higher salaries.

### **10.2.2 Corruption risks in private schools**

Corruption in private schools was reported in both directions, with schools corrupting the national curriculum they have been licensed to teach by the MoE and making money in unethical ways through extorting parents, and on the other hand, school proprietors being subject to corrupt MoE officials demanding bribes.

In the first case, there are schools that are using unauthorized textbooks, for example from Pakistan, that do not cover the necessary curriculum content and breadth as specified in MoE curriculum. There are, additionally, instances of unscrupulous school proprietors, charging families a fee to overlook poor attendance and failure in schools' examinations. The MEC team heard reports from some parents that, "...private schools are becoming a kind of trade zone to make more money."

Private school proprietors can also be victims of corruption, having to pay local officials to process school examination data in a timely fashion, rather than having to wait for months for the results to be authorized. The MEC team received reports from school proprietors of petty corruption and demands for bribes from MoE officials. In one example, a private school proprietor described tax laws for schools as a vulnerability: The school was initially told to pay taxes of AFN 300,000 but was subsequently informed that if they paid AFN 70,000 directly to the official, their records would be cleared.



# PART B

# Leadership & management

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Independent Joint Anti-Corruption  
Monitoring and Evaluation Committee

## 11. Leadership and management in the Ministry of Education

So far, this MEC report has concentrated on the ‘delivery end’ of the education system: the provision of education to students by teachers. This is where the test of an education system is found, and the verdict from interviewees was clear: There is corruption in such a high percentage of teacher appointments, with the consequent loss of educational quality, that the MoE is seen to be failing in its central purpose of educating the nation’s youth.

This fundamental point came up again and again in interviews, especially from parents. When the very concept of education is corrupted, successive generations do not develop the capacity to play a full role in a democratic society, as they lack basic literacy and numeracy; they do not acquire the instrumental skills in order to earn a living and to survive in competitive world. Perhaps, most importantly they do not develop a strong moral compass to tell right from wrong and to question authority where necessary.

Being a highly centralized system, the source of most of the problems – and the solutions – is to be found at the heart of the system, with the Ministry and the officials in Kabul. The problems of extensive nepotism, weak controls, inefficient and corruption-prone procedures and policies are all well-known and are long-standing, dating back at least 15 years.

Accordingly, MEC took considerable time to interview officials and stakeholders to understand the full complexity of corruption problems that exist. MEC interviewed 111 Ministry officials in Kabul and a further 127 officials from Provincial Education Directorates. MEC received a wide range of useful and thoughtful comments from officials.

They reflected a similar mix of comments to those that have previously been described in this report:

**Managers lack authority.** For example: ‘Managers of the central departments do not have direct control of the monitoring teams in the provinces and districts’; ‘We do not have transport and allowance to monitor projects well and check the quality of project’; ‘No coordination between development budget and public budget during assigning budgeting’; ‘No clear system between programs and departments; Not good coordination between the planning and budgeting departments; Political pressure, no respect of the authority of MoE by MPs’;

**Procurement corruption:** ‘Announcing of a project, contracting of the project and evaluation of the project is done by one department of procurement and this is a mistake – the gaps make opportunities for corruption’. ‘Extensive corruption with cash payments in provinces, and corruption with contracts and procurement’; ‘Still more corruption in books publication’; ‘Corruption with printing of text books, procurement, certificates, construction, EQUIP and adult literacy courses’; ‘High levels of embezzlement in procurement and contracting’; ‘Corruption with procurement and contracts, especially in provinces which are insecure and far, or difficult to monitor’; ‘Engineers who are responsible for monitoring and evaluation from

MOE side of the school building construction projects collude with the implementer company; ‘Members of Parliament interfere a lot in procurement.’

### **Multiple reports of problems of ghost teachers and ghost schools**

**Falsification of data:** ‘There is lots of falsification of data’; ‘The most common challenge in this department is that the number of vacant position in schools doesn’t have accuracy; further there is no database for registration of teacher and staff’; ‘Lack of a unique and integrated data collection mechanism and system, inconsistency in the data collected by different sources, over-reporting of school data by the Principals and Headmasters of the schools’; ‘There is no comprehensive database system to generate data easily and restrict the corruption’; ‘The number of students are decreasing in warzone regions and these changes are not represented in the EMIS’; ‘Monitoring department does not have any statistics of students and teachers, because there are some political pressure and relations do not allow us to have authorization to collect the number of students and teachers’; ‘Relations and political pressure disrupt the balance of development budgets in most Provinces.’

**Textbooks:** ‘Over 15 years, there has been a contract with only with one printing press by the name of Bahir, for printing books for the school curriculum, millions of money have been paid to the company, but still we do not have enough books in schools. Bahir sub-contracts with two foreign printing presses in India and Malaysia – half of the books are printed out and the money for the other half of the books is shared between Bahir printing press and the two foreign printing presses;’ ‘In some districts, schools are closed and inactive, but are still reporting that books are being sent, in fact the money for the books has already gone into the printing press’s pocket’; ‘The active schools do not have enough books and it is a big problem according to monitoring team reports.’

**Nepotism:** ‘Prominent occupants of government positions and MPs misuse their authorities and try to interrupt the recruitment for nepotism’; ‘Appointments are based on nepotism’; ‘Unqualified people are provided with the exam questions beforehand’; ‘Favoritism is more preferred than talent and specialization of teachers in recruitment’; ‘In our area, TVET, political selection is more important than considerations of qualifications and talent;’ ‘Most of the time school managers introduce their relatives; We monitor school teachers’ attendance but school managers do not agree with us to correctly monitor the teachers’ attendance sheet; Teachers do not receive their overtime completely, because lots of money goes to the pockets of school managers – it is all because school managers have strong relations with MoE’.

Among those officials who gave detailed responses on the full range of corruption issues encountered, the four main issues raised were the following:

**Main corruption issues raised by officials:**

*Poor control of finance/budget and/or inadequate control*

*Poor, old or confusing policies and procedures*

*Falsification of data*

*Nepotism*

Officials also made a number of practical points:

- The main problem in our deputy ministry is that the politics changes regularly, which effects the quality and quantity of work and all the staff are regularly changing;
- The continued extensive presence of ‘acting’ positions. In many key positions, the Heads are acting for a long time and they are obviously not paying attention to the efficiency of the work as they are not sure if they will be appointed for this position more permanently, so they often use the time they have to earn as much as possible through corrupt practices;
- There is a major lack of a sufficient budget for the monitoring; low capacity of staff; lack of responsibility among staff; and lack of support from high ranking authorities for the enhancement of literacy in the country;
- The outsized extent to which the ‘Technical Assistants’ actually run all the key processes.

## **11.1 Culture, Policy and Systems**

During many interviews for this assessment, Ministry respondents indicated that although corruption was not part of Afghans’ traditional culture, things have changed in recent years and it is now part of a set of cultural expectations. This means that everyone, including officials and citizens, have come to acknowledge that corruption is part of daily life. The citizens seeking a job in the public sector understand that in order to be successful in any recruitment process, they need to resort to bribes, family ties or political allegiances. This MEC assessment has confirmed that this is most certainly the case within MoE. There have not been improvements in the two years since MEC performed a VCA relating to recruitment in MoE, concluding at that time “...the MoE appears to be unable or unwilling to maintain the integrity of the teacher recruitment process... The corruption vulnerabilities identified in the teacher recruitment process are numerous.”<sup>72</sup>

Rule of law entities such as the police, the Attorney General’s Office (AGO), and the courts operate in ways that have failed to inspire the confidence of the population. The weakness of these entities, and existing allegations of corrupt practices, have ensured that many civil servants believe that they can indulge in unethical practices without being called to account – the key respondents in this study reported that unaccountability is frequently observed in the education sector. The officials interviewed by the MVCA team had rarely heard of any officers from the education sector being punished by the courts because of corruption in the past 15

years. At the same time, there have been numerous historical and contemporary allegations of corrupt and inefficient practices among inspectors at the AGO, the police, and in the courts.

In the education sector, the country has made significant progress since in 2001, when the number of children going to school was merely a few hundred thousand. Now, this number has grown to seven to eight million students, although the actual number may vary by a factor of several million and is contested (this may be due to political machinations – as the number may have been intentionally over or under reported by various MoE administrations – and at the very least points to the weakness in Afghan education statistics).<sup>73,74</sup> The number of schools being constructed and the number of teachers being hired in such a short period of time has been unprecedented in Afghanistan's history. Where the numbers have increased, the quality of the learning experience remains a challenge for the state. The substantial financial resources invested over the past decade to achieve this rapid expansion have resulted, for some, in irresistible temptations to indulge in corrupt practices in the education sector.

The recruitment procedures, for all but the most senior appointments at the MoE, were widely reported to reflect a culture of impunity of ethnic discrimination. There are different standards of recruitment being practiced by the MoE at different levels. The most senior officers are now supposed to be hired through a competitive process overseen by third party independent monitors, such as through the Capacity Building for Results (CBR) initiative. CBR is intended to ensure fair play and merit-based appointments. However, most recruitment at the MoE is undertaken by a letter of appointment or executive order approved by the Minister or a Deputy Minister. It is perceived by many of the key respondents that people who are hired in this way, regardless of their position or grade, consider themselves to be privileged – permitting them to do whatever they want without being punished. The MVCA team has been told MPs, high officials of the government, and other well-connected people recommend appointees. These MoE appointees are described as having the support of politicians, and subsequently enjoy protection for any wrongdoing.

Another major problem frequently cited in key respondent interviews has been the award of big contracts, which are transparently processed on paper, but in reality, are fixed to the companies belonging to high government officials or their relatives. Since those companies are connected to high government officials, either through shared profit or through patronage, they are almost certain not to be punished for their misconduct. This perception of contracting risks is certainly not unique to MoE.

An official from an MoE Procurement Directorate office stated, 'The Goods Department can provide fake quotation or can collude with two or three companies for an organized quotation,' and 'I, as an employee of Procurement Department, confess that a corrupt network inside the Procurement Department is established. They just pass the opportunities for each other. Within this situation, procurement cycles, from first to the end, are vulnerable to corruption. Especially, assessment phase (bid opening) and implementation phase is much vulnerable to corruption.'

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In another example, there are no limitations defined in the MoE Procurement Department about how many projects can be given to a company at the same time. For instance, 62 projects in Bamyan Province have been contracted with one company, which has now failed, and so the company will not complete those projects. There are many other companies that have left their projects incomplete but still get more project contracts from MoE's Procurement Department.

There are many cases where corruption at MoE has been reported but either the actions taken have failed or until now no action has been taken. In the case of the office of a deputy ministry, the MVCA team was told of a director who is the relative of a Member of Parliament. The director was accused of misusing his authority for personal gain and was terminated from his post. However, with the support of the MP, this director was not only reappointed but his return to the role also resulted in the deputy minister being forced to resign.

In another example, many people at MoE have called into question the personal integrity of a Human Resources manager at one of the Provincial Education Directorates. Under this person's supervision it is alleged that teaching positions in the province's capital city are routinely 'sold' for USD 1,000 to 1,300. Many teachers and their relatives testified to this practice.

## **11.2 Political interference – meddling and nepotism**

One of the striking things about the MoE in Afghanistan is the factionalism and the lack of cohesiveness that exists within and between the different parts of the Ministry; these all serve to create a rich breeding ground for corrupt practices.

MoE is uniquely vulnerable to the pressures of influential persons and MPs, for the reasons already presented – of MoE being such a large reservoir of jobs. As long as elected representatives and other high government officials are free to interfere with official recruitment and promotion processes and procedures without fear of suffering personal consequences, central reform will not be possible.

## **11.3 Education budget and the school population**

MoE has the highest budgets of all the civil ministries (excluding Ministries of Defense and Interior). MoE's expenditures (2012-2014) were estimated at USD 2.5 billion, with at least 43 percent funded by DPs. Of the DP aid, only 25 percent was on-budget, with the remaining development expenditure off-budget.<sup>75</sup> In line with the promises made at the 2012 Tokyo Conference on Afghanistan, DPs are committed to putting increasing amounts of their funds on-budget, but deep ambivalence persists on account of widespread corrupt practices. Misappropriation of public funds has become well known among the DP community – and they are increasingly reluctant to lose control of their projects by relying on the MoE to undertake project implementation and oversight.

As budgets are driven by the number of young people of school age, which determines the demand for school places, an accurate measure of the number of school students is crucial to inform future planning. Unfortunately, as mentioned previously, since this figure is politically

charged there are many incentives to overstate (10.5 million), or under-state (6 million) the true figure.

The reasons for many of these inaccuracies are plain: first, because it is reported that only about 50 percent of administrative districts are in government control, while the remainder lie in the hands of opposition forces who have no reason to cooperate with the government; and second, in the government-controlled districts, the manual gathering of data prior to data-entry in EMIS is only verified in 5 percent of schools, and there are natural incentives for school principals and district officials to over-state numbers in order to garner more resources.

From an operational perspective these uncertainties are seldom challenged and often perpetuated, as the Afghan Research and Evaluation Unit (AREU) notes in relation to the education sector: “much is still unknown about service delivery in Afghanistan, especially at district level, including basic information about actual student attendance rates, the qualifications of teachers, and levels of teacher absenteeism.”<sup>76</sup> Beyond any intentional misrepresentation of data, there are also serious concerns around the weak capacity of education personnel, at all levels of the system, in gathering, sharing and analyzing education data.<sup>77 78 79</sup>

#### **11.4 Audit department**

According to MoE’s Audit Department, they have referred 61 cases of suspected corruption to the AGO, with different levels of seriousness and complexity, but none of the people involved have been prosecuted. The staff of the Audit Department is understandably discouraged from acting on any new cases as they suspect that nothing will transpire. Consequently, by default these officials become part of a corrupt system instead of acting against suspected corrupt colleagues. There are many cases where *prima facie* evidence has been presented, such as the deliberate and obvious faking of invoices by a director of a PED, but no action has been taken thus far. This underscores the corrosive effects of corruption – as they lead to the disaffection and cynicism of those best placed to counter corrupt practices.

#### **11.5 Development Partners (DP)**

Since the fall of the Taliban-government in 2002, and in an endeavor to kick-start the education system in Afghanistan, the international community has provided generous funding over the past 15 years. The precise figures vary, depending on the source and the method of calculation, but by the end of 2016, USAID alone had spent almost USD 1 billion on education programs in Afghanistan. The Afghanistan Reconstruction Trust Fund (ARTF) administers funds from the DP community, with half of the funds coming from USAID and most of the rest from the World Bank. Via the ARTF, the Education Quality Improvement Program (EQUIP) program has been funding the Ministry of Education in an on-budget support mechanism.<sup>80</sup> There have been major control weaknesses in most of the EQUIP projects and it is estimated that as much as 40 percent of the available funds have been lost to corruption.<sup>81</sup>

Heavy funding into an embryonic education system in an impoverished country, as it has suffered more than four decades of armed insurgency, has fed corruption. Afghanistan has only a weakly constituted civil society, little genuine accountability, and a culture that has come to acknowledge corrupt practices as the norm. The most important reason for the corrupt practices and massive leakage of funds has been weak and ineffectual oversight of project implementations.<sup>82</sup> As the security situation has worsened so the DPs have been drawn into a vicious cycle of increasingly complicated attempts at program oversight. Some DPs have become increasingly reliant upon third-party agents to monitor the disbursement of funds and implementation of programs.

Together with USAID, the World Bank has been a major contributor to the education reconstruction initiatives in Afghanistan, disbursing its funds through the ARTF. It has supported EQUIP since the Program's inception in 2004; the Program's second phase, EQUIP II, should have been completed in 2012, but it was given a two-year extension and an additional USD 250 million. At the end of 2014, when many of the construction projects were still not complete, a further extension of two years was provided with no additional budget provision. At the official conclusion of the Program in 2016 more than 400 school building projects remained incomplete, despite the disbursement of all the funds.

	<i>Responsible for Construction</i>	<i>Incomplete Projects</i>
1	School <i>shuras</i>	417
2	School management <i>shuras</i>	27
3	Indian-funded contractors/companies	19
4	UNICEF-funded contractors/companies	11
5	EQUIP II by contractors/companies	169
6	GPE by contractors/companies	140

MEC reviewed formal documentation and official reports showing approximately 1,700 school construction, re-construction, or completion of infrastructure projects were not completed. The MEC team was unable to conclusively verify the number of incomplete EQUIP construction projects, with varying figures provided by the entities that were responsible for the construction, repairs, or completions.

## 11.6 Gender at MoE management level

At the MoE management level there is glaring lack of political will and/or interest within the MoE to accept women in leadership positions.

At the top level in Kabul, there are currently only four women who work at the Directorate level – none of the six deputy ministers are female. Only one of the Grade One General Directors at the MoE in Kabul is a woman. There are no female Provincial Education Directors, and only one Provincial TTC is directed by a woman. This lack of women in senior MoE leadership constitutes and especially stark corruption of the ideal of education, and amongst

other problems, is completely unrepresentative of female participation in education, given that an estimated 38 percent of Afghanistan's students are female.

The lack of gender parity in MoE leadership, unsurprisingly, extends to the subnational level where none of the 34 provincial directors of education are women.

### **11.7 National Education Strategic Plan (NESP III)**

NESP was formulated in close collaboration between MoE and the major development partners, and represents a helpful degree of collective agreement about the best way forward for education in Afghanistan. The DPs, nonetheless, also have their particular priorities, as they are answerable to their own governments.

*“...the problem with most development partners is that they try and create development programs based around their own priorities with only superficial links to the government policy.”*

**Senior Education Officer at an INGO**

The current NESP III is focused on the four years from 2017-2021, and aims to build on its predecessor with a strong focus on quality rather than access. This is not to say that the education access problem has been solved. For example, even in Herat, which next to Kabul is one of the most prosperous and populous provinces, with 750,000 school-age students, 484 schools do not have a building out of the 1,002 schools in the Province. In the Plan's formulation, there has been a growing realization that education quality has previously taken a subsidiary role to access. NESP III also represents a departure from the previous phases of NESP, as it is thematically based, rather than being program driven. The three broad themes are: I) Quality and Relevance; II) Equity of Access; and III) Efficient and Transparent Management.

The plan has been carefully formulated and presented; as such, it has been successful in enabling the Ministry to qualify for USD 100 million pre-approved entitlement funding from the Global Partnership for Education, with additional discretionary funds available. The launch of NESP III coincides with the World Bank's successor project to the partially successful EQUIP initiative. Additionally, in January 2017, the Education Quality Reforms for Afghanistan (EQRA) project was announced, with a budget of USD 300 million, and is planned to run from 2018 until December 2021, and will align with NESP III.

Despite not yet having a specific anti-corruption plan, NESP III explicitly addresses corruption and the MoE's intentions towards addressing it, stating:

*“The population perceives corruption as the second major problem facing Afghanistan. MoE has identified the elimination of corruption from education offices/institutions at all levels as a high priority. Action elements include teacher recruitment and complaints management, as well as transparent identification of eligible contractors and suppliers.”<sup>83</sup>*

and:

*“MoE will develop, in collaboration with other stakeholder ministries, a robust anti-corruption strategy to restore public and donor confidence in equitable and transparent service delivery. Reported or suspected breaches of procedures will be investigated and reported openly.”<sup>84</sup>*

One of the major vulnerabilities of the EQUIP program – procurement – will have been reduced by moving all procurement decisions to the control and oversight of the National Procurement Authority (NPA).

There are, however, several other corruption vulnerabilities evident in the performance and quality indicators in NESP III. Here they are discussed in line with the three themes of NESP III:

**Theme 1 – Quality and Relevance:** *Students at all levels acquire the knowledge, skills, attitudes and values to be productive, healthy and responsible citizens prepared to contribute to the welfare of society and equipped for viable employment in the national and international labor market.*

The objective of Theme 1 relies upon a successful conclusion of the UNESCO-supported curriculum review that is currently taking place, and the implementation of its proposals. However, the curriculum review will require consistent attention to maintain reform as a priority of the Government. New textbooks and the revised curriculum need to be adopted at the earliest possible date; there would reasonably be an interval before these revised curricula would have a positive impact upon learning outcomes. Additionally, employer satisfaction is more likely to be enhanced by programs endorsed by the forthcoming report, such as the GIZ O/S2 initiative (see Chapter 8), which aim to feed the informal economy with an enhanced skill base. Further success from the Community-Based Education sector would also contribute to the achievement of this Theme.

**Theme 2 – Equitable Access:** *Increased equitable and inclusive access to relevant, safe and quality learning opportunities for children, youth, and adults in Afghanistan, especially women and girls.*

Theme 2 will be vulnerable to the historic and contemporary concerns around the extent of government control and influence outside of the major cities. With around 50 percent of the districts *not* under government control, there is a distinct risk that attendance will be suppressed, or at best data about attendance and performance considered unreliable.

**Theme 3 – Efficient and Transparent Management:** *Transparent, cost-effective and efficient delivery of equitable quality education services at national and sub-national levels.*

Theme 3 will be at risk of corruption until there are more effective and empowered local oversight mechanisms of the operations of schools by communities, school *shuras* and Community Development Councils. The monitoring of the outcomes of the Plan is also highly dependent upon EMIS data, which, as this report highlights, remains unreliable.

## 12. Provincial, district and shura management and leadership

A good quality education system depends greatly on cooperation and coordination between different stakeholders at all levels; it relies on people working together towards a shared purpose.<sup>85</sup> However, one of the most significant and insidious impacts of corruption is a divisiveness, which prioritizes individual over collective needs, and works against solidarity.

Quite literally, corruption pits students against students, students against teachers, teachers against school administrators, school communities against district education departments, district education departments against provincial education departments, provincial education departments against MoE in Kabul, and different MoE departments against each other. As a senior provincial education official explained:

*“...The big problem in the education sector here is that when a person tries to bring positive changes, other members of the education department unite against him and remove or transfer him from that department. There is no one to fairly judge the situation and take action and remove the corrupt people from the department. When the person who tries to bring changes is transferred, then the government does not give him a chance in other places and his pension fund is also burned. Because of these issues, although there are a lot of people who want to stop the corruption, they are afraid of the poor government system.”*

It is therefore not enough to bring individual bureaucrats with integrity into the present system. People with a vision and integrity must be supported by their superiors. Ultimately, it is a leadership issue that must be faced by MoE and indeed all other Afghan government institutions.

### Poor communication

Divisions between education stakeholders are not necessarily intentional and can be a by-product of poor communication. However, whether intentional or not, the divisions caused by a lack of communication can lead to corruption and at the school community level, this works against positive engagement between community members and their schools.

One of the biggest challenges here is that schools do not communicate well with parents and other community members. For example, parents in one school community consulted for this MVCA reported that they had no knowledge or understanding about any aspects of the way their children’s school is managed, its budget, or the official curriculum. Indeed, they said that participating in the MVCA’s Focus Group Discussion was the first time they had actually been invited to the school.

Parents have expressed similar concerns in other schools and provinces. This lack of communication between schools and parents works against parental engagement and a sense of community ownership of schools. It also means that parents’ lack of knowledge about schooling and school management makes it very difficult for them to challenge corruption and hold school authorities, let alone education authorities at district, provincial or national level, accountable.

## 12.1 Provincial Education Directorates (PED)

The MoE, like all Afghan government ministries, remains a highly centralized organization, and has traditionally devolved power to provinces with great reluctance. The post of Provincial Education Director is a highly politicized position, with reference both to factions within MoE in Kabul and local politicians. In practice the MVCA team observed that around 90 percent of a director's time was spent on HR matters, developing influential relations and negotiating the sale of the education posts in the province. These directors often find themselves required to intervene in the minutiae of personnel management. In an endeavor to break the link between nepotism, patronage and appointments, it has been announced that the PED appointments will be made under the strictly merit-based CBR process. To date only a small number of appointments have actually been made using CBR.

The administrative structures of Directorates vary greatly in their capacity and their ability to rise to the challenge of devolved responsibility. This is owing to the fact that staff allocation is done on the basis of administrative division, rather than the actual number of schools, teachers and monitors. For instance the Directorate in one province, which carries administrative responsibility for approximately 18,000 personnel, has the same number of administrative staff as another province, which has only around 3,000 personnel to administer.

The enhanced role and the greater responsibilities that the provinces will carry, as envisaged through NESP III and the new Citizen's Charter National Priority Program (CCNPP), will require a review of the provincial staff allocation policy. This will be necessary in order to facilitate community empowerment and promote local accountability mediated through Community Development Councils (CDCs). This local accountability is welcomed and should begin to address some of the worst excesses and evident exploitation in the present system. For example, parents from a school community recounted stories that some members of the PED had tried to coerce female students and newly qualified female teachers into sexual relations, in exchange for high exam marks and access to teaching positions.

