Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)

Appraisal Stage | Date Prepared/Updated: 21-Nov-2019 | Report No: PIDISDSA24191
### BASIC INFORMATION

#### A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Project ID</th>
<th>Project Name</th>
<th>Parent Project ID (if any)</th>
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<tbody>
<tr>
<td>Myanmar</td>
<td>P163389</td>
<td>Inclusive Access and Quality Education project</td>
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<th>Estimated Board Date</th>
<th>Practice Area (Lead)</th>
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<td>EAST ASIA AND PACIFIC</td>
<td>26-Nov-2019</td>
<td>27-Feb-2020</td>
<td>Education</td>
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<th>Implementing Agency</th>
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<tr>
<td>Investment Project Financing</td>
<td>Republic of the Union of Myanmar</td>
<td>Ministry of Education</td>
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**Proposed Development Objective(s)**

To improve equitable access to, and quality of, basic education delivered through formal, non-formal and complementary institutions and providers.

**Components**

- Component 1: Improving quality and increasing inclusion in formal basic education schools (DLI)
- Component 2: Improving access to quality education for children at risk of being excluded
- Component 3: Strengthening systems (DLI)
- Component 4: Operational Support (IPF)

### PROJECT FINANCING DATA (US$, Millions)

#### SUMMARY

<p>| | |</p>
<table>
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<td>Total Project Cost</td>
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<tr>
<td>Total Financing</td>
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<td>of which IBRD/IDA</td>
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<td>Financing Gap</td>
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#### DETAILS

**World Bank Group Financing**

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<td>IDA Credit</td>
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Non-World Bank Group Financing

| Trust Funds                                      | 80.00 |
| Education for All - Fast Track Initiative       | 70.00 |
| European Commission Development Fund - TF       | 10.00 |

Environmental Assessment Category

B-Partial Assessment

Decision
The review did authorize the team to appraise and negotiate

B. Introduction and Context

Country Context

1. Resource rich, Myanmar is one of the poorest countries in Southeast Asia (World Bank 2014). It has a population of approximately 53 million and a per capita gross domestic product (GDP) of USD1,275 (2016). Poverty was estimated at 32 percent in 2015, concentrated particularly in rural and conflict-affected areas (Ministry of Planning and Finance (MOPF) and World Bank 2017).

2. In 2011, the country embarked on multiple transitions: from a planned to an open market economy, from military to civilian rule, and from conflict to peace. It held democratic national elections in November 2015, which resulted in a landslide victory for the National League for Democracy. The country has also experienced strong economic growth (averaging 7.3 percent per year from 2011 to 2016, 6.4 percent in per capita terms), a substantial reduction in poverty from an estimated 48 percent in 2005 to 32 percent in 2015 (MOPF and World Bank 2017), and other significant changes in all sectors of society, including rapid expansion in mobile phone ownership (from 4.8 percent in 2010 to 81.5 percent in 2017); a near doubling in access to electricity, particularly in rural areas; an increase in participation in civil society and use of social media; and progress—albeit somewhat limited—on the nationwide peace process, which led to the signing of a national ceasefire agreement (NCA) between the government and many, but not all, ethnic armed organizations (EAOs).

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2 Eight of 20 EAOs around the country initially signed the NCA, and two others did so in 2018.
3. **Nevertheless, significant challenges remain regarding conflict, income, location and ethnic disparities, as well as social inclusion.** The country has around two dozen major EAOs, many of which have been engaged over decades in a struggle to preserve their languages and cultures while retaining control over political and economic life in their areas. People all over Myanmar, particularly poor people, have limited access to basic services and infrastructure, including clean water, education, health care, and electricity. Lack of access to markets and services correlates with location, ethnicity, religion, and citizenship status. Gender equality indicators have slowly improved in recent years, but social norms continue to delineate spaces available to men and to women to a large extent, significantly affecting, among other things, access to the labor market (MOPF and World Bank 2017).

4. **Rakhine State has seen particularly high levels of violence.** Over the past decades, Rakhine State has seen multiple rounds of conflict, most recently in August 2017 when deadly violence led to the forced displacement of more than 730,000 Muslims who self-identify as Rohingya into Bangladesh. Such violence has exacerbated communal tensions and deepened social fractures. Rakhine State suffers from underdevelopment, intercommunal conflict, and lingering grievances toward the central government. It is estimated that about 600,000 Muslims remain in Rakhine State, a number that includes the vast majority of the close to 130,000 people in internally displaced persons camps in Central Rakhine.

