STRENGTHENING TEACHING-LEARNING AND RESULTS FOR STATES (STARS)

Recommendations for improved implementation

Contents

Executive Summary

On October 14th, 2020, Project STARS or "Strengthening Teaching-Learning and Results for States", was approved by the Union Cabinet, chaired by Prime Minister Narendra Modi, and declared effective in all the participating states on 23rd February, 2021.

Project STARS 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, 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.

The project, which is part funded by the World Bank, is also set to be implemented as a new Centrally Sponsored Scheme under the Ministry of Education (MOE). Its project's total worth is Rs. 5718 crore, with 3700 crore being funded by the World Bank[1]. Due to COVID constraints, the project hasn't been completely rolled out on the ground. In the Implementation Status and Results Report by the World Bank dated June 28th, 2021, delays have been listed for most intermediate results indicators, owing to the COVID-19 pandemic. According to a response to an unstarred question[2] in Lok Sabha by the Education Minister, a similar project ASPIRE is being planned to be rolled out in additional states with the support of the Asian Development Bank.

In response to a question in Parliament on 29th July, 2021, about a national framework for the implementation of STARS, the Education Minister Dharmendra Pradhan stated that the project would be implemented on the basis on the Project Appraisal Document (PAD), drafted by the World Bank. Therefore, the PAD becomes a crucial document to understand the specific contours of the project and implications it will have on the Indian education system.

For over a year, Oxfam India (OIN), in collaboration with the Right to Education Forum (RTE) and the All India Primary Teachers Federation (AIPTF), has led a detailed process of engagement on the provisions of the STARS project. This engagement began with a detailed critique of the Project Information Document, based on which a collective letter listing concerns with the project was drafted. The letter, which was endorsed by over 1400 academicians, researchers, practitioners, teacher unions, and civil society organizations and networks across 24 states, was sent to Hartwig Schafer, Vice President, South Asia Region of the World Bank on 18th July 2020. The concerns raised through the letter and the ongoing engagement with the Bank contributed to the removal of the mention of a 20% earmark for partnerships with non-state actors in the final loan document – the Project Appraisal Document.

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[1] However, in the PAD, World Bank's contribution is listed at USD 500 million and the majority – USD 2846 million is listed as the Indian government's contribution

[2] Unstarred question no 2098 answered on 2nd August, 2021 by Minister of Education

However, as concerns remained with the framing of the STARS PAD, particularly with regard to its emphasis on introducing privatisation of education in six of India's states, Oxfam India has led a wide-ranging consultative process on the STARS project across Maharashtra, Himachal Pradesh, Madhya Pradesh, Rajasthan and Odisha since July 2020 to March 2021. In all, 23 consultations[3] (virtual and physical) were organised across the six focus states, reaching out to over 2,300 teachers, community members and government officials.

In all the 10 districts where the consultations were organized, none of the 2300 teachers, community members or government officials were aware of or had been consulted regarding the STARS project. There was unequivocal consensus that teachers, community members and government officials should be closely consulted as part of the project planning process, in addition to establishing mechanisms for ongoing consultation as the project is rolled out. While the stakeholder engagement consultation organized by the World Bank on 28th September stressed the importance of wide-spread consultation, it is unfortunate that there is no STARS stakeholder engagement plan available in the public domain. Having a detailed stakeholder engagement strategy would be crucial to ensure that project implementation is rooted in ground realities and responds to the contextualized needs of each location.

Key Concerns
The broad concerns around the STARS project framework (PAD) that emerged from the consultations are with respect to:

- Promoting partnerships with the private sector as a tool of system reform despite evidence of past failures of PPPs in education
- Handing over core functions such as school management, teacher training and curriculum to non-state actors instead of strengthening the public education system
- Overreliance on ICT and a lack of critical assessments of similar, failed projects in the past that similarly relied on ICT as a remedy. The COVID-induced school closures have highlighted the deep digital divide in India – a reliance on ICT can create further iniquities
- Inadequate addressing/tackling of basic capacity issues: major vacancies across the education system – in District Institutes of Education and Training (DIETs), Block Resource Centres (BRCs), and in schools (teachers) remain unaddressed
- Use of compliance-focused teacher performance standards for teacher monitoring and surveillance instead of a supportive road-map for their growth and development
- Failure to address intergenerational, social and economic barriers to the education of Dalits, Adivasis and religious minorities
- Excessive focus on large-scale assessments instead of empowering teachers to use CCE
- Lack of/non-disclosure of a stakeholder engagement plan unlike other recent projects such as 'Supporting Andhra's Learning Transformation'
- No accommodations or changes to priorities or strategies following the lessons from the pandemic – many crucial issues have surfaced and new crises created by the pandemic

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[3] Details can be viewed in Annexure 1

Recommendations

1. **Considering the impact of the COVID-19 pandemic, prioritise resources and technical support for ensuring effective school reopening**, such that all children return to school and measures are in place to recover the learning loss. This may shift the attention and resources allocated to assessment and monitoring in favour of learning.

2. **Have wide-ranging consultations with teachers, community members, government officials and civil society** on an ongoing basis while planning and implementing different aspects of the project.

3. **Reconsider the proposal for partnerships with non-state actors, especially handing over of government schools, use of school vouchers** and outsourcing of core education functions such as teacher training and curriculum development.

4. **Ensure that partners selected to work with the public education system are not for-profit.** The iSTARS fund, which allows for-profit actors to apply, violates the in-principle commitment made by the World Bank that the project would only involve work with non-profit actors.

5. **Set up committees at state, district and block level to monitor and review activities undertaken as part of** PPPs being envisaged under this project or working closely with the public education system. Ensure that teachers, SMC members and civil society members are represented on all such committees.

6. **Seek inputs from community members, teachers and government officials to design the draft regulatory framework** for management of partnerships with non-government and private sector organizations, which was due in year 1 of the STARS project.

7. **Reduce excessive focus on large scale assessments and instead empower and support teachers** to use Continuous and Comprehensive Evaluation (formative assessment) to assess the progress of their students; improve intrinsic motivation of teachers by increasing their autonomy in classroom processes.

8. **Focus on building capacity of teachers more than processes of evaluating them.** Design teacher performance standards based on consultations and inputs from teachers, parents, education department officials and civil society representatives.

9. **Invest in school infrastructure and extensive teacher capacity building before introducing ICT in the classroom;** ensure that the burden of having requisite devices/tools to access technology does not fall on the child/teacher. Ensure that the supportive system is also in place, including electricity, adequate internet coverage etc.

10. **Envision the role of CRCs as supportive mentors rather than monitoring officials** as envisaged in the project. Seek feedback from teachers on key areas of on-site support needed and how they visualize the role of CRCs.

11. **Develop concrete plans for equity through ensuring universal secondary completion** (including out of school, child labourers, girls and migrant children) and support inequality-reducing measures such as multi-lingual education, addressing caste-based discrimination, promoting gender transformative and inclusive education and redressing the digital divide.

Theme-wise concerns and recommendations

Structure of report

This report is a culmination of a year-long process of engaging with a diverse group of stakeholders around provisions of the STARS project, including the consultations listed above. In addition to listing concerns with the project, the report offers recommendations on building a self-reliant, empowered equitable and innovative public education system.

The report is divided into the following six chapters:

a) Role of Non-State Actors
b) ICT
c) Education Governance and Accountability
d) Voice and Agency of Teachers
e) Equity
f) Assessment

Each chapter lists key issues related to the specific theme and offers recommendations to ensure that the STARS project works towards strengthening and creating a more equitable public education system.

Role of Non-State Actors

The project envisages promoting partnerships with the private sector as a tool of system reform, including the expansion of government funding for private provision of schooling. Despite claims to the contrary (such as IFC's [freeze](#) on investments in fee-charging schools), this loan needs to be seen as part of a growing World Bank agenda of promoting privatisation of education globally. Oxfam's analysis[4] of the Bank's primary and secondary education portfolio found over a fifth of the projects included an element of support to governments for private education provision. This ignores the concerns expressed [globally](#) with regard to the corrosive effects of privatization on the public education system. The STARS project risks significant diversion of Indian taxpayers' funds to an array of private actors and promotes the privatisation of education in six of India's states.

We welcome the informal assurances that partnerships with not-for-profit entities would be avoided during the project's implementation[5]. However, we regret that this has not been built into the core framing of the project. The extent to which this clause would be implemented during the course of the rolling out of the project with digital education providers (for teacher training, monitoring and education of students) is also not clear. PPPs remain an area of priority in the STARS project with an understanding of partnerships with non-state actors and the private sector as an area of priority in the capacity building strand.

We are deeply concerned about the creation of a Muti Donor Trust Fund within the project which is envisaged as a pooled fund for financing the work of donors' interest that "may not adhere strictly to government norms and funding thresholds". The PAD document suggests that J P Morgan has invested $ 10 million into the MDTF for a period of five years with a focus on school-to-work transition strategies and skills development. It is unclear why a separate fund that is not in line with government norms is needed and what it expects to achieve. Additionally, the iSTARS grant under the MDTF allows for-profit actors to apply, violating the in-principle agreement made by the World Bank that the project would only involve work with non-profit actors.

Key Issues

The plans for engagement with non-state providers is 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 the decline in standards of government aided schools 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. However, there has been a large-scale reverse [migration](#) of students from low-fee private schools to government schools during the pandemic,

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[4] Malouf Bous, K & Farr, J (2019) False Promises: How delivering education through public-private partnerships risks fuelling inequality instead of achieving quality education for all. Accessed from https://www.oxfam.org/en/research/false-promises on 4/6/2020.

[5] Letter from WB Country Director (India) to AIPTF President Rampal Singh, dated June 22, 2020. Accessed from https://drive.google.com/file/d/1qYuy_CGETWzUkOsOS5ruG-19nuM63-in/view?usp=sharing

indicating the unsustainable nature of such schools and the risks of depending of them for education delivery.

No reference is made to the fact that many of the so-called Low Fees Schools violate the domestic legal framework laid down by the RTE Act[6] or that learning in the early grade best happens in the mother tongue[7]. 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[8] and residualizing the public education system.

1. **Ignores the 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 a 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), direct benefit transfers for school choice (i.e., school vouchers) and digital instruction. In doing so, it lumps very distinct entities into a single category without considering the specific objectives and regulatory needs of each sub-sector that past research has identified as being critical[9].

   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)[10] pilot and the Public Private Partnership administered by the Punjab Education Foundation in Pakistan. The Oxfam supported research into the effectiveness of the latter[11], 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.

   In India, the Rajasthan Education Initiative's review[12] admits that it failed against many of the stated objectives, aiming for scale without producing innovative and successful models, approaches and

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[6] Nambissan, G. B. (2012) Low-Cost Private Schools for the Poor in India Some Reflections. India Infrastructure Report 2012. Private Sector in Education. Accessed from http://www.idfc.com/pdf/report/2012/Chapter_8.pdf on 6/06/2020

[7] https://bangkok.unesco.org/theme/mother-tongue-based-multilingual-education

[8] e.g. Malouf Bous, K & Farr, J (2019) Op Cit.

[9] Srivastava, P (2020) Framing Non-State Engagement in Education. Think piece for the 2021 Global Education Monitoring Report.: Non-state actors in education. Accessed from https://unesdoc.unesco.org/ark:/48223/pf0000372938/PDF/372938eng.pdf.multi on 04/04/2020

[10] An evaluation of the PSL project showed that the program led to children being turned away from PSL schools, in a move to boost test scores. Accessed from https://www.cgdev.org/sites/default/files/partnership-schools-for-liberia.pdf

[11] Afridi, M (2018) Equity and Quality in an Education Public Private Partnership. A study of the World Bank-supported PPP in Punjab, Pakistan. Accessed from https://www-cdn.oxfam.org/s3fs-public/file_attachments/rr-education-ppp-punjab-pakistan-170718-summ-en.pdf on 04.04.2020

[12] GESCI (2009) A review of the Rajasthan Education Initiative (REI) by the Global e-schools and communities Initiative. Accessed from http://14.139.60.153/bitstream/123456789/8432/1/A%20Review%20of%20the%20Rajasthan%20Education%20Initiative%20%

practices. In Mumbai, the 'School Excellence Programme' implemented by the Brihanmumbai Municipal Corporation was [shut](#) down as learning outcomes failed to improve, indicating the volatility of such approaches and the need for evaluation of partnerships which involve spending public money on private providers. Yet, this project wants to scale similar interventions to new states.

There are huge problems[13] 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 has resulted in severe issues of segregation[14]. The rigorous review[15] of non-state provision undertaken by Monazza Aslam shows very mixed evidence of the impact of vouchers.

2. **Fails to learn design lessons from the past failures of PPPs**
   The experience of the Randomized Control Trial of the [Liberia](#) project highlights that the choice of non-state actors in such interventions is of importance, with many non-state providers failing to deliver good quality education. In the STARS project, the requirement that the non-state actors (both providers and management) remain not for profit has not been specified, nor has an explicit mention been made regarding transparency in the process of contracting or of the oversight mechanisms. Past literature on PPPs[16] 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, and this raises significant concerns about the impact of these partnerships.

28REI%29.%20By%20the%20Global%20e-Schools%20and%20Communities%20Initiative%20September%202009.pdf on 04.04.2020

[13] Robertson, S, Mundy, K, Verger, A & Menashy, F (2012). Public private partnerships in education: New actors and modes of governance in a globalizing world. DOI - 10.4337/9780857930699

[14] Dian, Schaffhauser. How the Use of School Vouchers Has destroyed Child's Public Education System. Accessed from https://thejournal.com/articles/2018/06/27/how-the-use-of-school-vouchers-has-destroyed-chiles-public-education-system.aspx on 04/06/2020

[15] Aslam, M (2017). Non-state education provision; access and equality for the marginalized. K4D Helpdesk. Accessed from https://assets.publishing.service.gov.uk/media/5bad06c240f0b62ddcfd7029/178_non-state_provision.pdf on 04/04/2020

[16] Srivastava, P (2020) Op Cit.
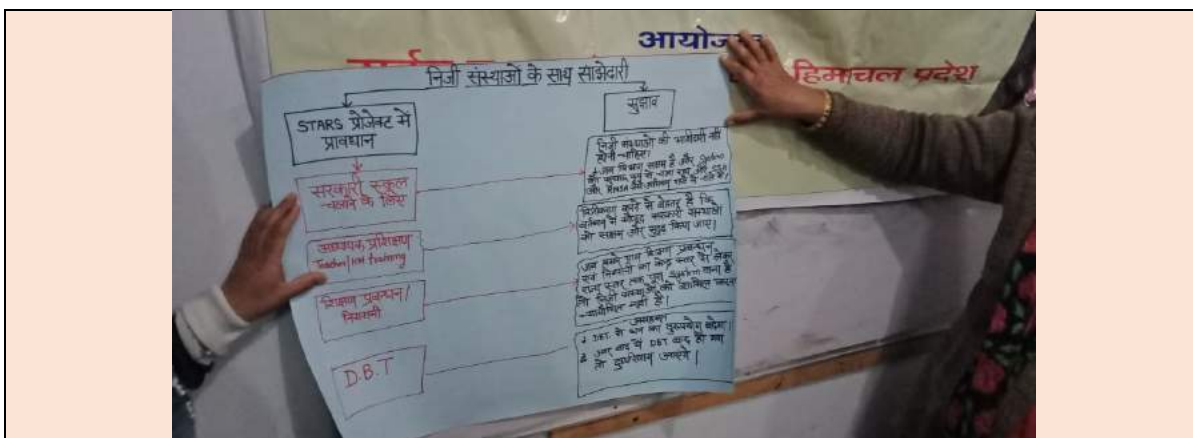
"There is a risk of key functions of the public education system being outsourced to the private sector"- Participant in STARS consultation in Kangra, Himachal Pradesh

3. **Ignores the poor track record on equity in India's private schools**
   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 while it is closing in government schools. The most comprehensive cross-country review[17] 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 costs approximately nine times [18]as much as sending her to a government school, including all indirect costs associated with schooling, such as buying books, and transport. Controlling for household characteristics in value-added models suggests that private schools' "better" performance often draws from sorting effects and not higher quality[19]. This has also been acknowledged in the Bank's own Word Development Report (WDR 2018)[20]. 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 some parents can buy while at the same time, undermining bottom-up accountability and weaking the demand for quality education.

4. **Fails to reiterate school education as a not-for-profit domain and provides for transfer of public funds for potential private gain**

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[17] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/439702/private-schools-full-report.pdf

[18] Härmä J (2009) Can choice promote Education for All? Evidence from growth in private primary schooling in India. *Compare: A Journal of Comparative and International Education* 39(2): 151–165.

[19] Wadhwa, W (2014) Government vs Private schools: How things changed? ASER 2014 Report. Accessed from http://img.asercentre.org/docs/Publications/ASER%20Reports/ASER%202014/Articles/wilimawadhwa.pdf on 04/04/2020

[20] World Bank (2018) Learning to Realize Education's promise. World Development Report 2018. Accessed from https://www.worldbank.org/en/publication/wdr2018 on 09/06/2019

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 (such as the Abidjan Principles) constitutes an extremely dangerous steer to the states in terms of how they should be spending their resources.

Recommendations

The project 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 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".

a. Partnerships should approximate the concept of **Multi-stakeholder Partnerships in Education**[21] [22] involving civil society organisations, UN agencies and other stakeholders in public education under arrangements that are non-contractual and non-commercial. Such participation will be based on the condition that the partnership does not initiate or legitimize privatization or commercialization of education, or erode public responsibility for governance and for curriculum development.

b. The partnerships need to **strengthen the public system rather than weakening the state's role in delivery**. The human rights principle of non-retrogression must apply where the partnership should strengthen state capacity to deliver the right to education, and not weaken it through a delegation of core functions to non-state actors. Complete or nearly complete outsourcing of key functions such as teacher training to non-state actors must be avoided.

c. PPP pilots with respect to payment of school vouchers and handing over of government to non-state actors need to be avoided at all costs.

d. **Selection of partners must ensure that education remains not for profit.** A careful screening of all private partners engaged in for-profit businesses and pursuing private interest, should be ensured prior to entry into any PPPs. At the same time, in line with the Abidjan Principles, funding must be withheld from those actors that abuse the rights of equality and non-discrimination by being selective and expelling or sorting learners, directly or indirectly, based on socio-economic disadvantage or other grounds or charging fees that substantially undermine access to education.

e. The proposed PPP framework/s would need to be **in line with provisions of existing human rights law** and guidance provided to member states on the issue[23]. This should at the very least ensure that the PPP[24]

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[21] https://www.ei-ie.org/media_gallery/Policybrief_10_PPP_eng.pdf. Accessed on June 14, 2020.
[22] https://sustainabledevelopment.un.org/index.php?page=view&type=400&nr=1741&menu=1515
[23] Eg. the periodic reports of different UN Special Rapporteurs who have provided guidance to member states on the issue eg. https://www.un.org/en/ga/search/view_doc.asp?symbol=A/70/342
[24] https://www.right-to-education.org/blog/framework-assess-role-non-state-actors-education-against-human-rights

- Does not lead to any form of discrimination or segregation, or create or increase inequality. Measures need to be put in place to address segregation based on income resulting from children from families with relatively higher income opting for private provision.
- Does not lead to fee-charging private schools being the only option for compulsory education
- Does not undermine the humanistic mission of education
- Conforms to minimum educational standards, being adequately regulated and monitored
- The role of non-State actors is publicly debated in line with the principles of transparency and participation and transparency is maintained during the entire course of the partnership

f. **A robust monitoring and enforcement capacity framework** would need to be put in place prior to entering into partnerships to ensure private education providers' full compliance. Setup committees at state, district and block level to monitor and review activities of NGOs, PPPs and other non-state actors working closely with the public education system. Ensure that teachers, SMC members and civil society members are represented on the committee.

g. **Ensure transparency** and open consultation in the design and functioning of the projects.
- The negotiations for the public-private partnerships are made fully transparent and are not kept confidential.
- Clear space for social dialogue and inputs from civil society, teacher associations and parents in decision making in matters pertaining to the Project.
- Undertake human rights impact assessments before and during the Partnership by truly independent assessors, make it public, and use the same to regularly re-evaluate and if necessary adjust the policies under the partnership.
- Include mechanisms for prompt, accessible, effective, procedurally fair and independent grievance and redress, enabling any rights-holder and other relevant stakeholders such as public interest groups, to be equipped with the capacity to claim rights and to seek remedies for any human rights abuses by a private actor involved in education.

ICT

The project puts a major emphasis on ICT as a means to tackle very different issues in the education system including in-classroom use of ICT to enhance learning, teacher and mid-level official training by means of Distance education and e-learning, surveillance of teacher attendance, assessments of students, teachers and teacher educators, teacher management (incl. administration of recruitment, transfer, performance evaluation), COVID-19 response and digital administration (using MIS, extending PFMS, etc.). Overall, there is an overreliance on ICT and a lack of critical assessments of similar, failed projects in the past that equally relied on ICT as a remedy.

The poor retention rates[25] of MOOCs show the ineffectiveness of overtly ICT-driven teaching. There is overwhelming evidence from various studies[26] during the pandemic that an overreliance on digital modes of delivery have only served to exacerbate educational inequalities. Studies during the pandemic have also shown that the burden of having digital infrastructure has fallen on teachers and students, leaving the most marginalized children outside the ambit of learning.

"The burden of access to technology should not fall on children"- Participant from STARS consultation in Ashoknagar, Madhya Pradesh

Key Issues

The major issues around the use of ICT in the operation are:

1. **Overreliance on technology**
   Seeing technology as a silver bullet for ingrained and systemic weaknesses (stemming from a lack of state capability, high vacancies, no proper training, etc.) is misplaced; previous projects by the Bank, including one to enhance teacher effectiveness by massive ICT use in India have failed[27]

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[25] Newton, D. (2020, June 21). The "Depressing" and "Disheartening" News about MOOCs. *Forbes.* Accessedf rom https://www.forbes.com/sites/dereknewton/2020/06/21/the-depressing-and-disheartening-news-about-moocs/?sh=725701c676ed

[26] For example, Oxfam India's Status Report on Government and Private schools during COVID-19

[27] https://www.worldbank.org/en/country/india/brief/enhancing-teacher-effectiveness-bihar

2. **Lack of smart regulation**

   In order for ICT in classrooms to be sustainable and safe, only free and open source software should be allowed inside a classroom; market-making exercises by multinational businesses should not be confused with genuine efforts to build educational software as a public good

3. **Use of ICT for surveillance**

   Instead of using ICT to generate valuable feedback for improving teacher training etc., the Project aims to use ICT for stricter surveillance, including assessments of subject knowledge and IT attendance systems. This signals distrust and can easily be gamed as evidence clearly illustrates[28]

Recommendations

ICT can be used effectively to support a self-reliant and strong public education system if the following recommendations are followed:

a. **Invest time and resources in infrastructure and capacity building before roll-out of ICT in the classroom**
   - Keep in mind high recurring costs as ICT equipment needs to be updated regularly
   - Effective use of ICT in classrooms requires extensive teacher training beforehand and having basic infrastructure in place, hence it requires major investments apart from equipment
b. **Put in place effective child protection mechanisms** and data privacy regulations to safeguard data[29]
c. **Ensure the use of open-source software and establish support mechanisms for use of ICT**
   - Make all software entering classrooms mandatorily free and open source[30]
   - Establish State- and District-level IT-support units for schools with helpline numbers and online support
d. **Review the effectiveness of training for teachers and mid-level officials training by means of distance education and e-learning**
   - Fundamentally rethink this approach in non-pandemic times; there is no evidence that such programs are effective[31]
   - If the pandemic requires distance education modes, make small groups, live webinars and blended offers

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[28] https://www.cgdev.org/sites/default/files/limits-accounting-based-accountability-education-and-far-beyond-why-more-accounting-will.pdf

[29] see https://privacyinternational.org/news-analysis/3709/schools-and-covid-19

[30] one can build on the FOSSEE (Free/Libre and Open Source Software for Education) project here or start a similar effort for classroom software; https://fossee.in/

[31] according to the World Bank itself: "Traditional distance education programs offering teacher education in India have not demonstrated success in scaling while retaining quality. Innovative approaches with the use of ICT are not yet proven." (http://documents1.worldbank.org/curated/en/184631468000251240/pdf/92972-PAD-P132665-IDA-R2015-0096-1-Box391421B-OUO-9.pdf, p. 97)

- Review content on national platforms regarding a) content[32] and b) teaching style; reading out PPT-slides is <u>not</u> effective teacher training
- Create effective feedback mechanisms for teachers and mid-level officials and opportunities for peer learning

e. **Reconsider the use of ICT for surveillance of teacher attendance.** ICT-based teacher attendance systems signal distrust and have not proven to be effective. While one might be able to monitor attendance, monitoring effective teaching is an entirely different matter. Rather than focusing on surveillance, supportive efforts should be undertaken (including lowering the administrative burden) to ensure more time spent on teaching[33]

f. **Digital administration (using MIS, extending PFMS, etc.)**
- Avoid tender-based software products and ensure that software is open-source
- Create interoperable and multi-use public digital infrastructure, e.g. by avoiding separated Management Information Systems in favour of platforms.[34] This will avoid redundancies in data-collection
- Create State-level, permanent, public-sector IT-labs administering and developing data infrastructure and supporting lower levels with tailored solutions using agile software development instead of tender-based software products

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[32] For instance, content on the SWAYAM-platform includes a lecture on "Type and Trait Theory of Personality" that suggests a highly problematic classification of "personalities" put forward by the German psychiatrist Ernst Kretschmer in the 1920s; https://www.youtube.com/watch?v=i6co6MfBP3s

[33] see a recent study by the Accountability Initiative on time-use of teachers: https://accountabilityindia.in/wp-content/uploads/2019/06/REPORT-ON-DELHI%E2%80%99S-GOVERNMENT-SCHOOL-TEACHERS-.pdf

[34] as an example, see this free and open source data exchange layer software used on scale in several countries: https://x-road.global/

Education Governance and Accountability

For administation to be effective, it must be equipped with adequate physical, financial and human resources. An overburdened bureaucracy with vacancies and without basic equipment cannot be expected to be effective. Often one hears that increasing inputs is a waste of resources as they are used inefficiently. This criticism neglects the fact that for efficiency, a critical minimum level of resources is a precondition. Unfortunately, in the education sector, we are short of all these aspects across all levels.

Second, administrative or governance reforms must give greater discretion to front-line bureaucracy to address local issues and innovate if required. This is as much a function of better resources at the local level as of greater decentralisation of decision-making or political authorisation. The movement against corruption and towards accountability has had an unfortunate fallout on innovation for fear of misuse of an increased room for manoeuvre. Yet, for reforms to be successful, public sector entities need to be able to try new things, and at times, to fail. Evidence[35] shows that state education departments (such as Himachal Pradesh) which promoted greater discretion in decision-making, performed better than those that focused on compliance to rules. Outsourcing to non-state partners not only takes away discretion from state actors but also their sense of accountability and ownership towards their job. Third, there needs to be trust within the administration among peers and across different levels within the administration. If suspicion is the guiding principle, institutional arrangements will be geared to monitoring and surveillance, not support and improvement. The goal must be to improve, not to judge and punish.

Key Issues

1. **Lack of adequate attention to state capacity**
   The STARS project neglects basic capacity issues: major vacancies across the education system – in District Institutes of Education and Training (DIETs), district and block education offices, and in schools, remain unaddressed. Without capable and motivated faculty, teacher education and training cannot be expected to improve. Similarly, at the block level, an already overburdened bureaucracy needs a substantial increase in trained manpower, support staff and other forms of institutional support.

2. **Lack of autonomy to state governments**.
   Providing autonomy to state governments rather than benchmarking their performance by governance indices allows them to be responsive to State-specific needs. Focusing on a few numbers (e.g. learning levels in grade 3) leads to perverse incentives to cheat in these thin

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[35] Mangla, Akshay. "Bureaucratic Norms and State Capacity in India: Implementing Primary Education in the Himalayan Region." Harvard Business School Working Paper, No. 14-099, April 2014. (Revised October 2015.)

number games[36]. Making assessments "cheating proof" is difficult and extremely expensive, and it does not contribute to improved service provision.

3. **Trust in mid-level and frontline bureaucrats is crucial**
   Decentralising decision-making requires devolution of funds and real decision-making power. This requires not just investment in the capacity of the front-line bureaucracy but also in increasing their discretionary powers[37] while fostering social accountability. This, in turn calls for higher level of trust. Trust, which implies listening and collaborating across different levels within the administration, is entirely ignored in the project. The project instead relies on Information and Communications Technology (ICT) on the apparent assumption that a flawed system can be fixed through the injection of more and better technology. Technology does not address systemic or governance challenges; it simply by-passes them. The way forward, instead, should focus on high-quality training that frontline workers perceive as useful to meet the challenges they face in schools.[38]

4. **Mismatch between intention and specified actions**
   Outsourcing basic governance functions by "expanding private initiatives" and "reducing government tasks" will not make education "more relevant to local needs" or "democratically promote people's participation by empowering local authorities" as stated in the Project document. Institutions of the state, from State-level officials who design policy changes, to district-, block-, cluster- and school-level officials who adapt those policies for solving local problems rely on past experience (institutional memory) to meet new challenges and build additional memories with every new reform they undertake. New private initiatives do not have these institutional memories, nor do they have a grasp of socio-cultural realities that play an important part in the delivery process[39].

5. **Social accountability needs to be fostered and cannot be replaced by ICT**[40]
   Greater decentralisation must allow for accountability to flow to the people rather than to supervising officers. In order for SMCs to be functional and capable of using the short road of accountability, their capability needs to be built by extensive outreach and training. Action-research illustrates how such pro-poor governance coalitions between parents and officials could be formed.[41] The project needs to build in a focus on social accountability and social audits

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[36] Hoing, D. (2019, May 24) Putting "Account" at the Center of "Accountability": Why ICT Won't Improve Education Systems (and Beyond), and What Will. *Center for Global Development.*

[37] says the World Bank's research arm: "Designs that do not address the trust deficit will miss an opportunity to use economic theory and research to build trust in public institutions at a time when it is urgently needed" (https://openknowledge.worldbank.org/bitstream/handle/10986/33663/Strengthening-Public-Health-Systems-Policy-Ideas-from-a-Governance-Perspective.pdf)

[38] see also https://academic.oup.com/jpart/article-abstract/29/4/556/5318685

[39] Bhatty, K. and Haus, M. (June 30, 2020). The World Bank's STARS project needs an overhaul. *The Hindu.* Accessed from https://www.thehindu.com/opinion/the-stars-project-needs-an-overhaul/article31947675.ece

[40] see various publications by the World Bank's Global Partnership for Social Accountability, https://www.thegpsa.org/resources

[41] see https://journals.sagepub.com/doi/10.1191/1464993403ps059ra

for transparency and provide extensive training and outreach to strengthen the voice of parents, SMCs and local self-governance structures (particularly in Schedule V Areas).

Recommendations

Effort must be made to ensure that DIETs, block and cluster resource centres, and schools are made self-reliant. This, in turn, calls for enabling them to develop their own capability to reform themselves. Introducing "independent" assessment agencies, creating an Indian Ofsted and increasing top-down performance judgement are laying the ground for creating a privatized education market where "school performance assessments" aim to guide parents in "school choice". Such an exit-biased effort to create a privatized education market, however, is not in the interest of India and its children. It might succeed in creating a commodity market for school education, but not in improving the quality of education.[42] Therefore, State governments should reject the paradigm and focus on their own, home-grown experiences to strengthen voice and social accountability in order to create a strong, self-reliant public education system.

"The funds from the STARS project should be used to strengthen the infrastructure, the current system and unburden teachers from extra duties that keep them away from the classroom"- Participant from STARS consultation in Una, Himachal Pradesh

The following specific steps could, in contrast, contribute to this goal:

a. **Fill vacancies within the administration and the academic support** structure to ensure minimum capacity is in place. Support staff with necessary equipment and other resources.
b. **Support administrative reforms to give discretion** to the front-line bureaucracy. Put trust in officers and focus on supporting them rather than judging their performance.

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[42] see Adamson, F., Astrand, B. and Darling-Hammond, L. eds., 2016. *Global education reform: How privatization and public investment influence education outcomes*. Routledge.

c. **Create cross-level working groups focusing on problem analysis and co-creation of solutions**. Project funds should be made available in a flexible manner for this purpose. Problem Driven Iterative Adaptation (PDIA)[43] can be used to structure these efforts.

d. **Involve frontline staff like teachers in the design process of indicators to monitor performance** and avoid using them for judging performance. Instead, try to align them with professional values[44] and to improve working environments to allow higher quality teaching in cooperation with teachers.

e. **Foster social accountability by using low-tech ICT and offline outreach to parents.** Provide accessible grievance redressal mechanisms through both offline and low-tech means, e.g. by organizing village meetings around struggling schools involving teachers, village officials, administrative officers, civil society etc. and facilitate such meetings to come up with specific improvement plans.

f. **Start an SMC training mission** and facilitate SMC meetings and organizations across different levels (clusters, blocks, districts, State).

Good Practice- Focus on community participation in Nagaland: Enhancing classroom teaching and resource project

STARS could learn from the project[45] 'Nagaland: Enhancing classroom teaching and resource' in making community participation an integral part of the project design and framework. In the Nagaland project, there are explicit strategies in place to strengthen School Management communities and enable them to:

- Monitor gender-disaggregated attendance and to report potential cases of dropouts
- Manage shared learning spaces in community to mitigate impact of COVID-19
- Lead financial, construction and procurement aspects of school management
- Facilitate transition of adolescents to higher education/world of work

Given that schools are re-opening after over 500 days of physical closure, the STARS project could do well to involve communities in ensuring effective reopening and building back better such that all children are in school and learning.

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[43] see https://bsc.cid.harvard.edu/PDIAtoolkit

[44] For example, see Moynihan, D. P., Baekgaard, M., & Jakobsen, M. L. (2020). Tackling the Performance Regime Paradox: A Problem-Solving Approach Engages Professional Goal-Based Learning. *Public Administration Review*, *80*(6), 1001-1010.

[45] https://documents1.worldbank.org/curated/en/103471608346988378/pdf/India-Nagaland-Enhancing-Classroom-Teaching-and-Resources-Project.pdf

Voice and agency of teachers

The commitment to strengthen the infrastructure of teacher training institutes at district and sub-district level is appreciated, including *'transformation of DIETs into centres for academic leadership and experiential learning'*. The need to reduce time spent by BRCs and CRCs in administrative functions, allowing them to play a more active role in providing on-site support and mentorship to teachers is also acknowledged. In addition, plans to build capacity of teachers on early childhood education is also a step in the right direction, aligning with the recent announcements made around the National Education Policy. It is also heartening to see that the Project talks about providing need-based training to teachers on understanding the requirements of adolescent boys from vulnerable groups, providing a much needed focus on equity.

However, there remain concerns with how the Project views teachers – as resources who have to be 'monitored', 'managed' and whose 'capacity has to be built', in order to improve learning outcomes. There is little scope to view them as independent, autonomous professionals capable of taking their own decisions within the classroom. Instead, there is a plan to create performance standards for teacher management and evaluation, without providing clarity about the role of teachers in determining what they should be evaluated on. With its excessive focus on assessments and the creation of online item-banks, it is unclear how the project seeks to support teachers to develop and use their own assessments for Continuous Comprehensive Evaluation. Lastly, undue faith is placed in the use of ICT for teacher training and classroom processes, ignoring infrastructural as well as pedagogical issues with such training modes, particularly in the context of Early Childhood Education.

Key Issues

1. **Excessive focus on assessment data and evaluation of subject knowledge to determine training needs**
We appreciate that the project talks about introducing need-based training for teachers. However, the assessment of these needs is proposed to be done primarily through analyzing data of large-scale assessments (Pg. 30) and through self-assessment of subject knowledge by teachers (Pg. 54). This is problematic because it is based on a narrow conceptualization of a teacher's role – largely that of raising test scores - and does not adequately take into account various other contributions that teachers are required to make, such as gender-sensitization and the teaching of non-cognitive skills. While the document does mention building capacity of teachers towards supporting needs of children from vulnerable groups, such non-cognitive skills do not find a mention in the results framework, which clearly focuses on the *'evaluation of teacher subject knowledge to identify teachers' training needs* (Pg. 54).

2. **Building capacity for CCE and excessive focus on standardised assessments contradict each other**

The Project pays lip service to enhancing teacher capacity to 'c*arry out and use data from Continuous Comprehensive Evaluation (CCE)'* (Pg. 29)*.* On the other hand, there is excessive focus on large-scale learning assessments at national and state level. Such assessments disempower teachers and risk creating a culture that encourages 'teaching to the test'[46]. Further, the *'creation of online item banks to support teachers' formative, diagnostic, and summative assessment activities by aligning them with key learning outcomes/competencies/ benchmarks'* (Pg. 29) ignores the diversity in classrooms across districts, blocks and villages. Having standardized, ready to use questions works at cross purposes with building teacher capacity to carry out ongoing assessment that meets the specific needs of their classroom.

3. **UK's Ofsted model for Indian CRCs**
   We appreciate that the project also speaks about reducing time spent by BRCs and CRCs in administrative functions, thereby allowing them to play a more active role in providing on-site support and mentorship to teachers. It also makes a mention of CRCs playing a role in offering need-based training to teachers based on classroom observations. However, this is in contradiction to the proposal that 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, especially for schools with the poorest students and the value of such school inspections for improving the quality of teaching. An evaluation[47] has also showed that Ofsted inspections have narrowed teachers' focus on improving test scores rather than delivering a holistic model of quality education.

4. **Excessive faith in ICT for training and classroom processes ignores ground realities**
   The project continues to place excessive faith in the use of ICT for in-service training as well as the use of ICT within the classroom – *'DLI 6 will also finance establishment of online teaching medium, web conferencing tools, developing online study materials, introducing tablet-based learning and realigning with the digital driven world of education'* (Pg. 25)*.* This ignores the infrastructural realities of government schools in India where fewer than 40% of secondary schools have a computer,[48] and high-speed internet and a steady supply of power cannot be taken for granted. Further, it fails to highlight challenges of exclusion emanating from use of technology, which has become starkly evident during the lockdown imposed due to the COVID-19 pandemic. In particular, the use of e-learning platforms for in-service training is not adequate for ICDS and it is unclear how this system will be engaged with, as part of the Project.

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[46] Glewwe, P., Ilias, N., Kremer, M., & Moulin, S. (2003). Teacher Incentives and Student Outcomes: Evidence from a Randomized Evaluation in Kenya. NBER Working Paper, (w967), 1.

[47] Ofsted (2019). **Teacher well-being at work in schools and further education providers. Retrieved from https://www.gov.uk/government/publications/teacher-well-being-at-work-in-schools-and-further-education-providers**
[48] UDISE 2016-17

5. **Controlling and managing teachers rather than supporting them**

   The project focuses on the development of teacher performance standards along with putting in place systems to monitor teacher attendance. It is unclear as to what these standards will be and the role (if any) that teachers will play in developing them. However, evidence on motivation shows that teacher performance standards not only affects the autonomy of teachers, it also leads to teachers becoming more controlling in the classroom and offering less autonomy to students[49]. The focus on 'managing' teachers stems from an inherent distrust of teachers, who need to be monitored to prevent them from shirking work. Such a culture does not augur well for the ability of the public system to attract and retain talented and creative teachers with a sense of autonomy and pride in their professionalism.

"Teachers, HMs, parents and children should be involved in the process of developing teacher evaluation standards."- Participant in STARS consultation in Sidhi, Madhya Pradesh

Recommendations

a. **Develop a consultative process to understand teacher needs** by soliciting feedback from teachers and teacher educators, particularly at the sub-district level. Broaden the scope of teacher capacity-building beyond building capacity on subject-matter expertise and preparing students to do well on large-scale assessments, by placing equal emphasis on teaching cognitive and non-cognitive skills. Ensure that skills such as community engagement and understanding needs of children from vulnerable groups[50], which find a mention in the document receive equal attention and are included in the results framework.

b. **Ensure that teacher performance standards are developed based on consultations and inputs**

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[49] Deci, E. L., Spiegel, N. H., Ryan, R. M., Koestner, R., & Kauffman, M. (1982). Effects of performance standards on teaching styles: Behavior of controlling teachers. Journal of educational psychology, 74(6), 852.

[50] For an example of how bureaucrats can be trained to address needs of children from vulnerable groups, see Mangla, A. (2021). Social conflict on the front lines of reform: Institutional activism and girls' education in rural India. *Public Administration and Development*.

from teachers, parents, education department officials and civil society representatives. Actual evaluation of teachers should be on an ongoing basis, be holistic in nature and involve children and parents. Further, it must be tailored to the specific class/subject that they teach.

c. **Reduce excessive focus on large scale assessments and instead, empower and support teachers** to use CCE to assess the progress of their students. Rather than a reliance on online item banks, create forums and opportunities – including time – for teachers to learn from each other by sharing ideas and best practices that work for their specific contexts.

d. **Envision the role of CRCs as supportive mentors rather than monitoring officials as envisaged in the project.** Rather than re-designing the role of CRCs along the lines of Ofsted, focus on building their capacity to offer on-site and need-based support. Seek feedback from teachers on key areas of on-site support needed and how they visualize the role of CRCs.

e. **Use technology strategically and review current use of ICT and platforms such as DIKSHA by gathering feedback from teachers**, including challenges and effectiveness of different modes. Through a detailed review of current ICT use including classroom observations and discussions with teachers and students, create a list of pre-conditions necessary for effective use of ICT in training and classroom processes and ensure that its use complements rather than replaces current processes.

f. **Create a culture of collaboration and provide teachers with structured opportunities** to collaborate, to meet often and discuss issues related to student achievement. This means empowering teachers to make decisions about student learning collectively rather than such decisions being forced upon them by performance standards prepared by those outside the profession.

g. **Develop a clear road-map of career progression and growth** for teachers that goes beyond incentivizing performance on test scores and is based on a holistic model of education, in line with recommendations of the National Education Policy (Para 5.17 to Para 5.19). Proactively seek inputs from teachers to develop this road-map. Also, take measures to improve intrinsic motivation of teachers by increasing their autonomy in classroom processes and consulting them in decisions regarding what they would be evaluated on.

Addressing Inequality

The Project appears to have six interrelated strategies to address differential gender needs of boys and girls and those from marginalized communities. Plans exist to generate a **gender-disaggregated baseline of dropouts** to understand the variations among out-of-school adolescent girls and boys and support their school-to-work transition with particular emphasis on preventing dropouts of the former. Progress in completion rate by gender in all selected states will be tracked. BRCs along with schoolteachers and school management committees (SMCs) will be expected **to monitor potential dropouts** amongst ST boys and form strategies to regularly engage with parents and communities on adolescent issues, block-level school completion targets and potential career opportunities. Plans exist to use behaviour change and interactive communication models targeting communities through, for example, audio-visuals in local languages, creative messaging on social media channels, strengthening of platforms for regular parental engagement of adolescent girls and boys and organizing vibrant youth clubs led by girl students to promote retention and completion of secondary education.

Focused life skills and vocational education Interventions (for both boys and girls, albeit there would be an emphasis on the former) are planned which would include training, career counselling, mentoring, and handholding through adolescence with a view to ensure higher female wage employment in high-growth sectors as well as self-employment. Maharashtra and Odisha will undertake **actions targeting girls** by offering lifeskills training in schools for adolescent girls (class 7-9). **To cater to the specific needs of boys, especially from vulnerable groups,** states will also offer career counselling facilities at the block/cluster level for secondary schools as well as exposure to a professional work environment, specifically tailoring these interventions for girls and boys.

At the same time, capacity building of teachers, BRCs and CRCs towards early identification of the needs of adolescent boys and girls especially in geographically excluded areas with high presence of SC, ST population in being planned. The **provision of separate toilets for girls and health/hygiene and necessary amenities and access which is sensitive to gender and needs of CWSN** is also mentioned**.** Odisha, Madhya Pradesh and Maharashtra will target ST boys through a roadmap for Educationally Backward Blocks and aspirational districts to prevent dropouts and encourage participation in TVET courses. This will be achieved through awareness campaigns to engage parents/communities, enrolment in TVET courses, improving access to digital learning resources and monitoring drop-outs at the community level through SMCs.

The case for the Project is based on the need to address poverty and inequality in India. While the project recognizes that completion of secondary schooling is affected by a combination of supply and demand side actions, inadequate efforts are being made to address supply-side barriers (schooling access and infrastructure) of India's secondary education.

Key Issues

1. **Failure to address intergenerational, social and economic barriers to education of Dalits, Adivasis and religious minorities**

Given India's history of social stratification based on caste one could have also hoped for more robust analysis and intervention to **address intergenerational, social and economic barriers to the education of Dalits, Adivasis and religious minorities**. An intervention aiming to ensure secondary completion needs to have a clear strategy for addressing the challenge of the high rates of dropouts. While the focus on the education of girls as a category is welcome, it would be critical to recognize and address the various intersectionalities and ensure educational systems are also transformational for marginalized communities. A more coherent strategy to address the specific barriers to the education of SC, ST and Muslim students would be critical.

Table 11 Drop-out rate in different education levels among Scheduled Castes and Scheduled Tribes

Levels	2012–13		2013–14		2014–15	
	SC	ST	SC	ST	SC	ST
Primary level	6.13	8.44	6.10	10.56	4.46	6.93
Upper primary level	4.65	7.86	6.61	11.13	5.51	8.59
Secondary level	15.92	22.27	20.89	29.79	19.36	24.68
Hr. secondary level	–	0.07	4.70	7.32	3.22	–

Source Flash Statistics U-DISE, NIEPA, 2016, 2018

In addition to inequality in school completion across social groups, there is also inequality across income groups. Therefore, a **more coherent strategy to correct educational inequalities between the rich and the poor in these states**. This would entail a more conscious strategy for addressing familial poverty (including freeships) and the provision of incentives to students to ensure completion. Research suggests that some of the biggest factors influencing completion of secondary and higher secondary school by a student are household assets[51] and

> **Social group and class as determinants of education in India**
>
> Educational attainment increases with household wealth. Females in the lowest wealth quintile have completed a median of 0 years of schooling, compared with a median of 9.1 years for females in the highest wealth quintile.

parental educational attainment[52]. More conscious efforts to support a reading culture in the home including availability of libraries and learning materials would be important. Other factors responsible for dropout at this stage that have not been addressed include early marriage and child labour. Many girls marry early despite completing secondary education, suggesting that the value of education is subordinate to the pressures of the marriage market. Furthermore, children's time spent on household chores has a negative effect on literacy skills during primary school years, suggesting that students who spend an insufficient time at school or on studying at home face a higher risk of dropping out of school. A clear strategy for addressing child labour would be critical to the success of the intervention.

2. **The question of access**

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[51] Woldehanna, T., Endale, K., Hamory, J., & Baird, S. (2021). Absenteeism, dropout, and on-time school completion of vulnerable primary school students in Ethiopia: exploring the role of adolescent decision-making power in the household, exposure to violence, and paid and unpaid work. *The European Journal of Development Research*, *33*(5), 1349-1389.
[52] Singh, R., & Mukherjee, P. (2015). Determinants of successful completion of secondary education: Evidence from Young Lives, Andhra Pradesh.

Lack of access to schools is one of the barriers to secondary completion. However, no clear strategies are in place to address the shortage of secondary school and increase school places. According to the 71st NSSO survey, more than 12 percent of rural households, surveyed by NSSO, did not have a secondary school within five kilometres. The relatively higher number of private/fees charging private schools at the secondary education stage has been attributed to being at least partly responsible for declining participation of girls in secondary education. A clear strategy to promote the opening of free, public schools could form a critical contribution to ensuring universal secondary completion. Furthermore, with the project emphasizing the engagement of non-state actors in education, it would be critical to put in place safeguards to address the exclusion of marginalized communities and girls in private schools.

In addition, the PAD has failed to provide for **essential safeguards for engagement of the private sector for direct delivery of education.** For example, keeping the provision not-for-profit has not been built into Project design framework. 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. No concrete steps to ensure re-entry of dropout children

The project appears to not have any plans for introducing structured accelerated programmes to facilitate the return to education of children who have dropped out. This is of particular importance now that schools are reopening across states after 18 months of closure. While remediation programmes might address learning gaps among students already enrolled, there is also need to address the learning requirements of those who have dropped out of school some time back and need to be brought back into mainstream instruction. Interventions of organizations like Doosra Dashak have shown the value of focused bridge camps as a strategy of bringing children back into the fold of education. Furthermore, dropout starts at the elementary stage and it would be critical to also provide scope for supporting special training at the elementary stage as well.

4. Vocational Education as a strategy for preventing dropout of girls?

It is unclear whether the proposed strategy of reliance on vocational education to ensure secondary retention of girls would yield the desired results. Existing evidence suggests that of 59.7% of females who have received formal vocational education in India are currently not in the labour force (compared to only 22% of men)[53]. This strategy must, furthermore, be seen in context of declining labour force participation of women in India. Access to vocational education would do little unless the barriers to women's employment including restrictive social norms, and absence of safe working and living environments in small towns and cities are addressed[54] .

At the same time, caution needs to be maintained to ensure that introduction of vocational education does not result in premature streaming of children from SC, ST and other marginalized communities out

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[53] Kumar, R., Mandava, S., & Gopanapalli, V. S. (2019). Vocational training in India: determinants of participation and effect on wages. *Empirical Research in Vocational Education and Training*, *11*(1), 1-17.
[54] Mehrotra, S., & Parida, J. K. (2017). Why is the labour force participation of women declining in India?. *World Development*, *98*, 360-380.

of academic instruction. Gender stereotyped occupations for boys and girls would likewise need to be avoided to ensure education does not reinforce existing low academic expectations for girls.

5. Lack of explicit strategies to strengthen SMCs

Considerable emphasis is being placed in this Project on the role of SMCs for ensuring equity and as instruments of change. However, explicit innovative strategies for their empowerment and capacity building, especially with respect to the role of members from marginalized communities, are not visible. The latest available UDISE data (2016-17) suggests that while 83.7% of secondary schools have a School Development Management Committee, only 8.7% schools had SDMCs which met regularly. This number is as low as 3.6% for Maharashtra. Consequently, while structures for community and parental participation exist, they are rarely effective as an instrument of dialogue and decision-making. Furthermore, with secondary education outside the purview of the RTE Act, these structures lack the same statutory power available to SMCs in elementary education. Forums such as Shiksha Samwads may be effective in ensuring the input and participation of parents, and also lead to better engagement through SDMCs.

Recommendations

a. **Expand and improve the public school net in secondary education** to ensure universal completion, especially among marginalized communities, which the NEP terms as Socio-economically Disadvantaged Groups (SEDGs).

b. **Ensure each state under the project has concrete and adequately funded strategies** for addressing the core challenges to the education of SC, ST, Muslim, OBC students and children with disabilities, particularly girls within the same. Strategy for addressing to child labour and child marriage and other causes of dropout would likewise be needed.

c. **Put in place and fund mechanisms for accelerated learning** of children who have dropped out to enable them to return to secondary education.

d. **Put in place safeguards for ensuring non-discrimination** in any PPPs/engagement with non-state sector during the course of the Project.

e. **Ensure that the introduction of vocational education does not result in premature streaming** of children from marginalized communities/poor families out of academic instruction and into vocational courses selected as being in line with traditional caste and gender roles.

f. **Put in place robust state level frameworks for community participation in education** including provision of legal powers to structures for community participation at the secondary stage of education equivalent to those of SMCs.

Good Practice- Focus on social inclusion in Supporting Andhra's learning transformation operation' Project

STARS could learn from the project 'Supporting Andhra's learning transformation operation' in how to ensure that social inclusion is an integral element of the project design. The project involves the development and implementation of a social audit tool to enable greater community engagement in school operations and performance. The tool will also be used to prevent school-related cases of gender-based violence and early marriage amongst girls. Further, the roll-out of the social audit

process is listed as a specific indicator in the results framework, ensuring that its progress on implementation will be measured and tracked.

Learning Assessment in the STARS Project

STARS prioritises the building of an independent assessment infrastructure with technical and administrative capacity to institutionalise standardised, competency-based assessments as a means to inform learning, monitor results and strengthen accountability. It also specifically supports India's participation in PISA. The latter would include support for the participation of Chandigarh and possibly also MP in 2022 or 2024. It will also fund the creation of a National Assessment Center and the establishment or strengthening of State Assessment Centres to manage state assessments and build teacher capacity for competency-based assessment (CBA) and continuous comprehensive evaluation (CCE).

Key Issues

While some of the initiatives may be beneficial (e.g., focus on CCE, improving NAS and CBSE exams), overall, these proposals are not aligned with the most urgent needs of India's education system: addressing inequities, supporting out-of-school children, and addressing the structural causes of poor outcomes. This plan prioritises assessment over learning. India has years of evidence of serious learning deficits (e.g., ASER reports), and funds and attention must urgently be directed towards addressing these deficits. Unwarranted faith is placed on the benefits of standardised, outcomes-based assessments (including PISA) to inform learning and governance, ignoring scholarly research on their limitations. Setting up 'independent' assessment cells, disconnected from (or in addition to) other agencies and institutions, could create distrust and unhealthy competition between agencies, weakening rather than strengthening the public sector. STARS assessment reforms will consolidate a false and heavily scripted decentralisation that leaves little room for genuine participation of local actors other than as implementers of objectives, priorities and processes decided elsewhere.

<u>Flawed assumptions</u>

1. **Change theory**: The STARS project operates on the change theory that the problem of poor learning outcomes is at its heart a problem of a lack of data.[55] It assumes that a strong system of assessment and accountability will lead to good teaching, good governance, and therefore good student performance.[56] This technical (and generic) approach ignores the specificities of the causes of poor performance, which are tied to historical, cultural and economic aspects of societies. It also ignores evidence of the failures of these approaches (as well as of competitive federalism, tying improvement to incentives, learning from 'best practices', etc.) in improving learning and reducing inequities both in 'mature economies' such as the US and Australia, and in the global south, where competency-based assessments, psychometric expertise, and incentive-based governance have been promoted for decades without results.[57] The argument that an outcomes-based approach is

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[55] See for example, https://www.ukfiet.org/2019/a-learning-crisis-or-a-data-crisis-rethinking-global-metrics/

[56] Gorur, R. 2017. Towards Sustainable, Collective and Participatory Accountability in Education 2030. (Background paper for Global Education Monitoring Report 2017/8.)

[57] Valverde, G. A. 2014. "Educational Quality: Global Politics, Comparative Enquiry, and Opportunities to Learn." Comparative Education Review 58 (4): 575–589

widely 'accepted' needs to be examined in light of the fact that incentives are frequently attached to the adoption of this approach by nations in the global south, which, for a variety of reasons, are only able to implement it partially.[58]

2. **Competency based assessment**: Conceptualisation of assessment (and learning) as 'competencies' derives from behaviourist ideas popular in the US in the 20th Century and encourages skill acquisition over conceptual knowledge.[59] [60] It has reduced education to a building blocks approach based on the development of discrete abilities.[61] While this can help to identify the key skills students need to develop literacy and numeracy, scholars (and the current global crises) highlight the shortcomings of an abstracted 'skills and competencies' approach to education,[62] and the need for an emphasis on social consciousness, a deep understanding of the interdependence of all beings, etc. These are unlikely to be taught as discrete skills: we would rather have people who care, than people who have 'caring skills'.[63]

Competence based approaches are fundamentally inequitable because individual teachers and learners are only viewed as objects of regulation - all other aspects are erased.[64] [65] The shortcomings of the competency model are now being recognised in medical practice and engineering education where it had previously been embraced with enthusiasm.[66] [67] The competency model has been part of the reform agenda of development agencies for decades, and it has not benefited these nations.

3. **Ability of Assessment to Inform Governance:** Since the 1990s, assessment has been ramped up globally to inform governance, with billions of dollars spent on international and national assessments. But the ability of these assessments to provide useful data to improve policy or governance is limited. Australia has participated regularly in PISA, oversamples to get fine-grained detail and provides detailed national reports. It also conducts NAPLAN, a census-based standardised assessment that tests all students in Grades 3, 5, 7 & 9 each year. Despite all this

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[59] Morcke, A. M., Dornan, T., & Eika, B. (2013). Outcome (competency) based education: an exploration of its origins, theoretical basis, and empirical evidence. *Advances in Health Sciences Education*, *18*(4), 851-863.

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[61] Gallagher, C. W. (2014) Disrupting the game-changer: Remembering the history of competency-based education. Change: The Magazine of Higher Learning, 46(6), 16-23

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[65] Richard Edwards (2016) Competence-based education and the limitations of critique, International Journal of Training Research, 14:3, 244-255, DOI: 10.1080/14480220.2016.1254366

[66] Morcke, A. M., Dornan, T., & Eika, B. (2013). Op. Cit.

[67] D. C. Woolston, "Outcomes-based assessment in engineering education: A critique of its foundations and practice," *2008 38th Annual Frontiers in Education Conference*, Saratoga Springs, NY, 2008, pp. S4G-1-S4G-5, doi: 10.1109/FIE.2008.4720266.

testing and analysis, scores on PISA have been declining steadily since its excellent performance in 2000, and NAPLAN scores have [stagnated](#) or slid. The US also has not seen any [improvement](#), despite participating in NAEP, PISA, TIMSS, etc. and various incentive schemes in NCLB, Race to the Top, Common Core, etc. The suggestion here is not that there should be no national assessments but that there should be a realistic understanding of the purpose of these assessments and what they can achieve.

4. **Ability of standardised, outcomes-based assessment to inform learning:** Standardised assessments - especially sample-based ones - are only designed to assess, in broad brush, the health of *systems*. They have little value in informing learning. On the other hand, linking performance on competency-based assessments to incentives can lead to the reduction of the curriculum to a series of discrete, de-contextualised and disconnected skills and competencies.

5. **PISA as a solution**: In a country where the drop-out rate is high and retention rate is a mere 70%[68] at elementary level and 20 million children[69] remain out of school, PISA will provide a skewed and inadequate picture (as has occurred in Vietnam), and deflect attention away from OOSC who are already neglected in policy. The idea that comparisons will produce 'shock' that can galvanise the nation into action does not apply here since India is already acutely aware of the deep lacunae in its education system(s).

   The small and non-representative sample of Chandigarh and KVs and NVs will result in skewed information which will provide little useful information. Moreover, the huge efforts being poured into preparing children to do well in PISA defeats the purpose of assessing the state of the system, which is the primary purpose of PISA. Using PISA as a catalyst to move curriculum away from rote learning and towards higher-order, application-based learning would be risky - PISA's claim that it is an 'application-based' approach as opposed to 'content-based' has been effectively challenged. The high success of the East Asian nations which emphasise the transmission model of learning should provide adequate pause in perpetuating this claim.

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[68] UDISE 20161-17
[69] Bhatty, K., Saraf, R., & Gupta, V. (2016). Out of School Children in India: Some Insights on What We Know and What We Don't.

"Large-scale assessments are blind to the ground realities and contexts which greatly differ across the states." Participant from STARS Consultation in Chamba, Himachal Pradesh

Recommendations

a. **Refocus on learning rather than measuring** - reconfigure assessment as a component of learning, rather than the driver of change.

b. **Reduce emphasis on competency-based learning** and assessment; ensure competencies are only part of a much richer understanding of education.

c. **Focus funds and attention on reducing systemic inequities**; ascertain the number of OOSC and support their learning.

d. **Strongly support CCE and its use in teaching** - focus on supporting and resourcing teachers to enable CCE in all six states (rather than three).

e. **Do not introduce incentives-based schemes** as they will lead to gaming the system, cheating, anxiety and displacement of attention from teaching to winning. Moreover, there are serious flaws in PGI and SEQI and indeed in the NAS data on which proposed incentive models are based[70].

f. **Support genuine and respectful decentralisation** premised on building relations of trust rather than control between different stakeholders. Creating independent cells and agencies reduces trust in government.

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[70] Dey & Gorur, forthcoming

Conclusion

Close to a year has passed since STARS was approved by Cabinet. A year later, schools are reopening gradually after over 500 days of closure. Studies have already shown that the long gap of school closure has led to a massive learning loss, with a [study](#) by Azim Premji University showing that over 90% children have forgotten at least one major language competency. At the same time, experts also anticipated a large-scale dropout of children due to the interruption in their education. Of those who return to school, many will have suffered greatly, facing pandemic-induced stress, poverty, family ill-health, bereavement, etc. There is also an exodus of children from private to government schools, and state schools need to be well prepared and strengthened to handle this increase in enrolment.

Given the current context, it is important that the funds and technical support as part of the STARS project are prioritised towards effective and safe reopening of schools, such that all children are back to school and learning. Doing so would include:

- **Large-scale awareness and enrolment drives** in communities to get children back to school
- **Sanctioning additional budgets for schools** to ensure availability of masks, sanitisers, and safe WASH facilities
- Ensuring that the public education system is **adequately resourced by filling vacancies** at all levels, especially teacher vacancies and at lower levels of the administration as well as teacher training institutes
- Development and roll-out of an **accelerated learning curriculum** to recover the learning loss

While ensuring effective school re-opening should be prioritised in the immediate short-term, ensuring that STARS works towards strengthening the public education system would necessitate the following:

- **Have wide-ranging consultations with teachers, community members, government officials and civil society** on an ongoing basis while planning and implementing different aspects of the project
- **Reconsider the proposal for partnerships with non-state actors, especially handing over of government schools, use of school vouchers** and outsourcing core education functions such as teacher training and curriculum development
- **Set up committees at state, district and block level to monitor and review activities undertaken as part of** PPPs being envisaged under this project or working closely with the public education system. Ensure that teachers, SMC members and civil society members are represented on all such committees
- **Develop concrete plans for equity through ensuring universal secondary completion** (including out of school, child labourers, girls and migrant children) and support inequality-reducing measures such as multi-lingual education, addressing caste-based discrimination, promoting gender transformative and inclusive education and redressing the digital divide

Annexures

Annexure 1- Details of consultations organised around the STARS project

The concerns about the STARS project and the recommendations to build a self-reliant, empowered equitable and innovative public education system, detailed below, are based on a comprehensive and wide-ranging consultative process which involved teachers, community members and government officials across Maharashtra, Himachal Pradesh, Madhya Pradesh, Rajasthan and Odisha. The consultations were done through a combination of virtual and on-ground consultations.

A series of 13 webinars were organised in collaboration with Oxfam India that reached out to over 2000 teachers across the 6 focus states of the project. These webinars oriented teachers on the key provisions of the project and sought their feedback and concerns, if any. In addition, a state level consultation was organised in collaboration with the Maharashtra chapter of the Right to Education Forum. This was attended by over 15 members including academicians, education activists and CSO representatives.

A total of nine on-ground consultations were held across Madhya Pradesh and Himachal Pradesh, two of the six focus states of the STARS project. Similar to the virtual consultations, the on-ground consultations started with a brief overview of the provisions of the loan and sought feedback, concerns and recommendations to implement the STARS project more effectively to improve the public education system. The consultations reached out to over 250 individuals including teachers, CSO representatives, government officials and academicians. The details of these consultations are given in the table below.

Sr. no	Consultation date	Location	Details
1	11th February, 2021	Mandi, Himachal Pradesh	The consultation was organised in collaboration with the Right to Education Forum, Himachal Pradesh and the Himachal Gyan Vigyan Samiti. It was attended by 24 participants including teachers, community members and civil society representatives.
2	21st February, 2021	Kangra, Himachal Pradesh	The consultation was organised in collaboration with the Right to Education Forum, Himachal Pradesh, and was attended by 28 participants including community members, teachers, officials from the education department, PRI members and civil society representatives.
3	24th February, 2021	Una, Himachal Pradesh	The consultation was organised in collaboration with the Right to Education Forum, Himachal Pradesh, and was attended by 22 participants including teachers, DPO and the DIET Principal.
4	8th March, 2021	Sidhi, Madhya Pradesh	The consultation was organised in collaboration with the All India Primary Teachers Federation, Madhya

			Pradesh Shaskiya Prathamik evam Purva Madhyamik Shikshak Sangh and Zilla Prathamik Shikshak Sangh, Sidhi. It was attended by 39 participants, including the DIET Principal, DPC, BRCC and teachers.
5	13th March, 2021	Chamba, Himachal Pradesh	The consultation was organised in collaboration with the Right to Education Forum, Himachal Pradesh, and was attended by 22 participants including teachers, DPO and the DIET Principal.
6	13th March, 2021	Rajgarh, Madhya Pradesh	The consultation was organised in collaboration with the All India Primary Teachers Federation, Madhya Pradesh Shaskiya Prathamik evam Purva Madhyamik Shikshak Sangh and Zila Prathmik Shikshak Sangh Rajgarh. It was attended by 40 participants, including the DIET Principal, DPC, BRCC and teachers.
7	14th March, 2021	Ashoknagar, Madhya Pradesh	The consultation was organised in collaboration with the All India Primary Teachers Federation, Madhya Pradesh Shaskiya Prathamik evam Purva Madhyamik Shikshak Sangh and Zila Prathmik Shikshak Sangh Rajgarh. It was attended by 43 participants, including the MLA of Ashoknagar, DIET Principal, DPC, BRCC and teachers.
8	21st March, 2021	Shajapur, Madhya Pradesh.	The consultation was organised in collaboration with the All India Primary Teachers Federation, Madhya Pradesh Shashkiya Prathamik evam Poorva Madhyamik Shikshak Sangh and Zila Prathamik Shikshak Sangh, Shajapur. It was attended by 30 participants including the DIET Principal, DPC, BRCC and teachers.
9	2nd April, 2021	Bilaspur, Himachal Pradesh	The consultation was organised in collaboration with the Right to Education Forum, Himachal Pradesh, and was attended by 20 government school teachers.