It is evident that, historically, the PED positions have been filled through grace and favor, and they are highly political appointments, since with the education portfolio also comes a great number of votes from parents who are the end-users of the education service, on behalf of their children. The accountability of the director is, notionally, to the Minister of Education. In several Provinces the governor's interests must clearly be considered within the web of patronage that exists at provincial level. In practice, the MVCA field research has indicated that a large amount of the PED's time is taken up in answering requests and enquiries related to teacher recruitment – a function that, rationally, should be undertaken by more junior provincial officials. It is a reality of the corruption vulnerabilities in the teacher recruitment process that so many PEDs take such a keen interest in recruitment.

### Monitoring and oversight by the PED

Since discretionary budgets in provinces are so restricted, there are severe constraints on the capacity of the PED to monitor the operations in the districts and in schools. Moreover, the

PED does not have a budget to pay for transportation of teaching and learning materials to schools. This means that often teachers or school principals, at their own expense, must arrange to collect these items. It has even been reported to the MVCA team that, on the occasions when inspectors come from district or provincial level, they expect some amount of money from school administrators to cover their transportation; this clearly compromises their independence. Consequently, the accuracy and integrity of the evaluations of schools are vulnerable to corruption as well.

## **12.2 District Education Directorates DEDs)**

The role of the DED is to provide a level of evaluation and monitoring of the activities in their district. However, Ministry officials at the DED are alleged to have abused their positions and power to extract personal gains. For example, some teachers report having experienced interference with their salaries, with no explanation. A teacher reported to the MVCA team that the District Education Director had cut AFN 400 from teachers' salaries without explanation and was putting pressure on teachers not to complain.

There are many ways in which the DED officials can support the professionalism of school principals. A teacher reported that his school's principal was only present in school one or two days each month. A group of parents from the same province also noted that their children's school principal was often absent and so were many of the school's teachers. A school inspector in the province also reported that many MoE staff are frequently absent from their positions. A general lack of oversight and accountability has been noted as a common feature among all these examples. When a community of students sees this sort of behavior being tolerated, they come to understand that the system is there to be cheated, and this often becomes reflected in their own behavior.

## **12.3 Community Development Councils (CDCs)**

In practice, there is poor coordination between the work of the CDCs and the provincial administrations, which are often unaware of CDC's practices. Indeed, the CDCs themselves are not sufficiently aware of the activities of the schools in their communities. For example, an MVCA field team member was told in one province of an issue at a local girls' high school where a development partner had provided a grant of USD 5,000. This award had been made for the purpose of school improvement through the CDC, but the funds were allegedly misdirected and never reached the school. When a meeting was called between the District Education Manager and the school administrator, even the District Education Manager was not aware of the grant. This lack of engagement and poor communication resulted in a gap that permitted the funds to be more easily misappropriated.

This instance was said to be typical of several similar corrupt misappropriations in this district of the province. The school *shura* was considered 'symbolic' without influence on the issues affecting their school – in other words a "ghost *shura*." In general, this MVCA's findings have been consistent with this example, with the *shuras* and CDC's typically seen as being more effective in the urban settings than those in more rural areas, where a great proportion of the

population are illiterate and have limited firsthand experience with representative democracy.

#### **12.4 Parents and School *Shuras***

Often, parents, families and school *shuras* lack the knowledge and capacities in understanding, managing and supporting their communities' schools. This is an issue that must be addressed by the facilitating partners of the CCNPP that will be responsible for training education sub-committees under the CDCs and Cluster CDCs to monitor the quality of education provision throughout Afghanistan over the coming years. Similar issues with the development and realization of the CCNPP have been raised regarding other sectors, including health.

Various school *shuras*, for example, expressed uncertainty about their roles and responsibilities in relation to education. Many parents and families also have limited knowledge about their community schools and the education system in general. All of this stems from a lack of empowerment for communities and a limited capacity to take genuine ownership of their schools. This has been compounded by an education system that lacks transparency and in which decisions from higher levels – which affect school communities, such as teacher recruitment and the provision of textbooks – are rarely explained or discussed and which, if known about at the school community level, either seem blatantly corrupt or arbitrary.

In a sense, school communities, particularly those in rural and hard-to-reach areas, are caught in a system which on the one hand, is highly centralized, rigid and hierarchical, and on the other, does not have the capacity to provide proper oversight and support to much of the country.

***Key stakeholders at the school community level, as well as other levels of the system, are not empowered to challenge corruption and make positive changes. In many schools consulted during the MEC analysis, principals and head teachers expressed their frustrations at not having authority to discipline or fire poor performing teachers. This includes the inability to do anything about teachers who lack the capacity to teach or have relevant subject knowledge; teachers who are verbally and physically abusive and threatening towards their students, and other teachers; teachers who extort money from their students or force their students to do work in their homes or farms; teachers who are not competent to teach; are regularly absent from class, or present, but not engaged.***

Alongside this, principals and head teachers have limited, if any, say in recruiting the teachers they need for their schools. The result is that schools often lack teachers with the relevant pedagogical skills and subject knowledge capacities to offer a decent standard of teaching to adequately cover the official curriculum.

## 13. Education Management Information System (EMIS)

Accurate enrollment data are essential to educational planning. Over the past decade the MoE, working closely with the World Bank and other DPs, has been largely successful in setting up a functional EMIS in Afghanistan,<sup>86</sup> yet there are persistent queries over the accuracy of the data.

EMIS estimated that there are some 16,000 schools in Afghanistan and an enrolled student population of 9.2 million. These figures are hard to verify, partly because of migration and shifts in student populations, and because schools are obliged to keep students who have been habitually absent on the school roll for up to two years. This subpopulation is estimated to be about 20 percent.<sup>87</sup>

While the quality and reliability of the data in EMIS has been described as improved in recent years, the system relies on data to be collected and verified at a school and district level by local officials – many of whom admit they lack appropriate training and whose capacity to travel to schools is strictly limited.

A recent study for USAID<sup>88</sup> undertook a data quality analysis to test the accuracy of the data in EMIS. Enumerators were sent to 1,067 schools in all 34 provinces (about five percent of the total number of schools) to test the accuracy of the student and staff numbers in EMIS, compared with those actually physically present at these schools. The findings of the research, which was carried out over two months in late summer of 2016 by 78 enumerators plus support staff, confirmed an accuracy of the EMIS data to within +/- 12 percent. In almost every case the EMIS data was found to be overstating the actual number compared to observations within schools.

### 13.1 Inaccuracies at data entry and data verification

Another challenge to the effective utilization of EMIS is the reliability of the student numbers from the point of data-entry. Owing to unreliable data processing, the central database cannot be populated accurately. As there are doubts as to the integrity of the field-based enumerations, these key data need to be accurately and independently verified through a national school census to verify the baseline data. The absence of accurate data has facilitated the generation of 'ghost schools,' 'ghost pupils' and 'ghost teachers.'

The EMIS Directorate conducts verification of data by randomly sampling five percent of schools. The Directorate selects the schools for data verification based on doubts in the school data, and the variation of the data from previous years.

A number of specific challenges to data accuracy and completeness were identified in the MEC analysis. These include:

- Insecurity preventing access for in-person checks,
- Lack of sense of responsibility in filling the data collection forms,
- Forms not being filled in on time, and

- Remoteness of the locations of some schools (lack of transportation, costs of procuring transportation).

Monitoring teams (4,500 persons across the country) acknowledged that they do not have enough familiarity with IT equipment, they lack methodologies for cross-checking the accuracy and veracity of the data they enter, and they often rely on a sole source for the data (reports from the schools themselves), without any verification.

At the school level, data are collected from manual records (records of teachers, manual recording of students, and observational records of the school facilities); at the provincial level, MoE personnel are limited and data integrity is at risk as a result. As a 2017 USAID report notes, "Officials unanimously identify lack of training and capacity gaps at the provincial, and particularly at the District and school levels, as significant challenges for improving data quality and process."<sup>89</sup>

While the Technical Assistance staff at the EMIS Directorate is qualified and skilled in data management, the majority of MoE staff does not have enough knowledge to understand how to utilize information technology in education management. Based on MEC's interview findings, MoE has developed about 20 separate information systems. Owing to the current lack of coherence and consolidation, it is possible for information to be updated in one of these systems, but not be reflected as a change in other systems. This ultimately paves the way for variance and potential inconsistency in the data.

The MEC team found that at present there are significant deviations in the aggregate data provided by different Departments regarding the number of students and number of teachers in any given province. For instance, EMIS says that the number of students in one province during 1394 (2015) was 726,266 registered students while the Registration and Payments Department indicated this number to be 723,497 students in the same year. The number of teachers in the province according to EMIS was: 14,791 during 1394, while Registration and Payments indicated the figure was 14,413 teachers, Finance indicated 14,109, and the Education Director stated the figure was 14,260. In the case of this particular province, they had not been allocated any new teacher positions since 1392 (2011). These discrepancies certainly add to the risks of accusations of "ghost" entities.

## 13.2 Sample check of EMIS data at schools visited by MEC

As part of the data-gathering exercise for this analysis, when teams visited schools, enrollment and attendance data was collected from school administrators. These were collected by MEC and compared with the number in EMIS by interrogating the database on a school by school basis (the results are reported in Annex 4). The number of schools where data were gathered was 107, but corresponding data in EMIS were only available for 93 of these schools (enrolment data), and 88 schools (attendance data). The data refer to the previous four school years as the data for the current school year were unavailable at time of this assessment (July 2017).

### Enrollment

When student enrollment numbers in the 93 schools is compared with EMIS data for the four years, the results show that EMIS has been accurate.

	1392	1393	1394	1395
Average % by which EMIS overestimates enrollment	2%	2%	-2%	1%

This finding would seem to show that the MoE efforts of the least few years to improve EMIS have borne some result.

### Attendance

However, when the data for actual attendance is used, not enrollment, the result was significantly different. Now EMIS is seen to be overstating the attendance figures by 23 percent, with no significant variation between 1392 and 1395.

	1392	1393	1394	1395
Average % by which EMIS overestimates attendance (88 schools)	24%	24%	21%	25%
Average over the four years	23%			

*The detailed results are presented in Annex 4.*

## 13.3 Weak Skills in using Information Technology (IT) at the MoE

Using IT for administrative tasks and data management brings more transparency and accuracy to organizational systems. Official tasks are implemented efficiently and effectively where people understand how to use the technology and they trust it. In the MoE, most respondents reported that the aggregate IT skills across the administrative levels of the Ministry are very weak. Moreover, many staff have no interest in the development of their skills or knowledge of IT system or databases, nor are they required to develop these skills and competencies. A frequent complaint during the interviews with the EMIS Department personnel was that many people in the Ministry believe that they are too old and their length of service is too long for them to have to trouble themselves with learning about information technology. EMIS staff reported that many older MoE colleagues consider IT as merely

symbolic and that efficient information systems would make their roles obsolete (lowering the incentive for them to cooperate in using IT systems).

*"We had worked three years on a project to register and save capital at the Ministry. We then found that there is a problem in government policy which does not authorize electronic signatures, then we stopped the project at that point."*

**Administrative officer at the MoE**

Nearly all of the MoE operational personnel at the EMIS Department are DP-funded Technical Assistants (TAs). The TAs in the MoE often have a higher degree of technical competencies than their government appointed colleagues, though they have been described as being less successful in transferring their skills and capacity within the MoE. There have also been tensions regarding the differential salaries between TAs and other MoE staff.<sup>90</sup> As Ahmadi, who conducted recent doctoral research into workplace learning in the MoE notes, "The development employees who are called technical assistants (TA) are paid by international donors (IIEP and World Bank). There is a huge salary gap between these two groups, which causes tensions between them and also frustration for the civil service employees. This is a general issue for the whole Ministry, even the whole government of Afghanistan. The civil service employee participants believed that this huge salary gap was unfair."<sup>91</sup>

The weak IT skills among MoE staff remains a major vulnerability to corruption, due to over-reliance on paper-based systems that can be more easily falsified compared with electronic records. The low IT capacity of staff exists in all departments of the MoE, both at a central level in Kabul, and in the provinces. IT capacity was observed to vary broadly across provinces, including levels of understanding about how to use IT effectively.

There are many reasons for this situation; for instance, some remote provinces are located significant distances from major cities, and their villages or districts are not under control of the government. MoE cannot develop the capacity of its staff and provide them facilities; in many provinces they do not have reliable access to electricity to utilize IT equipment in the Departments. Despite the recent development of a system for certificate issuance, low IT capacity of MoE personnel has meant that the system cannot be run effectively.

*"The IT skills of the people at the Ministry of Education are weak, many people do not use email for routine communications and most of the systems are paper-based."*

**Senior government official**

Aside from IT roles, MoE recruitment processes do not require applicants to have a stated level of IT literacy. Appointments are often offered to people who lack understanding of IT systems, while suitably skilled and qualified individuals are overlooked.

Computerized recording systems do not exist at most schools and, most significantly, at district level. Information is typically recorded using a paper-based mechanism, including student attendance and teacher daily registrations. The reporting system, on which EMIS is based, remains unreliable.

## 14. Procurement

### 14.1 Control weaknesses in construction projects

The speedy and timely delivery of highly visible projects, such as new school buildings, is a hallmark of many stabilization initiatives in volatile parts of the world. School buildings are especially favored because they provide demonstrable public shows of support for one of the most widely recognized manifestations of progress and modernization. However construction and reconstruction projects are inherently risky since they require goods, materials and equipment, all of which can be diverted or become difficult to track in unstable environments.<sup>92</sup>

Another vulnerability in the development of school buildings in remote areas is oversight of the quality of the construction, as would be the case with any other infrastructure project. In hard to reach or kinetic settings, the monitoring of progress and verification of quality both pose serious vulnerabilities to corruption. Afghanistan's recent history, with extensive international attention to infrastructure projects in many sectors, continues to struggle with these risks.

*"A contractor came into my office with \$200,000 in a suitcase; I refused the cash and my life was threatened."*

Administrative officer, MoE

The significant flow of funds through the procurement system for school construction makes it, of course, most vulnerable to corruption.<sup>93</sup> The state-centric nature of the Afghan economy makes procurement an especially sensitive area, with the livelihoods of millions of citizens depending on it, either directly or indirectly.

Given the sums that are spent in the procurement sector, every phase of the procurement process, from needs assessment to contract implementation to monitoring, is vulnerable to corruption. According to OECD<sup>94</sup> about 20-25 percent of countries' annual procurement budgets are wasted because of corruption and Afghanistan is a prime example. Even in the needs assessment phase, powerful officials often become improperly involved in the procurement process by exerting their influence to alter the type of project, the number of beneficiaries, and/or the location of the project, oftentimes moving planned roads, schools, and other amenities closer to their personal power bases. These risks are not unique to the education sector.

#### 14.1 Lack of transparency at bidding stage

Similarly, in the advertising phase, the Afghanistan Procurement Law requires a contract to be advertised for a specific time. But, according to interviews with MoE procurement officials, advertisements sometimes run for an abbreviated period of time to limit competition. After the "needs assessment" phase, powerful officials can still coerce procurement staff to define

the contract requirements in a way that results in a specific bidder, with insider knowledge and influence, winning the bid, rather than the most qualified bidder. This can occur by raising the amount or value of a contract to restrict the number of companies who have the capacity to submit well-conceived bids.



***High School in Ghazni Province***

Illicit intervention by politically influential persons may occur from the opening phases of the bidding process when outside actors maneuver their companies to the most favorable position. For instance, MPs and other senior officials have reportedly sent their personal representatives to procurement offices to ensure they obtain the desired outcome. Other MPs who do not control companies seeking government contracts still manage to enrich themselves by acting as brokers, allegedly steering contracts to companies who illegally paid them for this service.

Multiple senior officials interviewed by MEC indicated that contracts were either sold by the successful bidder to another bidder, or distributed among several bidders who were operating as part of a cartel. According MEC's previous report on Conflict of Interest,<sup>95</sup> an official from the National Procurement Authority reported that pilot studies indicate about 80 percent of bids and contracts during the past 13 years were affected by corruption. MECs recent findings/interviews for this MVCA support this claim.

This MVCA indicates that the procurement cycles within the MoE Procurement Department, from the planning phase to implementation phase, remain highly vulnerable to corruption. The projects have not been planned based on policies and criteria whereby all provinces or districts should have balanced opportunities for having reconstruction projects. Reconstruction efforts, mainly school buildings projects, have been allocated based on political decisions, not policies. MPs have reportedly inserted their preferred projects on the MoE's priority list and created an imbalance in development projects between the provinces, or districts and the cities. For instance, there is one province that has more than 15 reconstruction projects for the year 2017, whereas another has only one project.



*Typical of many, this school without a building is in Badakhshan Province*

MoE procurement officials also reported that social conditions undermine the procurement process. Often company owners are illiterate. These owners do not consider the bidding requirements such as having working experience, having an advanced financial system, office, or other technical conditions that have been defined on bidding documents. The illiterate bidders just ask from the Procurement Department two specific questions: When is the bidding date; and what is the amount of warranty (bond). If such a company is then disqualified or dismissed from competition because of weak experience or other shortcomings, they have reportedly complained directly to the AGO that they had given a very low offer, but did not win the project.

Additionally, MoE projects in insecure provinces may not be effectively monitored. When a project has not been monitored, it paves the way for corruption and the creation of “ghost schools.” Another vulnerability to corruption is local social conflict regarding the land or quality of the site where the school is to be built – this may result in projects that are vulnerable to corruption.

## **14.2 Lack of flexibility in building design and use of local materials**

The MoE provides a limited set of standardized designs for all projects regardless of social or geographic factors and this presents many challenges and corruption vulnerabilities. For instance, the infrastructure template and project budget for a six-classroom school in Kabul are the same as for a school in a remote district of Pansjir or Nuristan Provinces. The companies do not estimate the real costs of the project exactly. They offer very low bids for the project in order to win the bid and then face many challenges in the implementation phase of the project. Ultimately, they may deliver a low quality project to the Ministry, with risks of site engineers pressured or induced into signing off on work which is clearly below the agreed standard and specification.

Interference by MPs in these processes is reported to widespread. It is claimed that MPs recommend specific companies for projects. If the Ministry resists and does not submit, the MP may try to undermine the whole credibility of the process, alleging wrongdoing. MPs are reportedly routinely interfering in the procurement process to get projects for their own companies, or for those companies with which they have 'good connections.'

The MEC team was told of employees from the Procurement Department leaking project information, especially the estimated costs, to specific companies. The MEC team also was informed that elements inside the MoE Procurement Department have established relationships to channel projects towards specific companies, creating opportunities for embezzlement and collusion. According to allegations from a key respondent inside MoE, there is a company that has won bids for dozens of projects across several districts in a single province due to connections and inappropriate sharing of details in the bid process.

Feedback from MoE suggests that, since 2012, the standard design and estimation system have been improved by MoE design engineers, and that the new designs and estimation are based on site, location and local materials.

The collected data show that the Procurement Department, procured around USD 47 million for the year 2014, USD 22 million for 2015, and USD 90 million for the year 2016. While observers have commented on recent improvements in the Procurement Department with respect to combatting corruption in procurements, the risks still exist. In recognition of ongoing control weaknesses, the Procurement Department has had their authority to make final decisions withdrawn so that procedures must now be completed with the oversight of the National Procurement Authority (NPA).

According to observations by the MEC team, the Procurement Department has not procured projects according to the timeline defined in the Procurement Law: If a project is re-advertised, it should be completed in no more than 90 days. However, the MEC team was shown a list of projects that have been pending for between 800 and 1,000 days. The team reviewed documentation indicating 178 projects pending hundreds of days on the EQUIP project, and 1,700 projects that remain incomplete. Several Ministry officials claimed they could not tolerate this situation and acknowledged corruption as a probable cause for these substantial delays, though so far no companies had been punished.

### **14.3 All the vulnerabilities still remain**

Procurement processes of the MoE remain highly vulnerable to corruption, with multiple interviewees pointing to the existence of corrupt networks within the Department. Examples from interview with MoE staff and management involved in procurement give a sense of the variety of the problems:

- "A proportion of] the budget of projects is paid out corruptly to Procurement, otherwise processes to initiate the projects are stopped in Procurement."
- An Inspection Officer commented in the interview that they had found 22 ghost projects of UNICEF in just one Province.

- “There is corruption between Provincial Educational Directorates with the construction companies. The construction company deals with the Director of Education and it affects negative on the quality of projects as well.”
- “There are some projects Members of Parliament take from the Ministry of Finance, and they do not have place to build the building. Then we are facing with challenge with the MP. The project are not planned properly based on Provinces and based on needs. Some Provinces have 20 projects too many, and some Provinces even do not have one project.”
- “The engineers who are responsible for monitoring and evaluation of the construction projects (schools building) from MoE side collude with the implementer company. The MoE engineers know the gaps of the project and the low quality of the project as they regularly monitor, but they collude with company and make their report positive.”
- “Members of Parliament interfere a lot in procurement. They recommend specific companies for getting construction projects. The MPs push and force the Ministry to give project even for unqualified companies. If the Ministry resists and do not give the project for the MP’s company or for the company recommend by MP, then the MP does not allow the other company to implement the project.”
- “While the Procurement Department announces the project and asks for offers, sometimes some employees from Procurement Department leak the project information, especially the estimated cost, to the companies.”
- “The engineers who are working in Monitoring and Evaluation Department are corrupt. They are also not capable because they have not been recruited in transparent, competitive and merit-based process. They paid or influenced to be recruited, regardless of their qualification. Therefore, there is a lot of corruption.”
- “There is only one employee who has been terminated from his position from MoE Procurement Department within the last 15 years.”
- “Unqualified companies also make problems in procurement process. According to procurement law or bidding documents, companies have to fulfill the qualifications to be eligible for bidding process. But in fact, they are not qualified and they do not consider the qualifications (like work experience, office, staff), except the date of bid opening and Guarantee. They give a Low offer and expected to have the project.”
- “Since 2012, the projects were contracting by EQUIP itself and are also being monitored by EQUIP. The procurement, as usual, channelize the projects for specific companies, collude with companies, leaks the documents and get some share from contractors because of the project.”
- “The interviewee shared a document that shows 131 projects have been delaying almost for three years. The reason is that the procurement officials want to make a deal and collude on these projects. According to EQUIP, these projects have to be contracted before the end of 2017.”
- “62 projects of Bamyan Province have been contracted with one company. It means corruption and channelization of projects for one specific company by the Procurement Directorate.”
- “The Third component, which is called: ‘Social Awareness and Mobilization’ is the most corrupt part. Newly, a separate department or directorate on Education *Shuras* has been established. The responsibility of this department is to work with Education *Shuras*. EQUIP, previously has got World Bank approval for 800 Social Organizers post to work with Education *Shuras*. This department recruited those people and then left them for four months. The *Shuras* Department asked from each candidate one month of their salaries

to be recruited. Or they intended to embezzle the whole budget of this project. Finally, World Bank canceled the program and just 170 people, two people for each province, recruited."

- "Renting buildings for schools is much vulnerable to corruption. For instance, a building or home when it's real rent is AFN 100,000; we have seen that it's rented for AFN 200,000. This causes that a huge amount of MOE budget being thieved."
- "There are hundreds of projects have not been procured for three years which is opposite of procurement law. Only 178 projects from EQUIP is in pending with Procurement Department for months and years. MOE Officials says that, 98 percent of the projects get extension which is opposite of procurement law and they have not been charged any punishment by the Ministry as the Ministry high officials are part of corruption."
- "The M&E Departments for monitoring reconstruction projects are part of corruption and they are colluding with contractors in the field. It has also been said that, there is a strong internal corrupt network established inside procurement directorate that channelize the reconstruction projects for their benefit."
- An interviewee remarked about limits on interactions with contractors, 'They cannot punish, they cannot cancel the project or cannot stop the processing of project budgets. A network consisting of contractors and procurement officials are together doing corruption.'
- "The Procuring Committee or the bid opening committee has a critical role, which is corrupt. They give the contracts to specific companies. This committee selects the winner but since they have not got their percentage, they do not sign the contract."
- "Since I come to this Department, you can see a dramatic improvement in performance of Procurement Department. For instance, MOE Procurement Department, procured around USD 47 million in the year of 1393, USD 22 million for 1394 and USD 90 million for the year of 1395. You can see a dramatic improvement within these two or three years.(Typology 2 and 3)



***Boys School in Jaghori, Ghazni Province***

### ***Mullah Nasruddin's castle***

In another example cited by a member of a school shura, “*Our school building is like Mullah Nasruddin’s castle.*” [Nasruddin, the 13<sup>th</sup>-Century Turkish mullah was considered wise, but sometimes cast as foolish, and the butt of jokes] “*It had only one wall and a single door. Our schools are the same: We have walls, but no rooms or water supply. We don’t have any school buildings at all, but we have hope that our nation will be an educated nation, and that in our district, the girls can go to school, even in remote areas.*”

## 15. Payroll and record keeping

Reportedly, only 53 percent of the MoE personnel are paid through bank accounts, and 47 percent are paid in cash.<sup>96</sup>

In the provinces, cash is transferred from the center to districts and then to each school, with questionable oversights for cash handling and disbursements to the final recipients. Physical cash handling elevates corruption risks for all involved, increases the risk of employee impersonation, and does not prevent the possibility of MoE sustaining “ghost employees” on its payroll.

