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**Community Participation Planning Framework
(CPPF)**

For

Myanmar

Decentralizing Funding to Schools Program

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ABBREVIATIONS AND ACRONYMS

AY	-	Academic Year
CPP	-	Community Participation Plan
CPPF	-	Community Participation Planning Framework
DEPT	-	Department of Education Planning and Training
DBEs	-	Department of Basic Educations
DLI	-	Disbursement-linked Indicator
GoM	-	Government of Myanmar
MoE	-	Ministry of Education
EFA-NAP	-	Myanmar Education for All-National Action Plan
EGRA	-	Early Grade Reading Assessment
FGD	-	Focus Group Discussion
PTA	-	Parent and Teacher Association
SA	-	Social Assessment
SPC	-	School Program Committee
TEOs	-	Township Education Offices
TPWG	-	Township Program Working Group

A. Program Background: Decentralizing Funding to Schools Program

The Ministry of Education (MoE) in Myanmar is currently decentralizing funding for education through two national programs: (1) it transfers funding for various operating expenditures through townships to schools based on the number of primary students in the school, and (2) it transfers funding through townships and schools to provide cash stipends to poor children and scholarships to high achieving students.

Both of these initiatives were established through ministerial decrees during the 2009-2010 school year. The decrees established the basic framework of the amounts and the flow of funds, but neither initiative has been established as formal programs with statements of objectives, detailed descriptions of responsibilities, performance indicators, or provisions for monitoring their impact on the education system. Also, while these programs are nominally national in coverage, both are small in size of funds allocated.

The school grants program was initiated following the government's decision to make primary education (grades 1–5) free beginning in school year 2009/10, and aims to help schools meet their operating funds. It is national in coverage and growing quickly. All government-supported schools in Myanmar are eligible to receive school grants. In FY 2012/13, on average and for each school, approximately \$250 was transferred to small schools, \$400 to medium size schools and \$500 to larger schools as direct subsidies to support spending on goods and services.¹ Overall, more than 40,000 schools received about \$15 million equivalent in 2012/13 school year. The Government of Myanmar (GoM) is expanding the school grants program, as is evidenced by the budget allocated in 2013/14 which more than doubled the budget allocated in the previous year. The budget allocated to schools, however, is still smaller than regional norms: school grants programs in neighboring countries (Vietnam, Cambodia, and Laos) provide individual primary schools in the range of \$2,000 to \$3,000 per school annually.

While the school grants program supports financing on goods and services (which were transferred directly to schools), additional grants are also provided separately to schools on school maintenance which amounted to \$37.6 million (approximately \$940 per school) in 2012/13. School grants program will thus not support any civil works.

External donor support will support Myanmar in strengthening this school grants program in accordance with regional norms, and gradually giving school headmasters and communities a greater say in how resources (both the budget for goods and services and the maintenance budget) get spent.

The stipend program is also national in coverage, but is small in terms of the size of financing and the number of beneficiaries. Access is currently limited to about 33 students in each of Myanmar's 330 townships. About 11,000 students receive stipends. In the 2013/14 school year, the government plans to double the number of students receiving stipend in grades 1-5, raising

¹ In 2012/13, a small school was defined as a school (of any type) having less than 100 primary school students. A medium size school was defined as having between 101 and 200 primary school students. And a large school was a school with more than 200 primary school students. The estimates above are based on observed spending on goods and services at the school level (totaling 13.9 billion kyat).

the number of beneficiaries to 16,000 students. The stipend amounts are \$5 per month for primary students, \$6 per month for lower secondary students and \$8 per month for secondary students. Approximately \$700,000 equivalent is currently allocated annually for the stipend program nationwide. Funding for the stipend is awarded by townships to selected schools, and then the school headmaster and other school officials distribute stipend to selected poor families and the caretakers of orphans.

The implementation of the stipend program is uneven across and within townships. The stipend program uses a combination of categorical targeting, focusing on orphans, and a broad based poverty criteria for which there is no criteria. All schools are encouraged to nominate students for the stipend program, and selection among the nominated students is then made at the township level. Townships are encouraged in the existing guidelines to form committees to allocate stipend across schools. Practices for selecting students, however, are not uniform. In some state/regions, school officials consult with Parent-Teacher Associations and/or Boards of Trustees in making the stipend awards, although such consultations are not mandated.

Central funds for these programs are devolved from the MoE to Township Education Offices (TOEs). For the school grant program, each township is responsible for ensuring that the funds reach the school and are spent on eligible items in accordance with simple guidelines. Townships generally disburse funding to schools in cash. Schools are not currently required to prepare budgets or plans in order to receive funding. Purchases carried out by schools are recorded in account books and monitored by the Township Education Office.

The Ministry of Education has asked the World Bank and the Government of Australia for financial and technical assistance to help expand and improve these programs. Following is a description of that donor project funding for the Ministry of Education's programs.

B. Objective of the Program

The objective of this external funding (the World Bank supported *Myanmar Decentralizing Funding to Schools Project*) is to improve and expand Myanmar's existing school grants and student stipends programs. This objective will be achieved by (a) improving the design of the programs, (b) expanding their coverage, (c) promoting their financial sustainability, and (d) building the Ministry of Education's capacity to implement them and monitor their progress.

C. Programs to be supported

The external funding will contribute to the MoE's existing budget allocation in support of three specific programs: (1) expansion of MoE's existing national schools grants program that benefits all government-supported schools, (2) expansion of its student stipends program, focusing on 40 townships over the three year project duration, (3) strengthening of its capacity to monitor and implement these programs and lay the foundation for more focus on learning outcomes in future programs by conducting an early grade reading assessment baseline. The Bank will manage a parallel technical assistance program to support program design, monitoring and evaluation and a Bank-executed part of a Bank-executed Multi-donor Trust Fund.