Rakhine is also experiencing a security crisis in which all communities harbor deep-seated fears and mistrust of the others because of past violence and segregation. This includes tensions between groups of different ethnicities and between the ethnic Rakhine population and the Myanmar government over a perceived lack of local autonomy. In January 2019, the Arakan Army attacked police and military posts in northern Rakhine, and fighting has continued since, leading to further internal displacement. There is also chronic poverty, from which all communities suffer, in the state, and living standards lag behind the national average on virtually every dimension; 72.7 percent of the population is classified as poor in Rakhine, compared with 42.3 percent of the overall population, and the depth of poverty is more severe than in other parts of Myanmar. Rakhine is also

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3 Myanmar is thought to be one of the most ethnically diverse countries in the region. The precise breakdown of ethnic groups is contested. The government officially recognizes 135 distinct ethnic groups, which are referred to in the constitution as “national races.” The country has more than 100 living languages. The majority Bamar population are widely believed to account for approximately 65 percent of the national population.

4 In accordance with the Kofi Annan Advisory Commission report on Rakhine State (2017) and with the United Nations, we do not use the terms “Bengali” or “Rohingya” but refer to this population as “Muslims” or “the Muslim community in Rakhine.” This does not include the Kaman Muslims in Rakhine or other Muslims in the country.

the most deprived state in terms of nonmonetary welfare factors, with a multidimensional disadvantage index of 39.2—almost twice the national average (see figure 1; Ministry of Labour, Immigration and Population and World Bank, 2018). Although all communities in Rakhine are deprived and experience the effects of violence and chronic poverty, statelessness and prolonged discrimination have made the Muslim community particularly vulnerable. The majority of Muslims in Rakhine self-identifying as Rohingya have been denied citizenship and political representation in Myanmar and are the largest community of stateless people in the world. While all communities in Rakhine state often choose to limit their movements out of fear and concern for their safety, Muslim internally displaced persons (IDPs) are almost entirely deprived of freedom of movement (Advisory Commission on Rakhine State 2017).

**Sectoral and Institutional Context**

**Financing and diversity of providers**

5. The government has identified education and poverty alleviation as essential to achieving its vision of a peaceful, prosperous, democratic country. In the education sector, the National Education Law (2014; amended in 2015) and the National Education Strategic Plan (NESP) outline the reforms required to achieve these objectives. The NESP identifies sectorwide education reforms to be implemented from 2016 to 2021 to increase access to quality education for students at all levels. It also emphasizes the need for broad segments of the population to share education benefits and for excluded groups not to be left behind.
6. As a testament to the government’s prioritization of education, public spending for education has increased significantly in recent years, although it remains low as a percentage of government expenditure and of GDP. Public spending in education rose from MMK 310 billion (~USD230 million equivalent) in 2011–12 to more than MMK 2,177 billion (~USD1.4 billion equivalent) in 2018–19. This increase reflects growth in education budgets that outstripped spending in most other sectors. Nevertheless, at approximately 7.7 percent of government expenditures and 2.5 percent of GDP in 2018-19, public education spending is considerably lower than in neighboring and comparator countries.

7. The education sector in Myanmar is a complex web of systems and providers. MOE is the largest provider of education services in Myanmar (accounting for 83 percent of public spending in the sector), but there is also a sizable nongovernmental sector. More than 1,500 monastic schools registered with the Ministry of Religious Affairs (MORA) deliver the MOE curriculum while providing food and board for almost 297,000 children from the poorest communities and households. Ethnic basic education providers (some affiliated with ethnic armed organizations) provide education services of varying quality to more than 300,000 children, with well-established systems operating in Kayin, Mon, Kachin, and Kayah states. The major ethnic systems use their own languages in schools to differing extents and very often have their own policies, management systems, curricula, learner assessment frameworks, and teacher recruitment and professional development strategies. A political dialogue aimed at resolving many problems, including the decentralization of the delivery of services such as education to subnational levels was initiated in the context of the NCA but has yet to pay dividends. In central Rakhine, temporary learning spaces (TLSs), which nongovernmental organizations (NGOs) finance and manage, serve children in IDP camps. An unknown number of nonregistered schools also deliver education services of varying quality to school-aged children using curricula aligned to varying degrees with MOE’s curricula. Figure 2 illustrates the relative size of the different systems and providers.