In Herat Province, the PED has been uniquely successful in assuring that all MoE teachers have valid bank accounts and are paid by bank transfer. This systematic approach has improved timely payments and reduced the casual corruptions that can occur when large amounts of cash are being shipped around and handled multiple times by people at different tiers of the Ministry.

However, direct bank transfers for salary payments will not entirely eradicate risks of corruption. Teachers are subject to bank charges and transaction fees, and the MVCA team was told of a cashier in the region demanding AFN 200 per teacher each month. For those teachers who have their salaries paid directly into bank accounts, some reported problems in accessing the bank, particularly based in more rural and hard-to-reach areas where they must travel long distances to the nearest bank. This system can also impact on the provision of education: It was noted in one province that schools in certain districts are closed on what would be a normal school day so teachers could travel to the nearest bank.

The MVCA team was informed about cases of overtime pay earned by teachers, but not being paid. A school *shura* reported that the DED in their area has been allegedly embezzling overtime money in their community school for several years. In another case, overtime hours and pay were fraudulently claimed by head teachers on behalf of their colleagues. In another province, teachers reported being forced to pay AFN 3,000 (or more) for ‘processing’ timesheets in order to collect overtime payments they had earned.

MoE should accelerate the move to widely implement the electronic payment of teacher salaries, following the example of Herat.

### 15.1 Control weaknesses in data verification

Since record keeping at the school level is still paper-based, there are risks of data falsification and manipulation of records. Teachers sign-in and sign-out manually, and are supposed to keep a record of their lessons, but this practice is not consistently followed. Paper-based attendance registers can be falsified or altered.

As noted in the section on data gathering for EMIS, the paper-based records are completed at school and district level, and only at the provincial administration are the data entered into the system electronically. Since data verification by the EMIS enumerators is restricted to a

sample of just five percent of schools, there is ample scope for falsely generating student numbers and creating false entities.

## 15.2 Ghost schools, students, teachers and programs

Several key respondents told the MVCA teams in the field about “fake schools which graduate students and process their documents.” Aside from “ghost schools,” the MEC teams were told of “ghost students.” These are students who technically appear on a school register, but do not attend classes – allegedly some are not even residing in Afghanistan. In these cases, students (or their families) pay to keep their names on the school register without having to attend classes. It was reported that some cases these students are paying for exams and even school graduation certificates.

The process for certificate issuance remains one of risk and inefficiency. When a student has graduated from Grade 12, the school principals prepare the results from grades 10, 11 and 12 of that student, and send them to the Results Department of the Results and Certificate Directorate of the MoE in Kabul. The Results Department then compares the results of the three last years of the student and sends it to the Certificate Department of the same Directorate. The Certificate Department prints the results of the past three years on the certificate and sends this to the Minister for signature. After the Minister signs the certificates, they are returned to the Certificate Department to be sent to the schools; schools then distribute the certificates to their respective students. The entire process of verification and issuing certificates is manual; no electronic alternatives have been developed.

MoE should take immediate steps to electronically systematize the process of approving and issuing exam certificates, due to the extensive opportunities for fraud and modification that exist on the current manual process.

## 15.3 Evidence of false certification

False certifications have been identified by the Internal Audit Department of MoE, as well as in reports from the media. An example was revealed in a MEC interview with a senior officer at the MoE in Kabul. He described a principal in Kabul City involved in issuing certificates in collusion with some staff of the Results and Certificates Directorate:

*“...We came across cases of six persons who got false certificates and we asked them some very basic questions. They failed to respond even a single question. We reported this to the responsible Deputy Minister, but no action was taken.”*

**Official at the Internal Audit Office**

This principal was eventually caught and referred to the AGO for prosecution. He was arrested, but later released, though it was not clear why. The MoE official also told the team about one of his own relatives who was seeking a certificate for Grade 12 and approached him to get this certificate, but he refused, saying that it is not possible. Later the relative reported to the official he gotten the certificate at a cost of USD 1,000.

## **15.4 Vulnerabilities to false certification**

The MVCA team heard detailed accounts of private schools and private universities issuing certificates contingent on money being paid to them, without the student ever having attended the classes or passing exams. School principals are allegedly involved in issuing the fake certificates and falsification of data. Another risk in the issuance of false certificates involves students who complete their schooling in other countries. The schools for the Afghan refugees in Pakistan and Iran send their results to the MoE Education Attaché in the Afghan consulate or embassy. MoE officials acknowledged that verification and authentication by those missions is weak and unreliable.

MEC recommends that MoE toughen up the process of placement exams for students coming from Islamic schools from Pakistan and Iran madrasas, so that their placement test can no longer be passed by payment of a bribe to MoE officials. This could be done by ensuring that the exam is carried out by a different entity.

## 16. Monitoring, evaluation and audit

At present there is **no external oversight** of the work at MoE. The monitoring and evaluation and the audit units are actually *part* of MoE, so the Ministry is, in effect, reviewing its own work. With no external accountability, corrupt practices have been allowed to grow and flourish. This is a major weakness.

Internationally, it is common for there to be an external agency or third party monitor to report directly to government, with a mandate to oversee all aspects of the education service. The model for this sort of independent oversight of education began in the UK in 1993 with the formation of the Office for Standards in Education (OFSTED). The model has been seen to be effective and successful, and has now been replicated in many parts of the world. Similar external monitoring entities exist in other sectors to track quality, support standards, and provide reassurance to the public, which relies on these services.

These independent quality assurance agencies were, in the first instance, staffed by education professionals with a broad mandate to investigate what is happening in schools – with every school in the country being inspected over a 4-6 year cycle. The model has been further developed in iterations across the world. In some of the Arabian Gulf states, for example, every school – both public and private – is inspected every year. As the agencies have become more sophisticated and skillful, their mandate has been extended to include external evaluations and audits of local and provincial education authorities and, in some cases, whole Ministries of Education.

MEC recommends a major strengthening of MoE's oversight functions:

- A substantial strengthening of the internal audit function
- Establishment of a high-level MoE Audit Committee
- Establishment of an independent National Accreditation entity for education institutions to regulate both public and private schools.<sup>97</sup>
- Establishment of an independent body to do Education Quality Monitoring and Evaluation (M&E). This body should not be within the MoE, but will need to work closely with the Ministry. This body should take over the current internal capability and report on performance – strengths, weaknesses and gaps – so that the educational problems in schools are properly understood and accounted for.
- An oversight body for the integrity of teacher appointments



# PART C

## The way forward

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Independent Joint Anti-Corruption  
Monitoring and Evaluation Committee

## 17. Positive signs

The scale of the corruption problem in MoE is deep and long established. Unlike MEC analyses in other Ministries, the condemnation from interviewees has been almost universal – across officials, teachers, parents, students and other stakeholders. Interviewees did not speak of any noteworthy initiatives in the Ministry. So MEC has struggled to identify areas where there is energy for change and reform.

Nonetheless, MEC did ask about positive improvements and did hear of a number of initiatives, which were, at the least, bright sparks in a dark landscape. So we start the discussion of the way forward with positive education initiatives in schools, among active communities, in donor programs, in the training of female teachers, in two provincial education directorates, and in projects.

### 1. School and community level

At the school and community level, we have investigated and asked about communities' resistances and resiliencies to corruption. In practice, this has meant that the MEC research team has consulted school community members about their strategies for dealing with the corruption they face, their positive experiences of education, and what they feel are the best ways forward. These findings are expressed as follows:

#### Alternative schools – CBE and private schools

- One of the bright areas in education, recognized by the MEC analysis, is Community Based Education (CBE). The community-based schools evaluated as part of the MVCA have generally been seen as superior to their government counterparts in the quality, relevance, flexibility and accessibility of education they provide. These schools are typically established to serve communities that are not served by government schools, and are by their very nature, responsive to community needs and reliant on community engagement and resources.

Often, supported by NGOs, community-based schools tend to prioritize community involvement and accountability – key factors minimizing corruption. Indeed, when communities have greater responsibility in developing, maintaining and supporting their schools, there will often be less room and temptation for corruption to develop. As a District Education Manager suggested, “Citizen engagement with community schools can be a good way of preventing corruption.”

- Alongside CBE, there are different forms of ‘private’ schooling which have shown promise in providing communities with access to quality education while being resistant to corruption. Distinctions need to be made between for-profit private schools, and low-cost community-based schools that survive from the financial support of their parents/families. These low-cost schools can be relatively accessible, even in income-poor communities, and several that were looked at during the MEC analysis are very popular and successful in educating the children and young people they serve. Parents in some communities have remarked on the potential advantage of private schooling.

For example, a group of parents noted that the private sector was in some cases an improvement over the government sector because private schools were able to recruit young teachers with positive attitudes and knowledge of many innovative teaching methods. Again, private schooling, as discussed here, should not only be equated with high cost. There are a range of different versions of private and community-based education which are funded in different ways (including with funding from: NGOs/INGOs, public-private partnerships, communities themselves, and/or some combination of these).

### **Shuras and teachers taking active roles**

- When school *shuras* are active and engaged they can be very effective in promoting and supporting education in their communities. One school *shura* described how they were able to work together and meet with parents in their community to successfully motivate them to send their daughters to school. In another province, a group of teachers highlighted the powerful and positive role their school *shura* has played in generating funds for critical school infrastructure projects and working closely with families in the community to facilitate access to school for girls. In a similar vein, a teacher noted that her school *shura* had given a lot of support to the school, such as in providing access to safe drinking water and carpets.
- School *shuras*' advocacy, cooperation and coordination with their wider communities can work towards improving access to and quality of education – as well as reducing corruption. Involving school *shuras* more in the recruitment of teachers has been suggested by a range of community stakeholders as a way of minimizing corruption and of increasing transparency and community participation in education more generally.

### **Civic-minded teachers, locally paid teachers and volunteering**

- There are other ways to improve the relationships between schools and parents/families – teachers can take an active role in these processes. For example, teachers in one school reported that they had made a collection box for money to support community members in emergencies. They also reported that the teachers had pooled money to help pay for a student to get her National Identity Card (NIC) so she could attend school. The same teachers reported that they had been able meet with the father of a girl with disability who was selling bread in the market and had managed to convince him to send her to school and that now she was doing well in her studies.
- It has been noted in some communities that volunteer teachers are working in schools where there are teaching shortages. Indeed, the practice of volunteerism has been a necessity for many under-resourced schools. Families and other community members in many communities donate their time, labor and money towards resourcing and maintaining their schools. There is some sense that this volunteerism happens in response to the government's inability to properly support schools. However, the spirit of volunteerism and the engagement between community members and their schools that is fostered through the act of volunteering is deeply valuable in developing

solidarity and strengthening communities' ownership of their schools. So, this should not be lost even if/when schools receive higher levels of support from the government.

- Facing a shortage of qualified teachers (mainly due to corruption and inefficiencies in the system) a number of communities have taken matters into their own hands and pooled money to hire their own contract teachers to fill the gaps. Inevitably, these teachers are more directly accountable to the communities that have recruited them and pay their salaries, compared with teachers on typical Ministry contracts.
- School community members, when they work together and support one another, can also take an active role in resisting corruption. For example, a school resisted the corrupt practices of a school monitor who would only visit the school during harvest time and would order the students to harvest his crops. The teachers in the school held a meeting to discuss this issue and took a decision to not allow any monitor to visit the school without an official letter from the education authority.

### **A few outstanding schools, usually in cities**

- The MEC teams heard a few uplifting cases, of good schools with strong leaders. In cities, this tended to be connected to a good university in the same district. Often the school principal knew how to use the businesses, the community and the parents; for example to get the repairs done; all without help from MoE. In one case, the principal was highly conscientious and monitored the extra help outside school hours and advised them. In another case, a girls' school, the headmistress explained that she only had to call the local *shura* when she had a problem, and it would be solved.
- The MEC team heard a few similar examples in rural areas; almost always where there was a strongly supportive local community.

### **Better ways of employing female teachers**

- It can be a big challenge for communities, particularly in rural and hard-to-reach areas, to get qualified female teachers, as many of the female teachers who do graduate from TTCs are not from those communities (and therefore unlikely to be allowed, or willing, to work in a different village, away from their home and family). In some cases, female TTC graduates do not want to return to work in their home areas once they adapt to urban life. However, villages with secondary schooling for girls will have a number of Grade 12 graduates who could ultimately be trained and placed back in their villages as teachers, if the system would support this. It was noted in one province, for example, that although there is a serious shortage of female teachers in the villages, there are many young women who have graduated from Grade 12 and could be hired as teachers in their own or neighboring villages.
- Alongside conducting the MEC analysis in school communities, NAC was involved with evaluating an innovative teacher education initiative in Balkh Province. This Female Teacher Education Program (FTEP) was developed to address the need to recruit, train and place back, young women as teachers in rural and hard-to-reach villages. The four-year program (two years of training, and two years of support during in-service

placement as teachers) has been supported by the INGO, International Assistance Mission (IAM). FTEP recruited 15 young women (who were themselves students in Grades 8-9 when recruited) from rural villages and provided them with a combination of high school education (through to Grade 12) and teacher education. Throughout the training and placement of these young women back in their communities, the program worked diligently with the communities and the relevant DEDs, PED, and MoE in Kabul, to do the necessary advocacy work to ensure these young women could be actually employed as government teachers back in their communities. The evaluation of FTEP has shown the program to be largely effective in training and placing these women as teachers back in their communities and currently, 11 out of 15 are back working in their community schools, with proper government contracts, and without having had to pay bribes or use connections to get their teaching positions. The communities are very happy with these teachers, and with the knowledge and skills they bring to the classroom. Granted, this is a small program, somewhat costly, and labor and time intensive, but it shows what is possible and has been very effective in countering corruption and some of the other challenges, such as conservative values, that often prevent women from teaching in their communities. The 77 percent success rate is laudable given the current grim situation with teacher recruitment in the rest of Afghanistan.

## **2. Provincial Education Directorates**

Despite the struggles within MoE in Kabul, in the provinces there are a few signs where Provincial Education Directorates (PEDs) have been active and are making a significant difference. The MVCA teams found that in one large Province, Herat, and a relatively small one, Panjshir, the PEDs appeared to be working effectively, though there were still plenty of corruption problems.

Certainly, if the objectives and proposed outcomes of both the CCNPP and the NESP III are to be realized, there must a great deal more capacity building and empowerment of local communities, both within Kabul and provincially.

## **3. Donor programs**

### **USAID and its CBA initiative**

The best corruption-reducing initiative that MEC is aware of in education is the CBA initiative – an education sector capacity building project from USAID.

The CBA is a new project funded by USAID, set to begin by the end of 2017 with Chemonics as the implementing partner. The aim of the program is to address many of the major concerns that have bedeviled international aid initiatives in the education sector in the past. The project specification highlighted areas of significant concern which this five-year USD 25 million project is aimed at tackling. CBA is designed to be a centrally-managed, but with a provincially-based initiative that will be operational in the five Provinces of Balkh, Bamyan, Baghdis, Kandahar and Paktia. There is a remarkable concordance between the prime areas of focus

and the intended program outcomes of the CBA project and the emergent findings and recommendations of this MVCA.

The five prime areas of focus for CBA are:

**Human Resource Management** – To build robust HR systems and procedures, so that appointments in the education sector are made on the basis of merit through a transparent recruitment process that is free from the secrecy and nepotism that are the main characteristics of the present system.

**Payroll** – To move away from a cash-based payroll this is so vulnerable to theft and bribery. The plan is to work with commercial partners, such as the telecommunications companies and the banks, to create a cashless system for paying provincial MoE staff, especially, teachers.

**Finance** – To simplify financial procedures and to devolve budgetary responsibility to provincial level – as much as the local capacity permits. This is in line with best international practice as exemplified in the NESP III proposals for provincial empowerment and accountability where the local capacity exists.

**Education Management Information System (EMIS)** – To undertake rigorous verification of the data that is being entered into this electronic system.

**Empowering Civil Society** – To build the capacity of local communities to give them the confidence and the professional insights to be able to improve the accountability of MoE officers at provincial, district and school levels. This community empowerment is one of the key elements in raising educational standards, is a feature of best international practice and is a powerful way of giving parents and local communities effective oversight of schools. In this case through the strengthening of school *shuras* and community development councils.

#### 4. Projects

During the course of the data-gathering for this analysis it was announced that responsibility for procurement has been taken from MoE and given to the National Procurement Authority (NPA). The transfer of major procurement activities to the NPA should not be seen as a panacea. Many of the procurement problems that have occurred in the recent past, not least in relation to the EQUIP project, were caused by creating large centrally-managed and centrally-mandated construction contracts. But at least it is evidence of some reform in the corruption-strewn school construction sector.

As noted in this analysis, the more successful construction projects have been handled through small-scale locally-managed contracts that are closely monitored by INGOs and DPs on the ground. A major problem with the construction projects has been the one-size-fits-all approach to school design, some of which are completely inappropriate for the local contexts in the communities in which they are built. This means, for example, that instead of mandating the construction of multi-story school buildings in rural areas where land and space is plentiful, single story structures would be more appropriate, whereas a multi-story building would be more relevant in densely populated urban areas where space is at a premium. These school design templates should come with guidance supporting additional specific localization, including the use of locally available materials (instead of expensive imports), local traditional art and design, local characteristics of the landscape and area all of which take into consideration the risk of flooding and earthquakes, protection from the elements, and localized factors which impact lighting, cooling and heating.

## 18. Conclusions and next step

MEC has examined, in detail, the vulnerabilities to corruption across the Ministry of Education (MoE). MEC has spoken with many teachers, head teachers, school principals, school shura members, teacher educators, MoE officials at central, provincial and district levels, donors and other stakeholders, and with many parents and students. In total, MEC carried out 542 interviews and conducted 160 Focus Group Discussions: in Kabul, in the provinces of Badakhshan, Balkh, Faryab, Ghazni, Herat, Khost, Bamyan, Pansjhir and Nangarhar, and in 138 schools. All gave freely of their time and were eager to contribute to this study, as they made clear that education is essential for the future for their families and the country.

The study analyzes corruption vulnerabilities, and people's perceptions and experiences of corruption, but not actual corruption cases. The purpose of doing the analysis this way is to form a clear picture of where the most serious corruption vulnerabilities are and how corruption affects the education sector in general and school communities in particular, and then make recommendations that strengthen the education system and reduce corruption vulnerabilities. MEC has used mixed qualitative and quantitative methods, with systematic triangulation to eliminate false information.

### MEC concludes the following:

#### 1. Principal corruption vulnerabilities

MEC analyzed all the interviews according to a typology of 36 specific education corruption vulnerabilities. These vulnerabilities ranged from school-level issues, such as bribes to modify school certificates, to Ministry-level issues such as corruption in school construction and in textbook distribution. Most of these vulnerabilities were indeed found by MEC to be present in the Afghan education system. But one vulnerability in particular – the appointment of teachers on the basis of influence or nepotism, and not on merit – emerged as being the most extensive, with, teacher appointment seen as being largely corrupted. This is the most damaging issue for the education of students in the country.

#### 2. Teacher appointments are highly corrupted

- i) Possibly the most serious corruption in MoE relates to the appointment of teachers, as most appointments are made based on undue influences from people in power, and/or as a result of bribery, rather than merit.
- ii) This form of corruption seems extensive, and appears to have become normalized. MoE either colludes in this practice or is unable to prevent it. Many interviewees challenged MEC to find a single teacher, among thousands in cities and communities across the country, who had been appointed strictly on merit. This does not mean that all teacher appointments are corrupted, but this speaks to the negative perception among school community members, which contributes to the erosion of trust in the state.

- iii) MEC was given many examples where the official examination process for the teachers had been subverted.
- iv) There are related problems that arise from corrupt influences on teacher appointments, as presented by many interviewees: teachers who never show up, or are routinely missing every Thursday or other days of the week, teachers who are not qualified to teach the set subject, teachers who cannot be removed or reprimanded, older teachers who stay in place long past their retirement while younger teachers remain jobless, teachers requiring students to do work for them at home, teachers requiring students to pay them for “extra lessons” to succeed in exams, and so on.
- v) The extent of the nepotism in teacher appointment, and the consequent poor quality of the teaching, is of such magnitude that the education of children has been undermined.
- vi) A secondary result of the scale of corruption vulnerability in teacher appointments is that children learn from an early age that corruption is an inevitable part of life. This is not, and should not become, part of the Afghan culture, and is detrimental to the future of Afghanistan.
- vii) MEC recognizes that MoE is aware of this problem and is committed to bring more transparency in the teacher recruitment and increase accountability. For example, MoE is working to increase the role of school and community in the hiring process. Similarly, the Ministry is preparing for a more transparent way of recruitment, categorizing the positions of teachers as per subjects for what teachers are needed. For example, to identify needs for mathematics teachers in every school and only shortlisted candidates for the mentioned specific subject will participate in the examination. Nonetheless, the recruitment process is done at PEDs levels. MEC believes that while these measures are commendable they are not strong enough, nor local enough, to have a material impact on appointments.

### **3. Such a large, complex Ministry will always be vulnerable to high levels of corruption; it needs to reduce in size and scope**

The Ministry is the largest public employer in the country, employing some 262,000 people, or 68 percent of the government civil services employment. As such, it inevitably becomes a prime target for those wishing to find positions for friends, relatives, colleagues and the children of colleagues.

- i) The Ministry is also of such a scale and complexity as to be almost impossible to manage, and this unmanageability is the root cause of much opportunity for corruption. MEC believes that multiple measures need to be taken to reduce the size of the Ministry to a more conventional size, dealing with policy issues and not the day-to-day operation of the school system. This will allow the corruption vulnerabilities to be more readily managed.

- ii) It was not MEC’s task to do an organizational review of the Ministry, and MEC has not made a systematic analysis of this. Nonetheless, in the course of this review and as a byproduct of the analysis, MEC identified several functions that might usefully be removed from the Ministry in a way that would lead them to perform better and with less corruption. These could include teacher appointments, Teacher Training Colleges, the building of schools, TVET, and Monitoring & Evaluation. Some of these responsibilities could also be decentralized and handed over to communities and school *shuras* as an integrated element of the new National Citizens’ Charter.
- iii) MEC also concludes that other functions would benefit from a more market-oriented approach, as a way of reducing the corruption. Textbook production and distribution is the clearest example of this. Despite numerous efforts at reform, with extensive support by donors, the vulnerability of production and – especially – textbook distribution, seem to be as open to corruption as ever. In many of the parts of the country visited as part of this review, an informal market system is already operating, due to the absence of official textbooks.
- iv) MEC found only a few ‘bright spots’ in the school system. There were some schools where the principals and/or the community were succeeding in running a school with good teachers and low corruption. In the cases observed by MEC, this was usually due the financial contribution of the parents to provide good teachers and school materials. In addition, parents and communities regarded both the Community Based schools in rural communities and some of the low-cost private schools in the cities favorably. They saw these as effective schools with good teachers and low corruption. Besides encouraging such schools, community based solutions and public-private partnerships are other ways of reducing the size of the national MoE system. The government can also learn from the good models that these schools demonstrate, and use this knowledge to make positive changes within the government education system.
- v) MEC is aware of reports that CBE can be significantly more costly,<sup>98</sup> and the problems caused by diverse bilateral funding of these schools. Nonetheless, the point remains that they show the great advantages in terms of more local ownership. This is an area where increased focus and funding by development partners would be very positive.
- vi) One significant aspect of the unmanageability of the Ministry is the need for large volumes of accurate data, in a system where most officials do not have computers and are not IT literate. The issue here is not only one of funding and training; rather, many officials disclosed their reluctance to move towards IT systems, as this would reduce their ability to influence the results. The saga of inaccurate data in EMIS is the most obvious evidence of this, where a USAID study in 2016 found that the data discrepancy was 12 percent. MEC made a smaller check, based on the data at most of the 138 schools it engaged with, and found the data discrepancy to be similar. A similar problem exists with payroll.

- vii) Some of the Provincial Offices and related school management appear to have been comprehensively corrupted for many years. These may need to be restarted and reformed as part of the new CBR appointees, or else the new CBR person will find it difficult to do anything except continue this history.
- viii) Similarly, there are some parts of the MoE that seem to be very highly corrupted. Such entities should be closed down and only later consideration given to reopening a reformed alternative. An example that was given repeatedly to the MEC team was the implementation of the Adult Literacy program in the provinces.
- ix) MEC is aware of the current organization review of MoE being conducted by the Asia Foundation. However, as far as MEC was able to ascertain from those close to this review, it is not focused on reducing size and scope to improve manageability and control.

#### **4. There are extreme levels of nepotistic influence on both teachers and officials.**

Unless this influence is shut down, or dramatically constrained, it is difficult to see how there will be any improvement in the corruption vulnerability of teachers' appointments. There needs to be decisive action by MoE leadership, through Presidential Decree, by Provincial Governors and by Parliamentarians. In particular, Members of Parliament are seen as being involved in appointments to a much greater degree than their constituent service roles should permit.

