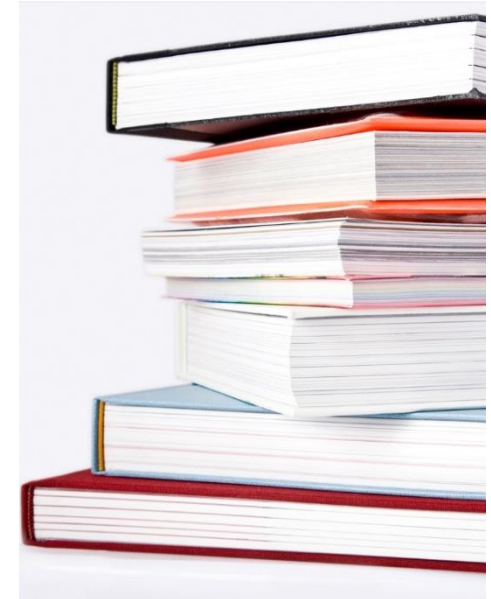




**Paid classes**



**Inclusive education**



**Publication of textbooks**

The following table summarizes the findings of the “Corruption Risk Assessment in the General Education Sector” study jointly implemented by the Transparency International Anticorruption Center (TIAC) and the Institute of Public Policy (IPP) within the framework of the USAID-funded “Engaged Citizenry for Responsible Governance” Project. It briefly presents issues causing corruption risks revealed by the research and puts forward recommendations aimed at their solution. It is expected that the latter will be addressed in the anti-corruption action plan of the Republic of Armenia Ministry of Education and Science, as envisioned by the 2015-2018 Anti-corruption Strategy approved by the Government of Armenia.

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## Corruption risk assessment in the general education sector in Armenia

### 1. Issues related to paid classes

Issues	Recommendations
<b>1.1 Conflict of interest</b>	
<p>1. A teacher may fail to fully perform his/her responsibilities, with the expectation of involving students in paid classes to receive additional income.</p>	<p>Develop a code of ethics for headmasters and teachers of general schools, which will also regulate possible situations of conflict of interest.</p> <p>Statutorily prohibit private classes on a paid basis by the teacher who teaches the particular subject course at school, deeming it as a breach of rules of ethics, irrespective of where those classes are held (at home or at school).</p> <p>Define and enforce sanctions for the teaching staff for:</p> <ul style="list-style-type: none"> <li>✓ any type of impact (e.g. baseless low marks, etc.) on students and/or their parents aimed at pushing the students to participate in paid courses;</li> <li>✓ baseless high marks to students attending paid classes (false performance evaluation).</li> </ul>
<b>1.2 Low quality of education and the practices of paid classes</b>	
<p>1. University entrance exams are much more complicated as compared with the content of the educational programs of high schools.</p>	<p>Match the complexity of tasks in university entrance exams with those in the textbooks of general schools.</p> <p>Revise and decrease the maximum number of students in each class.</p>
<p>2. High school does not effectively perform its functions.</p>	<p>Claim that teachers of high schools ensure high performance by students, simultaneously providing them with proper remuneration and advisory/methodological support.</p>
<p>3. The content of textbooks and the competency of teachers are not sufficient to ensure high quality education.</p>	<p>Revise the content of textbooks and match them both with the age peculiarities of children and with their practical abilities. Develop relevant mechanisms (e.g. salary supplements and other types of bonuses, professional promotions, etc.), which will motivate teachers to have a more active part in the expert examination of textbooks.</p>
<p>4. In many cases, the motivation for attending paid classes is not to get more knowledge, but to mechanically raise the grade and to show “good performance.”</p>	<p>Define clear criteria for evaluation of student performance and the formation of grades; develop alternative mechanisms for student performance evaluation (e.g. by external evaluators):</p> <ul style="list-style-type: none"> <li>✓ Develop alternative mechanisms for student performance evaluation (e.g. by external evaluators);</li> <li>✓ Make the principles and approaches of the formation of grades as transparent as possible both for students and their parents;</li> </ul>

	✓ Develop practices/culture of making comments on and justification of the grade by the teacher.
5. General schools do not have a high enough reputation among students and their parents.	See the solutions offered for issues 1-3 of this section.
6. There is no sufficient state oversight and control over the dissemination of paid classes.	Revise the powers of the State Education Inspection and include issues related to paid classes into the scope of inspections.
<b>1.3 Implementation of contract-based additional educational programs</b>	
1. Paid classes at schools are not based on legal contractual relationships with parents, or are organized in violation of defined requirements:	<p>Revise the procedure for implementation of additional general and/or vocational educational programs, as well as services on a paid basis, in RA state general educational institutions defined by Decision #1496-N of 2010 of the Government:</p> <ul style="list-style-type: none"> <li>✓ Ban the provision of additional paid educational programs on a contractual basis to students by the teacher of a particular subject course;</li> <li>✓ Define and enforce sanctions both for the teaching staff and the management for breaching the contract requirements;</li> <li>✓ Introduce mechanisms for motivation in provision of services with additional paid educational programs (e.g. by raising the size of remuneration of teachers in the overall size of payment for these services) and prevent any shady nature of those classes.</li> </ul>
<b>2. Inclusive education in the context of current reforms</b>	
<b>Issues</b>	<b>Recommendations</b>
<b>2.1 Issues related to implementation of inclusive education</b>	
1. Needs assessments done in accordance with the former unclear regulation are still in force.	Reevaluate the children needing special education conditions who have been evaluated and certified before 2014, in accordance with procedure prescribed by the law adopted in 2014.
2. People involved in teams of teaching/psychological support and evaluation lack professional training.	<p>Define clear criteria and procedures for recruitment and dismissal of specialists in teaching/psychological support and evaluation centers.</p> <p>Develop programs for periodic training of specialists at pedagogical and psychological support and evaluation centers.</p> <p>Develop position passports for the members of multidisciplinary teams, which will include minimum professional requirements, the scope of responsibilities of team members, job descriptions and the main functions.</p>
3. Headmasters may, at their discretion, recruit the multidisciplinary teams.	Reserve the right to select the employees of a multidisciplinary team to the administration board of a school, thus limiting the powers of headmasters in this area.
4. There are no necessary conditions for the training of specialists who assess the need for special conditions of education.	Develop clear criteria for the training process: criteria for training programs as well as for organizations providing training.

<b>2.2. Issues related to funding of inclusive education</b>	
1. The state funding provided to schools for implementing inclusive education triggers abuses.	<p>Develop clear mechanisms for control over the inclusive education provided by schools, with the inspection of at least the following:</p> <ul style="list-style-type: none"> <li>✓ Quality of inclusive education provided by schools;</li> <li>✓ Efficiency of use of the money provided from the state budget to schools implementing inclusive education (recruitment of needed staff; budgetary and extra-budgetary resources allocated for food, transportation and training packages, etc.);</li> <li>✓ Legal handling of the money allocated for the transportation of children receiving inclusive education in the event of parents' refusal to take it.</li> </ul>
2. Money allocated to schools for food for children studying in the scope of inclusive education is not properly spent.	<p>Centralize the food procurement process in the procurement department of the authorized state body, based on the example of Yerevan Municipality.</p> <p>Define a written procedure for parents' refusal of the amount of money allocated for transportation or food for children receiving inclusive education, and the legal consequences stemming from it: a requirement to return the leftover money to the state budget or an opportunity to use it for other purposes by schools only with the permission of the authorized state body.</p>
3. Money allocated to schools for transportation of children studying in the scope of inclusive education triggers abuses.	<p>Develop mechanisms for including the school administration boards in the process of control over inclusive education.</p> <p>Develop mechanisms for public control over the funding of inclusive education, involving NGOs that have experience in the education sector.</p> <p>Define a requirement for publicity of the total budget (budgetary and extra-budgetary resources) of general educational institutions and the expenses of inclusive education in that budget.</p>
4. No control mechanism is envisaged for managing the money that is allocated but not spent for the organization of inclusive education.	
<b>3. Policies of developing and selection of school textbooks</b>	
<b>Issues</b>	<b>Recommendations</b>
<b>3.1 Issues related to tender for textbook publication</b>	
1. Specialists who develop standards and programs often work in conflict of interest situations.	Define legal barriers for:

	<ul style="list-style-type: none"> <li>✓ Participation in textbook tenders by specialists of the National Institute of Education, or other employees of state bodies who are decision makers in the textbook creation process, to avoid conflict of interests situations and unequal competitive conditions;</li> <li>✓ Participation, as authors, in textbook tenders by specialists who develop general education standards or programs, thus excluding conflict of interests.</li> </ul>
<p>2. There are certain initial agreements and unfair competitive conditions in the subject course tender processes of textbooks.</p>	<p>Define a requirement for reporting the absence of interests by publishers, thus preventing, as much as possible, corruption arrangements both between the publishers and those who develop standards or make decisions, and between the ruling elite and the publishers themselves.</p> <p>Define a requirement for reporting the interests of the members of tender commissions, decreasing involvement of specialists in those commissions who have personal, business, family or other relations with publishers.</p> <p>Define and enforce sanctions against a person who performs an action or makes a decision in a conflict of interest situation. For example, a member of the commission who has committed a breach should be deprived of any further opportunity to become a member of the commission.</p> <p>Introduce effective mechanisms for appealing the results of textbook publication tenders, which will enable publishers and authors to understand the reasons of their possible staying out of the competition or defeat.</p> <p>Change the current procedure of formation of the textbooks for “Chess” and “History of Armenian Church” courses and implement publication of the textbooks of these courses by the procedure defined for the rest of the textbooks.</p>
<p>3. The final determination of price with the winning publisher is of discretionary nature.</p>	<p>Create mechanisms for providing explanations publicly and in a transparent manner on the results of tenders and on the publication of the most expensive textbooks on the website of the Textbook and Information Communication Technologies Revolving Fund (TICTRF), as well as through mass media.</p>
<p><b>3.2 Issues related to expert examination of textbooks</b></p>	
<p>1. Expert examination of textbooks is ineffective.</p>	<p>Develop mechanisms for presenting sound and complete opinions on textbooks from the schools selected for expert examination:</p> <ul style="list-style-type: none"> <li>✓ Allow teachers sufficient time for presenting opinions on the textbooks;</li> <li>✓ Encourage diverse and in-depth analyses of textbooks by teachers (in the form of certificates of appreciation, etc.).</li> </ul> <p>Make the opinions received from schools accessible in order to promote an open and public discussion.</p> <p>Create public platforms of textbook expert examination and feedback, as well as mechanisms that will help take into consideration the opinions of students and parents.</p>

	Develop mechanisms both for the involvement of NGOs operating in the education sector in the tender commissions and for expert examination of the winning textbooks by independent international experts.
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**3.3 Issues related to selection of textbooks and submission of bids**

<p>1. The principles of fair selection of textbooks are not followed, while selection of textbooks in many cases is guided by education bosses.</p>	<p>Study which publications from which marzer receive the main orders, or which schools of which marz fail to select alternative textbooks as a result of shady agreements.</p> <p>Create mechanisms for transparency of the selection of textbooks, excluding guidance of teachers and school headmasters from marzpetarans (regional governor offices) and other agencies in the selection of a particular textbook.</p> <p>Define a mechanism of approving more than one textbook for the teacher to be able to make a final selection of the textbook he/she wishes to use after studying the electronic versions of the textbooks, and for the parents to purchase the particular textbook selected by the teacher, thus eliminating the tender process and all associated corruption risks.</p> <p>Provide sufficient time for schools to become familiar with the textbooks, and to reveal their deficiencies during the teaching process, to select the most successful ones.</p> <p>Define and enforce strict sanctions for cases of failure to properly and timely collect the textbook bids, breach of initial bids, and incompatibility between the bids and the real demand.</p> <p>Limit the roles of marzpetarans (regional governor offices) in the process of submitting bids to the Ministry of Education and Science and the TICTRF. Provide the opportunity to directly download the textbook bids, with its summary accessible for the Ministry and the TICTRF, thus making transparent the size of the overall order and avoiding misinterpretation among the publishers about the mechanism of the formation of the publication order.</p> <p>Define a requirement for publicity of the bids and the decision of methodology boards justifying the bids, which can become a straightjacket in terms of shady agreements.</p> <p>Prohibit the Ministry of Education and Science and the TICTRF from publishing more textbooks than what is stated in the bids coming from schools.</p> <p>Define a requirement for reporting the absence of interest by the publishers, thus preventing, as much as possible, corruption agreements between the publishing houses.</p>
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	<p>Define by law strict sanctions for shady cooperation between the publishing houses, thus preventing corruption agreements as much as possible. For example, any publishing house that has breached the procedure should be deprived of the opportunity to participate in further bids for a certain time period.</p>
<p><b>3.4 Issues related to textbooks provided free of charge</b></p>	
<p>1. The mechanism of providing textbooks free of charge to socially vulnerable children operates just mechanically, and distribution of textbooks depends only on the headmaster of a school.</p>	<p>Develop clear criteria, while distributing textbooks free of charge in schools, with the function of making decisions to be vested in the administration board, thus eliminating the discretion approach from the headmaster.</p> <p>Apply a differentiated approach towards the Yerevan, marz and rural population, especially that of the border villages where all textbooks should be provided free of charge .</p>
<p>2. Textbooks are illegally put on free sale by individual booksellers.</p>	<p>Periodically study the origin of textbooks having appeared in the “black market”.</p> <p>To prevent sales of textbooks, adopt one of the following approaches:</p> <ul style="list-style-type: none"> <li>✓ Fully liberalize the textbook market;</li> <li>✓ Operate the liberal textbook market simultaneously with the current system, thus providing parents with an option of buying textbooks in bookstores;</li> <li>✓ Make publications of textbooks more frequent, which will increase the avoidance of using worn-out textbooks, boost the development of publishing houses, and reduce the circulation of outdated information available in textbooks.</li> </ul>