Expansion and Improvement of the School Grants Program (US\$52 million): All schools with primary students currently supported by government budget funding are eligible for participation in the school grants program. Expansion of the program, therefore, will mean increasing the size of annual operating grants to schools from approximately US\$250, US\$400 and US\$500 per school for small, medium and large schools, respectively, to targets of [US\$900, US\$1,200 and US\$1,800] per school, respectively, over a three year period.² Improving the program means introducing innovations from global experience, as well as improving the fiduciary management of the program, in particular its financial management. Innovations will be introduced to the program by revising its guidelines and by providing training. Specific innovations include: (i) introduction of well-defined program objectives and performance indicators; (ii) tying of the grant funding to school improvement planning; (iii) introducing increased autonomy on school-level spending; (iv) promoting community participation and oversight through parent teacher organizations; (v) standardizing financial reporting; (iv) provisions for audits; and (vii) linking program progress reporting to MoE's own information systems.

Expansion and Improvement of the Student Stipends Program (US\$21 million): While all government-supported schools in Myanmar are nominally eligible to participate in the existing student stipends program, the small size of the program (11,000 stipends to be awarded nationwide) effectively means that, while most schools apply for stipends funding, few schools are actually selected to participate in the program and those that do participate would have, in most cases, no more than 2 stipend students. Because the new student stipends guidelines will include an increase in coverage for each school and more rigorous targeting and administration, the program will only be expanded to more schools and students in a limited number of townships over time. In school year 2014-15, the stipends program will be expanded to 8 townships and is expected to cover [60 percent] of schools and approximately [30 percent] of grade 5-11 students in each township. An additional 12 townships will be added in school year 2015-16 and an additional 20 townships will be added in school year 2016-17, for a total of 40 townships (out of 330 total) to be supported over 3 years. The number of total stipends provided by MoE is expected to increase from about 11,000 currently to about [200,000] over 3 years (Myanmar's education system includes about 8.2 million students). Townships will be selected based on drop-out rates and poverty indicators to be agreed with the Bank as part of the DLI process.

Improving the stipends program means introducing innovations from global experience, as well as improving the financial management of program funding. Assessments of the program have suggested a number of ways in which the program design and implementation can be improved. The national program allocates stipends to all primary and secondary grades. Evidence from a number of data sources suggests that the fraction of students dropping out before grade 4 is small, and that dropout rates are particularly high at key transition moments from primary to middle school, and from middle school to high school. The revised program will therefore focus on children in grades 5 to 11, at the moments when dropouts appear to be the most prevalent. In

² MoE is considering re-organizing the three categories (small, medium and large) used during the first years of the program into more categories to allow for higher per school allowances for larger schools; the Bank supports this change.

addition, the stipend value will be progressively raised in lower-secondary and upper-secondary school to reflect the increase in opportunity and direct costs incurred as a child advances throughout the education system. As with the school grants, innovations will be introduced to the program by revising its guidelines and providing complementary training. Specific innovations include: (i) introduction of well-defined program objectives and performance indicators; (ii) evidence-based selection of initial townships; (iii) evidence-based targeting of schools and students within townships; (iv) better definition and communication of conditionality and of the program in general; (v) community participation and oversight; (vi) introduction of provisions for audits; and (vii) linking program progress reporting to MoE's own information systems.

Capacity improvement support to strengthen monitoring and implementation of programs (US\$7 million): This project will focus on training, and on conducting a baseline assessment of early grade reading. On training, MoE will design and begin implementing a national training program during school year 2014-15 aimed at introducing the new school grants and stipends program to township officials and school headmasters. Program content will be prepared as part of the process for the preparation of program guidelines. In the case of the school grants, it will also benefit from the example of similar training programs already introduced by UNICEF in Myanmar. The training program is expected to follow a cascade model used by UNICEF in which training providers are trained at the central level and are then responsible for delivering training sessions at the regional or township levels. Over 3 years, MoE is expected to deliver training to approximately 1,000 township education officers, assistant education officers and accounting clerks and approximately 43,000 school head masters.

Assessment data, capturing student learning achievement and progress, is a critical building block for school planning and effective resource targeting. During project preparation, the Bank has assisted MoE with technical assistance and trust fund financing to undertake an initial baseline for early grade reading assessment (EGRA) in the Department of Basic Education 3 (Yangon area). The survey will be completed in January and a full report and public presentation will be completed by June 2014. Save the Children Myanmar also contributed technical assistance to this initiative and helped to manage the survey. During the 3 year project period, MoE will carry out baseline surveys in DBEs 1 and 2 (lower and upper Myanmar) as part of the project, providing a complete map of the distribution of children's early grade reading skills across the country. The project's funds will help pay for travel costs and allowances for enumerators (who will likely be graduates from teacher training colleges). The Bank will continue to provide technical support through a parallel technical assistance program (see below).

Parallel Bank-Executed Technical Assistance Program: A Bank-executed technical assistance program in the amount of about [\$2.5 million], for which financing is being sought from the Multi-donor Trust Fund, is expected to accompany the recipient-executed project activities. These resources will be used to augment regular Bank supervision activities through a technical assistance program, supporting process evaluations to help inform future revisions of program design, close monitoring of program implementation, analytical activities and surveys. The analytical work would complement MoE's regular monitoring of the programs. The analytical work would be aimed at helping ensure that the programs supported are continually learning from their previous experience and improving over time. The cycle of learning and

improving that is proposed will aim to build the capacity of authorities at all levels to increase the use of monitoring and data in program design and implementation and to show how this can be done during the program cycle.

D. Ethnic Minorities and Legal Rights in Education

It is estimated that there are more than 130 ethnic groups in Myanmar, though the government usually identified eight groups as major national ethnic races including Kachin, Kayah, Kayin, Chin, Mon, Bamar, Rakhine and Shan. Bamar is the largest group which comprises around 69%, followed by Shan at 8.5%, Kayin 6.2%, Rakhine at 4.5%, Chin at 2.2%, Kachin at 1.4% and other groups at 0.1 %³. However, the 2008 Constitution of Myanmar doesn't endorse or provide the approved list of races which are considered as national races.

The Constitution describes in Chapter 1 in clause 22 states that the Union shall assist:

- (a) To develop language, literature, fine arts and culture of the National races;
- (b) To promote solidarity, mutual amity and respect and mutual assistance among the national races;
- (c) To promote socio-economic development including education, health, economy, transport and communication, so forth, of less-developed National races.