#### **5. The school curriculum is too large, leading to corruption vulnerabilities as teachers try to get ill-prepared students through the Kankor Exam**

There is no suggestion from MEC that the curriculum or the curriculum-development process is somehow corrupt. Instead, what MEC has observed is that an extensive curriculum, combined with one of the shortest school years anywhere in the world, leads to pressures on teachers and school management that forces them to do corrupt things in order to get students through the Kankor Exam.

- i) This pressure consists of the need to teach too many subjects, with few teachers able to cover these subjects; and too much material to teach in the time available. As a result, there is real corruption vulnerability as teachers find ways to get inadequately prepared students through the exam. Teachers reported that often the only way they can do this is via improper methods, such as to give out exam papers in advance, pick and choose what to teach, raise the exam scores, etc. This easily leads to corrupt practices.
- ii) This would be a problem even without the challenge of teachers not being properly competent due to the appointment vulnerabilities already discussed.

It is not within MEC's competence to analyze the education curriculum. But MEC does conclude that significantly reducing the size and scope of the curriculum – in whatever way the educational specialists in MoE think best – will have a beneficial effect in reducing the consequential corruption vulnerability at the school level.

- iii) MEC is aware that MoE shares a similar view regarding the overly-large size of the curriculum. MoE regards the potential for increasing the number of teaching hours as unrealistic. MoE also agrees that reduction in the number of subjects will give more time for teachers themselves to prepare for conducting examinations. Accordingly, a significant reduction in curriculum size is the most practical way to reduce the consequent risks.

## **6. There appear to be very few reform-minded officials who are either willing or able to bring reforms within MoE**

The MEC teams asked all relevant interviewees to discuss whether there were reform-minded individuals or groups within MoE, and how extensive they were.

- i) The response was that there were only a few such people in the MoE hierarchy. The number of such individuals identified were fewer than those MEC has identified in analyses it has conducted in other ministries.
- ii) On the other hand, a common response across interviewees was that many people would be prepared to support reforms if they were seriously undertaken and if the senior leadership was clearly committed to reform against corruption.
- iii) In the theory and practice of how to reform large organizations, there are generally three elements to solving the paradox of how to bring out the reform-minded elements.
  - The first is to bring together a critical mass of senior people clearly committed to reform; such a critical mass seems not to exist in MoE at present.
  - The second is to have a powerful, driving objective that is very clear, that is emphasized by the leadership at every turn, and which everyone – staff and citizens – can mobilize around. There is no such driving force at present.
  - The third element is that there must be structures inside the organization that drive the reform activities, and structures which reward all those who want to see improvement, formally or informally. Suggestions along these lines are made in the next section.

## 7. The extreme disconnect between new graduates and open teaching slots is likely due, in large part, to corruption

- i) 75 percent of the graduates of the Teacher Training Colleges are unable to get work as teachers.
- ii) MoE is aware of this problem. For example, MoE plans to strengthen its monitoring of TTCs to graduate better teachers, give preference to the recruitment of grade 14 graduates and bachelor or higher degree holders and will also hire Grade 12 graduates in areas where they do not have Grade 14 graduates. Nonetheless, the underlying reality that corruption is causing a significant part of this unemployment needs to be addressed more directly.
- iii) The major disconnect between new graduates and teaching places is not being addressed in any fundamental way. While MoE is taking some measures, such as that the Educational University and Faculties of Education should be more responsive to the teacher education needs in the country, there is a need to build strong links between the TTCs, the universities and the local employment market in the provinces where they are located so that new graduates' training is not wasted.
- iv) Similarly, there is a need to coordinate strategic plans between MoE and the Ministry of Higher Education to ensure the professional capacity of teachers' matches the requirements in alignment with supportive systems that are currently in development, in particular 'The Competency Framework for Teachers in Afghanistan.'
- v) A one-year placement in a school for TTC students, teaching part time, while still being registered at their TTC, would boost the teacher workforce at little cost; it would also improve the work-ready skills on graduation and it would help to reduce the corruption that currently swirls around teacher recruitment. MoE has a new policy to strengthen and expand the capacity of such in-service trainings.

## 8. Inspection, audit and oversight systems are ineffective or lacking

All organizations need multiple layers of systems to control them, including information and control systems, inspection systems and independent oversight systems.

- i) MoE has an M&E capability to check on the technical quality of educational delivery, but this is small, internal, and under resourced. Other countries have external agencies to inspect and uphold educational standards, fully independent of their MoE.
- ii) Similarly, there is an MoE internal audit function, but it is not strong and does not deter the corrupted processes and practices.
- iii) The only external oversight mechanism, reports from the Supreme Audit office, is not seen as effective.

## 9. Gender-Related Vulnerabilities

Since 2002, there has been progress in girls' and women's empowerment in Afghanistan, in terms of increased opportunities for participation in educational, social and cultural activities. There are greatly increased numbers of girls in school, women teachers, and women students in Teacher Training Colleges (TTCs). However, sexual harassment in the workplace and requiring sexual favors in return for school certificates, career advancement, etc., was reported to be widespread. This is corruption, worse than extracting bribes.

There is glaring lack of political will and/or interest within the MoE to accept women in leadership positions, which will be fundamental in efforts to address this problem.

## 10. EMIS

The problems with EMIS are well known and much effort is already underway to improve the system and the data gathering. MEC used its analysis to do a sample check of EMIS against both enrollment data and attendance data for 88 schools. The result showed that EMIS was accurate in relation to the number of students enrolled, with differences of 2 percent or less.

However, MEC also compared actual attendance data for the 4 years 1392 to 1395 to EMIS data. Here the results showed EMIS overestimating attendance by 23 percent on average for the 88 schools, with no improving trend. MEC does not suggest that these results would be replicated nation-wide: the sample size may be too small. However, the result do show the need for much better data estimation of attendance, such as by twice-yearly estimates, not once per year, as at present.

## Next steps

The findings show that the vulnerability to corruption in the Afghan education system is grave, putting at severe risk the education of Afghan children, the trust of the public in basic state services, and the gains achieved over the past years.

The complexity of the Ministry, the depth of corruption issues and historical political interferences have prevented the development of effective leadership at MoE that can operate with honesty and integrity. H.E. Minister Balkhi, has energetically supported this Ministry-wide Vulnerability to Corruption Assessment. For this the Minister deserves great credit. This is the first time such a comprehensive analysis has been conducted in Afghanistan.

The corruption problems exceed the capacity of the Ministry and even the most dedicated Minister. MEC sees the problem as difficult for the following reasons:

- MoE is significantly larger and more complex compared with other ministries
- Factionalism and disconnection within MoE has fostered a culture of resistance to reforms
- Although many individuals in MoE stated that they are ready for positive change, the climate is seen as negative towards reform

- MoE is a combination of policy and operations: very few government bureaucracies anywhere in the world are able to combine both roles effectively without separating and/or decentralizing many key responsibilities
- MoE lacks the service mentality to gain the trust of staff and school communities
- MoE has been unable to prevent powerful people from exerting undue influence

Therefore, the way forward must address the corruption vulnerabilities in a fundamental and sustainable way for the long-term. MEC suggests that the first, immediate step should be a discussion of the findings and the recommendations, at both government leadership level and among school communities in the provinces – so as to build a common view on the most appropriate reforms. MEC recommends the following:

**Next step 1: Conduct a high-level discussion and conclusion on the MEC findings**

- i) A review and discussion of the findings of this report by the NUG leadership; and similar review and discussion of the findings of this report by the education leadership and by the international Development Partners.
- ii) This would be followed by government actions to signal the desired direction of reform, to provide additional senior resources into MoE, and to prioritize progress on education in the government's budgets and plans.
- iii) Review and discussion of the findings of this report by Parliamentarians.

**Next step 2. Conduct actions in the Provinces to discuss and conclude on MEC findings.**

- i) **Circulate the MEC analysis widely to inform all stakeholders.** The Minister widely circulates this full report as well as a summary in a more accessible language for consultation and feedback: 1) Across MoE on national, provincial and district levels; 2) To Teacher Training College (TTC) heads and lecturers; 3) To school principals, head teachers, teachers and school *shura* members; 4) To parents and children; and 5) To other interested stakeholders, such as INGOs/NGOs working in education.
- ii) **Convene the following to examine and debate the central findings of the MEC report and discuss possible solutions;**
  - **Province-level meetings** headed by the Provincial Governors, to discuss how each province could act to improve the situation and how provinces, districts and communities might take on more authority. The results of these discussions would feed into the national discussion. School communities are eager to support education and are often willing to sacrifice time and resources to ensure that their children receive the education they are entitled to according to the law.

- **A young persons' conference** with equal participation of males and females, and with representation of youth with disabilities, and youth from different ethnic, language, religious and social backgrounds. This could be organized with the Deputy Minister for Youth, in the Ministry of Information and Culture, as they have already established a functioning Youth Parliament.
- **A conference with Development Partners** providing them with the opportunity to consider the implications of the report and how they might best respond and assist through their programming and leveraging resources.

iii) Followed by a consultation meeting of top government officials under the auspices of H.E. the President and H.E. the CEO to review the findings and proposed solutions from provinces, districts and communities, youth, as well as national and international development partners, of how the government can best address the problems identified.

MEC's understanding is that MoE is ready to undertake such a series of discussions and action workshops.

## 19. Recommendations

Reducing the vulnerability to corruption of the education system is not an end in itself; it is one part of the overall objective of improving significantly the quality of education in Afghanistan. Therefore some of the necessary reforms to reduce corruption are the same as those required for other reasons, such as better controls, better systems and more effective organizational structures. The problems of endemic corruption cannot be fixed on the basis of just 'anti-corruption' reforms.

A reform strategy to reduce the vulnerability to corruption will thus include both 'normal' quality improvement measures – typically institutional strengthening – and other measures that have a more explicit anti-corruption angle to them.

MEC classifies reform measures according to the following ten generic types:

- A. Citizen actions and other forms of civil and/or local oversight
- B. Institutional reforms – that encourage effectiveness and discourage corrupt behavior
- C. Organizational change leadership – how the Ministry, teachers, TTCs, DEDs and PEDs might be more effective at making institutional change happen
- D. Legal and procedural changes – how to remedy failings in law or legal implementation; administrative sanctions; citizen complaints mechanisms
- E. Signals of change to the population – specific actions, whether modest or substantial, that will indicate to the population that things are changing
- F. International community and development partners action
- G. Information systems, control and inspection systems, and independent oversight
- H. Transparency measures – how transparency of policy, of process and of practice and open publication of policies, standards, plans, budgets, results and reports will contribute to reducing corruption
- I. Enforcement – disciplinary measures, investigations, prosecutions, addressing impunity
- J. Market-based alternatives to monopoly government supply

Recommendations are proposed under each of these headings. Taken together, MEC believes that these 66 recommendations can form the basis of the Ministry's anti-corruption strategy.

### A. Citizen actions and local oversight

1. Remove the responsibility for appointing teachers from the PEDs, and place that responsibility closer to each school community. MEC recommends that teacher recruitments be decentralized to district levels. This change may require a new Presidential Decree.

This is a significant change to the current system, and would need detailed discussion and review. MEC suggests – in the spirit of starting this discussion – that the process could be as follows:

- a) The Civil Service Commission (CSC), together with MoE, transparently announces vacancies at national, provincial, district and school community levels;
- b) Three members of the Community Development Council (CDC), including at least one female member, would be involved as equal members of recruitment committees in all stages of the recruitment process, from the initial position announcement to the final selection of teachers;
- c) Teacher recruitment tests should be changed to multiple choice questions, which can be easily checked by recruitment committees (CDCs that are part of the CCNPP will receive capacity building over the next few months by facilitating partners, for other CDCs extra capacity building may be required);
- d) The results of teacher exams should be announced on MoE and CSC websites and at some publicly accessible locations at district and community levels.
  - This should be based on comprehensive criteria established by MoE and its DPs
  - The list of teachers under consideration for appointment by the school community should be made public, easily visible on MoE's main website
  - An oversight body should be established, independent of the MoE, which can receive complaints when this system is seen not to be working
  - A system of punitive measures should be put in place, including reasserting MoE control over recruitment processes should the agreed criteria not be met

2. Promote and formalize regular and substantive meetings between schools and communities, for involvement in education solutions. The process of consulting school communities during this MEC analysis provided a measure of hope to those involved, as most had never before been asked about these issues and were encouraged that their voices be heard. School community members requested more regular and substantive meetings between parents and schools.
3. In the longer term, devolve responsibility for education to school communities, Community Development Councils (CDCs) and Cluster CDCs, districts and provinces, encouraging and enabling citizens' participation and oversight in line with the Citizens' Charter National Priority Program (CCNPP). A considerable amount of training and professional development will be necessary, but it should be seen as the destination towards which long term policy planning should be aimed.<sup>99</sup>

This should be linked to the ongoing CCNPP program where CDCs and CCDCs will have education sub-committees, which will be trained by Ministry of Rural Rehabilitation and Development representatives and by the CCNPP facilitating partners (NGOs and INGOs).

4. Promote local ownership and cultural diversity by supporting communities to build schools using locally available materials and indigenous design (ref. UNESCO), adhering to MoE standards and universal design principles. Despite the known corruption vulnerabilities, continue to contract local communities in sourcing material and labor in construction and

maintenance of schools following a set of strict anti-corruption procurement policies and procedures.

5. Carry out a policy review on how to incorporate the positive lessons of community engagement with and ownership of education – from Community Based Education (CBE), which can be brought into the decentralization process of government schools.<sup>100</sup>

## B. Institutional reforms

MEC supports the many institutional reforms that are already underway at MoE. In addition to these, MEC recommends the following:

6. A reformed examination and selection process should be established that is highly transparent and strongly protected from modification and influence by officials. Reasonably foolproof processes have been created in other countries.
7. Lists of applicants and shortlisted candidates should be openly published.
8. Reduce the scope of the MoE, so that the resulting reduction in size can be more actively managed.
  - An urgent organizational reform – faster than the current review – should be commissioned, with the objective of proposing pragmatic scope and size reduction measures.
  - This may include making parts of the MoE into autonomous entities, or passing them to other ministries to manage, or decentralization of some operational responsibilities to provinces, districts and school communities, or other measures.
  - The review should also examine the potential for diversity and positive competition between provinces and districts to provide quality education and improve enrollment, retention and completion rates.
9. Establish an autonomous entity to monitor and oversee the decentralized recruitment process of teachers. The objective of the entity should be to ensure that a range of candidates, based on merit, are proposed; that appointments are equally based on merit and on the other agreed recruitment criteria; that appointments are free from political interference, and; and that the process has been concluded without financial inducements or bribes.
10. Ensure that the teacher recruitment process reflects the population in target communities, with quota systems benefiting both male and female candidates.
11. Flexible quota systems should also be used to ensure that candidates from rural communities and from ethnic and language minority populations are prioritized
12. Develop effective mechanisms for closer collaboration between the MoE Curriculum Department, TTCs and universities' faculties of education to better align school curricula, and curricula of teacher education programs for primary and secondary levels.

13. Review the curriculum, with a view to significantly reducing its size by prioritizing and reducing the number and depth of the subjects to be taught, based on the educational objective. In this way, MoE will better match the capacity of the teachers in place and reduce the consequential corruption to get students through their exams. ‘Reduce significantly’ should be defined by those in charge of the curriculum: MEC suggests it should be at least 25-30 percent, perhaps as much as 50 percent. In the longer term, also to increase the number of teaching hours (also approximately 50 percent) to regional norms. The recommendation may show the need to review the curriculum, prioritize and determine (reduce) the number of subjects to be taught based on the education objective.
14. Make TVET an autonomous entity with MoE, MoLSAMD, private sector, DP (e.g., INGO/NGO) participation. This will both limit the scope of MoE and help to ensure that TVET programs better meet labor-market needs.
15. Align new teacher graduates to the employment market in schools
  - Build strong links between the TTCs, the universities and the local employment market in the provinces where they are located so that new graduates’ training is not wasted.
  - Coordinate strategic plans between MoE and MoHE to ensure the professional capacity of teachers’ matches the requirements in alignment with supportive systems that are currently in development, in particular ‘The Competency Framework for Teachers in Afghanistan.’
  - Extend teacher-training courses (diploma level) by at least one year, with a great deal more practical teaching experience in classrooms embedded into the teaching preparation programs.
  - Put the teacher credentialing system – outlining different professional development pathways for teachers in relation to their level of education and experience – into practice as part of NESP III,<sup>101</sup>
  - Empower school *shuras* to receive and act on complaints and grievances from parents and students.
  - Implement IT solutions for tackling habitual teacher and school staff absenteeism including the use of fingerprint recognition technology to sign in and sign out.
16. Replace the adult literacy program, to limit the extensive corruption therein. Additionally, consider merging the reformed Adult Literacy Department with the new and autonomous TVET entity, to ensure that graduates will better qualify for the labor-market.
17. Develop flexible adult literacy programs for women and girls in collaboration with MoWA to promote women empowerment and strengthening of families (e.g., providing shorter literacy programs for working women).
18. Accelerate the MoE’s movement away from cash payments for teachers’ salaries through the use of bank accounts for those in areas where banks are easily accessible, and through mobile money payments, especially for teachers in rural and hard-to-reach areas. The

good example of Herat can be examined. Achieving more clarity on low bank fees is also needed for teachers who do access salaries through bank accounts.

19. Pursue positive ways forward for teacher education and professional development as outlined in NESP III and other policy documents and related systems.<sup>102</sup> These processes should be considered as to their roles in reducing vulnerabilities to corruption.
20. MoE should take immediate steps to systematize via IT the process of approving and issuing exam certificates, due to the extensive opportunities for fraud and modification that exist on the current manual process.
21. Toughen up the placement exam process for how students coming from Islamic schools in Pakistan and from Iranian madrassas are allowed to take the placement test, which is done by MoE officials after payment of money/bribe. This could be done by ensuring that the exam is carried out by a different entity.

### C. Organizational change leadership

It is one thing to propose specific institutional reforms. Whether they are good reforms or not, it is actually a very hard task to actually implement reforms. This is not at all specific to Afghanistan, but is a well-known feature of managing and changing large organizations: most large organizational change programs do not succeed. The recommendations in this section therefore focus on how MoE can become better at leading change.

22. MEC recommends that there be a strong, fixed, lead objective that forces the whole of MoE to pull in a single direction with its reforms. **MEC recommends that the lead objective of MoE be the resolution of the top corruption vulnerability – the improper appointment of teachers to schools – within three years.**

By focusing on a single top reform objective like this, MEC believes that MoE can also avoid the risk of trying to do much too quickly – a strategy that rarely works.

23. In order to make progress towards such an objective easily visible, MEC recommends that a simple metric of the success rate of appointing teachers on merit be developed, which works at local level. It could be as simple as a phone app that every school community uses every six months to vote on the appointment of any/all new teachers. It need not be centralized, and could be developed province by province by local students or educationalists.

24. All change leadership programs need a leadership and implementation structure. At the top it needs a very strong Champion, usually the Minister. We recommend that the Minister then: 1) Puts in place a leadership committee from across MoE to oversee the reforms; 2) Appoints a full time senior reform leader in MoE; 3) Appoints a full-time MoE task force to coordinate, monitor and press the reforms across the Ministry; 4) Appoints senior sponsors and working-level focal points in every directorate to lead the reforms in

that part of the Ministry. With such a structure, it will still be difficult, but without such a structure, the program has minimal chance of success.

25. The difficulty of this sort of reform means that senior members of the team should be drawn both from within MoE – those that really know how MoE works –from the outside of MoE – those who can be more open about what can be achieved, being less bound by the institutional history and culture. For this reason, MEC recommends that the relevant Cabinet-level NUG Committee be charged with ensuring that MoE receives the necessary reform resources to join the reform team.
26. MEC also recommends that networks be established in each province, at which those in charge of the reforms in the province bring together all concerned parties. The purpose of the network would be twofold: to help the province to become the best in educational provision, and to support all those engaged in reform. Some support can be provided by international Development Partners; those involved and doing well can perhaps be rewarded by support for extra vocational training (e.g., advanced teacher courses); and those provinces that are making most progress can perhaps receive additional educational budget for more teachers. MEC recommends that DPs consider funding such networks.
27. Expand the CBR process beyond the current appointments of MoE's Provincial Directors of Education.<sup>103</sup>

#### **D. Legal and procedural changes**

28. MEC recommends that a Presidential Decree be issued to reinforce that the MPs and any other influential heads are prohibited from talking to the Ministry on the appointment of teachers. If they do so, the MoE's Office of Parliament Affairs must report to the Parliament and they need to take action against the offending MPs. This should not be only for teacher recruitment but also in relation to contracts for projects.
29. MEC recommends that Parliament enact legislation to make it a criminal offense for anyone to approach MoE officials regarding appointment of new MoE teachers, or other employees at any level; and similarly in relation to contracts for projects.
30. MEC recommends that an independent mechanism established to receive and handle complaints. One possible mechanism is to use an outsourced organization, overseen by a Board of MoE and Development Partners. Another is to learn from the example of the Afghan National Police complaints hotline. Another could be to try a decentralized approach, with a small group in each province associated with one of the Cluster CDCs. Another could be to set this complaints body up alongside the independent education quality M&E body. (See Recommendation 48).
31. Ensure that a transparent system of accountability is in place for MoE staff, including teachers and school managers, so that violations lead to sanctions and, if needed, dismissal and prosecution.

32. MEC recommends that a Code of Conduct relating to integrity, honesty and anti-corruption be developed and enforced for all MoE staff. Violations leading to public censure and other potential repercussions.<sup>104</sup>
33. MEC recommends that as soon as possible, the MoE should issue all salary payments electronically to bank accounts or mobile devices, and cease cash payments which are highly vulnerable to corruption.
34. MEC recommends that all large-volume contracts should be evaluated and approved by the National Procurement Authority (NPA) and National Procurement Committee (NPC). Once awarded, then the implementation of these large contracts should be closely monitored by a joint NPA/MoE committee, following the guidelines in the World Bank's best practices of contract procurement.
35. Additionally, for procurement, MEC recommends that responsibility for the implementation of all major rural construction contracts be moved to the Ministry of Rural Rehabilitation Development (MRRD) and projects in cities moved to the Ministry of Urban Development and Housing (MUDH).

### **E. Signals of change to the population**

Structural institutional reforms are undoubtedly necessary, but they cannot be the only measures: they are slow, and have a high failure rate. Most of all, citizens do not see any results for at least 1-3 years – or the services can get even worse before they get better – so they do not have any faith or patience in grand reform announcements from the center.

For this reason, it is essential that the MoE reform plan includes significant changes that immediately signal to the population that real changes are on the way.

36. Consideration is given to immediately announcing that teachers will be appointed by local communities; within six months (April 2018). Publish other key appointments data, such as vacant positions within MoE, including PED and DED, within six months (April 2018).
37. Develop a mobile phone app reporting success/failure in meritocratic appointment of teachers, as already proposed above. Consider developing other mobile apps for similar purposes, e.g., for reporting and reducing teacher absenteeism alternatively, where there is no mobile coverage, on teacher absenteeism, the school *shura* should take more responsibility and sign off on the teacher attendance sheet every month. As mentioned in the Citizen Charter, the school *shura* should take a more active part in school affairs, and not just rule symbolically.
38. Provincial PEDs and governors organize regular meetings with PED and DED staff and local school communities to listen to communities' concerns about corruption (and other problems with education), and feedback to communities on how corruption is being addressed. Use social media (e.g., Facebook, YouTube, etc.) as a means of sharing positive stories and innovations in education.

39. In the longer term, publish individual school budgets or official spending plans for each school. This practice is known to be a powerful corruption-reducing measure, and this could be done through the CDCs and Cluster CDCs and school *shuras*.

## **F. International community and Development Partners action**

40. Align and coordinate donor programs around the core objective proposed above (meritocratic appointment of teachers).

41. Expand the USAID funded Capacity Building Activity (CBA) initiative. This can be used as a pilot program for provincial empowerment as envisaged in the NESP III and the CCNPP to improve local oversight and the accountability of the service providers in schools and TTCs.

42. Expand the support for CBE-style approaches to school education.

43. Regularize Technical Assistants (TAs) through a systematic professional development program to improve MoE staff's IT skills; and review the *Tashkiel* in order to shift operational responsibilities from the TAs to full time MoE staff.

44. Consider providing funds to MoE to permit and facilitate outsourcing of services, such as payroll and possibly EMIS.

45. Consider funding to MoE to support the national anti-corruption organizational reform structure and to sponsor the networks supporting reformers in each province.

46. Improve institutional memory among DPs and within MoE.<sup>105</sup>

47. Toughen up the monitoring and oversight system for the new phase of school construction, with stronger community monitoring, tougher ARTF oversight, and World Bank HQ formal oversight of the ARTF monitoring

## **G. Information systems, control and inspection systems, and independent oversight**

Accurate management information systems, effective control systems, quality inspection systems and independent oversight systems are the layered lines of defense of all well managed, low corruption organizations.

48. First, regarding EMIS, MEC recommends that it be improved by the following:

- Send enumerators from the EMIS Directorate to schools twice per year – at the beginning and at the end of the school session – to verify entries in the EMIS database accurately reflect school enrollment
- Increase EMIS's verification sample from the current level of 5 percent to 20 percent, even if this has to be done in stages.
- Consolidate/collate MoE's databases to enable verification and cross-checking of EMIS, HRMIS, and payroll. This consolidation should be controlled by the EMIS Directorate so there is consistency in data management and reporting, both in MoE and to other parts of the Government.

- Review and enrich guidelines for data collection in order to cover all aspects of the data collection process.
- Data collectors (monitors) should be trained on the collection and documenting/reporting techniques so that the data collection, entry, and verification are performed in an informed and consistent way.
- Make EMIS data accessible and ensure it is shared at provincial, district and school community levels.
- Provide for local verification of the schools data. This should be done either by school monitors or an independent entity to verify that the data produced by schools are accurate.<sup>106</sup>
- Ensure there is a periodic review of MoE information and control systems by an independent, external body comprised of relevant stakeholders (including DPs and Afghan educators).

49. Implement a more robust HR record-keeping information system within EMIS. This is a huge issue for teachers and MoE to track teachers' annual assessment, pension and other administrative issues, and is currently proceeding very slowly.

50. Regarding internal audit:

- Increase the number of auditors, and bring in a significant proportion of qualified auditors from outside MoE.
- Strengthen reporting lines of internal audit. Consider formally connecting the Internal Audit Function to the MoF.
- Publish all MoE internal audit reports as from January 1, 2018, and ensure that they are accessible to key stakeholders.
- Request Development Partners to fund the placement of a critical mass of professional auditors and investigators in the MoE Audit Department.

51. Establish an Audit Committee at the top level of MoE, including outside representation from MoF, Development Partners and civil society.

- This committee will review all internal audit reports, external audit reports from SAO, and all other reports from external bodies such as SIGAR and Checchi.
- This audit committee will publish a review every year of the control weaknesses it identifies and the actions taken.

52. Develop an independent National Accreditation entity for education institutions to regulate both public and private schools.<sup>107</sup>

53. Establish an independent body to conduct Education Quality Monitoring and Evaluation (M&E). This body should not exist in the MoE, but will need to work closely with the Ministry. This body should take over the current internal capability and report on performance – strengths, weaknesses and gaps – so that the educational problems in schools are properly understood and accounted for.

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## H. Transparency measures

Many transparency measures have already been noted in the previous sections. The most critical ones relate to the vacancy list of all teaching positions and the publication of the possible candidates for every available teaching position. In addition, MEC recommends:

54. MEC understands from MoE that all open teacher positions are currently publicized. However, this was not appreciated or agreed to by many respondents. MoE should set up a simple website on which all open positions can be easily visible, as can the proposed list of potential applicants for each.
55. MoE should publish meta-data on the status of all teacher positions in total and in detail in each province.
56. MoE should publish its anti-corruption strategy by January 1, 2018. It should then publish reviews of progress against implementation of this strategy every three months, starting in April 2018, until the end of 2019.
57. Initiate a transparency initiative, both centrally and locally, so that within three years MoE becomes a leader in 'open government.'

This could start with a small task force drawn from across the ranks of MoE, with a task of identifying what information should be routinely made public. This will cover formal documents, such as policies, standards, and procedures; financial documents, such as all budgets, spending against budgets, financial variation reports; recruitment data, as already mentioned in earlier recommendations; all reports on the education sector; and the anti-corruption plans and progress against them. MoE could develop this idea both centrally and in each province/district.

## I. Enforcement measures

58. MoE leadership take pragmatic steps to show – visibly, so that parents may see it – that corrupt behavior will no longer be tolerated in MoE.

MEC suggests the following for consideration in relation to this policy:

59. Within six months (April 2018), MoE leadership sets out an MoE anti-corruption policy; and MoE senior staff present this policy in all directorates, in all provinces, in all districts and in all school communities.
60. In preparation for the launch of this policy, within the next six months, MoE set up a complaints hotline that can be used by citizens and MoE staff. Similarly, MoE establishes the independent education quality agency, which also has a role in receiving comments about quality that may also relate to corruption.
61. MoE leadership should liaise with the AGO to ensure that existing cases involving past or current MoE officials are prioritized as much as possible in AGO prosecutions. Within six months, some of these cases should be prosecuted.
62. Within six months (April 2018), MoE should complete a review all the existing sanctions, disciplinary measures, prosecution options and other dissuasive mechanisms that are in

place in MoE. The purpose is to understand the disciplinary tools at the disposal of MoE, whether they are being fully utilized, and the potential for using each sanction more vigorously.

63. MoE leadership should place officials suspected of corruption under investigation and take them away from their post during the ongoing investigation.

64. MoE staff should be formally obligated, in their contracts, to report all corrupt occurrences.

#### **J. Market-based alternatives to monopoly government supply**

65. Move towards a market solution for textbooks. Carry out a feasibility study to examine options for switching to commercial textbook production.<sup>108</sup>

66. Study and implement options for parents being given electronic vouchers (via their cellphones), which they could redeem at local vendors in exchange for textbooks.

# ANNEXES

## Annex 1. Sample of press and media reports on Education corruption allegations

Area/Level of concern	Common corruption types in Education	Source of Evidence, and the main points
Planning & Funding decisions	Diversion of Education funds (from Government accounts and international assistance) by corrupt officials and politicians which may result in shortage of resources for the original project planned and pave the path for probable corruptions.	<p><b>Afghan Broadcasting Network, January 22, 2016</b></p> <p><u>Details of Corruption in MoE disclosed by a fact-finding commission</u></p> <ul style="list-style-type: none"> <li>• Embezzlement of USD 770 million</li> <li>• Embezzlement of USD 400 million under the name of capacity building</li> <li>• Recruitment of 1,200 advisors through relations rather than a transparent recruitment process</li> <li>• Existence of around 75,000 Ghost teachers who received salary totaling USD 125,000 each month</li> <li>• Existence of around 3,500 Ghost schools</li> <li>• Embezzlement of USD 288 million under the name of “Publishing new Textbooks”</li> </ul>
	Corruption in recruitment process of teachers and staff in MoE	<p><b>Salam Watandar Newspaper, October 19, 2016</b></p> <ul style="list-style-type: none"> <li>• Allegation of corruption in recruitment of Principals in around 30 schools in Ghazni. The accused officials include two staff of Ghazni Education Department, a number of MPs(Ghazni representatives in Parliament), PC members, a number of MoE Kabul staff whose cases were referred to the AGO.</li> <li>• The allegations include corruptions such as: <ul style="list-style-type: none"> <li>- Avoiding to conduct a writing test of candidates</li> <li>- Giving an average of 5-15 free scores to principals of high schools</li> <li>- Preparing false results sheets for certain candidates</li> <li>- Ignoring the experience of candidates</li> <li>- Incomplete evidences on candidates' qualification</li> </ul> </li> </ul>
	Deficiency in construction of Teacher Training facilities	<p>SIGAR 17-19-IP, Friday, December 30, 2016, Pages: 2, 3, 5, 6, 7, 9 and 10.</p>

Requiring payments for services that should be free.

**8 Sobh Newspaper, February 28, 2016**

Corruption in Herat Education Department

Finding of an assessment conducted by two technical committees assigned by MoE in a number of insecure districts of Herat indicates the following corruption:

- Existence of Ghost teachers and students, illiterate teachers, Ghost schools, and inactive schools
- Distribution of teachers' salaries to ineligible individuals
- Teachers with no school certificate
- Existence of teachers' name in the list and teacher does not exist
- Acting beyond his/her authority, ignoring the MoE rules and regulations, lack of awareness of MoE laws and regulations
- Receiving unauthorized fees from the teachers
- Nepotism in recruitment of contracting teachers
- Embezzlement of teachers' salary/benefits
- Receiving two salaries by a number of teachers
- Receiving salary by individuals who are on the list, but they are not actually the teachers
- Lack of awareness of a number of teachers about their salary/benefits
- Teaching part of curriculum due to low teachers' qualifications

Ethnical, linguistic discrimination in education system

**Jamhoor News Agency, March 2014**

Financial corruption, nepotism, racial and linguistic discrimination, lack of Monitoring of Education System in remote provinces/districts, exclusive privileges to Kabul Education are among the major shortcomings of education system in Afghanistan.

Providing false information to government and development partners in order to secure more fund

**AFGHAN NEWS AGENCY, December 14, 2016**

A Technical Working Group assigned by the government, assessed 1,007 schools throughout the country. Findings of this assessment indicate:

- False reporting of the number of active and inactive schools, number of schools, administrative staff, teachers and students, number of schools with and without a building
- Delay in payment of teachers' salary

- Allegations of the new MoE Minister on the former MoE about falsification of data about the number of active and inactive schools in the country, schools with and without building, teachers' salary, etc.

### **TOLO NEWS, February 2016**

#### Continued discrepancies in the number of school students in MoE

- According to the MoE Minister, the number of present school students throughout the country is less than 7 million, while this number was reported around 11.5 million by the former MoE leadership.
- The figures of the number of school students provided by the present Deputy Minister for Finance/Administration indicate quite different picture which shows around 9.2 million students throughout the country.

Lack of political will within NUG in fighting corruption

### **The Daily Afghanistan, January 9, 2017**

#### Rotation of Corruption wheel in Afghanistan

- Existence of Ghost schools, Ghost students and Ghost teachers
- A SIGAR (2016) report says about waste of USD 750 million of U.S. assistance on these Ghost entities

Advisors with low qualification, high benefits and authorities

### **The Daily Afghanistan, January 8, 2017**

Findings of an assessment team assigned by the President of Afghanistan shows:

- Existence of hundreds of Ghost schools and thousands of school teachers and students
- Embezzlement of millions of international community aid to education including the allocation for printing of textbooks
- Discrepancies in the number of active and inactive schools
- Incomplete school buildings while the contractors receive the payments
- Ghost training programs
- Nepotism in distribution of scholarships
- Renting premises for schools at higher price than in the market

Lack of reliable and updated information in MoE (falsified data)	SIGAR-15-62-SP, June 11, 2015, Pages: 1-9.
Lack of reliable facts and figures in MoE, and lack of cooperation in providing the required information because of corruption	<b>Mandegar Newspaper, November 3, 2015</b> Member of a fact-finding group for assessment of corruption in MoE – The case of Wardak's corruption can be submitted to the President, lack of reliable facts and figures in MoE, and lack of cooperation in providing the required information because of corruption.
Ineligible and unsupported costs Occurred in the implementation of the BESST and CBSG programs in Afghanistan.	Financial Audit 14-18-FA, Tuesday, January 7, 2014
Turnover of staff because of existing corruption	<b>Payam-e-Aftab News Agency, January 8, 2017</b> The Director of TTC in Herat resigned He explained the reasons for his resignation as follows: <ul style="list-style-type: none"><li>• Abuse of authorities by caretaker Director of Education Department in Herat</li><li>• Embezzlement of funds</li><li>• Illegal practices, illogical remarks, threats, insults nepotism and political appointments by Education Director</li></ul>
Lack of comprehensive assessments by USAID of its support programs to the primary and secondary education in Afghanistan waste, fraud and abuse of funds, etc., in U.S. construction projects.	SIGAR 16-32-AR, Tuesday, April 26, 2016, Pages: 2, 3, 4, 9, 23 and 24. • Spotlight, Wednesday, December 10, 2014.
Approval of Project completion before all contract requirements met.	SIGAR-Inspection 10-01, October 26, 2009, Pages: 3, 5, 6, 7, 12 and 13.

<b>Procurement /Contracting</b>	School building left incomplete by contractors, even though he already received the entire payment of the contract.	<b>Bakhtar News Agency, January 1, 2017</b> <ul style="list-style-type: none"><li>• The leadership of Bamyan Education Department says about the existing challenges in Education Sector of this Province during the visit of 2<sup>nd</sup> Vice President (Sarwar Danish) to Bamyan.</li><li>• According to the Head of the Bamyan Education Department, teachers' pension, shortage of human resources and payment of salaries of contract teachers are the most problematic areas in Bamyan Education Sector.</li></ul>
		<b>8 Sobh Newspaper, June 28, 2016</b> <ul style="list-style-type: none"><li>• Incomplete school buildings</li><li>• Corruption in repair and maintenance of school buildings (embezzlement of allocated funds)</li><li>• Bribery and extortion</li><li>• Lack of monitoring of school construction sites</li><li>• Nepotism in recruitment of advisors, teachers and administrative staff</li><li>• Sale of positions (bribing for recruitment)</li><li>• Interference of politicians in recruitment process</li><li>• Distribution of teachers' salaries in insecure districts among the members of Provincial Council</li></ul>
	Ignoring/bypassing criteria in recruitment, job allocations, appointments, transfers and promotion of administrative staff and teachers	<b>Dari News Agency, 2015</b> <ul style="list-style-type: none"><li>• Widespread corruption in recruitment of teachers in the MoE</li><li>• Around 55 percent of school teachers in Afghanistan do not possess the necessary qualifications</li></ul>
	Taking bribes for recruitment /placement of teachers	<b>Farhang News Agency, July 2, 2016</b> <p>According to Ghazni representatives in Parliament and a number of Ghazni Provincial Council members, ethical corruption and bribery are common corrupt practices in Ghazni Education system.</p> <b>Ariana News Services, July 5, 2016</b>

	<p>Corruption in Kabul schools Bribery, nepotism, and political pressure in recruitment of teachers in Kabul schools</p>
Interference by local warlords and influential in recruitment of teachers and school staff	<p><b>Ural Newspaper, September 17, 2015</b> Corruption chain in Education – From the Ministry to school. A report from Nahoor district of Ghazni. According to the report, the following types of corruption found in Nahoor schools:</p> <ul style="list-style-type: none"><li>• Teachers' absenteeism</li><li>• Interference of local powerful individuals in recruitments</li><li>• Lack of qualified teachers, lack of textbooks, furniture and other school supplies</li><li>• Harsh behavior of teachers and school administration with school students</li></ul>
Misuse of education funds allocated by the central Ministry as well as the money contributed by community or international NGO	<p><b>8 Sobh Newspaper, December 21, 2016</b> • Embezzlement of education funds worth USD 16 million in Kunduz Province</p>
Absenteeism of teachers and school students	<p>SIGAR-17-12-SP, November 4, 2016, Pages: 5-16. Article of report (85), Page 19</p>
Insufficient planning, safety problems and poor quality control in construction projects of MoE.	<p>SIGAR-Inspection 10-02, October 26, 2009. Pages: 3, 5, 7 and 9.</p>
	<p><b>Radio Ashna, August 24, 2013</b> Corruption in Balkh Education Department</p> <ul style="list-style-type: none"><li>• Sexual abuse of female teachers by the Head of Balkh Education Department</li><li>• Widespread corruption in education projects of Balkh</li><li>• Abuse of power and authority</li></ul>
	<p><b>Noor TV, January 5, 2016</b> Corruption in Education Department of Zabul Province</p>

- The Director of Education in Zabul has been introduced to AGO because of corruption and abuse of authority
- A number of employees in Zabul Education Department were suspended due to having links with the corrupt Director

Diversion of school supplies to local markets

**Paywandgah News Agency, May 2016**

One-third of Oruzgan schools are closed due to corruption and insecurity

- Around 100 schools including three girls schools have been closed throughout Oruzgan Province due to:
  - Widespread corruption
  - Lack of government attention and regular monitoring
  - Continued insecurity
- Due to corruption, the teachers cannot receive their salaries and the school is left without essential supplies

Lack of accountability of officials in education sector to people

**Payame Aftab, 2016**

Financial corruption and lack of accountability in Balkh Education system

- Nepotism and bribery in recruitment
- Lack of accountability

Falsifying documents

**Ofuq News Agency**

- 12 high-ranking officials of Bamyan Education Department have been sentenced to prison and are subject to fines
- Neglect in fulfilling the responsibilities as well as falsification of documents are the major cases of corruption

Paying bribes (by teachers) for recruitment and posting

**Azmoon-e-Milli Newspaper, January 9, 2017**

- Bribery, ethnical and partial relations is oppressing in Afghanistan Education Ministry
- Widespread nepotism in recruitment process
- Payments for obtaining certificates

Sale of false school certificate

**Jorghai & Burjagai News Network, August 4, 2011**

<b>Recruitment &amp; Placement</b>	Embezzlement of funds allocated to schools which are closed since many years	Sale of false school certificates <b>Pajwak News Agency, February 21, 2016</b>
		<ul style="list-style-type: none"><li>• Existence of ghost teachers, particularly in insecure districts of Herat Province</li><li>• Low qualifications of teachers</li><li>• Payment of teachers' salaries while their schools are closed</li><li>• Payment of teachers' salaries in a number of closed schools, to the principals of those schools</li><li>• Interference of local powerful individuals in recruitment of teachers</li><li>• Lack of regular Monitoring of Education process, particularly in remote and insecure districts</li></ul>
	Sale of food aid allocated to students in the market	<b>Hamrasani, December 4, 2016</b> Embezzlement of education funds in Ghor Province
	Insulting behavior of the school administration	<b>Bamyan Newspaper, December 31, 2011</b>
	<ul style="list-style-type: none"><li>• Sale of aid items (cooking oil and biscuits) provided to Bamyan school students in the market</li></ul>	
	Embezzlement of education funds	<b>Afghan News Agency, January 1, 2017</b>
	<ul style="list-style-type: none"><li>• A number of girl students in Bamyan center protested against ethical corruption (sexual abuse) in the Education Department</li><li>• Misconduct of the Director of Education with students</li></ul>	
	Ghost students, schools and teachers	<b>Peace Press Afghanistan –A students' News Agency, November 28, 2016</b>
	<ul style="list-style-type: none"><li>• Corruption in the examination process of candidates for scholarships</li><li>• Nepotism and favoritism in recruitment of administrative staff, lecturers and service staff</li></ul>	
<b>Creating and Accrediting</b>	Structural damage to school buildings soon after construction	SIGAR Report SIGAR-17-12-SP, November 4, 2016, Pages: 5-18.
	SIGAR-17-12-SP, November 4, 2016, Pages: 5-18.	

of private schools and Private Teacher Training Colleges	SIGAR-16-38-SP, May 19, 2016, Pages: 1-5. <b>Jamea-e-Baz Newspaper, January 8, 2017</b> 52 private schools in Kabul have been suspended because of: <ul style="list-style-type: none"><li>• Low qualification of teachers</li><li>• Low quality of education</li><li>• Tax evasion</li><li>• Lack of Business Licenses</li></ul>
Un-reliable information provided by MoE	<b>Islah Online, November 27, 2016</b> Findings of the Center for Strategic & Regional Studies (CSRS) about the literacy programs in Afghanistan. According to the findings of CSRS, the following shortcomings are obvious in literacy system of Afghanistan: <ul style="list-style-type: none"><li>• Discrepancies in the number of individuals who benefited from literacy programs during the period (2009-2014)</li><li>• Lack of reliable data about the number of illiterate persons (men and women), and number of graduates of literacy courses during the last ten years</li><li>• Discrepancies in the figures about the number of literacy courses provided by MoE and provided by National Statistics Authority</li><li>• Lack of a standard literacy curriculum</li><li>• Misusing the literacy funds allocated by MoE as well as the funds raised by community, INGOs, etc.</li><li>• Diversion of supplies allocated for literacy courses to local markets</li><li>• Ghost literacy courses and literacy teachers</li></ul>

## Annex 2. MoE staff, by Province, gender, teaching, non-teaching. 1395 (2016)<sup>109</sup>

Staff of MoE 1395 (2016)													
		Teacher			Officer/Agent			Ancillary Staff			Total Structure		
		Male	Female	Total	Male	Female	Total	Male	Female	Total	Male	Female	Total
1	Kabul	3,989	1,766	5,755	414	33	447	780	21	801	5,183	1,820	7,003
2	Kapisa	2,970	568	3,538	393	19	412	732	19	751	4,095	606	4,701
3	Parwan	5,312	956	6,268	640	30	670	1,299	42	1,341	7,251	1,028	8,279
4	Wardak	4,287	266	4,553	694	8	702	1012	7	1,019	5,993	281	6,274
5	Loger	2,837	419	3,256	349	16	365	632	23	655	3,818	458	4,276
6	Ghazni	5,052	1,711	6,763	553	67	620	1,275	65	1,340	6,880	1,843	8,723
7	Paktia	2,874	149	3,023	370	4	374	652	1	653	3,896	154	4,050
8	Nangarhar	12,649	1,592	14,241	898	16	914	2,197	53	2,250	15,744	1,661	17,405
9	Laghman	3,854	297	4,151	429	8	437	727	12	739	5,010	317	5,327
10	Kuner	3,916	215	4,131	473	7	480	936	6	942	5,325	228	5,553
11	Badakhshan	7,045	3,477	10,522	636	105	741	1,446	70	1,516	9,127	3,652	12,779
12	Takhar	5,982	2,525	8,507	657	64	721	918	56	974	7,557	2,645	10,202
13	Baghlan	6,936	2,419	9,355	432	32	464	1,667	62	1,729	9,035	2,513	11,548
14	Kundoz	4,812	1,937	6,749	423	45	468	987	85	1,072	6,222	2,067	8,289
15	Samangan	1,773	757	2,530	142	16	158	464	27	491	2,379	800	3,179
16	Balkh	5,381	6,595	11,976	457	151	608	1,478	219	1,697	7,316	6,965	14,281
17	Jawozjan	2,665	1,977	4,642	171	58	229	817	50	867	3,653	2,085	5,738
18	Fariyab	3,499	2,024	5,523	175	44	219	1,126	66	1,192	4,800	2,134	6,934
19	Badghis	2,090	462	2,552	230	15	245	542	26	568	2,862	503	3,365
20	Herat	7,930	8,407	16,337	454	133	587	1,606	377	1,983	9,990	8,917	18,907
21	Farah	1,707	983	2,690	277	33	310	555	52	607	2,539	1,068	3,607
22	Nemroz	629	911	1,540	209	18	227	245	35	280	1,083	964	2,047
23	Helman	2,290	498	2,788	301	4	305	594	39	633	3,185	541	3,726
24	Kandahar	4,024	745	4,769	453	26	479	1,400	85	1,485	5,877	856	6,733
25	Zabul	731	75	806	180	4	184	389	14	403	1,300	93	1,393
26	Urozgan	1,143	39	1,182	111	1	112	260	4	264	1,514	44	1,558
27	Ghor	4,066	482	4,548	404	12	416	884	13	897	5,354	507	5,861
28	Bamyan	2,578	822	3,400	245	19	264	509	15	524	3,332	856	4,188

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29	Paktika	3,593	58	3,651	279	0	279	806	5	811	4,678	63	4,741
30	Noristan	1,391	190	1,581	217	1	218	295	6	301	1,903	197	2,100
31	Sari-pol	2,138	1,046	3,184	363	63	426	752	62	814	3,253	1,171	4,424
32	Khost	4,199	195	4,394	419	6	425	704	5	709	5,322	206	5,528
33	Pansjir	1,036	284	1,320	212	13	225	291	18	309	1,539	315	1,854
34	Daikundi	2,066	1129	3,195	363	69	432	499	55	554	2,928	1,253	4,181
35	Kabul City	7,511	19,284	26,795	2,342	1,013	3,355	4,591	1451	6,042	14,444	21,748	36,192
<b>Total</b>		<b>136,332</b>	<b>66,004</b>	<b>202,336</b>	<b>16,976</b>	<b>2,555</b>	<b>19,531</b>	<b>36,464</b>	<b>3,509</b>	<b>39,973</b>	<b>189,772</b>	<b>72,068</b>	<b>261,840</b>

**Annex 3. Private Schools by Type and Province, 1395 (2016)**

No.	Province	Primary School		Middle School		High School		Teachers		Students	
		Boy	Girl	Boy	Girl	Male	Female	Male	Female	Male	Female
1	Aruzgan	0	0	0	0	0	0	0	0	0	0
2	Badghis	0	0	3	0	0	0	24	10	140	50
3	Bamyan	4	0	1	0	2	0	35	15	600	78
4	Badakhshan	2	0	1	0	4	0	44	20	787	300
5	Baghlan	6	0	3	0	4	0	27	30	700	400
6	Balkh	16	0	13	0	22	0	200	275	2,000	274
7	Parwan	0	0	2	0	6	0	50	15	800	419
8	Paktia	4	0	3	0	7	0	100	18	1,900	183
9	Paktika	0	0	1	0	1	0	20	12	600	75
10	Pansjir	0	0	0	0	0	0	0	0	0	0
11	Takhar	3	0	2	0	5	0	80	11	800	39
12	Jawzjan	2	0	1	0	4	0	70	11	800	99
13	Khost	11	0	51	0	31	0	600	208	7,000	870
14	Dikundi	3	0	0	0	1	0	20	15	400	22
15	Zabul	1	0	0	0	0	0	3	1	60	17
16	Sare Pul	0	0	1	0	2	0	20	13	600	22
17	Samangan	1	0	1	0	1	0	20	5	200	82
18	Kabul City	100	0	300	0	199	0	4,000	1,982	50,000	13,844
19	Ghazni	20	0	10	0	4	0	200	79	3,000	953
20	Ghor	0	0	0	0	1	0	3	1	40	14
21	Faryab	3	0	0	0	3	0	40	6	500	79
22	Farah	4	0	3	0	4	0	100	43	1,000	437

23	Kapisa	0	0	2	0	0	0	3	1	70	12
24	Kandahar	9	0	10	0	20	0	300	108	8,097	290
25	Kunduz	3	0	7	0	3	0	80	17	1,000	283
26	Kunar	2	0	3	0	2	0	40	16	700	114
27	Laghman	2	0	2	0	2	0	30	13	900	96
28	Logar	2	0	7	0	2	0	100	33	1,000	722
29	Nangarhar	40	0	30	0	14	0	400	157	7,000	1,046
30	Norustan	0	0	0	0	0	0	0	0	0	0
31	Nimroz	2	0	6	0	2	0	70	10	900	160
32	Herat	50	0	50	0	42	0	1,000	681	20,000	4,706
33	Helmand	2	0	8	0	2	0	70	14	1,800	240
34	Wardak	1	0	1	0	1	0	20	7	400	85
35	Kabul Province	10	0	10	0	10	0	200	50	2,000	872
<b>Totals</b>		<b>303</b>	<b>0</b>	<b>532</b>	<b>0</b>	<b>401</b>	<b>0</b>	<b>7,969</b>	<b>3,877</b>	<b>115,794</b>	<b>26,883</b>
<b>Grand Total</b>						<b>1,236</b>		<b>11,846</b>		<b>142,677</b>	

## Annex 4

Comparative enrollment, attendance and EMIS for selected schools in target Provinces

### Table A: EMIS versus Enrollment data for selected School

The data for the current school year were unavailable at time of this assessment in July 2017. The data from the previous four school years show the variance between the declared enrollment number at the school and the corresponding number held in the EMIS database. In most cases there is wide variance (in the % column a (-x) shows that Enrollment number is over than EMIS number of student and (+x) shows that EMIS number is over than Enrollment).

#	Name of School	Province	Year 1392			Year 1393			Year 1394			Year 1395		
			Enrolled	EMIS	% Variance									
1	Abdul Rahim Shahd Boys High School	Kabul	13,762	11,381	-21	13,836	11,532	-20	15,662	13,022	-20	15,136	13,911	-9
2	Zinab Kubra Girl High School	Kabul	7,396	7,152	-3	7,204	7,231	0	7,547	6,931	-9	7,541	7,082	-6
3	Abo Qassim Ferdosi High School	Kabul	2,755	3,235	15	2,018	3,421	41	3,082	3,102	1	3,011	3,207	6
4	Guldara Girl High School	Kabul	547	840	35	642	509	-26	626	542	-15	638	532	-20
5	Yasra School (Private school)	Kabul	192	298	36	312	281	-11	717	399	-80	590	463	-27
6	Amir Hamza	Kabul	2,353	2,429	3	2,418	2,290	-6	2,439	2,430	0	2,532	3,554	29
7	Ghulam Haider Khan (Days)	Kabul	6,708	6,274	-7	6,290	6,336	1	6,300	6,367	1	6,250	6,359	2
8	Ghulam Haider Khan (Night)	Kabul	1,100	1,745	37	1,300	1,426	9	1,370	1,646	17	1,400	1,359	-3
9	Rabia Balkhi	Kabul	2,404	2,380	-1	1,997	2,308	13	2,157	2,335	8	1,936	3,221	40
10	Mahmood Hotaki	Kabul	3,864	4,060	5	3,746	3,799	1	2,840	3,708	23	2,500	3,309	24

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11	Malika Jalai High School	Herat	1,950	2,726	28	2,200	2,413	9	2,413	2,276	-6	2,420	2,420	0
12	Fakhrul Madares High School	Herat	620	933	34	800	910	12	933	933	0	1,028	1,079	5
13	Darul Hefaz School	Herat	382	440	13	320	383	16	413	413	0	374	394	5
14	Amir Ali Sher Nawaee Girls High School	Herat	2,812	4,035	30	3,052	3,110	2	3,145	2,982	-5	3,069	3,069	0
15	Sultan Geyasuddin Ghuri School	Herat	5,500	8,561	36	6,130	7,500	18	7,053	6,817	-3	7,431	7,227	-3
16	Amir Ali Sher Nawaee Boys High School	Herat	2,400	2,917	18	2,545	2,706	6	2,911	2,787	-4	2,641	3,260	19
17	Gawhar Shad Girls High School	Herat	5,671	9,073	37	5,500	7,930	31	7,354	8,051	9	5,977	7,849	24
18	Agriculture and Veterinary Institute	Herat	620	980	37	610	634	4	828	528	-57	711	722	2
19	Tajrobawee Girls High School	Herat	2,950	3,685	20	3,400	3,497	3	3,614	3,614	0	3,714	3,792	2
20	Tajrobawee Boy High School	Herat	2,000	2,997	33	2,670	2,862	7	2,288	2,874	20	2,837	3,299	14
21	Qwayee4 Zarah Dar Engil District	Herat	752	1,246	40	1,050	1,288	18	1,107	1,519	27	1,171	1,196	2
22	Khulm Male High School	Balkh	1,724	1,016	-70	1,747	1,779	2	1,602	1,697	6	1,729	1,803	4
23	Khaja Borhan Male High School	Balkh	1,416	1,439	2	1,408	1,312	-7	1,196	1,241	4	799	1,290	38
24	Khaja Borhan Female High School	Balkh	1,160	1,273	9	1,035	1,165	11	1,146	1,137	-1	1,073	1,210	11
25	Masoud Shahid High School	Balkh	1,165	1,156	-1	1,171	1,165	-1	1,014	1,014	0	933	1,063	12
26	Amin Hussain Female High School	Balkh	1,267	1,431	11	1,257	1,357	7	1,289	1,289	0	1,284	1,369	6
27	Abdul Raof Khulmi High School	Balkh	873	883	1	853	845	-1	652	691	6	686	729	6
28	Tangee Female High School	Balkh	342	345	1	307	307	0	335	358	6	410	381	-8
29	Sultan Razia Female High School	Balkh	5,305	5,306	0	5,206	4,857	-7	4,822	4,770	-1	4,606	4,964	7
30	Sultan Ghyasudin High School	Balkh	6,437	8,052	20	6,744	6,389	-6	5,189	5,612	8	6,037	5,920	-2

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31	Khiradman Shahid	Badakhshan	2,170	2,147	-1	2,117	2,236	5	2,130	2,080	-2	2,095	2,186	4
32	Ganda Cheshma	Badakhshan	475	374	-27	489	493	1	462	460	0	521	547	5
33	Sum Dara	Badakhshan	669	615	-9	669	682	2	639	632	-1	585	674	13
34	Khan Aqa	Badakhshan	157	156	-1	158	159	1	177	176	-1	187	194	4
35	Mir Fazlullah School	Badakhshan	3,475	3,434	-1	3,709	3,495	-6	3,709	3,440	-8	3,681	3,584	-3
36	Mashhad Girls School	Badakhshan	2,705	2,583	-5	3,012	2,583	-17	3,012	2,811	-7	3,019	2,926	-3
37	Naw Abad Gandom Qul Girls School	Badakhshan	1,005	906	-11	1,042	1,023	-2	1,042	1,073	3	1,183	1,124	-5
38	BeBe Asma School	Badakhshan	522	478	-9	525	478	-10	522	515	-1	542	591	8
39	Mahdaba Mixed School	Badakhshan	358	300	-19	337	293	-15	337	619	46	355	351	-1
40	Wakhshi High School	Badakhshan	817	434	-88	768	709	-8	718	625	-15	680	665	-2
41	Halima Sadia High School	Badakhshan	2,497	2,017	-24	2,321	2,265	-2	2,134	2,096	-2	1,420	2,154	34
42	Qara Kamar Secondary School	Badakhshan	261	275	5	288	290	1	319	319	0	333	366	9
43	Sabzi Bahar School	Badakhshan	262	262	0	283	285	1	274	274	0	305	312	2
44	Deh Dehi Girls School	Badakhshan	1,048	1,268	17	1,048	1,275	18	1,083	1,083	0	998	1,111	10
45	Fizia Boy High School	Ghazni	640	617	-4	644	639	-1	620	620	0	606	617	2
46	Fizia Girl High School	Ghazni	754	728	-4	773	772	0	770	779	1	733	748	2
47	Sabaz Chob Bala	Ghazni	375	374	0	383	388	1	340	416	18	394	437	10
48	Sang Joy Loman Mixed High School	Ghazni	408	412	1	415	631	34	408	406	0	421	394	-7
49	Loman Boy High School	Ghazni	898	885	-1	833	903	8	833	789	-6	743	739	-1
50	Loman Girl High School	Ghazni	738	551	-34	750	723	-4	883	789	-12	803	812	1
51	Seyed Jamaludin Girl High School	Ghazni	568	555	-2	573	603	5	548	540	-1	525	502	-5
52	Mohajeren Boy High School	Ghazni	390	377	-3	407	397	-3	407	455	11	441	455	3
53	Mohajeren Girl High School	Ghazni	408	405	-1	409	407	0	437	409	-7	413	417	1
54	Sanay Grdan Khodidad	Ghazni	410	679	40	450	759	41	763	763	0	827	841	2

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55	Tawhid Abad Boy High School	Ghazni	1,488	1,443	-3	1,774	1,964	10	1,277	1,938	34	2,129	2,002	-6
56	Qala Amir Moh Khan Girl High School	Ghazni	823	832	1	1,133	1,322	14	1,133	1,083	-5	1,247	1,235	-1
57	Balol Mixed High School	Ghazni	686	735	7	827	832	1	820	956	14	851	1,103	23
58	Sultany Boy High School	Ghazni	2,840	1,881	-51	3,004	1,894	-59	2,675	2,672	0	2,481	2,905	15
59	Shohada Girl High School	Ghazni	2,130	2,121	0	2,211	2,140	-3	2,203	2,203	0	2,040	1,979	-3
60	Seyed Jamaludin Boy High School	Ghazni	527	490	-8	548	535	-2	572	575	1	480	476	-1
61	Khodidad Boy High School	Ghazni	1,000	990	-1	1,100	1,073	-3	963	973	1	1,020	1,053	3
62	Khodidad Girl High School	Ghazni	893	894	0	807	899	10	886	899	1	859	940	9
63	Mogholan Girl High School	Ghazni	1,129	1,072	-5	1,156	1,338	14	1,274	1,402	9	1,448	1,415	-2
64	Alberoni Girl High School	Ghazni	3,658	3,375	-8	3,700	3,978	7	3,721	4,056	8	3,772	4,198	10
65	Fatimatuzara Girl High School	Ghazni	1,707	1,773	4	1,832	1,773	-3	2,007	1,931	-4	2,053	1,753	-17
66	Qala Shada Boy High School	Ghazni	2,528	2,389	-6	2,691	2,389	-13	2,655	2,640	-1	2,653	2,834	6
67	Wali Asar Girl High School	Ghazni	1,663	1,814	8	1,654	1,925	14	1,785	1,739	-3	1,879	1,923	2
68	Miradina Boy High School	Ghazni	1,984	2,099	5	1,992	2,135	7	2,057	2,057	0	1,484	2,116	30
69	Miradina Girl High School	Ghazni	1,093	1,132	3	1,188	1,144	-4	1,188	1,178	-1	1,240	1,248	1
70	Lalchag Girl High School	Ghazni	686	673	-2	693	995	30	963	721	-34	670	666	-1
71	Maknak Girl High School	Ghazni	1,086	1,107	2	1,154	1,160	1	1,154	1,154	0	1,181	1,150	-3
72	Sediq Rohi Girls High School	Khost	1,696	1,857	9	2,430	2,678	9	2,400	1,994	-20	2,300	1,880	-22
73	Sediq Rohi Boy High School	Khost	2,291	2,339	2	2,268	2,323	2	2,631	2,518	-4	2,663	2,630	-1
74	Shahid Dawood, Boy High School	Khost	2,925	3,642	20	2,760	4,563	40	3,885	3,885	0	4,060	3,989	-2

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75	Dargai, Boy High School	Khost	277	1,265	78	504	1,400	64	1,299	1,299	0	1,377	1,398	2
76	Abdul Hay Habibi, Boy High School	Khost	3,928	4,712	17	4,018	4,859	17	5,678	5,649	-1	6,374	6,235	-2
77	Dargai, Girls High School	Khost	1,257	637	-97	1,197	663	-81	942	947	1	953	899	-6
78	Perbadsha, Girls School	Khost	640	342	-87	768	491	-56	629	628	0	675	681	1
79	Karte Sullh Boys Secondary School	Faryab	715	735	3	849	872	3	885	813	-9	928	897	-3
80	Arab Khana Boys High School	Faryab	3,299	3,473	5	2,959	2,882	-3	3,003	2,989	0	2,860	2,692	-6
81	Pasha Khani Boys Secondary School	Faryab	979	874	-12	1,056	1,042	-1	1,108	1,008	-10	946	973	3
82	Pasha Khani Girls Secondary School	Faryab	582	596	2	615	625	2	608	608	0	636	593	-7
83	Mowlana Amrullah Girls High School	Faryab	988	1,126	12	1,124	1,135	1	1,155	1,155	0	1,242	1,230	-1
84	Karte Sullh Girls High School	Faryab	881	986	11	843	820	-3	985	924	-7	1,066	911	-17
85	Gawhar Shad Bigum Girls High School	Faryab	1,487	1,483	0	1,467	1,417	-4	1,502	1,493	-1	1,533	1,537	0
86	Jernail Ghuwasuddin Boys Secondary School	Faryab	1,491	1,809	18	1,413	1,809	22	1,678	1,676	0	1,726	1,730	0
87	Khurasan Boys High School	Faryab	1,193	1,217	2	930	875	-6	932	890	-5	964	848	-14
88	Setara Girls High School	Faryab	3,000	3,244	8	3,000	2,633	-14	2,424	2,424	0	2,480	2,490	0
89	Kohi Khana Boys High School	Faryab	1,215	1,187	-2	1,127	1,109	-2	1,224	1,234	1	1,197	1,208	1
90	Abu Obid Jowzjani Boys High School	Faryab	1,459	1,414	-3	1,532	1,389	-10	1,596	1,432	-11	1,649	1,419	-16
91	Afghan Kot Girls High School	Faryab	2,659	2,606	-2	2,410	2,494	3	2,284	2,284	0	2,368	2,298	-3
92	Tatar Khana Girls High School	Faryab	1,110	1,427	22	1,085	1,102	2	1,162	604	-92	1,122	526	-113
93	Tokaly Khana Boys Secondary School	Faryab	701	675	-4	744	677	-10	757	757	0	870	879	1

	Avg. Variance Percentage				2%			2%			-2%			1%
	Avg. Variance (1392-1395)							1%						

i. **Annual and four-year Average Variance Percentage of EMIS versus Enrollment:**

Description	Year 1392	Year 1393	Year 1394	Year 1395
Average percentage by which the EMIS is overestimated/underestimated than the Enrollment	2%	2%	-2%	1%
Average Percentage of EMIS versus Enrollment Over the 4 years of 1392-1395			1%	

**Note on EMIS V/S Enrollment:** In 1392, 1393 and 1395 EMIS is overestimated than enrollment; Just in 1394 EMIS is -2 percent Underestimated than enrollment. The four years holistic average variance percentage shows that 1percent EMIS is overestimated than the Enrollment

**Table B: EMIS Versus Attendance data for selected School**

In the following table the data from the previous four school years show the variance between the declared Attendance number at the school and the corresponding number held in the EMIS database. In most cases there is wide variance (in the % column a (-x) shows that attendance number is over than EMIS number of student and (+x) shows that EMIS number is over the Attendance number.

#	Name of School	Province	Year 1392			Year 1393			Year 1394			Year 1395		
			Attend.	EMIS	% Variance									
1	Abdul Rahim Shahd Boys High School	Kabul	11,172	11,381	+2	10,880	11,532	+6	13,018	13,022	0	12,042	13,911	+13

2	Zinab Kubra Girls High School	Kabul	6,955	7,152	+3	6,631	7,231	+8	6,931	6,931	0	6,900	7,082	+3
3	Abo Qassim Ferdosi High School	Kabul	2,179	3,235	+33	1,757	3,421	+49	2,649	3,102	+15	2,560	3,207	+20
4	Guldara Girls High School	Kabul	472	840	+44	507	509	0	513	542	+5	531	532	0
5	Yasra School (Private)	Kabul	182	298	+39	265	281	+6	438	399	-10	311	463	+33
6	Malika Jalai High School	Herat	1,745	2,726	+36	1,857	2,413	+23	2,099	2,276	+8	1,950	2,420	+19
7	Fakhrul Madares High School	Herat	550	933	+41	670	910	+26	770	933	+17	762	1,079	+29
8	Darul Hefaz School	Herat	160	440	+64	180	383	+53	230	413	+44	201	394	+49
9	Amir Ali Sher Nawaaee Girls High School	Herat	2,400	4,035	+41	2,533	3,110	+19	2,635	2,982	+12	574	3,069	+81
10	Sultan Geyasuddin Ghuri School	Herat	4,920	8,561	+43	5,200	7,500	+31	5,623	6,817	+18	5,521	7,227	+24
11	Amir Ali Sher Nawaaee Boys High School	Herat	2,000	2,917	+31	2,300	2,706	+15	2,875	2,787	-3	2,570	3,260	+21
12	Gawhar Shad Girls High School	Herat	4,451	9,073	+51	5,225	7,930	+34	5,764	8,051	+28	5,673	7,849	+28
13	Agriculture and Veterinary institute	Herat	350	980	+64	500	634	+21	550	528	-4	552	722	+24
14	Tajrobawee Girls High School	Herat	2,700	3,685	27	3,000	3,497	+14	3,100	3,614	+14	3,184	3,792	+16
15	Tajrobawee	Herat	1,900	2,997	37	2,550	2,862	+11	2,280	2,874	+21	2,690	3,299	+18

	Boys High School													
16	Qwayee4 Zarah Dar Engil District	Herat	580	1,246	53	900	1,288	+30	863	1,519	+43	863	1,196	+28
17	Khulm Male High School	Balkh	1,270	1,016	-25	1,206	1,779	+32	1,187	1,697	+30	1,211	1,803	+33
18	Khaja Borhan Male High School	Balkh	978	1,439	+32	839	1,312	+36	1,169	1,241	+6	570	1,290	+56
19	Khaja Borhan Female High School	Balkh	883	1,273	+31	704	1,165	+40	707	1,137	+38	574	1,210	+53
20	Masoud Shahid High School	Balkh	870	1,156	+25	815	1,165	+30	770	1,014	+24	726	1,063	+32
21	Amin Hussain Female High School	Balkh	853	1,431	+40	775	1,357	+43	940	1,289	+27	725	1,369	+47
22	Abdul Raof Khulmi High School	Balkh	618	883	+30	625	845	+26	520	691	+25	515	729	+29
23	Tangee Female High School	Balkh	247	345	+28	247	307	+20	271	358	+24	307	381	+19
24	Sultan Razia Female High School	Balkh	4,668	5,306	+12	4,659	4,857	+4	4,226	4,770	+11	4,185	4,964	+16
25	Sultan Ghyasudin High School	Balkh	5,884	8,052	+27	5,991	6,389	+6	4,552	5,612	+19	5,345	5,920	+10
26	Khiradman Shahid	Badakhshan	1,515	2,147	+29	1,509	2,236	+33	1,416	2,080	+32	1,227	2,186	+44
27	Ganda Cheshma	Badakhshan	360	374	+4	227	493	+54	296	460	+36	325	547	+41
28	Sum Dara	Badakhshan	475	615	+23	486	682	+29	519	632	+18	486	674	+28
29	Khan Aqa	Badakhshan	101	156	+35	118	159	+26	142	176	+19	137	194	+29

30	Mir Fazlullah School	Badakhshan	2,618	3,434	+24	2,651	3,495	+24	2,651	3,440	+23	2,730	3,584	+24
31	Mashhad Girls School	Badakhshan	2,222	2,583	+14	2,520	2,583	+2	2,520	2,811	+10	2,592	2,926	+11
32	Naw Abad Gandom Qul Girls School	Badakhshan	817	906	+10	834	1,023	+18	836	1,073	+22	998	1,124	+11
33	BeBe Asma School	Badakhshan	378	478	+21	389	478	+19	378	515	+27	419	591	+29
34	Mahdaba Mixed School	Badakhshan	305	300	-2	282	293	+4	282	619	+54	288	351	+18
35	Wakhshi High School	Badakhshan	528	434	-22	419	709	+41	454	625	+27	483	665	+27
36	Halima Sadia High School	Badakhshan	1,950	2,017	+3	1,877	2,265	+17	1,943	2,096	+7	1,187	2,154	+45
37	Qara Kamar Secondary School	Badakhshan	235	275	+15	245	290	+16	254	319	+20	274	366	+25
38	Sabzi Bahar School	Badakhshan	189	262	+28	200	285	+30	232	274	+15	262	312	+16
39	Deh Dehi Girls School	Badakhshan	657	1,268	+48	657	1,275	+48	652	1,083	+40	745	1,111	+33
40	Fizia Boy High School	Ghazni	499	617	+19	469	639	+27	416	620	+33	270	617	+56
41	Fizia Girl High School	Ghazni	750	728	-3	760	772	+2	660	779	+15	638	748	+15
42	Sabaz Chob Bala	Ghazni	335	374	+10	328	388	+15	316	416	+24	365	437	+16
43	Sang Joy Loman Mixid High School	Ghazni	279	412	+32	300	631	+52	286	406	+30	265	394	+33
44	Loman Boy High School	Ghazni	643	885	+27	602	903	+33	602	789	+24	526	739	+29
45	Loman Girl High School	Ghazni	609	551	-11	646	723	+11	600	789	+24	483	812	+41

46	Seyed Jamaludin Girl High School	Ghazni	451	555	+19	431	603	+29	388	540	+28	429	502	+15
47	Mohajeren Boy High School	Ghazni	262	377	+31	260	397	+35	259	455	+43	245	455	+46
48	Mohajeren Girl High School	Ghazni	284	405	+30	265	407	+35	269	409	+34	249	417	+40
49	Sanay Grdan Khodidad	Ghazni	399	679	+41	434	759	+43	653	763	+14	712	841	+15
50	Tawhid Abad Boy High School	Ghazni	1,210	1,443	+16	1,614	1,964	+18	1,390	1,938	+28	1,495	2,002	+25
51	Qala Amir Moh Khan Girl High School	Ghazni	679	832	+18	979	1,322	+26	979	1,083	+10	989	1,235	+20
52	Balol Mixed High School	Ghazni	600	735	+18	769	832	+8	760	956	+21	790	1,103	+28
53	Sultany Boy High School	Ghazni	1,936	1,881	-3	1,858	1,894	+2	1,712	2,672	+36	1,737	2,905	+40
54	Shohada Girl High School	Ghazni	1,859	2,121	+12	1,801	2,140	+16	1,832	2,203	+17	1,766	1,979	+11
55	Seyed Jamaludin Boy High School	Ghazni	391	490	+20	367	535	+31	323	575	+44	316	476	+34
56	Khodidad Boy High School	Ghazni	800	990	+19	750	1,073	+30	700	973	+28	695	1,053	+34
57	Khodidad Girl High School	Ghazni	673	894	+25	637	899	+29	657	899	+27	697	940	+26
58	Mogholan	Ghazni	946	1,072	+12	997	1,338	+25	1,110	1,402	+21	1,205	1,415	+15

	Girl High School													
59	Alberoni Girl High School	Ghazni	3,335	3,375	+1	3,500	3,978	+12	3,580	4,056	+12	3,218	4,198	+23
60	Fatimatzara Girl High School	Ghazni	1,700	1,773	+4	1,800	1,773	-2	1,767	1,931	+8	1,667	1,753	+5
61	Qala Shada Boy High School	Ghazni	2,002	2,389	+16	2,176	2,389	+9	2,128	2,640	+19	2,085	2,834	+26
62	Wali Asar Girl High School	Ghazni	1,323	1,814	+27	1,368	1,925	+29	1,444	1,739	+17	1,302	1,923	+32
63	Miradina Boy High School	Ghazni	859	2,099	+59	913	2,135	+57	981	2,057	+52	750	2,116	+65
64	Miradina Girl High School	Ghazni	862	1,132	+24	922	1,144	+19	922	1,178	+22	886	1,248	+29
65	Lalchag Girl High School	Ghazni	331	673	+51	330	995	+67	363	721	+50	340	666	+49
66	Maknak Girl High School	Ghazni	823	1,107	+26	724	1,160	+38	736	1,154	+36	703	1,150	+39
67	Sediq Rohi Girl High School	Khost	1,496	1,857	+19	2,119	2,678	+21	1,696	1,994	+15	1,738	1,880	+8
68	Sediq Rohi Boy High School	Khost	1,697	2,339	+27	1,731	2,323	+25	1,988	2,518	+21	2,110	2,630	+20
69	Shahid Dawood Boy High School	Khost	2,061	3,642	+43	1,634	4,563	+64	2,652	3,885	+32	2,623	3,989	+34
70	Darga Boy High School	Khost	231	1,265	+82	441	1,400	+69	1,166	1,299	+10	1,172	1,398	+16
71	Abdul Hay Habibi	Khost	2,543	4,712	+46	2,225	4,859	+54	3,969	5,649	+30	4,260	6,235	+32

	Boy High School													
72	Dargai Girl High School	Khost	840	637	-32	933	663	-41	811	947	+14	780	899	+13
73	Perbadsha Girls School	Khost	534	342	-56	599	491	-22	509	628	+19	554	681	+19
74	Karte Sullh Boys Secondary School	Faryab	589	735	+20	589	872	+32	686	813	+16	718	897	+20
75	Arab Khana Boys High School	Faryab	2,691	3,473	+23	2,691	2,882	+7	2,675	2,989	+11	2,545	2,692	+5
76	Pasha Khani Boys Secondary School	Faryab	564	874	+35	564	1,042	+46	610	1,008	+39	615	973	+37
77	Pasha Khani Girls Secondary School	Faryab	456	596	+23	456	625	+27	502	608	+17	636	593	-7
78	Mowlana Amrullah Girls High School	Faryab	797	1,126	+29	797	1,135	+30	936	1,155	+19	960	1,230	+22
79	Karte Sullh Girls High School	Faryab	629	986	+36	629	820	+23	838	924	+9	857	911	+6
80	Gawhar Shad Bigum Girls High School	Faryab	1,205	1,483	+19	1,205	1,417	+15	1,250	1,493	+16	1,169	1,537	+24
81	Jernail Ghuwasuddin Boys Secondary School	Faryab	1,196	1,809	+34	1,196	1,809	+34	1,343	1,676	+20	1,400	1,730	+19
82	Khurasan Boys High School	Faryab	974	1,217	+20	974	875	-11	683	890	+23	658	848	+22

83	Setara Girls High School	Faryab	2,900	3,244	+11	2,900	2,633	-10	1,876	2,424	+23	828	2,490	+67
84	Kohi Khana Boys High School	Faryab	956	1,187	+19	956	1,109	+14	970	1,234	+21	982	1,208	+19
85	Abu Obid Jowzjani Boys High School	Faryab	1,160	1,414	+18	1,160	1,389	+16	1,197	1,432	+16	1,266	1,419	+11
86	Afghan Kot Girls High School	Faryab	2,188	2,606	+16	2,188	2,494	+12	1,922	2,284	+16	1,955	2,298	+15
87	Tatar Khana Girls High School	Faryab	809	1,427	+43	809	1,102	+27	867	604	-44	906	526	-72
88	Tokaly Khana Boys Secondary School	Faryab	520	675	+23	520	677	+23	604	757	+20	678	879	+23
	Avg. Variance Percentage			24%			24%			21%				25%
	Avg. Variance Percentage (1392-1395)						23%							

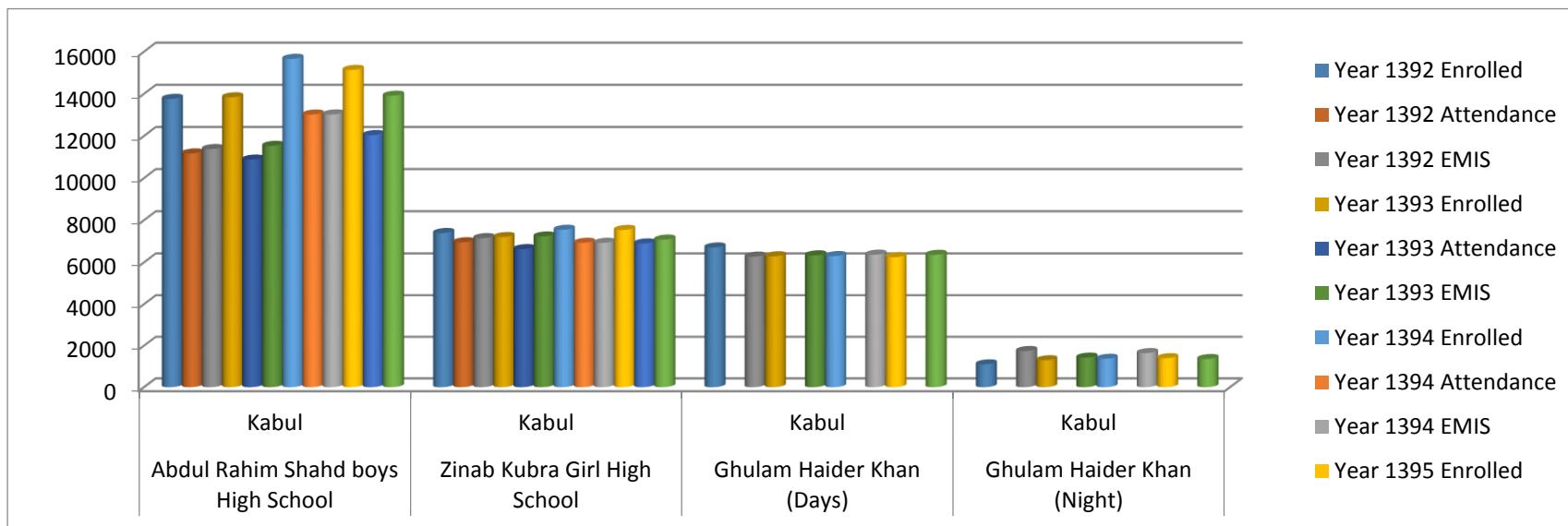
ii. Annual and Holistic Average Variance Percentage of EMIS versus Attendance:

Description	Year 1392	Year 1393	Year 1394	Year 1395
Average percentage by which the EMIS is overestimated/underestimated than the Attendance	24%	24%	21%	25%
Average Percentage Over the four years of 1392-1395	23%			

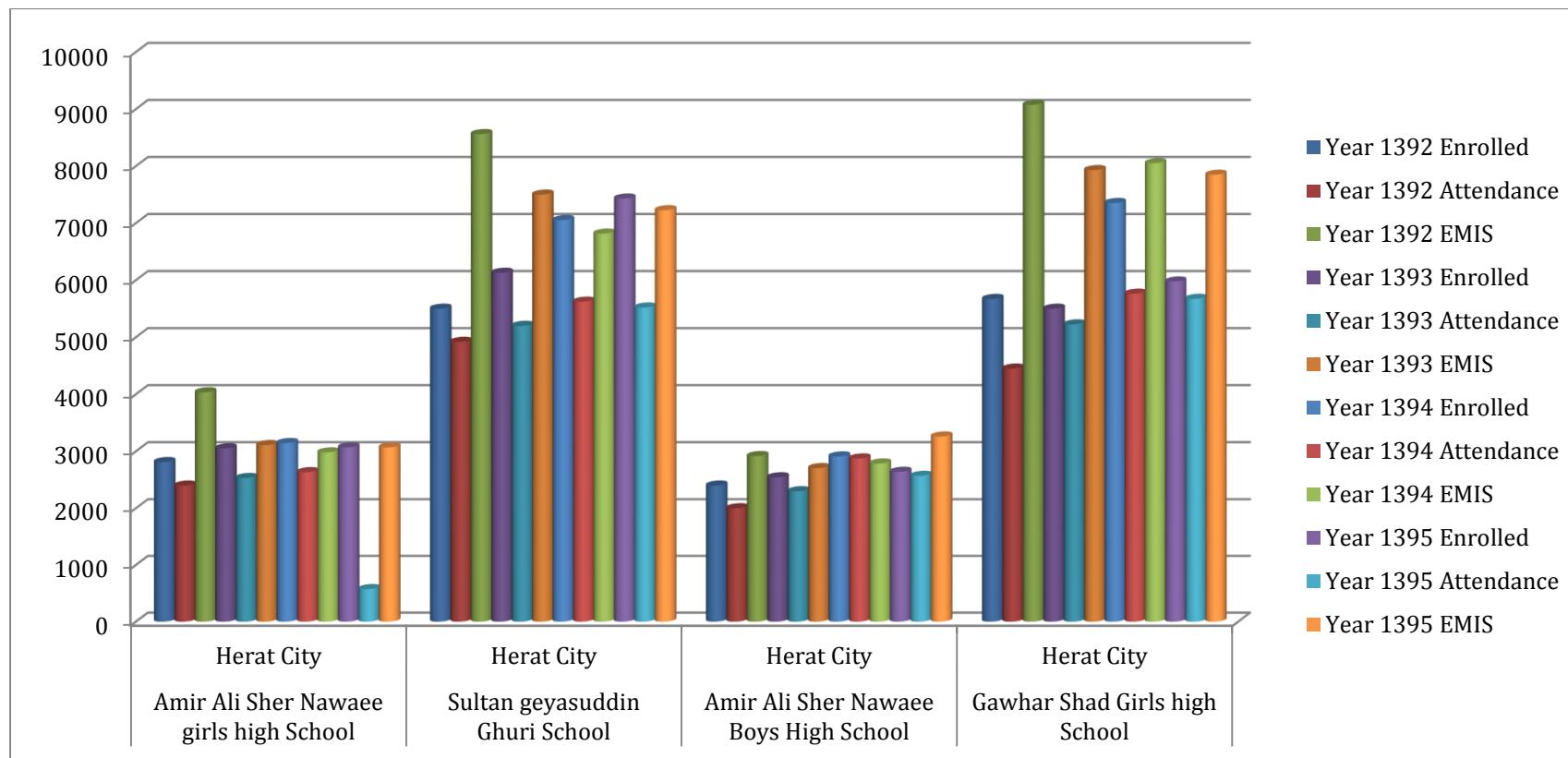
## Sample check of EMIS data at schools visited by MEC.

In seven provinces schools were visited to compare enrolment, attendance, and data extracted from EMIS. The tables below display a sample of the data from four years.

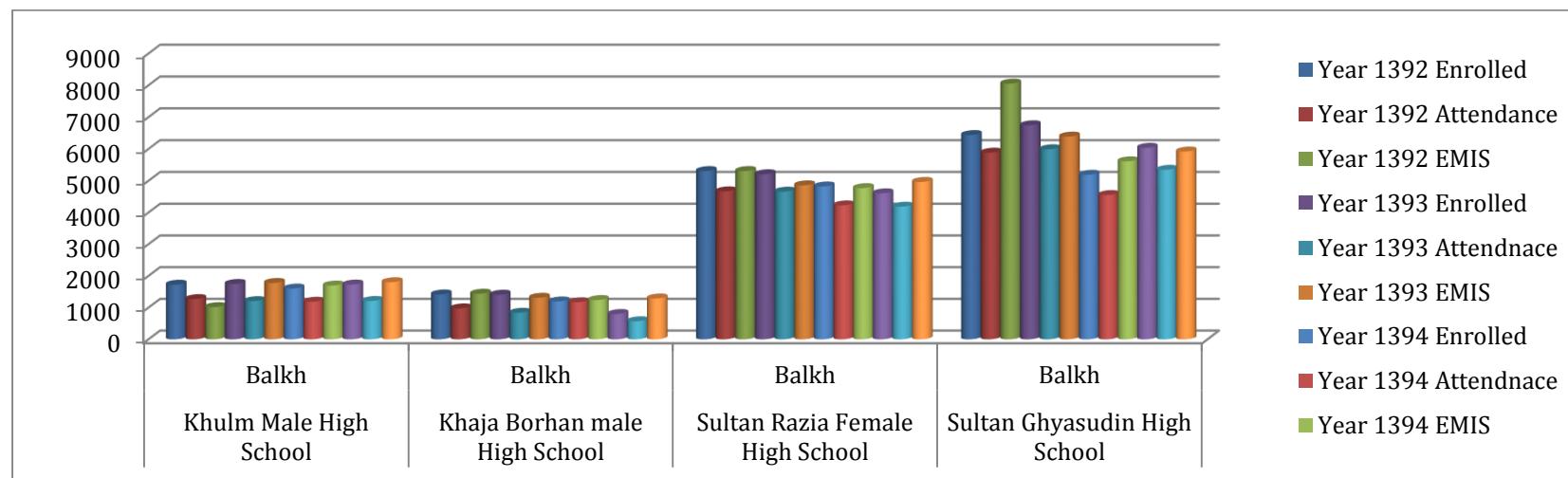
### Kabul



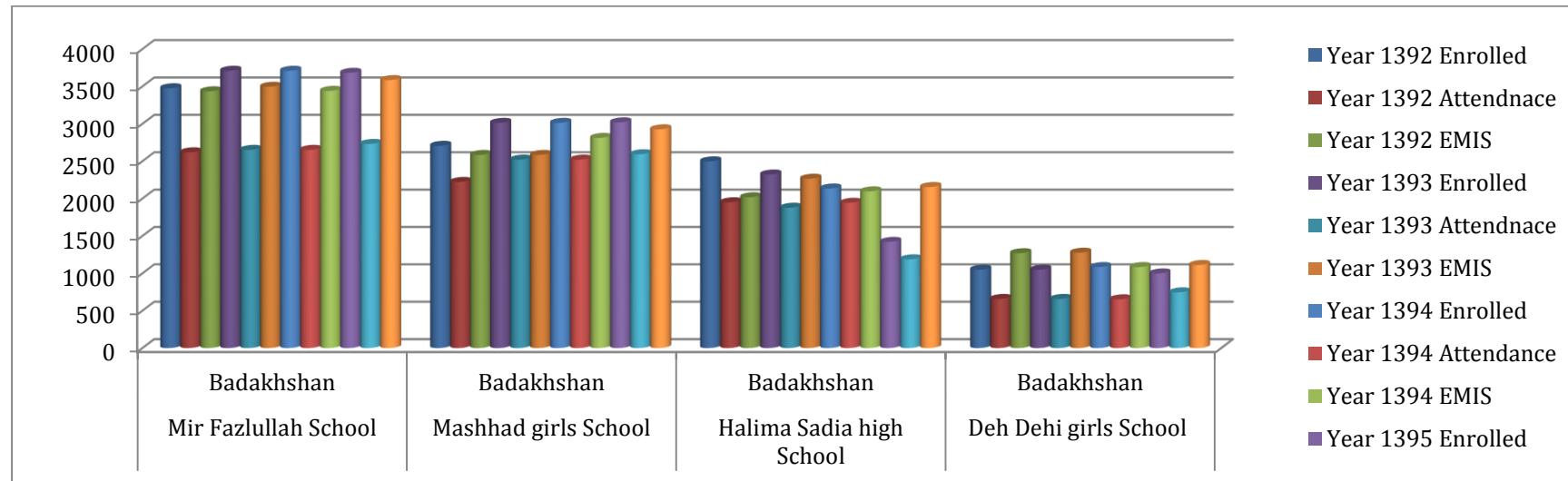
## Herat



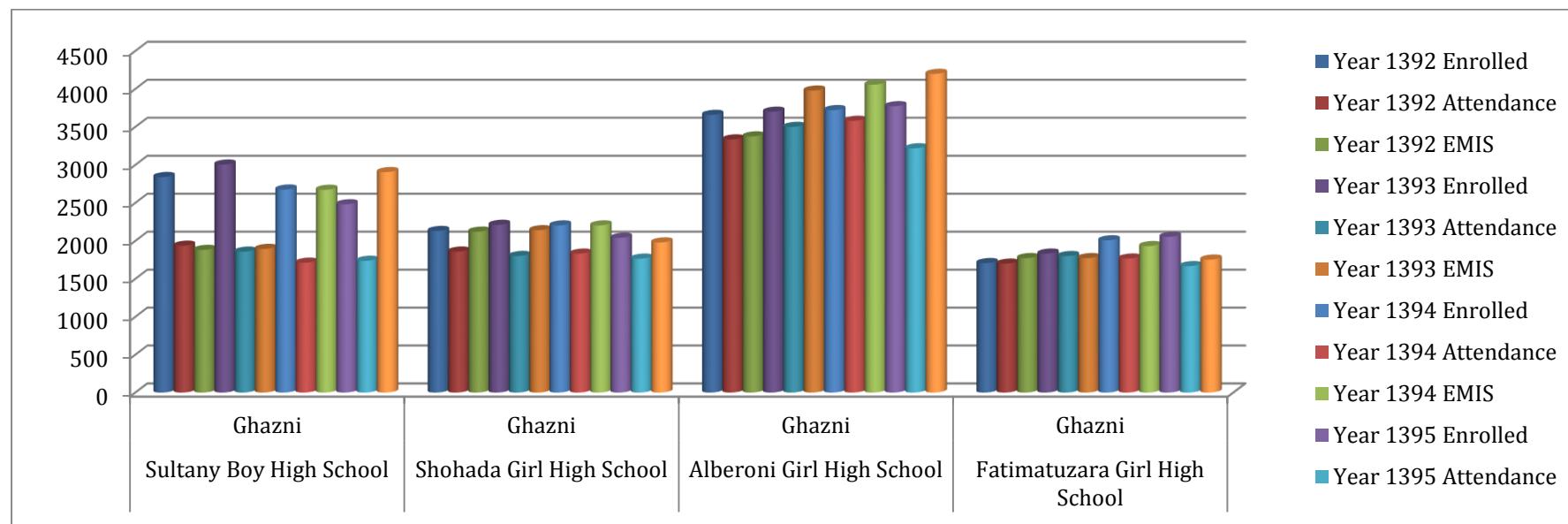
## Balkh



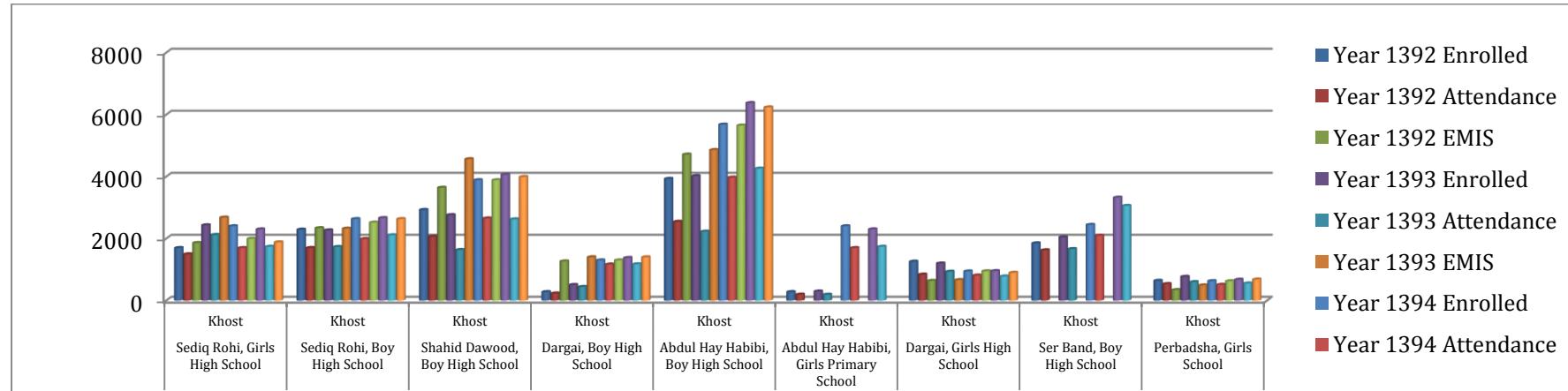
## Badakhshan



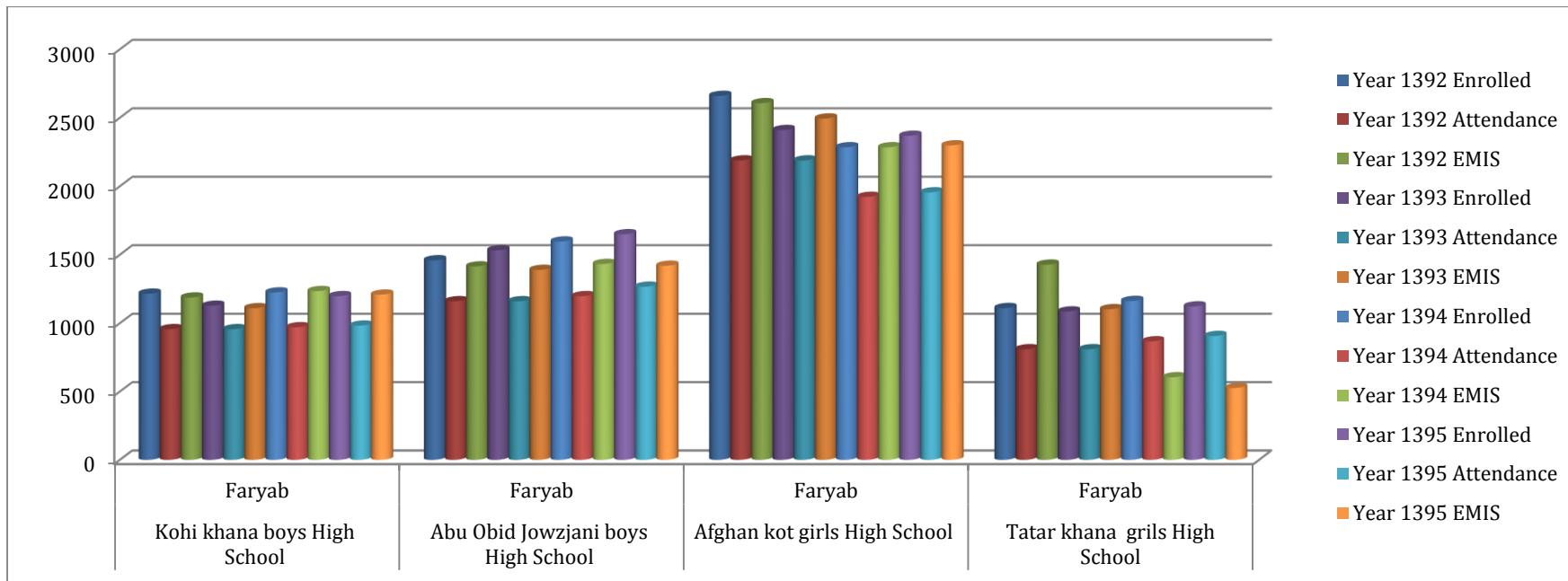
## Ghazni



## Khost



## Faryab



## ANNEX 5. Supreme Audit Office inspections of MoE for 1392, 1393

### The findings of the SAO from 1392 inspection

1. Lack of observance of the authorities particularly in relation to weaknesses in the development budget which led to the use of only 38.4 percent of the total development budget.
2. Lack of use of the budget allocated in the precautionary and reserve codes for the ordinary and development expenses which was a sum of AFN 23,573,889.
3. The risk of lack of observance of the best practices for accounting and financial reporting because of reserving the deals without existence of the specific composition code. The transparency of the financial reports has been endangered by reserving the expenses under unclassified codes.
4. The danger posed to transparent financial management due to the existence of many advance payments that are accounted during the financial year.
5. The danger posed from the huge advances with the cashiers/treasurers due to weak control over the accounts and financial documents.
6. The danger posed from lack of observance of accounting and financial rules which leads to misuse of the public fund and fraud. ***The auditors of SAO found some cases of such types out them is the case of not paying the salaries of some teachers and not returning them to the provincial accounting department (Mustawfiat) in Kapisa Province for the month of Sawer of the year 1392 which was a sum of AFN 92481.*** “This could be a case of ghost teachers.”
7. The danger of extra expenses on the salaries due to lack of observance of guidelines for the use of the budget. ***The SAO auditors found that the salaries of 161 temporarily (ad-hoc) employees was supposed to be AFN 13,000 per month but the total salaries paid to them was AFN 10,536,000, which means that each of the 161 ad-hoc employees in focus received salaries between AFN 18,000 to 22,500 per month, which was against the threshold specified.***
8. Danger posed by the lack of observance of the contract specifications/terms in employment of the staff, which led to extra payments of the sum AFN 158,400. “This is a case in relation to literacy DM in the year 1392.”

