



Independent Joint Anti-Corruption
Monitoring and Evaluation Committee

November

2017

**PROGRESS MONITORING REPORT
AGAINST CORRUPTION
MINISTRY OF
HIGHER EDUCATION
(MoHE)**



Kabul – Afghanistan

ACRONYMS

AOP	Administrative Office of the President
AFN	Afghani (currency)
ACP	Anti-Corruption Plan
CBR	Capacity Building for Results
DoPHEI	Directorate of Higher Education Institution
IARCSC	Independent Administrative Reform and Civil Service Commission
MoHE	Ministry of Higher Education
MoF	Ministry of Finance
MoJ	Ministry of Justice
NUG	National Unity Government
PHEI	Private Higher Education Institutions

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Executive Summary

MEC is independent, and is not subject to direction from either the Afghan government or the international community. It was created through Presidential Decree 61 after the need for an autonomous anti-corruption monitoring and evaluation body was identified at the London and Kabul Conferences.

MEC focuses on:

- Developing anti-corruption recommendations;
- Monitoring and evaluating the anti-corruption efforts of the Afghan government and the international community; and
- Reporting on a regular basis to the President, Parliament, and people of Afghanistan, as well as to the international community, about the state of the fight against corruption.

MEC is carrying out reviews of Ministries' anti-corruption plans. Almost all Ministries have developed such plans and so far MEC reviewed four of these plans.¹ In the 2017-2018, the Ministry of Higher Education committed to implementing an Anti-Corruption Plan. This MEC report is the review of that Plan.

During the review and analysis, MEC's findings indicate that to some degree the MoHE worked to implement their Anti-Corruption Plan which consists of 25 activities, and eight indicators to achieve eight objectives.² But these efforts are not meeting the MoHE's outlined in the objectives of the ACP and as well as some main issues that had to be focused on.

The activities and indicators in the Plan are largely relevant to those functions and processes of the Ministry which are potentially vulnerable to corruption. However, the problem with the Plan is its baselines, which are virtually non-existent.

One of the main findings of this Review is the need to properly collect revenues from private educational institutions. The Plan also stipulated the establishment of a board or committee to monitor and evaluate the Ministry's performance. However, during the research phase of MEC's Review, this had not been established. In addition, the problem of students not writing their theses still exists, and there are no actions in the Plan to address this.

MEC hopes that the recommendations contained in this Review will be properly looked upon by the Ministry and will be taken into consideration in drafting a new ACP.

¹ <http://mec.af/index.php/reports/ac-plan-reviews>.

² Internal document, Parliamentary Legal Department, MoHE, August 29, 2017.

Recommendations

1. To conduct comprehensive anti-corruption risk assessment in the Ministry in order to understand the main vulnerabilities;
2. To assign this risk assessment to an independent institution/organization; and
3. Based on the results of the assessment, draft a new comprehensive Anti-Corruption Plan for upcoming year(s);

No.	Recommendation
1	The MoHE in collaboration with the Ministry of Finance should develop a monitoring and evaluation mechanism to ensure that private institution revenues are properly collected.
2	The MoHE should develop a mechanism to solve the issue of later admissions of students (after the Kankor entry examination) in private higher education institutions.
3	The MoHE, along with the Directorate of Higher Education Institution (DoHEI), should develop a mechanism to ensure that the students are regularly participating in on-site program classes.
4	The MoHE, along with the DoHEI, should establish a mechanism to ensure that the students themselves are writing their thesis, and not paying others to do it. This is crucial for ensuring academic integrity.
5	The MoHE should recruit all director-level positions based on the Civil Service Law, Article 23.
6	The MoHE should fill the Acting Director positions through a competitive process using relevant qualified professional bodies.
7	The MoHE should establish an effective monitoring and evaluation mechanism for the entire processes of the establishment of private higher education institutions to prevent or reduce the risks to corruption in relevant process.
8	The MoHE should launch the regular follow-up in Ministry of Justice (MoJ) for the further process of higher education's regulations.
9	The MoHE should develop its budget based on its department's needs.
10	The MoHE should establish monitoring mechanism to make sure that the students' food allowance money is transferred to their accounts on monthly basis.

Introduction

The Ministry of Higher Education (MoHE) itself declares that it is committed to success, recognizing that quality of higher education is the key to national development and the personal well-being of the citizens of Afghanistan.

The MoHE's vision is to provide a high quality public and private higher education system that responds to Afghanistan's growth and development needs, improves public well-being, respects traditions, incorporates modern scientific knowledge, is well managed, and internationally recognized³.

Methodology

MEC's Review was conducted to assess the progress of the Ministry in implementing its Anti-Corruption Plan (ACP). To analyze the indicators of the ACP, MEC initially conducted desk research, collected and reviewed relevant policies and procedures, and the strategy plan of MoHE and the ACP.

Next, the data and information about the implementation of activities and indicators outlined in Anti-Corruption Plan were collected via interviews with key informants, observations, cross-checking of information, documents, focus group discussion and analysis respectively.⁴

Regarding this report MEC conducted interviews with Administrative, Finance Deputy Minister on August 8, 2017, as well as interviews with other officials at different levels of MoHE's structure, including directors such as Finance and Admin, Policy and Plan, Human Resource Management, Procurement, Legal, and Internal Audit..

Findings

This Review assess whether MoHE has achieved the outlined activities and indicators in the Plan.

According to the MoHE's ACP the objectives are to: identify corruption; reduce the risks to corruption in Ministry process and in higher education service delivery. To accomplish these objectives, the Ministry established eight objectives, eight indicators and 25 activities. The objectives, activities and indicators are analyzed as follows:

³ <http://www.mohe.gov.af/policy1/en>

⁴ The period of review was from late August to early October 2017.

Objective 1 - Review of legislative documents

Objectives	Activities	Baseline	Indicators
Review of legislative documents	Acceleration of activities and measurements to follow the process of legislative documents via collaboration with relevant departments.	First quarter of the year	Review and amendments of the legislative documents contents, and developing them based on laws and the requirements of education system

Findings

Most of the legislative documents (regulations, procedures, and guidelines) of the MoHE were reviewed and sent to relevant entities and departments to further process. Those documents such as amendments to procedures and guidelines which are under the authority of the Ministry are processed and are in place.⁵ However, those amendments which require MoJ approval have not been processed in timely manner.⁶

A numbers of higher education regulations were adopted in 2017, such as the Higher Education Law, Night Shift Higher Education Regulation, and Education Document Assessment Regulation.⁷ But for three years the Regulation of the Establishment of New Higher Education Institutions has been in-process with the Administrative Office of the President. A number of procedures were also developed by MoHE such as Academic Credit System Procedure, and the procedures on Institutional Development. Many guidelines have been processed and are in place such as the Higher Education Institutions' Curriculum Development Guideline, the Selection Guideline of Candidates for Scholarships.⁸

The Ministry's ACP does not have correct baselines for its activities. A baseline is a known state by which something is measured or compared⁹ and an indicator is a specific, observable and measurable characteristic that can be used to show changes or progress a program is making toward achieving a specific outcome.¹⁰

⁵ Interview with an official of MoHE, September 16, 2017.

⁶ Ibid

⁷ Internal report of Directorate of Academic Affairs, MoHE, 2017.

⁸ Ibid.

⁹ <http://whatis.techtarget.com/definition/baseline>

¹⁰ <http://www.endvawnow.org/en/articles/336-indicators.html>

Conclusion

Most of the activities in Objective 1 have been implemented and to some extent the objective is achieved. However, based on the ACP, the follow-up for remaining activities would take place in the last quarter of 2017.

Objective 2 - Establishment of audit and effective control systems based on the needs of MoHE

Objectives	Activities	Baseline	Indicators
Establishment of audit and suitable control system with the needs of Ministry	Expansion and review of structure and job description of Internal Audit Department based on the structure of new framework of 1396 of the Ministry.	The first quarter of the year	Creation of eight new positions

Findings

With the purpose of establishing an audit and suitable control system in accordance with the needs of the Ministry, eight new positions have been approved for recruitment in order to strengthen and develop the Internal Audit Directorate.¹¹

Of the eight new positions, only three positions (Internal Audit of Private Higher Education Department, Inspector of Private Higher Education in center, and Inspector of Private Higher Education in provinces) have been recruited thus far.¹² The remaining five positions are in the process of recruitment, but due to the recent President Decree, all grades positions must be recruited by the Independent Administrative Reform and Civil Service Commission (IARCSC). Therefore the recruitment process has been prolonged.¹³

Job descriptions for five positions have been developed,¹⁴ the three remaining positions' job descriptions are under the process of completion.¹⁵ An Official from the MoHE complained of a lack of technical equipment, such as shortage of cameras, tape recorders, and transport facilities for the missions to collect evidence documents.¹⁶

¹¹ Interview with employee of MoHE, August 29, 2017.

¹² Audit Directorate internal report, MoHE, 16/01/1396. April 4, 2017.

¹³ Interview with an official of the MoHE, August 29, 2017.

¹⁴ Audit and HR Department records, MoHE, August 29, 2017.

¹⁵ Ibid.

¹⁶ Interview with an official of the MoHE, August 29, 2017.

Conclusion

The outlined objective in this section is partially achieved, while the recent legislative Presidential Order was a factor of the delay in the recruitment process of the rest of the positions.

Objective 3 - Establishment of effective monitoring and evaluation methods for the Ministry's performance for the implementation of development projects in the center and provinces

Objectives	Activities	Baseline	Indicators
Establishment of effective monitoring and evaluation methods on Ministry performance	<ul style="list-style-type: none"> Establishment of a board or committee on monitoring and evaluation on the Ministry's activities, and its second entities (directorates in provinces). Developing the Terms of Reference of monitoring and evaluation committee 	First quarter	The board would be composed of senior officials from Ministry's departments and representatives of the universities

Findings and Conclusion

The activities which must be implemented in order to establish the board or committee of monitoring and evaluation on the Ministry's performance as well as the terms of reference have not been completed.¹⁷ Overall, this objective has not been achieved.

Objective 4 – Ensuring transparency and legitimacy in recruitment process of cadre and other staff

Objectives	Activities	Baseline	Indicators
Ensuring transparency and legitimacy in cadre and other staff recruitment process	<ul style="list-style-type: none"> Review of the working committees. Solving of Capacity Building for Result (CBR) conflicts, recruitment of low grade competitive positions. Collection of data and identification of practical steps to prevent the establishment and development of faculties and departments which are against regulation and decisions of the High Commission of Private 	Continuing	Reviewing the committee in accordance to the guidance document and setup of job description

¹⁷ Interview with an employee of the MoHE, August 29, 2017.

	<p>Higher Education have been taken place.</p> <ul style="list-style-type: none"> • Preventing influences of irresponsible persons in relevant recruitment examination committees. • Making sure of transparency in implementation of Labor Law, and Civil Service Law and relevant recruitment regulation in recruitment process of cadres and other employees in center and provinces. • Ensuring the Provision of Justice regarding the awards and punishments are based on the rule and regulations. 		
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Findings

The HR Department established the committee for recruitment based on the Civil Service Law.¹⁸ All the recruitments process took place under the monitoring of assigned committee which includes members from the IARCSC, HR, Gender and other relevant directorates.¹⁹

According to an official from MoHE, all the recruitments, except CBR, are being conducted by the IARCSC.

MEC found that six key Directorate positions in MoHE have been led by acting directors²⁰ and this situation could be an obstacle for directors to perform their activities and responsibilities properly.

Five key director positions have been recruited directly by the Minister’s suggestion and approval of the President,²¹ but this action is against the appointments mechanism mentioned in Civil Service Law:²² The recruitment of the key five director positions had not been gone through a competitive process.

¹⁸ Interview with an official of MoHE, September 10, 2017.
¹⁹ Internal report of MoHE on fighting against corruption, 1395-1396. 2016-2017.
²⁰ Internal document, HR Department, MoHE, September 11, 2017.
²¹ Ibid.
²² Civil Service Law, Article 23

According to an interviewee (an official from the MoHE), there are not adequate funds to conduct the data collection process in order to identify the faculties and departments which are not complying with regulation and decisions of the High Commission of Private Higher Education. Therefore, it seems that this activity has not been performed.²³

For preventing influences of irresponsible persons in the recruitment examination committee, the entire recruitment process for positions above Grade 6 has been taken place based on the Civil Servant Commission Law under the delegation from relevant department, HR, Admin and Finance to make sure there is transparency in the recruitment process.²⁴

Regarding the Provision of Justice on the awards and punishments the Internal Audit Department has taken two cases as a result of which the MoHE took relevant steps. Once the MoHE dismissed the Dean of the Economy Faculty of Kabul University, who illegally sent two students abroad and provided scholarship was later on proved that the Dean of economy faculty was guilty.²⁵ The second was the case of stealing of ultrasound machine from the medical faculty: the case was prosecuted and the ultrasound machine was returned.

Conclusion

The one third of the key positions are occupied by acting directors and some other key positions have been recruited at the suggestion of Minister. Based on these findings, the objective should be considered not implemented.

²³ Interview with an official of MoHE, September 10, 2017.

²⁴ Interview with an official of MoHE, September 10, 2017.

²⁵ Interview with an official of MoHE, August 29, 2017.

Objective 5 - Strengthening the quality of the private higher education institutions to provide education services in accordance with the law and regulations of the Ministry

Objectives	Activities	Baseline	Indicators
<p>Strengthening the quality of the private higher education institutions to provide education services in accordance with the law, and regulations of the Ministry</p>	<ul style="list-style-type: none"> • Monitoring and making sure to provide technical and HR opportunities in private higher education institutions in the center and provinces. • Completion of third-round evaluation of the private higher education institutions to implement higher education strategy with the purpose of providing good quality services and to take steps based on the market requirements. • Launching activities in creating of suitable mechanism for the safety of the admission book and the results book for each semester’s and the students graduation books. • Continuing monitoring and controlling on the academic activities of universities and private education institutes. • Taking steps to prevent the establishment of those faculties and departments which established oversight on the process of depositing revenue of private higher education institutions. 	<p>Continuing</p>	<p>Finalizing of private higher education institutions establishment regulation and their activities procedure</p>

Findings

According to the Private Higher Education Director, in order to strengthen the quality of higher education, the MoHE conducts oversight and tries to secure provision of technical and HR opportunities in private higher education institutions in the center and provinces. However, due to lack of budget, this activity did not take place and as well the third-round monitoring and evaluation process of private higher education institution has not been started. Nevertheless, officials are trying to find the budget to start this process as soon as possible.²⁶

Continuing monitoring and controlling of academic activities of universities and private education institutes did not take place in all provinces up to October 2017 due to lack of

²⁶ Interview with an official of the MoHE, September 7, 2017.

budget.²⁷ The Directorate of Private Higher Education Institutions (DoPHEI) reviewed the Private Higher Education Institution Establishment Regulation and their activities procedure with the purpose to ensure transparency and now the mentioned regulation is in waiting for process in the Administrative Office of the President for three years²⁸.

By execution of this Regulation the corruption factors will be reduced. Based on the proposed Regulation there would be a database for new inclusions of students, the yearly based results of students, and the students' graduations book.²⁹ As of October 7, 2017, this regulation had not been approved. However, three new private higher education institutions (Moraa, Jahan Noor University, and Nokhbagan University) have been established by the President special orders to them in 2015 and 2016.³⁰ The mentioned three orders of the President are against the Presidential Order No. 769, 1393/11/28. Feb 17, 2015. According to the one of the mentioned orders, one of the established PHEIs belongs to one of the representatives of the leadership of NUG.³¹ But, 57 private higher education institutions in Kabul and the provinces have been suspended in 2014.³²

Currently the Directorate of Private Higher Education Institutions has 26 employees, while it has more students than the government higher education institutions/universities; therefore, the Director of DoPHEI proposed the expansion of Directorate to private deputy ministry.³³

MEC found that two vulnerable points to corruption exist in private higher education institutions. The students should write their thesis/monograph themselves, while some of them preparing their thesis by others.³⁴ In this connection, there is no monitoring and evaluation mechanism in place to make sure that the students are writing their thesis themselves.

The second issue is that some of those students who could not participate in Kankor entry exam of private higher education institutes, the same students later on still they got admissions. When they are graduated they refer to the Higher Education Directorate for attestation, the Directorate does not attest their graduation certificates, because their names do not exist in the entry examination book.³⁵

²⁷ Ibid.

²⁸ Interview with the representative of MoHE, 07/09/2017.

²⁹ Internal report of MoHE on fighting against corruption, 1395-1396.2016-2017.

³⁰ Moraa, order number.2012. date: April 11, 2016. Jahan Noor, order number.3379. date: December 31, 2016. Nokhbagan, order number. 3600. date: Jan 16, 2017.

³¹ Jahan Noor, order number.3379. date: December 31, 2016.

³² Internal document of DoPHEI, list of suspended institutions based on Presidential Order No. 769, 1393/11/28.

³³ Interview with an official, MoHE, October 3, 2017.

³⁴ Interview with an official, MoHE, October 3, 2017.

³⁵ Interview with two students who studied the faculty x, but since their name were not in institution entry examination, therefore, made trouble for hers degree attestation, October 2, 2017.

So this process creates difficulties for students and as well as for the Directorate of Private Higher Education, and usually such cases are being solved by referring to the MoHE's High Council.³⁶ According to the interview with an official from the MoHE this process is vulnerable to corruption, since someone did not participate in entry exam but somehow they could get the attestation on their graduation certificate from DoPHEI and MoHE.

The DoPHEI faces the shortage of space and structure, therefore the DoPHEI cannot ask for students' monographs from private higher education institutions. Instead they request the official thesis letter number, topic and its certification by the relevant higher education institutions.³⁷

Oversight of the process of depositing revenue of private higher education institutions which outlined to bring transparency has not taken place, and based on the MoHE officials the MoF should oversight the process of revenue collection from Private Higher Education Institutions.³⁸ According to the interviewee with an official from MoHE , in collaboration with MoHE, the MoF should have the oversight on the private institutions revenue collection process to bring transparency in private institution revenue collection.³⁹

Conclusion

The MoHE faces the lack of budget for its operational activities of monitoring and evaluations. The lack of monitoring and evaluation mechanism exists in MoHE to monitor and evaluate the process of student's thesis writing and making sure that on-site students are regularly participating in classes. Therefore and based on the analysis of objective 5, it can be concluded the objective was not implemented.

³⁶ Interview with an official of the MoHE, October 3, 2017.

³⁷ Interview with an official of the MoHE, October 3, 2017.

³⁸ Interview with an official of the MoHE, September 17, 2017.

³⁹ Interview with an official of the MoHE, 25/09/2017.

Objective 6 - Strengthening the national Kankor Examination process

Objectives	Activities	Baseline	Indicators
Strengthening the Kankor Examination national process	<ul style="list-style-type: none"> • Expansion of the structure of Kankor Examination general Directorate and recruitment of suitable and experts' employee. • Outfit/equipping of the committees with modern equipment (bio-metric system). • Finalizing the regulation of Kankor Examination wage. • Taking steps to gain the support of the NUG Cabinet to prevent influence of powerful bodies in the Kankor process. 	First quarter	Creating new positions

Findings

The Kankor Directorate needs to recruit nine new positions based on its new structure, but due to President's last order (number: 1160, date: 30/3/1396 June 20, 2017) all the government staff recruitments is being processed through the Independent Administrative Reform and Civil Service Commission.⁴⁰

The recruitment process of all government ministry staff through Independent Administrative Reform and Civil Service Commission is a very time consuming process. But the Kankor General Directorate is in need of on time recruitment, so for the acceleration of the process the MoHE leadership has decided to propose the issue to the minister council and cabinet to let the MoHE to recruit the nine new positions through the HR Department of MoHE.⁴¹

The Kankor Directorate equipped the process of Kankor with modern equipment system. As before the Kankor forms were distributed to the students, after the filling of the forms with identification card (Tazkira), they were submitting their forms and copy of their Tazkira to the Kankor Directorate, then they were receiving the Kankor cards for participation in Kankor exam. Now the students are first registered through biometric system then the Kankor cards are provided for students by the Kankor Directorate, then the students can participate in exam.⁴²

The Kankor Directorate with purpose of bringing transparency into Kankor process has implemented some initiatives:

- Establishment of a modern printing office equipped with temporary information technology for printing the Kankor examination questions and activation of bio-metric system of applicants.

⁴⁰ Presidential Order No. 1289, 18/04/1396. July 9, 2017.

⁴¹ Interview with an official of the MoHE, September 24, 2017.

⁴² Ibid.

- Enriching the exams bank of questions
- Changing the time and method of taking Kankor examination providing for each applicant one form of question notebook. Ensuring that the Kankor examination is based on a provinces' seasonal/climate situation.⁴³ Now to some extent the mentioned changes have affected positively the Kankor process.

According to an official from MoHE the regulation of Kankor examination wage from the MoJ was sent to the Cabinet for approval on 26/06/1396. Sept 17, 2017. The regulation, as of September 24, 2017, has not been approved yet.⁴⁴ During the Kankor examination the MoHE delegations by the support of the NUG Cabinet went to several provinces to prevent any sort of influences in the Kankor examination process.⁴⁵

Conclusion

The Kankor Directorate is in need of recruitment of new positions in order to strengthen the exam process. The Kankor process has been improved due to some technical initiatives initiated by Kankor Directorate. Based on this, the objective was partially implemented.

Objective 7 - Simplifying the procurement process and reviewing of the effectiveness of contracts of the development and non-development projects

Objectives	Activities	Baseline	Indicators
Simplifying the procurement process and reviewing of the effectiveness of contracts of the development and non-development projects	<ul style="list-style-type: none"> • Providing new working guidelines according to the Procurement Law and regulations to have active participation of bidders in the procurement process. • Preventing the corruption factors in bidding and bid opening process. • Continuing oversight on development project contracts, especially monitoring and inspection of these projects at center and provincial levels. • Establishment of coordination among the relevant departments for lawful implementation of the projects and distribution of the received reports regarding the on-time progress of the projects. 	Whole year	Reviewing of mechanism in the procurement process and the legitimacy of core and development budget

⁴³ Internal report of MoHE on fighting against corruption, 2016-2017.

⁴⁴ Interview with an official of the MoHE, September 24, 2017.

⁴⁵ Ibid.

	<ul style="list-style-type: none"> Continuing monitoring and evaluation on the activities of the Directorate of Higher Education Development Program, HEDP and the universities supporting program (University Support and Workforce Development Program-USWDP) 		
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Findings

A step was taken towards making of biddings, opening of biddings and details of the contracts, and the procurement process through a transparent mechanism has been processed.⁴⁶ No new working guideline has been improved.⁴⁷

To prevent the corruption factors in bidding and the bid opening process under the ministry's capacity and threshold limits, the procurement process have taken place under the joint delegations from the Plan and Policy, Admin and Finance, Procurement Directorates and relevant departments' delegation.⁴⁸