Outcomes, achievements, and challenges in Myanmar

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6 For example, in 2016, Vietnam spent 4.3 percent of GDP on education ([https://data.worldbank.org/indicator/SE.XPD.TOTL.GD.ZS](https://data.worldbank.org/indicator/SE.XPD.TOTL.GD.ZS))

7 Fourteen other ministries providing vocational and higher education services with their own budgets manage the remaining 17 percent. For example, the Ministry of Health runs and finances health-related universities (World Bank 2015a).

8 In Rakhine, there were already approximately 120,000 people in camps for IDPs before August 2017 because of intercommunal conflict. In 2019, approximately 22,000 children are enrolled in TLSs.
8. Despite significant progress in access to basic education (primary, middle, and high school) in recent years, completion rates and learning outcomes are suboptimal. The average net enrollment rate, in schools managed by any providers, increased from 88 percent in 2009-10 to 97 percent in 2016-17 in primary schools, from 52 percent to 71 percent in middle schools, and from 26 percent to 44 percent in high schools (MOPF, UNDP, World Bank 2017). These statistics also illustrate the remaining challenges regarding dropouts and completion. It is estimated that 2.7 million children aged 5 to 16 (~23 percent of this age group) were out of school at the time of the 2014 census, having dropped out or never having attended school. Even when in school, evidence indicates that a significant proportion of students are not reaching the expected minimum proficiency level. At the national level, in government schools, using data from early-grade reading assessments (EGRAs) and early-grade math assessments, it is estimated that less than 30 percent of grade 3 students achieve fluency in reading grade-appropriate text in Myanmar language, and less than 40 percent achieve proficiency in solving basic mathematical problems. According to the Human Capital Index (HCI), a child who starts school at age 4 can expect to complete 9.8 years of school by his or her 18th birthday (expected years of school) but only 6.7 years when factoring in what children actually learn (learning-adjusted years of school), an important learning gap of 3.1 years.9

9 Key education outcomes are also unequally distributed within the country and between children and households of different social and economic backgrounds. Dropout rates are especially high for children and youth from poorer households; in families in the bottom 40 percent of the wealth (proxied by consumption) distribution, 74 percent of children (versus 60 percent overall) starting grade 1 drop out before the end of middle school (figure 3). The numbers of dropouts and of those who never went to school also vary substantially across townships as well as states and regions.10

The gap in nonattendance rates for youth aged 6 to 16 in 2014 (census data) between the state with the highest prevalence of nonattendance (Shan East, 53 percent) and the region with the lowest (Chin, 15 percent) is 38 percentage points. Students from wealthier households perform significantly better on EGRA (World Bank 2015b).11 Overall, boys drop out earlier, learn less, and fall behind faster than girls, but

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10 Regions are defined subnational areas where most of the population is of Bamar ethnicity.
11 Author’s analysis of other rounds of EGRA data.
there are significant economic and regional disparities. In poor households, 71 percent of girls complete primary school, compared with 77 percent of boys, and fewer girls transition to middle school (64 percent, versus 69 percent of boys). Shan State has the lowest female literacy rate for young women (59.4 percent), and in Rakhine State, 57 percent of girls aged 10 to 15 are not in school (versus 49 percent of boys) (Asian Development Bank, United National Development Programme, United Nations Population Fund, United Nations Entity for Gender Equality and the Empowerment of Women 2016). Finally, some analyses indicate that language is an important factor in access, completion, and learning. For example, students who predominantly use the Myanmar language at home perform significantly better on EGRA (World Bank 2015b). The correlation between education outcomes and conflict is difficult to determine. Although 63 percent of conflict-affected townships score below the national average on a composite education subindex, the presence of strong nonstate education providers mitigate this effect in some areas, such as Kachin, which, despite experiencing active conflict, has education outcomes above average. It is likely that the effect of temporary displacement as a result of fighting on access to school of displaced children and on children from the host communities is not captured in these statistics.