9. Danger of lack of appropriateness in connection to conduct of the operation activities which led to unnecessary payment of the sum AFN 849,644. "This is a case about the internal audit of the Education Attachés of Afghanistan in India, Pakistan and Iran. Such an audit is done by the SAO every three years. This audit is seen as unnecessary by SAO."
10. Danger of extra payment of the sum AFN 359,484 for travel expenses due to lack of observance of the rules related to travels.
11. Danger of lack of observance of rules and regulations of procurement which led to selection of the applicant who offered the third in the bidding process which led to spending USD 46,059 that could be not spent. "This case is about procurement of 1,130 laptops and other IT equipment for the Ministry."
12. Danger of lack of observance of the rules in change in the contracts which led to extra payment of a sum of AFN 46,920 for the services provided.
13. Danger of weak control in the procurement section, which led to doubtful pricing for the purchase of good for the Ministry. "This is a case about buying carpet for the Ministry offices."
14. Danger of lack of observance of the Tax Law provisions in contracts which led to lack of receiving of the tax sum of AFN 925,692 due to less income tax paid by an IT company and a sum of 14,592 tax of the contract for transportation services.
  - a. Receiving less beneficial tax than the fixed amount of tax from the contractors of internet service provider.
  - b. Not receiving the transportation charges from the providers of the transportation services.
15. Danger of lack of observance of the terms of contracts, which led to low service provision of sum AFN 31,500.
16. Danger of lack of observance of conditions and regulations governing contracts which led to spending of a sum AFN 3,010,000 that was possible not to spend it.
17. Danger of lack of observance of procurement without considering the approval of the approving authority (Aamere Eta) which valued a sum of AFN 495,600. "This a case of buying 20 frames for photos, 15 flags, 300 meters cable, etc."
18. Danger of waste of sum AFN 28,108,857 of government money due to lack of observance of the Procurement Law.
19. Danger of lack of observance of guidelines and the best practices in asset management, which led to waste of materials and goods.

This happened within the MoE at Kabul while almost the same issues had been observed in the Provincial Education Directorates in 1392. In this report the dangers posed to development and non-development budgets of the Ministry are due to weak and ineffective control systems, or due to lack of implementation of the relevant laws and regulations in different layers in relation to budget, financial management and reporting particularly in the field of salaries, procurement, asset management, accounting for the advance payments, non-settlement of the

money with the cashiers/treasurers and less taxation form the payment for the companies and individuals has been indicated and found. The SAO provided recommendations to MoE for overcoming all of the gaps and irregularities that are found.

### **The findings of the SAO from 1393**

1. Danger of waste of the sum AFN 692,588 due to extra payments. “This is about extra payments for the travel expenses of the MoE employees 1393.”
2. Danger of waste the sum AFN 28,302 due to differences in taxes.
3. Danger of waste of the sum AFN 14,250 due to not receiving the charges on the transportation contract.
4. Danger of not receiving and settling the advance payments of the sum AFN 160,393,579 that are not settled during the time required.
5. Danger of waste of the sum AFN 20,669,657 due to difference in prices. “This is about a construction contract the TTC directorate of MoE in 1393.”
6. The differences in the cash counts inventory and asset inventory. “As result of inventories in the stores and performance of check and balance in the cash accounts seven store keepers and four cashiers were suspected of having extra cashes and extra goods or less cashes and less goods in their inventory.”

This subsequent SAO report focused on the lack of implementation and/or inappropriate implementation of the provisions of the different laws and regulations, such as Regulation of Budget Spending, Law on Income Taxes, Procurement Law, Law on Administration of Financial Affairs and Public Expenses, Regulation of Travel Expenses and other rules and regulation and procedures. These irregularities and lack of adherence to rules and regulation and laws has been observed in the operations of the MoE at different layers and levels.

**Note:** The audit report of the years 1394 and 1395 is under process and will be released “soon,” but the SAO office did not provide the draft to MEC.

## Endnotes:

<sup>1</sup> Lincoln, Y.S. & Guba, E.G. (1985). *Naturalistic Inquiry*. Newbury Park, CA: Sage: p. 306.

<sup>2</sup> Geertz, C. (1974). *The Interpretation of Cultures*. New York, NY: Basic Books.

<sup>3</sup> Burde, D (2014). *Schools for Conflict or Peace in Afghanistan*. Columbia University Press: p. 12.

<sup>4</sup> Ulsaner, E. and Rothstein, B. (2014). The Historical Roots of Corruption: State Building, Economic Inequality, and Mass Education: p. 4.

<sup>5</sup> Yazdi, H. (2008). 'Education and Literacy in Afghanistan: Lessons of History and Prospects for Change.' *The Monitor*: pp. 41-42.

<sup>6</sup> Burde, D (2014). *Schools for Conflict or Peace in Afghanistan*. Columbia University Press: p. 94.

<sup>7</sup> Hall, M. (2011). *Corruption and Afghanistan's Education Sector*. CFC: p. 3.

<sup>8</sup> Sigsgaard, M. (2009). *Education and Fragility in Afghanistan – A Situational Analysis*. INEE.

<sup>9</sup> USAID (2009). Assessment of Corruption in Afghanistan.

<sup>10</sup> Guimbet, S. et al. (2008). 'Back to school in Afghanistan: Determinants of school enrollment'. *International Journal of Educational Development*: p. 28.

<sup>11</sup> Ibid: p.433.

<sup>12</sup> Samady, S. (2013). *Changing Profile of Education in Afghanistan*. Deutsches Institut für Internationale Pädagogische Forschung (DIPF): p. 10.

<sup>13</sup> Centner, A. (2012). Implementing International Anti-Corruption Standards to Improve Afghanistan's Education System, 44 Case Western Reserve Journal of International Law: p. 848.

<sup>14</sup> Adili, A.Y. (2017). A Success Story Marred by Ghost Numbers: Afghanistan's inconsistent education statistics. Afghan Analysts Network.

<sup>15</sup> Ibid: p. 7.

<sup>16</sup> Ibid: p. 7.

<sup>17</sup> USAID. (2016). Technical Assessment of Selected Offices within the Afghan Ministry of Education for Textbook Development and Distribution: p. 12.

<sup>18</sup> CMI (2016). Review of Norwegian Development Assistance to Afghanistan 2011-2014: p. 7.

<sup>19</sup> Ibid: p. 59.

<sup>20</sup> UNESCO (2015). Afghanistan – Education for All 2015 National Review: p. 29.

<sup>21</sup> Pouras Consult Aps. (2016). Education Sector Analysis Afghanistan: p. 20.

<sup>22</sup> MEC (2015). *Vulnerability to Corruption Assessment (VCA) of Teacher Recruitment in the Ministry of Education*.

<sup>23</sup> MEC (2015). *Vulnerability to Corruption Assessment (VCA) of the Education Quality Improvement Program (EQUIP) in the Ministry of Education*.

<sup>24</sup> CMI (2016). Review of Norwegian Development Assistance to Afghanistan 2011-2014: p. 19.

<sup>25</sup> Ibid.

<sup>26</sup> Sida (2016). Review of the UNICEF Programme Basic Education and Gender Equality in Afghanistan 2013-2015

<sup>27</sup> Ibid: p. 7.

<sup>28</sup> Ibid: p. 47.

<sup>29</sup> UNESCO (2015). Afghanistan – Education for All 2015 National Review: p. 56.

<sup>30</sup> SIGAR (2016). SIGAR 16-32 Audit Report.

<sup>31</sup> Ibid.

<sup>32</sup> Ibid.

<sup>33</sup> SIGAR (2015). SIGAR 15-62-SP Inquiry Letter: Afghanistan Education Data.

<sup>34</sup> SIGAR (2016). SIGAR 16-32 Audit Report.

<sup>35</sup> Ibid.

<sup>36</sup> SIGAR (2009). 10-4 Inspection Report.

<sup>37</sup> SIGAR (2009). 10-02 Inspection Report.

<sup>38</sup> SIGAR (2016). 16-38-SP Alert Letter: Structural Damage at Educational Facility S145A.

<sup>39</sup> SIGAR (2016). 17-12-SP – Review: Schools in Herat Province.

<sup>40</sup> SIGAR (2016). 17-19-IP Inspection Report.

<sup>41</sup> SIGAR (2016). 17-12-SP – Review: Schools in Herat Province.

<sup>42</sup> Ibid.

<sup>43</sup> SIGAR-17-XX-SP, March 2017.

<sup>44</sup> MEC (2015). Vulnerability to Corruption Assessment of Teacher Recruitment in the Ministry of Education.

<sup>45</sup> MEC was informed by MoE that they had recently '*finished the written tests and interviews for 33 Provincial Education Directors at the same time several other key central positions have been announced and interviewed through MoE CBR committee and several other Grade 1 and 2 positions are in different stage of CBR till date.*'

<sup>46</sup> All of these figures relating to teacher numbers and gender are taken directly from EMIS for the year 1395 (2016).

<sup>47</sup>UNESCO – background to Curriculum Reform Plan, 2017. unpublished

<sup>48</sup> The only student testing that is standardized on a national scale is the Kankor examination, which is taken at the end of Grade 12 by those students wishing to enter university or undertake further study after completing high school. Students take the exam over a period of five months at the end of their formal schooling.

<sup>49</sup> Comment from MoE: "*TED according to its mandate committed to provide capacity building and professional development opportunities without any kind of discriminations and nepotisms to all teachers and school administrators. The enrolment and introducing of eligible and needy teachers to the training is responsibility of provincial education authorities. At the beginning of each training package TED urge PED and DEDs to introduce eligible teachers and avoid enrolment of one teacher repeatedly in the same training package. From 2007-2017, TED has a lot of achievements in providing In-service training both for teachers and school administrators. The following are number of beneficiaries in each training package: In-service training for teachers (INSETs) INSET-I (100833), INSET-II (86771), INSET-III (115814), INSET-IV (154699), INSET-V (154811), and INSET-VI (71338). School Management Training for school administrators (SMTs) ,SMT-I (7059), SMT-II (7056), SMT-III (21277), SMT-IV (8367), SMT-V (17485), SMT-VI (17542). It is worth mentioning that some of NGOs are also engaged in teacher training and they play significant role in capacity building of teachers.*"

<sup>50</sup> USAID. (2016). Technical Assessment of Selected Offices within the Afghan Ministry of Education for Textbook Development and Distribution: p. 10.

<sup>51</sup> Ministry of Education of Afghanistan. (2004). *Afghanistan Education Curriculum*. Kabul: Ministry of Education of Afghanistan.

<sup>52</sup> MoE disputes this view of 400 hours per year: "*Based on the educational plan, students in grades 1-3 receive 4 lessons per day and 24 hours per week. Classes' 4-6 students have 5 lessons per day and 30 lessons per week. And students in grades 7-12 have 6 lessons per day and 36 hours per week .According to the article 300 of elementary education the time of lessons are between 40-45 minutes. Study days are nine months of teaching without any Friday And other public holidays And the days of the exams And mid-year holidays For students in grades 7-12 (200) days or (33) weeks. But in case of Winter and other vacation it will extend one week or two weeks. Or if other barriers happen (28) weeks have been taken instead of (33) week. 28×36=1008 hours of classes. 1008×45=45360 minutes (45360/60=756 hours.) And from class students 4-6: (840) hours of classes, (630) hours. And from class students 1-3: (672 ) hours of classes (504) hours.*"

<sup>53</sup> International Bureau of Education (IBE), <http://www.ibe.unesco.org/en/country/afghanistan>

<sup>54</sup> Education Sector Analysis – Pouros Consulting for the MoE, 2016. Unpublished.

<sup>55</sup> UNESCO Country Report, 2015.

<sup>56</sup> NUFFIC

<sup>57</sup> CIA World Fact Book <https://www.cia.gov/library/publications/the-world-factbook/geos/af.html>

<sup>58</sup> Monitoring Trends in Educational Growth (MTEG) Afghanistan: Strengthening Afghanistan's Learning Assessment System, ACER Australian Council for Educational Research, 2013.

<sup>59</sup> Ibid: p. 4.

<sup>60</sup> The MoE acknowledged problems in terms of TVET teachers' practical skills, and expressed its commitment to training of TVET teachers in and outside the country.

<sup>61</sup> To address the problems in curriculum, MoE has signed a MOU with the private sector (Afghanistan Industries Association) to closely engage this sector in curriculum development and a committee within DMTVET for revising the curriculum has been established. MoE claim that it has been very successful in revising the curriculum as per the needs of the market and changes the lecture note systems into printed books, "*As of now, 347000 revised and updated books in 126 subjects have been printed and another 216000 books in 87 subjects are to be contracted and printed. Moreover, 54 subjects are currently under design. Our curriculum department in DMTVET has also started its activities for developing curriculum for the aural impaired. This committee developed curriculum for agriculture. DMTVET has prioritized eight trades as per the needs of the labor market and is developing curriculum for these trades (ten to fourteen). Moreover, GIZ has also developed curriculum for six technical trades at high school level.*"

<sup>62</sup> Key respondent interview

<sup>63</sup> <http://www.unesco.org/education/edurights/media/docs/73bd70820e1cbd26ec53bcc0f4e554a694a0f233.pdf>

<sup>64</sup> Checchi and Co. Consulting (2016) "Technical Assessment of Selected Offices within the Afghan Ministry of Education for Textbook Development and Distribution." USAID. [http://pdf.usaid.gov/pdf\\_docs/PA00M4W5.pdf](http://pdf.usaid.gov/pdf_docs/PA00M4W5.pdf)

<sup>65</sup> Heynemann, S. P. 2000. From Party/State to Multiethnic Democracy: Education and Social Cohesion in Europe and Central Asia. *Education Evaluation and Policy Analysis* 22, n.2, pp. 173-91.

<sup>66</sup> Burde, D – Schools for Conflict or Peace in Afghanistan. 2014, Columbia University Press. P. 113.

<sup>67</sup> The Kuchi are Pashtun from southern and eastern Afghanistan, they follow a nomadic lifestyle. They are a social rather than ethnic grouping, although they also have some of the characteristics of an ethnic group.

<sup>68</sup> Regarding the number of girls reached [in CBE]: DFID anticipate this to be a higher figure, because the (UK) program alone has reached 100,000 girls, and is supporting that number to transition to the next phase of their education.

<sup>69</sup> Source: Swedish Committee for Afghanistan. <https://swedishcommittee.org>

<sup>70</sup> Communities Empowered - Better Education for Villages; Save the Children Fund, 2014 (<https://afghanistan.savethechildren.net>)

<sup>71</sup> Burde, D, and Linden, L "The Effect of Village-Based Schools: Evidence from a Randomized Controlled Trial in Afghanistan" NBER Working Paper No. 18039. May 2012. <http://www.nber.org/papers/w18039>

<sup>72</sup> MEC (2015). *Vulnerability to Corruption Assessment of Teacher Recruitment in the Ministry of Education*.

<sup>73</sup> An accurate measure of the number of school students is crucial to inform planning. Unfortunately, as mentioned previously, since this figure is politically charged there are many incentives to over-state (or under-state) the true figure. The previous Minister of Education put the figure for the number of students in school at 10.5 million to demonstrate how successful that government had been in boosting school numbers so significantly since the time of the Taliban-government. However, the current Minister, as recently as December 2016, put the figure at just 6 million. The true figure may actually reside somewhere between these extremes. No one knows the exact figure, but the data available from EMIS suggest that the enrolled school population is 9.2 million: 8.7 million active enrollments with 20 percent long-term absentees (whom the schools are obliged to keep on their official roll). Taking into account casual absenteeism, the best estimate from one of the Development partners is that around 7 million students, on any given school day, actually attend classes. In this report, MEC uses '7 to 8 million' as the number of students in class.

<sup>74</sup> Adili, A.Y. (2017). A Success Story Marred by Ghost Numbers: Afghanistan's inconsistent education statistics. Afghan Analysts Network.

<sup>75</sup> Education Sector Analysis, Pouros Consult Aps. 2016 - unpublished

<sup>76</sup> AREU (2016). The Political Economy of Education and Health Service Delivery in Afghanistan. Kabul: Afghan Research and Evaluation Unit (AREU).

<sup>77</sup> Adili, A.Y. (2017). A Success Story Marred by Ghost Numbers: Afghanistan's inconsistent education statistics. Afghan Analysts Network.

<sup>78</sup> USAID. (2016). Technical Assessment of Selected Offices within the Afghan Ministry of Education for Textbook Development and Distribution.

<sup>79</sup> CMI (2016). Review of Norwegian Development Assistance to Afghanistan 2011-2014

<sup>80</sup> VCA on the EQUIP program. November 2015. MEC

<sup>81</sup> Ibid.

<sup>82</sup> SIGAR. (2016). Primary and Secondary Education in Afghanistan: Comprehensive Assessments Needed to Determine the Progress and Effectiveness of Over USD 759 Million in DOD, State, and USAID Programs.

<sup>83</sup> Nation Education Strategic Plan – 2017-2021: p. 24.

<sup>84</sup> Ibid: p. 55.

<sup>85</sup> International Bureau of Education (2016). Training Tools for Curriculum Development – Reaching Out To All Learners - A Resource Pack for Supporting Inclusive Education. UNESCO: Geneva. P. 78-79.

<sup>86</sup> USAID (2017). Data Verification and Quality Assessment Education Management Information System Afghanistan II - Final Report. [http://pdf.usaid.gov/pdf\\_docs/PA00MTBN.pdf](http://pdf.usaid.gov/pdf_docs/PA00MTBN.pdf)

<sup>87</sup> See footnote 54 for more elaboration

<sup>88</sup> Ibid.

<sup>89</sup> Ibid: p. 2.

<sup>90</sup> Ahmadi, M.J. (2017). *Capacity Development and Workplace Learning: An Analysis of Factors Influencing Workplace learning at Afghan Ministry of Education, Department of Planning*. Doctoral Dissertation. University of Massachusetts Amherst.

<sup>91</sup> Ibid: p. 123.

<sup>92</sup> Burde, D – Schools for Conflict or Peace in Afghanistan. 2014, Columbia University Press.

<sup>93</sup> According to Transparency International, the average cost of procurement around the world each year estimated at between 13-20 percent of countries' gross domestic products (GDP). This means that, globally, approximately USD 9.5 trillion is spent on state procurement each year. According to the Organisation for Economic Cooperation and Development (OECD),

about 20-25 percent of procurement budgets are wasted because of corruption, which is estimated at approximately USD 2 trillion.

<sup>94</sup> <https://www.oecd.org/site/adboecdanti-corruptioninitiative/37575976.pdf>

<sup>95</sup> [http://www.mec.af/files/2015\\_12\\_09\\_Conflicts\\_of\\_Interest\\_Paper\\_\(English\).pdf](http://www.mec.af/files/2015_12_09_Conflicts_of_Interest_Paper_(English).pdf)

<sup>96</sup> Source: MoE communication to MEC

<sup>97</sup> There are multiple angles to this that can assist transparency. See for example, other existing initiatives in MoPH (Afghan Healthcare Accreditation Organization and the Afghanistan Midwifery and Nursing Education Accreditation Board). MoE is making efforts in this direction but these should be accelerated.

<sup>98</sup> Refer EJSR 2015 report

<sup>99</sup> This fits with the intended move towards decentralization of education, which has been discussed for many years and is outlined in NESP III and related policy documents. It is important to reemphasize that decentralization of education needs to be coupled with a deep and sustained program of capacity building towards managing and monitoring education at provincial, district and community levels. This process needs to take account of the risks, noted by Hall, that, '...rapid decentralization has the potential to enable corruption given that resources pass from office to office (e.g., from the ministry to the provincial education department to the districts, etc.) and given that local officials may be inexperienced with education sector management.'

<sup>100</sup> This process is already beginning through the reformation of the MoE/DP CBE and Accelerated Learning (AL) working group and their development of a CBE/AL policy, but the mutual learning between MoE and CBE providers will need particular emphasis and support.

<sup>101</sup> Ibid.

<sup>102</sup> In particular the development of the 'Competency Framework for Teachers in Afghanistan' as part of the Canadian funded Teacher Certification and Accreditation Project (TCAP), alongside the relatively recent formation of the MoE's Learning Equivalence Assessment Unit (LEAU) with responsibility for teacher credentialing. These linked initiatives, although not explicitly addressing corruption, nevertheless work towards developing a higher qualified and more competent teaching force in Afghanistan and, crucially, building professional development pathways for the many under-qualified teachers that currently exist in the system. Such work, then, is about both quality and equity (particularly for those under-qualified teachers who otherwise might be left behind in the push towards teacher professionalization) - key factors that mitigate against corruption.

<sup>103</sup> It is encouraging to note that CBR is now being applied to the appointments of Provincial Education Directors, and this, in itself, should lead to a more meritocratic series of provincial appointments.

<sup>104</sup> INEE/UNICEF (2010) Minimum Standards for Education – Preparedness, Response, Recovery: p. 98.

<sup>105</sup> The MoE has suffered through multiple repetitions of similar exercises (NESP I, II, III, etc.) caused in part by the arrival of new groups of donors, or wanting a 'new' approach for donor capitals. The rotation of experts is so fast that experienced watchers in MoE know that they can return to the way they are used to working once they have sat out the next cycle.

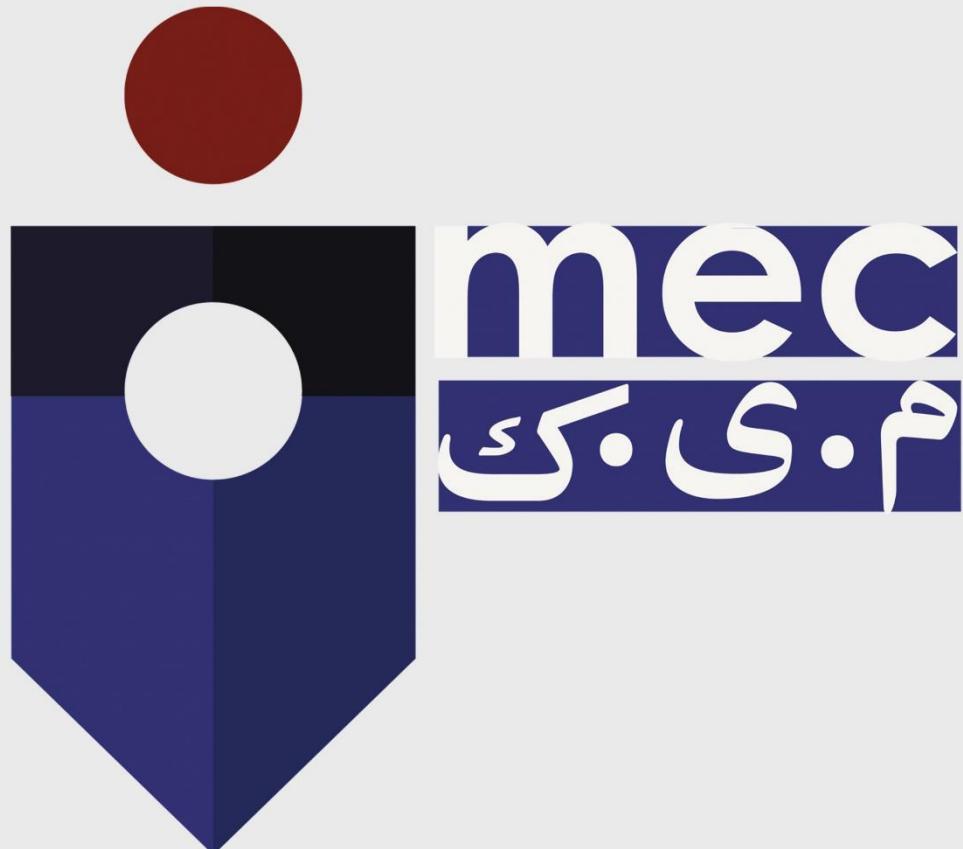
Something similar is the case with MoE staff. Several of the MEC team recall a wider and deeper range of expertise among the MoE officials 5-7 years ago, that seems no longer to be the case.

<sup>106</sup> At MoPH, there has been engagement with a formally contracted external 3<sup>rd</sup> Party Monitor (KIT Netherlands Tropical Medicine Institute, alongside SRTRO an Afghan-led M&E and research organization.) It works there for data verification, on a sampling basis.

<sup>107</sup> There are multiple angles to this that can assist transparency. See for example, other existing initiatives in MoPH (Afghan Healthcare Accreditation Organization and the Afghanistan Midwifery and Nursing Education Accreditation Board). MoE is making efforts in this direction but these should be accelerated.

<sup>108</sup> This is a restatement of a recommendation made in a report to USAID in February 2010, and it also features in the NESP III strategy.

<sup>109</sup> Source: EMIS



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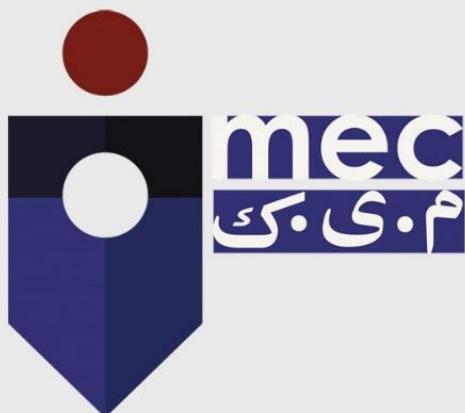
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