There are currently few laws and regulations which explicitly mention race or ethnic minorities in Myanmar

E. Objective of CPPF

This CPPF aims to provide the Ministry of Education with the operational framework to improve the stipend and school grants programs to be transparent, fair, participatory and efficient through enhanced community involvement. In order to achieve this objective, the CPPF seeks to ensure that: (i) the poor and vulnerable groups including but not limited to ethnic minorities will benefit from the stipend and school grants programs; and (ii) negative impacts, if any, that may arise from the implementation of the programs will be avoided or mitigated.

This CPPF is developed so it addresses the World Bank Operational Policy (OP) 4.01 and 4.10. All elements of an indigenous peoples planning framework (IPPF) are reflected in this CPPF. It is developed based on the findings of a preliminary social assessment and inputs from free, prior and informed consultations with broad stakeholders including ethnic and vulnerable groups, in order to ascertain their broad community support. The CPPF seeks to ensure that vulnerable groups including but not limited to ethnic groups will receive benefits that are culturally appropriate and gender- and inter-generationally inclusive. Potential risks or adverse effects to will be identified, managed, and mitigated by Community Participation Plan (CPP) which will be developed annually based on the results of Social Assessment (SA) that will be conducted annually and include a vulnerability assessment and free, prior and informed consultations with stakeholders including vulnerable and ethnic groups. More details on how vulnerable and ethnic

³ The data is according to the 1983 population census. There is no more concrete updated reference on the composition size of ethnic groups.

groups will be identified and consulted and CPP be developed during implementation are provided in this CPPF, especially in Section H.

Only a preliminary social assessment was conducted during preparation because townships where the project will support the stipend program have not been determined before appraisal. The townships where the stipend program would be implemented during the first year may be identified before the Board approval of this project scheduled on May 20, 2014. A Social Assessment (SA) including free, prior and informed consultations with ethnic and vulnerable groups will be conducted in first year townships immediately after the school restarts on June 1 after a school holiday season – even if project supported townships are selected before the Board approval, it is impractical to carry out SA during the school recess as many eligible students and teachers are away from schools. Initially, a SA including free, prior and informed consultations with vulnerable and ethnic groups will be conducted annually in all townships where the program newly rolls out. When it is judged that MoE has developed sufficient safeguard capacity, SA will be conducted in selected townships. The selection will ensure that all ethnic and vulnerable groups affected under the program are represented, and will be conducted in consultation with the World Bank. A CPP will be developed and cleared by the Bank based on the results, following the provisions of this CPPF, before funds are disbursed to first year townships.

F. Applicable World Bank Policies

The World Bank's Operational Policy (OP) 4.10, *Indigenous Peoples*, applies to this project because the stipend and school grants programs will be implemented in areas where ethnic minorities that meet the eligibility criteria of the Bank OP 4.10 are present. The OP 4.10 aims to achieve the following objectives:

- a. Affected ethnic groups are afforded meaningful opportunities to participate in planning that affects them;
- b. They are given opportunities to receive culturally appropriate benefits; and
- c. Any project impacts that adversely affect them are avoided or otherwise minimized and mitigated.

The World Bank OP 4.10 provides that indigenous peoples share the following characteristics in varying degrees:

- a) Self-identification as members of a distinct indigenous cultural group and recognition of this identity by others;
- b) Collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories;
- c) Customary cultural, economic, social, or political institutions that are separate from those of the dominant society and culture; and
- d) An indigenous language, often different from the official language of the country.

OP 4.10 requires that an ethnic screening would be conducted during the early phase of project preparation to determine whether ethnic groups are present in or have collective attachment to the project area. If this is the case, a Social Assessment (SA) will be carried out in order to evaluate the project's potential positive and adverse effects on the ethnic groups and examine project alternatives where adverse effects may be significant. The breadth, depth, and type of analysis in SA are proportional to the nature and scale of the proposed project's potential effects on the ethnic groups. OP 4.10 also requires that free, prior and informed consultations are conducted with affected ethnic groups leading to their broad community support for the project. Where broad community support is not established, the project will not be implemented.

The policy also requires that an Indigenous Peoples Plan (IPP) is prepared when ethnic groups are present in or have collective attachment to specific areas supported by the project. For this project, CPP will serve as the IPP. The CPP will include all the elements of an IPP and be developed annually based on the consultations and social assessment that will be conducted in townships that the program will newly roll out. Initially, a SA including free, prior and informed consultations with vulnerable and ethnic groups will be conducted annually in all townships where the program newly rolls out. When it is judged that MoE has developed sufficient safeguard capacity, SA will be conducted in selected townships. The selection will ensure that all ethnic and vulnerable groups affected under the program are represented, and will be conducted in consultation with the World Bank. The processes that will lead to the development of CPP, and what it should contain, are embedded in this CPPF and described below in detail.

In addition to OP 4.10, OP 4.01 *Environmental Assessment* was triggered even though no environmental impact is anticipated under the project because the Bank Operational Policies provides that this umbrella policy would be triggered when any safeguard policy is triggered. The OP 4.01 is also triggered because it covers some social impacts that are likely to occur but which are not covered under OP 4.10 or OP 4.12, such as potential exclusion of non-ethnic minority social groups from the stipend program and other benefits of the project.

G. Preliminary Social Assessment: Potential Impacts of the Stipend and School Grants Program

A preliminary social assessment was carried out to identify vulnerable social groups including but not limited to ethnic groups who may face risks of exclusion from the programs, assess potential negative impacts and risks and develop measures to address them, as inputs this CPPF. More detailed Social Assessment (SA) will be carried out during implementation in all townships where the program newly roles out to provide inputs to CPP that will be developed annually. Once it is judged that MOE has gained sufficient safeguard capacity, SA and consultations may be conducted in selected townships. The selection will ensure that all ethnic and vulnerable groups affected under the program are represented, and will be conducted in consultation with the World Bank.

Six townships where the preliminary social assessment was conducted were identified, based mainly on poverty levels and the number of student drop-outs, as follows: Yaetarshay in Pegu Region, Kalaw in Shan State, Mudon in Mon State, Mahar Aung Myae in Mandalay Region,

Zabu Thri in NayPyiTaw, and Seik Gui Khanaungto in Yangon Division. These areas across the six townships have diverse levels of income as well as a number of different ethnic groups (annex I provides an overview of the ethnicity in each township). Whether or not the six townships will benefit from the project support to the stipend program will be known only after the project appraisal when beneficiary townships are identified based on the selection criteria currently under development.

As part of the preliminary social assessment, free, prior and informed consultations were conducted with Parents Teachers Associations (PTAs), the poor and vulnerable families and students from different ethnic background. A total of 63 focus group discussions and 86 key informant interviews were conducted to ascertain broad community support to the two programs. In total, 195 of Bamar vulnerable people and 166 ethnic people including 35 extremely poor ethnic people participated in free, prior and informed consultations conducted during the SA. Many government stakeholders including township education officers and school headmasters were also interviewed. Annex I provides the characteristics of ethnic minorities with whom free, prior and informed consultations were consulted under the SA. More detailed socioeconomic, ethnic and demographic data of people who reside in project townships will be collected under Social Assessment (SA) that will be carried out during implementation when specific townships where the project would be implemented will be determined. Free, prior and informed consultations will be conducted with program affected vulnerable and ethnic groups as part of the annual SA. Townships where SA would be conducted will be selected to ensure that all ethnic and vulnerable groups affected under the stipend program are represented

The following summarizes the findings of the preliminary social assessment.

Constraints for access to education

Findings from this social assessment indicate that the reasons for the high number of school drop-outs, especially in Grades 7 and 8 are both financial and non-financial. Poor parents, and especially those in remote areas, face difficulties in sending their children to school. In all schools visited for the SA, much larger numbers of poor and needy students are found eligible to receive stipends than the program could afford. Lack of money is the most important barrier to education. Many of these poor students come from daily wage-earning or unstable income families with high numbers of children. SA respondents reported that difficulties increase from Grade 7, the first year of middle school, as the costs for school supplies and transportation to school increase at this grade level. Middle and high school students often have also to pay for additional private tuition if they are to do well in these higher grades. The estimated average monthly cost for middle school is about 30,000 Kyat and for high school, about 100,000 Kyat.⁴ Respondents said this is beyond the means of poor parents, many of whom are daily wage earners (2,000-3,000 kyats per day). The costs can be significantly higher for high school students from remote villages who must either stay in boarding schools or with relatives. As a result, most poor villagers stop sending their children to school after the primary level.

⁴ These costs were calculated by the research team based on estimates provided by poor parents, school heads, teachers, and school committee members. The figure for costs is the average for the answers given by respondents in each township and the average for six townships.

As for the non-financial constraints, key stakeholders interviewed raised remoteness as one of the three most important barriers⁵. One school headmistress in a remote village said that half her students drop out by the middle of each year due to difficulties to commute. Many remote villages are not connected by all-weather roads or transportation services to the towns that have middle and high schools. Students from some remote villages must travel by both boat and road to reach middle or high school, and during the rainy season, rivers and local roads are often unsafe. Many poor students drop out because they cannot afford to cover the cost of transportation or boarding schools, or because they do not have reliable relatives near schools at whose homes they can stay during school terms. The problem is more acute for middle or higher school students which are typically located in towns.

Stipend Program

Overall, SA found that students and parents are generally pleased with the stipend program and they confirmed that the majority of funds do reach poor, eligible students. They mention that stipends, even though small in amount under the current allocation, greatly help poor students go to school, especially at the primary level. However it was also reported that the amount falls far short of needs for middle and high school levels where higher fees apply and which are typically located in cities and transportation costs are higher.

The SA also found some gaps in the stipend program, many of which are related to institutional arrangements and implementation procedures. The study found that many eligible students and parents are not informed of the stipend program because local officials involved in the implementation such as TEOs and school headmasters are afraid of making the program known to the public which can create expectations that cannot be met. The current budget allocations allow giving stipends only to one or two students per school, while a lot more students are potentially eligible; interviews with schoolmasters indicate that only 22% of eligible students actually receive stipends. While the concern of school headmasters is understandable, the lack of transparency necessarily raises a concern about the selection of stipend beneficiaries, as was pointed out by participants of focus group discussion (FGD) who called for an increased participation of parents in the selection process to increase accountability of the program.

The stipends program is implemented differently across schools, depending on how TEOs and schoolmasters understand the very general guidelines provided to them. SA found that, because detailed implementation guidelines are not developed yet, the majority of TEOs lack a consistent understanding of the program's institutional arrangements. In some areas, the township education office works directly with schools in the area, in other areas TEOs have set up the Township Board for Selection of Students (TBSS) to oversee the allocation of stipends. Also, different selection criteria are used among townships, and even among schools within the same townships. One criterion that is common across schools is the orphanage, however, almost all

⁵ Two other non-financial constraints identified are language for ethnic minorities and existing school evaluation systems. The detailed description of these two non-financial constraints is provided in the SA report. The MoE started to address the issue of language barriers by publishing textbooks in ethnic languages. As a start, textbooks in Mon and Rakhine have been published. Since the government is addressing the issue through its own program, the issue of language will not be directly addressed under this project which will focus on other constraints to education.

schools use additional poverty related criteria in selecting beneficiary students, which vary depending on the preference and judgment of school headmasters and teachers where they are involved in the selection. No school is found to use ethnicity as a criterion, and FGD participants including ethnic parents indicates that they are not aware of discrimination in the selection of beneficiaries on the ground of ethnicity.

Many participants of FGD also indicated a concern that recipients of stipends may be stigmatized as poor and/or orphaned, which may make many eligible students hesitant to participate. In the absence of awareness raising and public education, such a concern may well be real and inhibit the potential in reaching out to the poor and disadvantaged.

SA also found that parents with concerns normally go to classroom teachers for advice and resolution, before going to schoolmasters in case issues cannot be resolved. Issues regarding students such as performance, attendance or quarreling would be managed at the school level. The school headmasters do not pass on the cases or records to the TEO level.

School Grants Program

SA found that all schools are eligible for school grants to cover various operational expenditures. Compared with the stipend program which will be provided only to selected students from among other students who also meet eligibility criteria, the school grants program by design does not involve significant risks of social exclusion given the fact that all schools receive the grant. In fact, the SA did not find any discrimination or unfair treatment of schools involved in the implementation of school grants. It also found that school grants help schools cover many operating expenses such as stationery, sanitation, drinking water pots, chalk, dusters, painting the blackboard, and teaching and learning materials. Although the very limited size of grants makes it difficult for schools to address many critical needs,⁶ especially because only a narrowly defined range of cost items can be financed, many school headmasters interviewed mentioned that school grants are useful given the very limited operating budget available to schools.

As is the case for the stipend program, parents or other stakeholders are not well informed of the usage of school grants, causing concerns about accountability in the use of grants. The school headmasters typically make decisions on the use of the grant, but only in some of the schools visited were the headmasters found to consult with the school board on the use of grants.⁷

Existing grievance handling mechanisms

The SA found that the current stipend and school grants programs do not have a system to allow people to provide feedback/suggestions or complaints. Those with concerns or complaints would usually go to the classroom teachers or the school headmasters. Thus, the issues are normally dealt with internally and with no specific report or record on the cases. The SA found that parents interviewed consider it is important to strengthen feedback/ grievance mechanisms

⁶ For example, school grants cannot be used for such critical needs as provision of drinking water and maintenance for electricity.

⁷ SA also found that school headmasters and teachers need to strengthen their financial knowledge and skill. The school headmasters interviewed mentioned that they did ask for financial training so that they can better manage this program.

for the stipend and school grants program in order for the programs to be able to improve its fairness, transparency and effectiveness.

H. Community Participation Planning Framework (CPPF)

1. Principles of CPPF

The following principles will govern the stipend and school grant programs:

- a. The national guidelines will be developed for the stipend and school grants programs, separately, in line with this CPPF. The guidelines, when developed, will be widely consulted with key stakeholders in the country including but not limited to ethnic minority communities. The Community Participation Plans (CPP) will be developed, and then updated annually as the stipend program rolls out to new townships, in line with the provisions of this CPPF.
- b. As part of the preparation of the CPP, a Social Assessment (SA) will be conducted which includes vulnerability assessment to identify groups of people whose socioeconomic standings in local communities may subject them to risk of exclusion from stipend program. Free, prior, and informed consultation will also be conducted as part of SA with potential beneficiary groups of the stipend program leading to their broad community support to the stipend program.
- c. The public in general, and students eligible to the stipend program and their parents in particular, will be adequately informed of the objective, eligibility criteria and selection procedure of the stipend program.
- d. Selection criteria will be refined so that a broad range of poor and vulnerable social groups become eligible to the stipend program.

Mechanisms will be set up to address grievances accessible to affected people and monitor implementation of this CPPF. The School Program Committee (SPC) will be established which will participate in and monitor the implementation of the stipend program at the school level. SPC will comprise the school headmaster, parents and teachers, and also include representatives from vulnerable groups including but not limited to ethnic minority groups. In principle, SPC will have equal representation of male and female parent members, one third of the committee should be females, and one third of the committee should be from parents. SPC will be empowered in monitoring and grievance mechanisms to ensure that the stipend and school grants programs are implemented under the support of this program as per provisions of this CPPF.

2. Institutional Arrangements for CPPF Implementation

The Department of Education Policy and Training (DEPT) and the relevant Departments of Basic Education (DBE) under the Ministry of Education (MoE) will assume overall responsibility for the implementation of this CPPF. Regarding the stipend program, DBEs will

carry out many activities provided under this CPPF in collaboration with Township Education Offices (TEO) and Township Program Working Group (TPWG)⁸ at the township level, as well as beneficiary schools. DEPT will pull together data and inputs collected by DBE at the township level and develop, and annually update, the Community Participation Plan (CPP). Detailed implementation arrangement will be spelled out in the national stipend program guidelines. Regarding the school grants program, DEPT will ensure that all schools will receive grants as per national guidelines for school grants program, and that all schools will be treated fairly and transparently in the allocation of school grants.

At the school level, a School Program Committee (SPC) will be established based on the existing but significantly strengthened community participation mechanism in school management through the PTA. The SPC will play a key role in the selection of stipend beneficiaries, management of school grants and handling of grievances at the school level. The SPC will comprise the school headmaster, teachers and parents including those from vulnerable groups including ethnic minorities. The SPC will be empowered in the monitoring and grievance mechanisms to ensure that the stipend and school grants programs are implemented under the support of this program as per the provisions of this CPPF.

3. Implementation procedures of CPPF

Detailed, step by step procedures to implement the principles outlined above will be developed in the MoE's own guidelines for the stipend and school grants programs. The procedures described below will serve as the basis to develop more detailed procedures that will be described in the guidelines.

Step 1 – Development of National Guidelines for the Stipend Program and School Grants Program

At the beginning of the program implementation, the MoE will develop the national guidelines for the stipend program and for the school grant program. The MoE will develop the guidelines in line with this CPPF. The national stipend guidelines and the national school grants guidelines, when developed, will be widely consulted with key stakeholders including but not limited to ethnic minority communities for inputs. Regarding the school grants program, which will be implemented by MoE nationwide and from which all schools are eligible for funding, MoE will closely monitor the implementation throughout the program based on the monitoring and grievance mechanisms described below in this CPPF. Regarding the stipend program, it will be implemented based on the following procedures.

Step 2 - Development of Institutional Arrangements

At the national level, the MOE will designate the DEPT to be responsible for an annual update of the community participation plan (CPP) prior to the roll out of the programs in new townships as

⁸ Township Program Working Group comprises representatives from township education office and schools.

part of its overall reporting on the development and implementation of the programs. DEPT will work closely with relevant DBEs to implement this CPPF. CPPF focal points will be appointed at DEPT and DBEs responsible for the development and implementation of CPP. The Township Program Working Groups (TPWG) and the School Program Committees (SPC) will be strengthened, and will be responsible for the implementation of the programs at the township level, according to MoE's revised guidelines for the school grants and stipends programs. Representatives of vulnerable groups including ethnic minorities, and female parents, will be encouraged to participate in the School Program Committee.

The DEPT, DBEs designated officers will work in collaboration with TEOs, TPWGs and SPCs. Roles and responsibilities of TEOs, TPWGs and SPCs will be clarified in the national guidelines for the stipend program.

Step 3 - Capacity Building of Key Stakeholders

The MOE in collaboration with the World Bank will provide training for DEPT and DBEs to implement the elements of the CPPF, particularly with regard to basic principles and approaches of vulnerability assessment, specific issues that CPPs should address, and roles of SPCs in the implementation and monitoring of stipend and school grants programs. The responsible DBE officers will further provide appropriate training to TEOs, TPWGs and school headmasters on core CPPF principles. The Bank will help to ensure the inclusion of CPPF elements in the MoE's training of TEOs, TPWGs and school headmasters, and may participate in training sessions from time to time.

Step 4 – National awareness campaign

In order to help ensure that more eligible students and their parents are aware of the stipend and school grants program, a media campaign will be conducted as part of the campaign for the national *Education for All* policy. This campaign should involve TV and radio programs and be implemented prior to the beginning of each school year. While the media campaign itself will aim to inform the public about the *Education for All* policy, it will also include the description of the school grants program, eligible expenses and other key information about the program, as well as of the stipend program, eligibility and selection criteria, and the list of townships where the stipend program will be rolled out, and feedback mechanisms. In addition, for the stipend program, a brochure will be prepared which will describe the objectives, eligibility criteria, selection process and other key information about the stipend program. The brochure will also describe the roles of TPWGs and SPCs, grievance and feedback mechanisms that are available to eligible students and their parents. The brochure will use simple Myanmar language and the languages of the major ethnic groups. The TEOs will distribute them to all schools within their respective townships and school headmasters will collaborate with SPCs to make them available at the schools.

Step 5 - Selection of Townships for the Stipend Program

It is expected that the project will support the stipend program in 40 townships during the Academic Year (AY) 2014-2018. About half the schools in each township will participate in the

stipend program. The criteria for the selection of these townships are under development and will be provided in the national guidelines for the stipend program, but they will include levels of poverty, remoteness and drop-out rates.

Step 6 - Social Assessment (SA) for the Stipend Program

The SA will be conducted on an annual basis, and cover those new townships that will be included into the stipend program in the respective year. It will consist of two aspects, namely: vulnerability assessment, and free, prior and informed consultations at selected schools. Results of the SA will help inform the development of the CPP. Initially, a SA will be conducted annually in all townships where the program newly rolls out. When it is judged that MoE has developed sufficient safeguard capacity, SA will be conducted in selected townships. The selection will ensure that all ethnic and vulnerable groups affected under the program are represented, and will be conducted in consultation with the World Bank.

Vulnerability assessment: each year, a the focal point from the Township Education Office for the Stipends Program will carry out a vulnerability assessment together with the TEOs, ATEOs, TPWGs and SPCs. Relevant DBE offices may also assist townships as feasible to support the conduct of the vulnerability assessment. The vulnerability assessment aims to identify those social groups within the townships who are potentially eligible and in particular need of the stipend program. Indicators and eligibility criteria to identify such vulnerable groups are under development and will be specified in the national guidelines for the stipend program, but they will at least include the poor, orphans, and ethnic minorities. A simple template will be developed as part of the national guidelines which will be used by the TEO focal points and, where possible, the DBE officers to record basic data on eligible vulnerable groups including their gender and ethnic background. The basic data sheet will include a list of eligible families for the stipend program in the areas. The list will be used by the SPC to verify the students along with the proposed list from the classroom teachers. The DBE officers may visit some schools to verify the results. The result of the vulnerability assessment will be aggregated and send to DEPT in Nay Pyi Taw to prepare its annual CPP and the update of the CPP for the subsequent years.

Free, prior and informed consultations: The TEO focal points and, where possible, the DBE officers, in collaboration with TEOs, ATEOs and TPWGs, will visit selected schools and carry out consultations with parents and students to seek inputs to the design of the stipend program and potential measures to better implement the program. Potential negative impacts of the stipend program and mitigation measures will also be explored. SPCs will be invited to the consultations and their perspectives on vulnerable social groups who may be excluded from the stipend program will also be solicited and used as inputs to the vulnerability assessment. The SPCs will make sure that consultations will cover all vulnerable groups potentially eligible for the stipend program in their selected schools. Minutes will be developed and the record of comments provided by participants will be kept by DBEs and the TEOs.

From the second year on, TEO focal points, TEOs and TPWGs will take the lead in carrying out the SA and, under the guidance and supervision of DBEs, carry out vulnerability assessment and stakeholder consultations. DEPT and relevant DBEs will remain responsible for ensuring that

SA is done in line with this CPPF, and relevant DBEs will participate in some of the consultation meetings to be held in townships, however, the implementation of many aspects of SA will be delegated to the TEO focal points, the TEOs and TPWGs in collaboration with SPCs. The training program to be developed and implemented by DBEs will develop the capacity of TEOs and TPWGs so they understand SA processes and procedures. Such a delegation of SA responsibilities to the township level is important to ensure that good social development practice will more likely be integrated at the local level. However, DBEs will determine the degree of delegation based on the capacity of respective TEO focal points, TEOs and TPWGs. The responsible officers at DEPT and DBEs will consult the Bank task team for guidance.

Step 7 – Development of the Community Participation Plans (CPP)

DEPT will pull together the results of SA to be conducted at the township level and develop, and annually update, the Community Participation Plan (CPP). In doing so, DEPT will work closely with relevant DBE officers who take the lead in SA processes and assist in collecting data on vulnerable and ethnic groups at the township level. DEPT will update the CPP annually based on the result of SA. Details of what CPP should contain will be described in the national guidelines for the stipend program, but it will address all element of Indigenous Peoples Plan under OP 4.10. CPP will seek to make sure that vulnerable social groups would not be excluded from program benefits, and that negative impacts of the program, if any, will be adequately addressed. CPP will therefore focus primarily on addressing these social exclusion risks and include the following:

- A summary of the vulnerability assessment;
- A summary of the results of the free, prior, and informed consultation with the affected poor and vulnerable groups including ethnic minorities that led to broad community support for the program;
- A framework for community participation in the implementation of stipend program at the school level, most notably the modality of participation of School Program Committee in the administration of stipend program, selection of stipend beneficiaries and monitoring of program implementation. Free, prior, and informed consultations should be conducted as part of the participatory framework with eligible students and their parents including those who belong to vulnerable social groups, in order to ensure that the poor and vulnerable students are indeed able to benefit from the stipend program;
- Description of potential negative impacts ,if any, and measures to address them;
- Description of training program to strengthen the capacity of TEOs, TPWGs, school headmasters and relevant entities such as SPCs in transparent, fair, participatory and efficient administration of the stipend program;
- Mechanisms and benchmarks for monitoring, evaluating, and reporting on the implementation of the CPP. Measures will be identified that will most cost effectively support the participation of beneficiary students and their parents, in particular through SPC, in the monitoring of program implementation;
- Grievance redress mechanisms; and

- The financing plan for CPP implementation which will be integrated in the annual MOE budget for the programs.

Step 8 –Disclosure of CPP

Copies of CPP will be made available to beneficiary schools. The CPP will also be translated into relevant ethnic languages of the townships where appropriate and feasible. MoE will consult draft CPP with relevant stakeholders and revise CPP based on the inputs received. TEO and TPWGs will ensure SPCs which include representatives from ethnic and vulnerable groups will discuss CPP and provide inputs for revisions, where necessary.

Step 9 – Implementation of CPP

In order to ensure that all potentially eligible students and their parents are aware of and can potentially benefit from the stipend program, a brochure describes the objectives, eligibility criteria, selection process and feedback process will be prepared in Myanmar and key ethnic languages. The TEOs will distribute them to all schools within their respective townships and school headmasters will collaborate with SPCs to make them available at the schools.

DEPT and DBEs will assume an overall responsibility for the implementation of the CPP. The Township Education Officers (TEO) will be in charge of day-to-day implementation of CPP together with TPWGs, and regularly review the progress of the stipend program. The implementation of CPP will be reported to MoE and the World Bank annually as part of MoE's annually reporting on program implementation.

For the first year stipend program, a Social Assessment (SA) will be conducted and CPP be developed only after the Board approval of the project even if project supported townships are identified before the Board approval because schools are in the long recess – even if project supported townships are selected before the Board approval, it is impractical to carry out SA during the school recess as many eligible students and teachers are away from schools. The CPPF process of carrying out SA including free, prior and informed consultations with vulnerable and ethnic groups will be carried out immediately after the school recess, and CPP will be developed based on the results and the provisions of this CPPF. Project funds will be disbursed to first year townships after the approval of CPP by the Bank. From the second year on, the process will be repeated as described in this CPPF.

4. Monitoring and Evaluation of the CPPF

The Ministry of Education will empower SPC in the monitoring of the stipend and the school grants programs through supporting their oversight roles. For the stipend program, the SPC would regularly meet beneficiary students/families and receive feedbacks especially on stipend payments. The SPC will also be working closely with the classroom teachers on students attendance, if the beneficiary students have irregular school attendance record, parent and teacher members of the SPC will need to pay a visit to the student and family to gather reasons as well as to identify ways to address the issue and encourage the students to attend school. Record of all visits will be discussed at the SPC meetings and be kept at the school. In addition, the SPC will

be the focal point of contact to assist with the beneficiary assessment, and school and household surveys. SPC will organize a school assembly to inform the results of these assessment and surveys to the school community. Recommendations from the assembly will be submitted to TPWGs and TEOs to further improve the implementation of the program. SPC will make sure that the results of the assessment, surveys and their recommendations are displayed at the school notice board.

As for the school grants program, support will be provided so SPCs will be able to provide inputs to develop the school plan and endorse the final school improvement plan. The endorsed school improvement plan will be announced at the school assembly and will be displayed at the school notice board for the public. SPCs will regularly monitor the implementation of the school grants according to the endorsed school improvement plan. Townships will report the number and share of schools with school plans to DBEs and DEPT, and DEPT will report to the Minister of Education.

In addition, a beneficiary assessment, financed and facilitated by the Bank and its contacting agency, will be conducted as part of the regular external monitoring and evaluation conducted by the Bank described below. It aims to assess and report to MoE and beneficiaries the progress with regard to the school stipend and school grants programs including on implementation of CPPF. Among other issues, the beneficiary assessment will assess how vulnerable and ethnic groups participate in the selection of stipend beneficiaries at the school level, whether risks that vulnerable and ethnic groups are excluded are properly addressed, and whether free, prior and informed consultations were conducted and vulnerability assessment carried out adequately. DEPT, DBEs and TEOs will organize meetings with beneficiary communities and share assessment results. Minutes of the meeting will be submitted to the DEPT and DBEs.

These monitoring steps in the local areas will be incorporated into the Bank-executed technical assistant (TA) program which will provide information to help the MoE continuously improve the management and operations of the stipend and school grants programs. The TA program related to enhancing monitoring and evaluation of the program would include the following:

- (i) *Spot-checks* to independently verify the status of the programs, as part of due diligence before payments are disbursed against Disbursement Linked Indicators.
- (ii) *Annual school and household surveys* that will capture detailed information on school instructional and teaching equipment, and on the beneficiaries of the programs. These surveys will aim to be linked to an impact evaluation of the program that will be designed to assess whether the program is reaching its goals.
- (iii) *Process or operational evaluations* to assess implementation of the programs, to identify procedures that do not work well and receive feedbacks from schools and townships.

Assessment of the performance in CPPF implementation including the performance of grievance redress mechanisms will be embedded in the TA program so as to swiftly and cost-effectively identify issues that may hamper the adequate implementation of CPPF. Beneficiary satisfaction on how stipend and school grants programs are implemented at school levels, including on how vulnerable groups are consulted and benefit from such programs, will be used to refine program

operations guidelines. The summary of beneficiary assessment including issues identified for CPPF implementations will be translated and made available to program supported schools.

The World Bank will conduct missions twice a year to oversee the implementation of the stipend and the school grants program. The implementation of CPP elements will be part of midterm review and end-project evaluation by independent consultants

5. Grievance Redress Mechanisms

The Ministry of Education will encourage students and parents with questions or grievances to seek clarifications and solutions through a grievance redress mechanism to be included in its revised guidelines. It is the MoE's intention to manage key complaints/feedbacks at the township level to make key issues public and solve the issues in a transparent manner. DEPT, DBEs and the TEOs will also make sure that local populations are informed of these processes and mechanisms. Detailed processes and procedures of feedback/ complaint handlings will be developed and included in the MoE's program guidelines, but they will consist of the following principles:

1. The MoE will establish a simple procedure to receive and address feedbacks and complaints. An M&E focal point will be appointed at each participating Township Education Office whose job will include the overall monitoring of stipend and school grants programs, including questions, complaints and concerns from local population.
2. Complaints may be submitted through the follow channels:
 - P.O. Box at the Ministry of Education in Nay Pyi Taw;
 - Public complaints at program activities' meetings; and
 - Directly to the teachers, school headmasters, TEOs, the township administrative officers and the village heads
3. School headmasters will be the first tier of grievance mechanisms to receive, address, and keep record of the complaints and feedbacks. SPC that includes ethnic and vulnerable groups will be empowered to receive grievances and work with school headmasters to address them.
4. If satisfactory resolutions cannot be found at the school level, the issue will be elevated to the TEOs. If a satisfactory resolution cannot still be found, the complaint may be elevated to the MoE.
5. All local population where stipend and school grants programs are implemented are entitled to provide feedbacks, concerns and questions directly to the MoE through a special P.O. Box established in Nay Pyi Taw.
6. The TEO or the M&E focal point at each participating township will keep the record of complaints received and responses provided, which will be shared with DEPT which will keep a file for review.
7. A program brochure will include the explanation of the feedback/complaint system and provide contact details for complaints; and
8. The programs will continue to use the sanction procedures stipulated in chapter 6 "managing to curb offences" of the MoE administration and inspection.
9. The random spot checks of schools, annual school/ household surveys and process evaluations to be supported under Bank-executed TA program will review performance

of grievance redress mechanisms at the school level, address remaining grievances identified and take steps to strengthen the mechanisms.

6. Consultations of this CPPF

This draft CPPF was consulted with a broad stakeholders on March 19, 2014. Both national and international NGOs as well as other agencies involved in education and ethnic minority issues were invited. Myanmar and English copies of the draft CPPF and the executive summary of the preliminary social assessment were provided to the invited agencies two weeks before the consultation meeting. Overall, participants expressed strong support to the project, as well as measures provided in this CPPF to ensure that the project will benefit vulnerable and ethnic groups. Ministry of Education appreciated all comments and offers from stakeholders to help improve the programs going forward and encouraged participants to provide additional written comments. The key inputs from the consultations have been reflected in this CPPF, which include:

School grants program should consider: 1) extending the program support to monastery schools and community-based schools which often are located in the poor and remote areas; 2) providing longer training and coaching to teachers to better develop and implement school improvement plans; 3) putting in place a rigorous monitoring mechanisms for the program; 4) avoiding using school grants as a substitute for parent/community contributions to the schools; and 5) making a full use of existing entities such as PTA and BOT instead of creating a new committee for the program.

Stipends program should consider: 1) students below grade five should also be considered for the program; 2) NGOs and INGOs could collaborate with the Ministry to reach out to more disadvantaged students especially disabled children; and 3) a longer timeframe should be allowed for complaints – seven days may not be sufficient for people from remote areas to provide complaints.

Ministry of Education officials responded to all comments during the consultations. It was pointed out that the programs would be evaluated annually by MoE, as well as by the World Bank as part of its technical assistance program. These evaluations would be discussed in formal annual reviews and consultations. Based on these reviews, the operational ‘guidelines’ would be revised annually as needed.

The MoE explained that monastic schools would not be included in the first year programs because monastic schools do not currently participate in the MoE’s formal grants program, which requires schools to spend and report spending against government budget codes. It is not certain that monastic schools would agree to or be capable of meeting the program’s financial and reporting requirements. However, it was explained that many monastic schools already receive significant government support, including for teacher salaries and direct provision of books and materials. The MoE expressed its aim of eventually including monastic schools in the grants program.

7. Budget for CPPF Implementation

The estimated cost of the implementation of the CPPF is **1,334,700,000** kyats (about US\$ 1,390,312) for the three academic year of 2014-2017. This budget is indicative which includes training for safeguards protections and public consultation which are an integral part of the stipends program and are therefore difficult to separate out from overall training for the program. DEPT will calculate the detailed budget for the implementation of the CPPF, and ensure that they are integrated in the overall annual budget of the MoE. The World Bank will also provide funding support for training, monitoring and evaluation activities.

Table 1 Estimated cost for the development and implementation of the CPPF in 40 townships.

Activities	Unit costs	Quantity for 40 townships/Total MMK
Training for DEPT and DBE staff in NPT	500,000	1,500,000
Training TEOs and schools at the townships	360,000	14,400,000
Developing brochures and posters 500 for brochures and 100 for posters per township, translation to other languages and publication	20,000	480,000,000 160,000,000 (for ethnic languages)
Meetings for public awareness program at the township	160,000	6,400,000
SA processes including vulnerability assessment and free, prior and informed consultations at the township level	100,000	200,000,000
Development of CPP Write up, consultation, publication and distribution	20,000 per publication 160,000 Per consultation at the township	42,000,000 6,400,000
Monitoring and Evaluation	100,000	24,000,000
Beneficiary assessment	100,000,000	400,000,000
Total		1,334,700,000 kyats

Annex I: Ethnicity of Townships where preliminary social assessment was conducted

Townships	Majority	Minorities
Yaytarshay	Bamar (99%)	<ul style="list-style-type: none"> • Karan (0.09%) • Pa O (0.01 %)
Seikgyi Khanaungto	Bamar (98%)	<ul style="list-style-type: none"> • Very few migrant families from Rakhine and Karan which is totally mixed in towns
Mudon	Mon (87%)	<ul style="list-style-type: none"> • Bamar (9.6%) • Karan and Indian ancestry (3.41%)
Kalaw	<ul style="list-style-type: none"> • Danu 37% • Pa O 21% • Bamar 21% • Taung Yoe 15% 	<ul style="list-style-type: none"> • Palaung 2% • Shan 1% • Inn Thar 1% • Karan 0.4% • Other 1%
Mahar Aung Myae	Bamar (70%)	<ul style="list-style-type: none"> • Indian ancestry • Islamic population • Shan • Chinese ancestry (Yunanese) • Kachin • Kayah • Mon • Rakhine
Zabuthiri	<ul style="list-style-type: none"> • Majority are Bamar. 80% of the population are in government services 	<ul style="list-style-type: none"> • Various background with 10% native people and 10% migrant worker

Source: The SA research team