10. **To increase access to education and learning, MOE has recently launched and implemented many important reforms.** The school improvement planning process and transfer of funding to schools ensures that the free education policy is respected and promotes participation of parents and communities in school management. Stipends were paid to almost 200,000 poor and vulnerable students in the 2018–19 school year reduce poor households’ financial burden linked to schools and, per preliminary estimate, dropouts. A large curriculum reform, including revisions of the content and pedagogical strategies and the move to a kindergarten-to-12th grade structure were initiated in 2016 and will continue to be progressively phased in over the next several years. Larger investments in school infrastructure resulted in more than 8,000 new schools, 12,000 new classrooms, and the renovation or upgrading of more than 15,000 classrooms. More than 60,000 new teachers (although many initially recruited under temporary contracts and without teaching qualifications) and several thousand teaching assistants (assigned to classrooms to help non-Myanmar-speaking students) were recruited over the last few years. Competency standards frameworks for teaching and nonteaching staff were drafted, education colleges were upgraded from two-year-diploma to four-year-degree institutions, and a mentoring program offering in-person and regular coaching to inexperienced teachers was introduced and will soon reach all townships.

11. **Nevertheless, major challenges remain around the uneven availability and quality of education services run by various providers across the country, the standards of education services (including but not limited to infrastructure), teacher competencies and human resource management, public financial management, as well as linkages between state and nonstate systems.** Infrastructure needs remain high, especially considering the ongoing curriculum reform and the related need for new classrooms. School-level funding and management processes must be improved since the current ones have not led to measurable improvements in equity and learning. Teacher competencies vary widely, and the in-service teacher training offer is scattered and unsystematic. Inefficiencies in human resource (HR) management

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12 The education subindex draws on four indicators: literacy rates, school enrolment, and elementary school (ages 6-11) and middle school (ages 12-16) attainment rates (The Asia Foundation 2017).

13 Preliminary analysis of the content of textbooks and teacher guides to inform development of peace and inclusive training curriculum (see subcomponent 1.2) indicates that, although areas for growth remain, new textbooks feature more democratic, systematic, and inclusive pedagogy, as well as some enhanced inclusivity in terms of ethnicity, religion, disability, geography, and age.
lead to inequitable deployment of the teaching force across the country and across grades. The lack of formal recognition of performance and opportunities for professional development is demotivating and leaves the potential for better teaching untapped. No specific mechanisms are in place to ensure adequate services are offered to children from internally displaced populations or from migrant households. Pathways to education for over-age out-of-school children, particularly in the poorest and conflict-affected townships, are limited given the underdevelopment of the alternative education (AE) sector. The public financial management (PFM) system is cumbersome (mostly paper based) and inefficient, budget formulation does not adequately reflect strategies and priorities, and financial reports are insufficiently disseminated and not used properly to inform decisions. Most students attending schools managed by ethnic basic education providers (EBEPs) struggle to transition to other systems or to have their credentials recognized and therefore have difficulty realizing a return on their investment and contributing to economic life.

Outcomes, achievement, and challenges in Rakhine

12. **Education outcomes in Rakhine State are considerably poorer than the national average.** Net total enrolment rates at all three basic education levels (primary, middle, high) are below the national average (90, 58, and 31 percent respectively), and the state ranks in the bottom five for whether children are at the age-appropriate level of schooling. Furthermore, unlike in most other states and regions, there are large gender gaps in youth literacy and enrolment in middle and high schools that favour boys. For example, there is a 6 percent to 15 percentage point enrollment gap for girls in Rakhine’s middle and high schools (CSO, UNDP, World Bank 2018).

13. **Education challenges in Rakhine State relate to broad underdevelopment, decades of underfunding, as well as a history of deep-rooted conflicts, and stem from many interrelated problems.** Given the poverty level, direct costs (tutoring, transportation, supplies, and uniforms) make secondary education prohibitively expensive for all communities, discouraging school attendance and disproportionately affecting girls. Most Muslim IDP children (in central Rakhine) attend TLSs, which generally offer only kindergarten and primary education, and therefore have little opportunities to access higher levels of education. Outside of the camps, long distances to the closest middle and high schools combined with official and unofficial restrictions on movement leads to high dropout and low completion rates or a reliance on nongovernmental institutions that teach the government curriculum (community-funded schools and monastic schools) or not (madrasas and church schools). Shortages of teachers, especially qualified teachers, is also a major concern across the state and especially in remote areas and Muslim communities. Past and recent violence has dissuaded many non-Muslim government teachers from working in remote areas, especially in majority Muslim villages, which leads to low retention and high absenteeism, and qualified Muslim teachers are scarce. As a consequence, especially in Buthidaung, Maungdaw, and Yathedaung (BMY), there is widespread reliance on unqualified community volunteers. This lowers the quality of education delivered and limits the opportunity for students to learn the Myanmar language. Limited access to higher education—primarily for the Muslim population—is a serious concern. Although Muslim students in Rakhine can complete some university correspondence courses and degrees, physically attending university is difficult because of movement restrictions and

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14 Before August 2017, based on MOE data, BMY townships had the highest pupil-to-teacher ratios in the country. Internal displacement, exodus of refugees, and redeployment of teachers have since led to the opposite situation, with some teachers remaining idle in their new schools.
discriminatory practices emanating from security concerns (Advisory Commission on Rakhine State 2017; unpublished data).

14. **The upsurge in violence and forced displacement in the state since August 2017 has also deepened the challenges in the education sector.** Before August 2017, BMY had 595 schools serving 205,000 students, whereas the rest of Rakhine had 2,574 schools for 425,000 students. Although there is no rigorous estimate of enrollment rates according to ethnicity, approximately 60 percent of schools in Buthidaung, 90 percent in Maungdaw, and 25 percent in Yathedaung were located in Muslim communities and villages and therefore were probably serving (mostly) Muslim students. More than 70 percent of schools and all three township education offices (TEOs) in BMY, which closed at the end of August 2017, have reopened, but data to assess the inclusiveness of practices in schools that reopened are limited, and MOE is facing difficulties in deploying qualified teachers to certain areas. Furthermore, recent fighting between the Arakan Army and Myanmar security forces has led to internal displacement of approximately 30,000 individuals (as of May 2019), which is likely to lead to even more constraints on provision of education and access to schools in the area.

15. **MOE is committed to implement the education recommendations of the Rakhine Advisory Commission and proactively and publicly introduced targeted initiatives with varying degrees of success.** To support reopening of schools in BMY after August 2017, MOE provided accommodation for teachers in neutral areas and transportation to and from school. Considering the difficulties in deploying non-Muslim teachers to Muslim areas, MOE initiated the recruitment of more than 10,000 teaching assistants and volunteers to be assigned to these schools. Teaching assistants will be offered training opportunities, acceptable remuneration, and a projected career pathway toward eventually becoming recognized civil servants. To address known challenges in adult literacy, the scope of the literacy campaigns in the state was substantially increased. To increase access to higher education, more spaces were created in distance education programs. To support children in IDP camps, MOE has progressively increased the portion of teachers’ salary it covers and is discussing with partners strategies to take full responsibilities of delivering accessible education in some of the camps. Some of these initiatives are only partially implemented because of local political economy constraints, and numerous challenges remain.

### C. Proposed Development Objective(s)

16. **The Project Development Objective (PDO) is to improve equitable access to, and quality of, basic education delivered through formal, alternative, and complementary institutions and providers.** Basic education services cover kindergarten, primary, middle, and high school. The distinction between formal, alternative, and complementary is as follows.

   (a) **Formal basic education** is basic education services that schools sanctioned by or falling under the purview of the government deliver, following the official MOE curriculum, within the regular school grade structure (currently transitioning to a kindergarten–12 structure) and hours. Facilities of these schools are generally permanent but can also be temporary if serving

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15 This is also confirmed when comparing MOE school-level enrollment and census data, which indicates discrepancies as a result of noncoverage of Muslims in Rakhine in the census. This exercise indicates that approximately 86 percent of enrolled students in Buthidaung, 93 percent in Maungdaw, and 29 percent Yathedaung were probably Muslim.
mobile (migrants or displaced) populations. Government schools managed by MOE and monastic schools registered with the MOR fall under this category.\textsuperscript{16}

(b) \textit{Alternative basic education} is provided in accelerated and flexible learning programs (also called non-formal education classes) following a curriculum that allows students to achieve critical end-of-cycle competencies in fewer years than in formal schools and delivered outside regular hours. Providers falling under this category are currently limited to AE centers under the purview of the MOE.

(c) \textit{Complementary basic education} is formal education or AE services delivered following a curriculum that is aligned, to varying degrees, with the official MOE curriculum delivered by providers that operate with a certain level of independence from the government. Providers falling under this category include EBEPs and other nonregistered schools, private (for profit or not) schools, and NGOs operating TLSs in Rakhine.

D. Project Description

17. The program is expected to be implemented over four school years\textsuperscript{17} (2019–20 to 2022–23) and is structured around four components, three of which are results-based. Financing under the first three components will use a results-based or disbursement-linked indicators (DLI) mechanism. Achievement of results, measured through DLIs and against verified execution of an EEP, will trigger disbursement. Funding for these components will be channeled through government systems and will finance specific budget line items (defined in the EEP). