WORLD BANK FUNDED PROJECT STARS: A CRITIQUE

The project STARS or "Strengthening Teaching-Learning and Results for States" is a quarter trillion rupees education project in six states in India, part-funded by a loan from the World Bank. A portion of the funds are proposed to be spent in partnership with non-state actors including handing over operation and management of government schools to non-state actors, outsourcing services, seeking support of management firms/NGOs and direct benefit transfers as school vouchers. The overarching framing of the loan needs to be revised in context of the COVID-19 pandemic, pilot partnerships with the private sector should be removed and replaced with measures to strengthen the public sector*, and a stronger focus on equity built in.*

Project STARS or "Strengthening Teaching-Learning and Results for States"[1] seeks to reform the educational governance system in six states in India — Himachal Pradesh, Kerala, Rajasthan (high performance-*Lighthouse States*), Madhya Pradesh, Maharashtra and Odisha (whose performance needs strengthening-*Learning States*) — and support some national interventions.

Its components include: strengthening early years education; improving learning assessment systems, particularly India's participation in PISA 2021[2], competency-based assessments, and Continuous and Comprehensive Evaluation(CCE); strengthening classroom instruction and remediation; improving teacher development and school leadership; facilitating school to work/ higher education transition; and, strengthening the district as the unit of planning. As such, it seeks to further the stated objectives of the *Samagra Shiksha Abhiyan* and is in line with the existing government objectives. There are many components in the same which support actions that are beneficial to India.

The project's total worth is 3.346 billion USD or just over a quarter of a trillion INR, of which 500 million USD is financed by a loan from the World Bank. 85% of the project amount would be funded by the Government of India and the respective State Governments. Amongst other areas, the project promotes partnerships with the private sector as a tool of system reform, including the expansion of government funding for private provision of schooling. A National Framework for Partnership with Non-State Actors would be developed to provide guidance for identifying schools to be brought under PPPs and processes of identifying non-state partners. This loan needs to be seen as part of a growing World Bank agenda of promoting privatisation of education globally. Oxfam's analysis of the Bank's primary and secondary education portfolio[3] found over a fifth of the projects included an element of support to governments for private education provision, and that the Bank's policy advice has promoted this approach, despite a mixed evidence base and concerns about the potential of this approach to deepen educational inequalities.

The STARS project risks significant diversion of Indian taxpayers' funds to an array of private actors, introduces the privatisation of education in six of India's states, and changes the framing for the private sector's engagement with education in India as a whole. Accordingly, understanding the provisions of the loan is not just of academic interest, but would be critical for engaging with the loan process and the project as a whole, which is likely to have far-reaching impacts on the Indian education system. We acknowledge the improvement made in the framing of the loan through removing mention of a 20% earmark for partnerships in the Bank's Programme Information Documents (PID)[4]. However, we feel that this change does not address the substantial concerns on the content that remain. The specific concerns with the project and the loan are as follows:-

Grounds of the Project

1. **The Changed Scenario:** The COVID-19 pandemic has fundamentally changed the education sector and created new challenges that would not have been predicted when the project was envisaged. Both Lighthouse and Learning states have been significantly impacted, albeit in differential ways and different policies have been adopted by all these states to respond to this global emergency. A clear set of actions to address the implications of the COVID-19 scenario need to be explicitly built into the intervention. This must include interventions to support enrolment of children of migrants in nearby schools, steps to prevent dropout and entry into child labour of children, particularly girls, provision of print materials and institutionalization of accelerated learning mechanisms to compensate for time lost.

    Care would need to be taken to not convert India's digital divide into an instrument of digital exclusion. Given that 85% of India's rural households lack access to internet[5] and 45% of rural India lacks TV penetration (Broadcast India, 2018 Survey)[6], it would be critical to not rely on online and distance education for lesson transaction, but continue to prioritize offline modes (such as print materials) without compromising on physical distancing requirements. At the same time, only 79 million[7] DTH TV subscribers exist among India's 250 million households (2011 Census[8]) making reliance on DTH TV as the medium of lesson transaction exclusionary.

2. **The case for the project is based on the need to address poverty and inequality in India but it gives no details:** No clear pro-equity measures have been spelled out to address intergenerational, social and economic barriers to the education of Dalits, Adivasis, religious minorities; the specific challenges faced by girls in the Indian context. It does not address discrimination or correct educational inequalities between the rich and the poor in these states. The project needs to prioritize universal secondary completion; address dropout and child labour (particularly of girls); staff and adequately resource schools (to the levels of *Kendriya Vidyalaya* and *Navodaya Vidyalaya* schools given their recognised superior performance) and teacher training institutes; mainstream mother tongue based multi-lingual education; strengthen social accountability and grievance redress mechanisms thus strengthening citizen voice; and address the needs of migrant families. Schools must be free (including free from any hidden charges and not just tuition fees).

    None of these actions have been included in the document. Indeed, the PID itself flags the potential of exclusion due to poverty, migration and inadequate provision for persons with disability and poor capacity of School Management Committee (SMC) members. None of the mitigation measures proposed address these issues beyond commitment towards greater investment in aspirational districts. At the same time, the project design framework disclosed does not include essential safeguards for engagement with the private sector like keeping provision not for-profit; for profit institutions are likely to neglect the groups mentioned above. The latter is particularly critical in view of the recent decision by the IFC to freeze investment in for-profit education.

3. **Plans for engagement with non-state providers based on unfounded assumptions and not grounded in evidence:** The project appears to be grounded in the assumption that declining enrolment in government schools is principally due to migration to schools run by non-state providers and that government aided schools' decline is the result of regulatory issues. Particular reference is made to the English medium Private-Aided and Low-Fee Private Schools implying that their growth is in some way affecting government school attendance. No reference is made to the fact that many of the so-called Low-Fee Private Schools violate the domestic legal framework laid down by the RTE Act[9] or that learning in the early grade best happens in the mother tongue[10].

The document has also failed to reiterate that the government sector would remain the majority provider in line with India's international human rights obligations. It must lay down specific measures that the government would take to ensure that the private sector acts in line with its human rights obligations, particularly in line with the provisions of the "Abidjan Principles on the human rights obligations of States to provide public education and to regulate private involvement in education"[11]. Furthermore, the project's promotion of a PPP approach overlooks the growing body of academic evidence which shows that PPPs and private education do not necessarily deliver better education outcomes and at the same time risk increasing inequalities in education[12].

4. **The absence of recognition of political and social inequalities within the school education sector in India:** This is a critical element that is missing. While the document is correct in flagging that the government school networks like *Kendriya Vidyalaya* and *Navodaya Vidyalaya* outperform other schools, it partly misdiagnoses the reasons for their success. These systems have been built to play specific function and enjoy significantly higher funding levels compared to mainstream government schools. They also receive more oversight and have in-built political incentives to function better because they cater to children of government bureaucrats who are in turn incentivised to make these systems work. In 2014–15[13], the average (median) expenditure in government schools (at INR 16,151) was 58% of that in *Kendriya Vidyalayas* (INR 27,723). The intake of these systems is highly selective based on the class of those eligible for admission (in *Kendriya Vidyalayas*) and ability (in *Navodaya Vidyalayas*). Similar levels of funding and attention to all government schools could be expected to have similar high standards of quality as seen in *Kendriya Vidyalayas* and *Navodaya Vidyalayas.*

Paradoxically, despite these advantages the document cites a mere 1% above average pass percentage as an example of superior performance of these systems. Fundamentally, while a range of practices of these schools have been flagged (including PPPs with ICT companies), the most basic difference between *Kendriya Vidyalayas* and other government schools is that they are funded unequally and there are differences in the demographic characteristics of the student cohort. A strong socio-political analysis of the education sector would be critical to ensure that the project yields results.

Involvement of the Private Sector

1. **Poor track record of similar PPP initiatives:** The proposed framework supports the handing over of government schools to non-state providers as well as the official introduction of the voucher system in India. The model proposed includes private providers taking over school operations and their management (while retaining government teachers), outsourcing specific services (such as teacher training and school leadership), seeking support of management firms/NGOs (management, monitoring and school leadership), and direct benefit transfers for school choice (i.e., school vouchers). In doing so it lumps very distinct entities into a single category and without considering the specific objectives and regulatory needs of each sub-sector that past research has identified as being critical[14].

Similar large scale experiments in other countries (many of them flagged in a previous version of the document as being worthy of emulation) are the Partnership School for Liberia (PSL) pilot and the Public Private Partnership administered by the Punjab Education Foundation in Pakistan. The Oxfam supported research into the effectiveness of the latter[15], which was intended to enhance access to education, found that enrolled students were largely pulled from existing schools. Only 1.3% of enrolled students had actually been out of school prior to the commencement of the programme; unsurprising given that the non-fee costs incurred for one child represented over half of the income of a parent living below the poverty line.

The Liberia School Pilot[16] was not only marred by an international scandal of sexual abuse of minors by one of the operators, but in the end was found to have failed to significantly

improve learning outcomes, increased dropouts and failed to reduce sexual abuse of students. It was also problematic on technical grounds[17] with private providers in the pilot exploiting contract loopholes and failing to act in the public interest (Romero et al. 2020).

In India, the Rajasthan Education Initiative's review[18] admits that it failed against many of the stated objectives, aiming for scale without producing innovative and successful models, approaches and practices. In Mumbai, the 'School Excellence Programme' implemented by the Brihanmumbai Municipal Corporation was shut down[19] as learning outcomes failed to improve, indicating the volatility of such approaches and the need for evaluation of such partnerships which involve spending public money on private providers. Yet, the government wants to scale similar interventions to new states.

There are huge problems[20] with reliance on vouchers which have been known to compound educational inequalities and create stratified education systems. Chile forms the classic cautionary tale of the significant negative equity impact of vouchers that have resulted in severe issues of segregation[21]. The rigorous review of non-state provision undertaken by Monazza Aslam [22] shows very mixed evidence of the impact of vouchers.

The document should, in contrast, prioritize developing State capacity and innovation within the public sector in order for change to be sustainable. This requires (a) less reliance on non-state actors, (b) freedom and untied funds for SCERTs, DIETs, etc., (c) sufficient human resources. Outsourcing and results linked to thin numbers (like a governance index) provide perverse incentives and inhibit tackling problems that are seen as important by people inside the system.

2. **Fails to address the learnings regarding the design of PPP projects based on past failures:** The experience of the Random Control Trial of the Liberia project highlights that the choice of non-state actors in such interventions are of importance with many non-state providers failing to deliver good quality education. Requirements that the non-state actors (both providers and management) remain not for profit have not been specified, nor has an explicit mention been made regarding transparency in the process of contracting or of the oversight mechanism. Past literature on PPPs[23] highlights issues of compliance in education systems with low capacities to monitor and regulate arrangements. None of these critical design elements have been acknowledged or dealt with in the document, thus raising concerns about the impact of these partnerships.

3. **Ignores the poor track record on equity of private schools in India:** The recent World Bank's Living Standards Measurement Study in Uttar Pradesh shows that the gender gap in enrolment in private schools is increasing, even when it is closing in government schools. The most comprehensive cross-country review of the literature on privatisation in education finds that, 'girls are less likely than boys to be enrolled in private schools'.

Private schools, by definition, enrol children from families that can afford to pay. Sending a child to a private school in India is approximately nine times as much as the cost of a government school, including all indirect costs associated with schooling, such as buying books, and transport. This control for household characteristics and move to value-added models suggests that private schools' "better" performance often draws from sorting effects and not higher quality[24]. This has also been acknowledged in Bank's own Word Development Report (WDR 2018)[25].

Furthermore, international evidence suggests that engagement of independent non-state providers is limited in hard to reach and remote areas. There are some studies also that highlight that private providers are disproportionately likely to come up in villages with sufficient populations of younger, unmarried women, who had a secondary school education, and then become teachers in low fees schools. Such an educated female labour force was said to be available in the villages where the government had invested in girl's secondary education in the last 20 years (Chudgar 2012).[26] Reliance on the private sector for delivering

education fundamentally alters the character of an education system — from a universal good to which everyone has free access by right to a private good which parents must buy.

4. **Fails to reiterate school education as a not for profit domain and provides for transfer of public funds for potential private gain:** The explicit absence of mention of retaining education as not for profit or excluding commercial entities, in line with India's domestic legal framework and international human rights frameworks, constitutes an extremely dangerous steer to the states in terms of how they should be spending their resources. This is particularly the case given that alternatives to the involvement of external stakeholders, staffing and adequately resourcing schools, teacher training institutes and strengthening social accountability and grievance redress mechanisms, thus strengthening citizen voice, have not been included.

Implications on Education Governance

1. **Selection of States:** While the project divides the states into high and low achievers, they largely constitute middle of the road performing states. Irrespective of whether one examines the extent of RTE compliance of schools in a given state or their Performance Grading Index (PGI) performance, the states selected are not the ones most in need of financial and technical support. The placement as lighthouse and learning states also appears somewhat idiosyncratic if one compares the PGI score against overall RTE compliance. More critically however, given the framing of the proposal in equity, it would be critical to not designate states as 'Lighthouse states' without a serious look at equity issues. Thus, there are deep gender-based inequities in Rajasthan which would be difficult to ignore while labelling it as being a 'lighthouse' for other states. Funds may have been better spent supporting the most educationally lagging states needing additional financial investment.

	RTE Compliance Rank(of 36)	PGI Category (of 5)
Lighthouse States		
HP	3	3
Kerala	8	1
Rajasthan	14	2
Learning States		
MP	12	2
Maharashtra	2	4
Odisha	20	3

2. **Strange framework of what constitutes education governance reform**: It starts with the laudable recognition that availability of good education infrastructure, teaching and learning materials and human resources, and mechanisms for community interventions aimed at decentralised reform are critical for strengthening schools. Yet, no concrete new measures have been incorporated to address these critical drivers of change. Instead, governance and decentralised management is viewed as 'help reduce government tasks', 'expand private initiatives' and form 'new partnerships for enhanced efficiency'. It is wholly unclear how these would lead to education being 'more relevant to local needs' or 'democratically promote people's participation by empowering local authorities' — both stated goals of the project. In addition, it fails to recognise the need to build State capacity by coherent empowerment of the public sector and its entities while suggesting measures that undermine the aim of a self-reliant, empowered, entrepreneurial and innovative public sector. This increases reliance on

external consultancies and non-state entities instead of fostering problem solving and implementation capabilities within the public sector.

3. UK's **Ofsted model for Indian CRCs?** The proposal suggests that the UK's Office for Standards in Education, Children's Services and Skills (Ofsted) will serve as an example for the kinds of capabilities and roles to be developed at the Cluster Resource Centre (CRC) level. Concerns have been consistently voiced in the UK about the accuracy and consistency of grading by Ofsted inspectors[27], especially for schools with the poorest students. Schools with financially better off students tended to receive better judgements[28]; in contrast blunt judgements against schools in poor areas have had stigmatising effects making it more difficult for them to recruit good teachers. Ofsted judgements have been reported as being a major cause of stress among teachers[29] and the process has been criticised as disempowering head teachers and teachers. Given the current low capacity and training of current CRCs, a greater public discussion is needed in India before committing to going the Ofsted path.

4. **Inadequate attention to nuances of operating in Schedule V areas:** The document flags that five of six states have designated Schedule V areas. It is not clear how the project's governance would take into consideration and protect the existing legal rights of the indigenous populations in these locations. No specific provisions for engagement with the Gram Sabha or differentiation in the processes of planning in Schedule areas which would have been expected according to the provisions of the **Panchayat (Extension to Schedule Areas) Act, 1996**.

Quality of Education

1. **Excessive focus on standardised assessments.** The value for money of the funds to be spent on strengthening the national standardised testing/learning assessment system in India is questionable, relative to supporting formative assessments by teachers themselves. The project will fund the administration of PISA in India and media work around the same, developing new tests and testing standards, development of a national state Centres for Assessment, introducing technology-enabled assessment platforms and dovetailing Board assessments.

There is a clear misalignment of the objectives since none of the project states would be participating in PISA. Considerable emphasis is being placed on using the National Achievement Survey (NAS) data for planning, however, serious concerns persist about its reliability and validity. After over a decade of ASER assessments and several rounds of NAS administration, there is no lack of awareness among all concerned stakeholders that learning needs to improve. Instead of reconfirming this fact, emphasis should be put on changing it i.e. improving the quality of education. Efforts should instead be invested in addressing concomitant factors responsible for poor learning such as reliance on non-mother tongue based instruction, addressing the discriminatory hidden classroom curriculum (including caste-based discrimination and teachers holding low expectations from children from marginalized communities), absence of home support from neo-literate parents, classroom hunger and other factors.

2. **Non-strategic use of ICT:** The grant seeks to strengthen ICT-enabled approaches of teacher development, technology-enabled student assessment platforms and use of digital platforms for Early Childhood Education (ECE) strengthening through creation of ECE content, parent orientation and peer-to-peer learning, among others. The use of technology offers scope for strengthening system capacity, if used correctly. However, according to UDISE data, in 2016-17, 35.6% of India's elementary schools lacked an electricity connection. No information about computer access in elementary schools is available; only 36.8% secondary schools had a functional computer. Unless the project aims to massively invest in basic government school infrastructure (which would be welcome), any use of ICT in classrooms remains unrealistic, insignificant and hence ineffective at a system-level[30]. In this regard it

may be worthwhile to look at the track record of the recently concluded World Bank supported project on teacher effectiveness in Bihar[31] where a number of the project's ICT related activities like its online Teacher Management Information and Enterprise Resource Planning systems have been delayed or been unsuccessful.

3. **Premature introduction of vocational education:** The introduction of vocational education and career counselling at secondary education risks streaming children from poor families (and marginalised communities) into vocational education instead of other more academic pursuits. This would also be expected to reiterate existing gender and social identity based stereotypes. Indeed, the updated PID flags that vocational education would be particularly critical for children from marginalised communities. This runs counter to the existing literature that warns against the negative equity impact of early streaming.

Process of Formulation of the Proposal and the Post-COVID Context

1. **Inadequate consultation:** According to the environment assessment document, there were site visits to 25 schools and two teacher training institutes in the states and a consultation workshop in Delhi in September 2019. The Final Environment and Social Systems Assessment of the project[32] suggests that no state or district consultations were held in Madhya Pradesh and no major national education civil society networks have been consulted. It is not clear whether any independent civil society or teacher associations were consulted, despite the Bank's stated commitment to citizen engagement in its projects.

2. **Need for more consultation in the changed post-COVID context:** The pandemic calls for a fresh round of consultation with a more representative set of stakeholders which would reflect the changed context post-COVID. This will make sure that the project is ready for purpose in light of changed realities.

Recommendations:

Indian government and the World Bank management should postpone the finalisation of the loan in order to:

i.   Hold wider consultation around the proposed loan, particularly in the project states, and involve communities likely to be directly affected, independent civil society organisations and teachers.

ii. Revise the project's framing in the context of recovery from the COVID-19 pandemic with a comprehensive focus on strengthening the public education system.

iii. Remove the proposal for piloting engagement of non-state actors in education including handing over of government schools, outsourcing of services, engagement of management firms and school vouchers since many of these measures have been attempted in the past and failed. Learn from past practice and strengthen state regulatory capacity to enforce compliance with existing legal and contractual provisions by the private sector and ensure transparency in these processes.

iv. Prioritize developing State capacity and innovation within the public sector in order to be sustainable. This requires (a) less reliance on non-state actors, (b) freedom and untied funds for SCERTS, DIETs, etc., (c) sufficient human resources. Outsourcing and results linked to thin numbers (like a governance index or attainment of narrowly defined learning outcomes) provide perverse incentives and inhibit tackling problems.

v.   Include a strong focus on equity and address specific socio-economic and cultural needs of India's Dalit, Adivasi and Muslim communities to redress age old inequality and discrimination. The project needs to enhance school places for the poorest, address dropout and child labour (particularly of girls), staff and adequately resource schools (to the levels of KV and NV schools given their recognised superior performance) and teacher training institutes, mainstream mother tongue based multi-lingual education, strengthen social accountability and grievance redress mechanisms thus strengthening citizen voice and address the needs of migrant families. Schools must be free (including free from any hidden charges and not just tuition fees). The funds could be better spent to also shore up the gap in funding for India's educationally lagging and financially distressed states.

vi. Prioritize investment in enhancement of teacher capacity by strengthening DIETs and other academic bodies at the district and block level instead of enhancing the testing infrastructure in India. Teachers' capacity to carry out and use data from formative assessment (Continuous and Comprehensive Evaluation) and other classroom based assessment activities that directly benefit students should be strengthened and not to fund India's preparation for PISA.

vii. Strengthen social accountability in education through building clear mechanisms for strengthening the voice of parents, statutory structures for community participation (SMCs) and local self-governance structures (particularly in Scheduled Areas).

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Notes

[1]All base documents from the World Bank about the loan can be accessed from the Project's dedicated page https://projects.worldbank.org/en/projects-operations/project-detail/P166868

[2]A worldwide learning assessment study undertaken by the Organisation for Economic Co-operation and Development (OECD) intended to evaluate educational systems by measuring 15-year-old school pupils' scholastic performance on mathematics, science, and reading. Some of the criticism of PISA includes that it has fuelled the trend towards standardised testing, narrowed the focus on education and vested too much power in a globally unrepresentative OECD.

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[6]Broadcast India Universe Update (July 2018) Accessed from https://www.barcindia.co.in/resources/pdf/BARC%20India%20Universe%20Update%20-%202018.pdf on 4/6/2020

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[16] https://www.cgdev.org/sites/default/files/beyond-short-term-learning-gains-impact-outsourcing-schools-liberia-after-three-years.pdf

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