Before the dissolution of Procurement Department, it had the continuing oversight on development project contracts, especially monitoring and inspection of these projects at the center and provincial levels, but since early 2017 no monitoring or inspections have taken place.⁴⁹

According to an Official of MoHE, they conduct video conference every two weeks with all the relevant provincial focal points to make sure the legitimate implementation and continuing monitoring of the projects and coordinates with relevant departments accordingly.⁵⁰

The new Procurement Directorate's structure, the entire Procurement Directorate employees' positions were dissolved in early 2017 and work of the staff was suspended. When an employee goes under suspension, he/she cannot sign any official documents, but even after the Procurement Department's staff were suspended, the employees continued doing their jobs and signing official documents.⁵¹ The suspended employees afterwards sent a petition to the Administrative Office of the President requesting to determine their job status, but as of September 18, 2017, they had received no clear response from the Administrative Office of the

⁴⁶ Procurement Directorate, MoHE internal report, 1396.

⁴⁷ Focus Group discussion with employees of MoHE, 18/09/2017

⁴⁸ Ibid.

⁴⁹ Ibid.

⁵⁰ Interview with an official of MoHE, MoHE, September 25, 2017.

⁵¹ Focus Group discussion with employees of MoHE, 18/09/2017.

President.⁵² Therefore, the employees found themselves in a questionable condition with their jobs being suspended.⁵³ Based on the officials of MoHE, the review team found that no continuing monitoring and evaluation on the activities of the Directorate of Higher Education Development Program (HEDP) were conducted by MoHE, but MoHE officials agree with the work HEDP has done so far. The Universities Supporting Program (USWDP), supported by the USAID, does not report and coordinate its work with the MoHE.⁵⁴

Conclusion

Currently the Procurement Directorate is dissolved; no monitoring and inspection of development and non-development projects have taken place. No monitoring and evaluation on the development projects (HEDP and USWDP) has taken place by the MoHE to date September 25, 2017. This objective is partially implemented.

Objective 8 - Transparency in Finance and Administrative affairs (preventing the corruption factors in relevant departments)

Objectives	Activities	Baseline	Indicators
Enhancing transparency in Finance and Administrative affairs	Establishment of a mechanism for food allowance money to be deposited directly into students' bank accounts	First quarter of the year	Establishment of bank account for those students which deserved for food allowance money

Findings

To achieve the objective of enhancing transparency in finance and admin affairs of MoHE, the Finance and Administration Directorate holds meeting on the progress and implementation of activities of all staff in a transparent way and emphasizes on legitimate measures against factors which lead to corruption.⁵⁵

The Finance and Administration Directorate executes the new procedure to deposit the food allowance amounts of students to their bank accounts which before were being provided in cash to the students that was most likely led to corruption.⁵⁶

⁵² Ibid

⁵³ Ibid.

⁵⁴ Interview with an official of MoHE, September 25, 2017.

⁵⁵ Ibid.

⁵⁶ Internal report, Admin and Finance Directorate, MoHE, 1396.

According to an official from MoHE, the AFN 1,830 per-student monthly food allowance is very low. This year, the MoHE proposed to increase the allowance amount to AFN 2,500 but the proposal is still in the approval process.⁵⁷ Also, based on the interviews with students from Kabul and Mazar, as of October 11, 2017, their food allowance had not been transferred to their bank accounts.⁵⁸

The challenges also stated by Admin and Finance Director are lack of budget to meet the requirements, and not enough development in government universities. But some universities exist in problem areas, while they are not functioning actively, but due to political reasons still kept open. There are total of 38 government universities that exist across the country.⁵⁹

Conclusion

This objective is partially achieved, most of the students now have their food allowance bank account, but due to administrative issues in some banks the food allowance amount has not been deposited in most of the students' accounts. This is especially true in Kabul which has high numbers of students.

⁵⁷ Interview with an official from MoHE, September 25, 2017.

⁵⁸ Interview with two students from Kabul and Mazar-i-Sharif, October 11, 2017.

⁵⁹ Interview with an official of the MoHE, September 25, 2017.