JUNE 2, 2021

SECRETARIAT CHIEF EXECUTIVE OFFICER

EDUCATION SECTOR PROGRAM IMPLEMENTATION GRANT ADDITIONAL MCA FOR COMOROS

Reference	Decisions
CEO/2021/06-01	**<u>Allocation for an Education Sector Program Implementation Grant Additional MCA:</u>** The CEO, in her delegated authority from the Board of Directors: 1. Does not approve an allocation for Comoros Education Sector Program Implementation Grant Additional Maximum Country Allocation (US$ 5.2 million) due to the following: (i) Several standards used to assess the quality of the proposed program are not met, while others are only partially met (for additional information, please refer to the QAR III Report page 12).

Annex A – Secretariat quality assurance review phase III report

QUALITY ASSURANCE REVIEW – PHASE 3

(SECRETARIAT DELEGATED AUTHORITY)

MAY 10, 2021

COMOROS

Additional MCA

Proposed GPE Grant Amount: US$5.2 million
Fixed Part: US$5.2 million, of which US$690,000 for Grant Agent's Implementation Support Costs;
Variable Part: ex-ante approach
Implementation period: 3.5 years
Projected implementation start date: July 1, 2021
Grant Agent: UNICEF

1 BACKGROUND AND EDUCATION SECTOR OVERVIEW

1.1. COUNTRY BACKGROUND

The archipelago of the Comoros is situated in the Indian Ocean north of the Mozambique Channel and includes four islands: Grande Comore (Ngazidja) where Moroni, the capital city, is located; Anjouan (Ndzuani); Mohéli (Mwali) and Mayotte (Maore). The latter remained under French administration after the independence in 1975. The country endured more than 20 years of institutional and political instability due to a series of coups. In 2001, a new Constitution was adopted which enacted the rotation of the presidency between the three islands and gave them a large autonomy. In 2018, a new Constitution was approved by referendum modifying the rotation system for the presidential elections, expanding the power of the presidency, and diminishing the competences of the islands.[1] The president Azali Assoumani was reelected in 2019 for a five-year term. The country is currently categorized as fragile due to its "high institutional and social fragility".[2]

Comoros is densely populated with approximately 465 inhabitants per km² and more than half of the population is under the age of 20. A sizeable diaspora living in France and in other parts of the Indian Ocean significantly contributes to the country's economy with remittances

[1] Word Bank, 2019, Towards a more united and prosperous Union of Comoros. Systematic country diagnostic
[2] FY21 list of fragile and conflict-affected situations, World Bank

accounting for 14.5 percent of the GDP.[3] Economic growth averaged 3.6 percent in 2018 driven by agriculture (vanilla, ylang-ylang, clove, fishery) and services. Classified as a lower-middle income country, Comoros ranks below the average of its income level category in terms of the human development index. Four out of ten Comorians live below the international poverty line and two out of ten live in extreme poverty. Important socioeconomic differences exist between islands – Anjouan and Mohéli lagging behind – and between rural and urban areas.[1]

Comoros islands are subject to severe climate-related events, the most recent one being the Kenneth cyclone in April 2019 which affected 345,131 Comorians and caused significant damages, including on agriculture and schools.[4] When the country was still recovering from the aftermath of the cyclone, the COVID-19 pandemic hit the country, which is likely to offset the positive impacts from reconstruction efforts.[5]

	Comoros
Population	850,886 (2019, World Bank)
Human Development Index Ranking	156 out of 189 countries (2020, UNDP)
Learning-adjusted Years of School	Boys: 5.1 years, Girls: 5.2 years (2020, World Bank)
GDP	US$1.165 billion (2019, World Bank)
GDP per capita	US$1,370 (2019, World Bank)
World Bank Income Classification Level	Lower middle income (2019, World Bank)

1.2. EDUCATION SECTOR OVERVIEW

In 2017-18, the Comoros education system accommodated more than 225,000 students from pre-primary to higher education and 22,500 children were out-of-school. More than half of the students are enrolled in primary education: 63 percent of them are enrolled in public schools while 37 percent are enrolled in private schools. After years of progress in terms of access and participation to education, some indicators are coming to a halt in primary and upper-secondary education, while pre-primary and lower-secondary benefit from a sustained dynamic. In April 2019, the education sector was strongly affected by cyclone Kenneth: 224

[3] Source: World Bank data (accessible here)
[4] Plan Comores Emergent 2030
[5] World Bank, Comoros country overview

school sites, accounting for 38 percent of the country's classrooms, were damaged, and the education of nearly 45,000 children was disrupted.[6] The COVID-19 pandemic impacted the education system during a rehabilitation phase in 2020 as schools were closed between March and July, and again in January and February 2021.

The education sector is going through a transition at both institutional and policy levels.[7] Lack of institutional clarity regarding decentralization and around the role and responsibilities of different stakeholders in the sector is expected to be addressed by the new Education Law (December 2020). This transition period is also characterized by the multiplicity of policy orientations: the transition education plan (*Plan de Transition du Secteur de l'Education*, PTSE) ended in 2020 but its objectives are considered still relevant for 2021, and the next education sector plan preparation will start in 2021; the new national development plan (*Plan Comores Emergent 2030*) and its multiyear action plan (*Plan de Développement Intérimaire 2020-2024*, PDI) are also including education sector specific objectives.

1.2.1. Equity

The latest available data[8] show that enrollment in pre-primary education is very dynamic (+4 percent annually) as a result of the effort to include new pre-primary classrooms within existing public primary schools. However, the primary education gross enrollment rate declined by 3 percentage points between 2015 and 2018, reaching 101.6 percent, and the completion rate went from 74 percent in 2014-15 to 66 percent in 2017-18.[9] The trend is different at the lower secondary level with a gross enrollment rate of 72 percent in 2017-18, increasing from 64 percent in 2014-15, and a completion rate increasing over the same period by one percentage point to reach 42 percent.[6] This situation can be explained by an increasing number of children transitioning from primary education and the development of private education provision at secondary level.

Inequalities between islands can be observed. Mohéli's gross admission rate in primary is 23 points lower than the national average, but the island had the strongest annual increase in primary education school population between 2015 and 2018 (+7 percent against +1 percent on average). Net enrollment rates show that Grande Comore is lagging (76 percent) compared to Anjouan (87 percent) and Mohéli (91 percent) in 2017-18.[10]

[6] PTSE implementation report 2017-2019, Joint Sector Review Comoros, December 2019
[7] Program document, p.41
[8] The latest published statistical yearbook in Comoros covers the 2017-18 school year
[9] Explanatory note submitted in the application package
[10] Comoros statistical yearbook 2017-18, Ministry of Education

However, the relatively high enrollment rates in primary education go together with a deteriorated school environment. Crowded classrooms, with 45 pupils per classrooms on average (above 50 in 5 regions), lead to the use of double shift in 75 percent of Comoros' classrooms. While this is an efficiency issue, this practice also reduces learning time and may create social inequalities between children enrolled in morning shifts and those in afternoon shifts, the latter having 4 hours less of learning scheduled by week.[11] The school environment is also affected by a lack of basic furniture in many schools. In terms of desks-benches for students, it is estimated that 15 percent of seats are currently missing to accommodate all children in primary schools. This figure goes up to 26 percent when the new requirements of social distancing to address COVID-19 are factored in.[12]

Gender inequalities are not visible on average in primary education (GER gender parity index: 0.99) although disparities between islands remain, for instance in Mohéli where girls are less likely to be enrolled than boys. In secondary education, trends between sub-cycles are reversed with girls overrepresented in lower secondary (parity index: 1.06) and under-represented in upper-secondary (parity index: 0.95).[13] Factors affecting girls' participation in education are distance to school, especially in secondary education, early marriages and negative sociocultural perceptions.[14]

Out-of-school children face multiple barriers often related to socio-economic vulnerability or to the lack of inclusion in the education system. Economic poverty has been identified as one of the barriers to school access and participation based on the 2012 household survey: 66 percent of children aged 5-14 from the lowest quintile were enrolled in school while 93 percent of children from the highest quintile were enrolled.[15] In terms of inclusion, the PTSE notes that 60 percent of children with disabilities were out of school, because schools are not adapted.[16] The EMIS collects some data on children with disabilities: less than 700 pupils in the country were enrolled in primary in 2018 (0.5 percent of total enrollment).[10] Inclusive education is featured in the policy priorities and sensitization, training and school equipment were part of the activities undertaken during the PTSE implementation, and supported with the 2018-2021 ESPIG, especially for children with hearing or visual impairments.

[11] Program document, p.46
[12] Program document, p.48
[13] Program document, pp.10-12
[14] Program document, pp.43-44
[15] Program document, p.50
[16] PTSE 2017-2020, p.14

1.2.2. Learning outcomes

Few learning assessments have been recently carried out in Comoros: a PASEC assessment was conducted in 2009 and a national learning assessment was carried out by the Ministry of Education in 2017 using a similar methodology. This latest assessment concluded that Comorian children struggled in mathematics in grade 2 and 5, with respectively 35 percent and 33 percent of correct answers on average. Learning outcomes in French language skills, although slightly better, only reach 47 percent of correct answers for grade 2 tests. When broken down by competencies, Comorian children performed better in reading with 63 percent of correct answers. However, in grade 5, the results are similarly worrisome with 35 percent of correct answers, down from 47 percent in grade 2. Performance between islands differs: Mohéli generally lagged behind the other two islands.[6]

Despite the absence of detailed and evidence-based analysis of learning determinants, possible causes of low learning achievements were discussed and identified through the 2019 joint sector review: (i) absence of appropriate textbooks; (ii) insufficient school supervision; (iii) insufficient parental involvement; (iv) absence of tutoring; (v) weak skills in French language hindering students' overall learning ability.

A focus on teacher supervision reveals that the needs are massive and likely to increase in the near future considering the aging population of current inspectors and pedagogical advisors. The supervision function in primary education is composed of 56 staff members only (inspectors and pedagogical advisors), translating into inadequate supervisor ratios (e.g., 164 teachers for 1 inspector). Half of the school supervisors being over 50 years old in 2020, the supervision conditions will deteriorate starting in 2024. Lack of human resources and lack of means of transportation have also led to infrequent visits to schools. 22 percent of public primary schools had not received any visit in 2017-18, the situation being particularly critical in two prefectures in Anjouan where more than half of the schools did not receive any supervision visit.[17]

In 2018, the Francophone Initiative for Distance Teacher Training (IFADEM) supported a diagnostic of in-service training in Comoros. Among the needs identified by IFADEM, the need to improve teachers' command of ICT was noted as essential. School supervisors and school headteachers were identified as other priority beneficiaries.[18]

[17] Program document, pp.53-55
[18] Workshop on the National Strategy on Continuous Professional Education in Comoros, IFADEM, 2019

1.2.3. Efficiency

The internal efficiency coefficient amounted to 63.5 percent in 2015, slightly above the Sub-Saharan Africa average.[19] Internal efficiency is notably impacted by high repetition rates, around 15 percent in primary education in 2018[20] – a rate that has been consistently steady for the last ten years.

Pupil-teacher ratio is rather low in Comoros, averaging to 27.6 students per teacher. However, teacher allocation is not optimal. The degree of equitable allocation of teachers in primary education amounted to 77 percent in 2018.[21] A recent analysis by the Ministry of Education for the 2019-20 school year showed that 48 percent of schools exhibit a teacher deficit and 11 percent have a teacher "surplus" based on a ratio of one teacher per class.[22]

In addition to having fewer teachers in hours, some children are more likely to have less experienced and less trained teachers. The pupil per trained teacher ratio amounted to 50 in 2018, significantly lower than the Sub-Saharan Africa average (67), but still falling short of the objective of 40 pupils per trained teachers.[23] Based on 2017-18 data, most teachers in public primary education meet the national requirements either by possessing the DIFOSI (Teacher Higher Education Training Diploma) for 59 percent of them, or by having successfully taken a professional exam for 37 percent of them.[10]

1.2.4. Monitoring of Sector Performance

A joint sector review (JSR) was held in December 2019 covering the first two years of the PTSE implementation. It documented the very modest implementation of the plan for which only 22 percent of activities were carried out, while 7 percent were ongoing. As a comprehensive and participatory exercise, it met 3 out of the 5 criteria of GPE JSR quality standards.[24] Two main obstacles are restraining sector monitoring: (i) the regular monitoring of the sector plan and related strategic planning suffered from a lack of governance and adequate steering mechanisms;[6] (ii) the EMIS is not able yet to produce statistics on a regular basis. A collaboration with UNESCO has been initiated to strengthen EMIS with additional support proposed to be funded with the additional MCA.

[19] GPE Results Framework, Indicator 13
[20] COVID-19 Education strategy Comoros, 2020, p.12
[21] GPE Results Framework, Indicator 11
[22] Program document, p.53
[23] GPE Results Framework, Indicator 12
[24] GPE Results Framework, Indicator 18

Most partners are part of the Local Education Group (LEG) in Comoros. One civil society organization is a member of the LEG: it is quite active in the sector and has acted as an implementing partner for the 2018-2021 ESPIG. Regarding representation of teachers, union representatives have been identified but they do not take part in LEG meetings despite outreach initiatives by the coordinating agency. One of the LEG's main limitation identified during the 2019 JSR was its lack of technical and evidence-based dialogue and capacity to build a strategic partnership. While meeting regularly until 2020, the LEG recently encountered difficulties as no meeting was held between the end of 2020 and the first quarter of 2021. A meeting was held to endorse the proposed project but the dialogue between stakeholders remains intermittent and unable to resolve some challenges in the collaboration between partners. After serving as coordinating agency for five years, the French Embassy concluded its last mandate in April 2021. The seat is currently vacant and the designation process for a new CA has yet to be finalized.

2 ESPIG DESCRIPTION

2.1 CURRENT ESPIG PERFORMANCE

The Union of Comoros became a GPE member in 2013 and has since been granted two ESPIGs and one Accelerated Funding for the COVID-19 response for a total US$7.65 million.

2018-2021 ESPIG ($2.3M - active). The second ESPIG was approved in May 2018 for US$2.3 million to support implementation of the Transitional Education Sector Plan 2018-2020, with UNICEF as grant agent. It became effective on August 1, 2018 and currently has a closing date on July 31, 2021. The project funded with the ESPIG, entitled PTEUC (Project for the transition of education in Comoros), aims to improve access to equitable and quality primary education, by reinforcing governance and oversight of schools (pilot of 50 school development plans, better use of statistical data, improved accounting management instruments, learning assessment exercise), with quality-focused interventions (pedagogical training of teachers, provision of teacher kits, distribution of French and math textbooks and teacher guides), and with equity-focused interventions (standardization of school-entry age, activities to reduce girls' absenteeism and improve their retention in Moheli island, and adapt classroom facilities, provide devices to children with hearing and visual impairments and train teachers in sign language in order to improve inclusion).

Two revisions were made: 1) a revision was approved retroactively by the Secretariat in June 2020 for a budget reallocation and changes in the results framework, due to underestimated unit costs for textbooks, underestimated costs for the JSR, and non-planned support to EMIS; 2)

a second revision was decided in Aug 2020 at the country level after LEG consultation for up to 25% of the ESPIG budget reallocated towards COVID-19 response interventions, in compliance with delegated authority provided to governments and grant agents to respond to the impact of COVID 19.

The grant agent rated the program as moderately unsatisfactory in its second annual progress report covering July 2019 – June 2020. Data provided to the Secretariat from UNICEF HQ indicates a disbursement rate of 28.3% (Dec 2020) while data provided by the country office points to a rate of combined disbursement and commitment of 38.6% (April 2021). The grant has been considered as off track for two consecutive years. Major disbursements were made for the provision of textbooks and teacher guides, the organization of the 2019 JSR, COVID-19 response activities and GA implementation support. Delay factors include a) challenges related to political and institutional ownership, stemming from and further worsening the tensed relations between MOE and UNICEF; b) the absence of a steering committee, unlike what was planned originally, which made it difficult to appropriately monitor and address implementation challenges; c) the late reimbursement of advanced and non-justified funds (about US$43,605 from the ESPIG) by the MOE for planned activities that were not carried out, which impeded transfers from UNICEF to the MOE from Sep 2019 to Oct 2020 ; and d) difficulties to define baseline data and to monitor the results framework indicators due to unreliable statistical data. A request for restructuring and an extension of the closing date is to yet be prepared, otherwise the grant will close, and unspent funds will be returned to the Trustee.

2020-2021 COVID-19 Accelerated Funding ($750,000 - active). The COVID-19 AF grant was approved on October 27, 2020 for US$750,000 with UNICEF as grant agent. It became effective on November 1, 2020 and is expected to close on December 31, 2021. It aims to contribute to ensuring a smooth reopening of schools and strengthen the preparation of the two school years 2020/2021 and 2021/2022. The project focuses on ensuring educational continuity at the primary level (provision of hygiene materials and hand-washing facilities; involvement of communities to coordinate the response; household survey to assess impacts of interventions undertaken to address COVID-19); preserving teaching quality and supporting the most vulnerable students (learning materials and textbooks, accelerated remedial and tutoring program), and strengthening the system and its resilience (reorganizing school mapping, operationalizing the MoE website to host the Classera platform).

The first progress survey covers the first three months of implementation and reports a non-satisfactory performance with a very limited level of disbursement (US$10,250 disbursed). Delay factors reported by the GA are related to the second wave of COVID cases started in November/December that led to a renewed restriction of movements across the country, the

closing of schools in December and a high volume of work at the central level of administration. The next progress survey will be submitted to the Secretariat by May 31, 2021.

It has been brought to the Secretariat's attention that a set of issues have impeded effective implementation of both active grants. Such issues relate to lack of shared understanding primarily between the Government and UNICEF as grant agent as regards process to revise grants' design and each party's roles and responsibilities. The Secretariat has engaged with both parties and other members of the local education group to address these issues.

2.2 ESPIG DESCRIPTION

The grant was initially planned to be added to the initial MCA by restructuring the PTEUC project (2018-2021 ESPIG), as evidenced by the documentation used to identify and confirm UNICEF as grant agent (as late as August 2020). However, the draft documentation provided to the Secretariat in November 2020 did not clearly present the grant as additional, and in its QAR 2 report the Secretariat asked for clarification and summarized the two options available: 1) restructuring the existing grant and including the additional MCA in it for a total $7.5M project; or 2) proposing a separate project for the $5.2M additional MCA and proceed with a restructuring of the initial grant separately if needed. In a letter addressed to UNICEF Country Office Representative, the Minister of Education confirmed that option 2 was preferred, following a high-level meeting between the Minister, UNICEF Representative and the Cooperation Advisor of the French Embassy (coordinating agency) on February 26, 2021.

The Project to Support the Transition of Education in Comoros (PATEC in French) is therefore proposed for a total amount of $5.2 million and will build on results of the 2018-2020 Transitional Education Plan and on lessons learnt from the on-going COVID-19 crisis and its impact on the sector. Expected to cover 3.5 years from July 2021 to December 2024, the project is aligned to the 2020-2030 national development plan and objectives defined within this plan for the education sector. It is structured around the following components:

Component 1 – Improve Access and Equity in Primary Education aims to strengthen capacities of the system, including at the school level, to adapt to and stimulate demand for primary education (provision of classroom equipment, distribution of hand-washing supplies, medical visits in schools to monitor student's health) and to support the enrolment of vulnerable children including girls (survey on poor and vulnerable children, distribution of learning kits for surveyed children, distribution of hygiene kits for girls).

Component 2 – Improve Supervision and Teaching Conditions aims to strengthen inspection and supervision services (provision of equipment and vehicles to subnational inspection offices, pre-service and in-service training of inspectors and counselors) and to improve in-service training of school directors and teachers to improve school management, teaching practices and the use of ICT. This component also proposes to promote health education and health services by revising the curriculum to integrate resilience, safety, protection, and health education, by providing training to teachers on the revised curriculum, and by setting up a health insurance system for all schools (feasibility study to be conducted, followed by an initial provision of $350,000 to finance the fund and three annual transfers amounting to $52,500).

Component 3 – Improve System Governance and Management Capacities aims to strengthen the capacities of the central administration to steer and manage the system through the development and implementation of a staff training plan and by covering costs for MOE teams involved in the implementation of the project and involved more broadly in planning and coordinating sector policies (provision of equipment and vehicles, coverage of recurring costs and missions, staff costs, salaries for drivers). The component will also support strengthening the EMIS (upgrading the EMIS software and hardware, providing training to subnational planning offices, providing equipment and rehabilitating these offices), developing and ensuring the updating of the MOE's website. Annual statistical data will be published for the 3 years of implementation of the project. Finally, this component includes costs related to project management: UNICEF staff cost (Education specialist), development of operational manual and final evaluation.

The total grant agent implementation support costs are US$ 690,000 or 13.3% of the program amount, consisting of: (i) implementation support of US$ 390,000, detailed separately from the project components and which include contributions to the GA country office recurring costs and to staff costs, and (ii) US$ 300,000 for an education specialist post as part of sub-component 3.1. There are several other program management-type costs under the sub-component 3.1.2 that may be deemed GA program management costs, pending clarifications.

The implementation modalities will be similar to the PTEUC project (2018-2021 ESPIG).

2.3 VARIABLE PART DESCRIPTION

Not applicable. The GPC approved the ex-ante approach for the initial MCA, and this is automatically applied for the additional MCA.

Table A: ESPIG Components and Costs

	GPE Financing US$	% of total
1. Improve Access and Equity in Primary Education	**1,355,800**	**26.1%**
Strengthen capacities to adapt to and stimulate demand	715,500	13.8%
Support enrolment of vulnerable children and girls	640,300	12.3%
2. Improve Supervision and Teaching Conditions	**1,971,500**	**37.9%**
Reinforce inspection and pedagogical supervision	956,450	18.4%
Improve in-service training of school heads and teachers	441,000	8.5%
Promote health education in schools	574,050	11%
3. Improve System Governance and Management Capacities	**1,182,700**	**22.7%**
Strengthen steering and management capacities	810,500	15.6%
Improve and strengthen the information system	372,200	7.2%
Grant Agent's Implementation Support Costs*	690,000	13.3%
GRAND TOTAL (with Grant Agent's Implementation Support Costs)	**5,200,000**	**100%**
Agency Fees**	364,000	

* Include Grant Agent's direct costs, such as Program Management, Administrative and other direct implementation costs.

** Agency Fee is not included in the MCA and is calculated as percentage rate (agreed with each GA) from the Total Fixed Part and Total Variable Part.

3 RECOMMENDED DECISION

The Secretariat considers that requirement 1 continues to be met and encourages rapid implementation of the roadmap to develop the next education sector plan, with support of all members of the local education group. Regarding requirement 2, the Secretariat welcomes the government's efforts to maintain education sector's current expenditures above 20 percent of the national budget. However, the requirement 2 is considered partially met, because commitments to increasing and maintaining the allocation of current expenditures to the primary education level at 45% of the education sector budget from 2017 onwards have not been met. Two strategies have been proposed by the Ministry of Education to ensure an increase in the share of the education budget to the primary level in the future, i.e. recruiting additional teachers and redistributing the excess of teachers at the secondary level toward primary and preprimary levels. The Secretariat supports strategies that can ensure efficient allocation and use of domestic budgets so that all children can have equitable access to education, that they can complete a full cycle of basic education and that their learning needs are met. The Secretariat further encourages the Government with support of its partners to conduct necessary analytical work, such as on the efficient recruitment and distribution of teachers, that can facilitate attainment of these goals.

The Secretariat recognizes efforts made by the Government, the grant agent and members of the local education group to develop this additional financing application in highly difficult and unprecedented circumstances. Nonetheless, several standards used to assess the quality of the proposed program are not met or partially met. The Secretariat's quality assurance report at phase 2 (QAR2) had raised concerns as to the quality of the proposal and made recommendations for its improvement, but the Secretariat noted that some recommendations were not addressed and that some adjustments made in the final application raised additional concerns. There are indeed specific concerns as regards the quality of the program design, the results framework and M&E strategy, and risk mitigation measures. The program is also proposed to use similar implementation modalities as the existing ESPIG but persisting challenges to the effective implementation of this grant raise concerns as to the country's capacity to implement a relatively large additional financing in the proposed timeframe.

The Secretariat therefore does not recommend approval of this application.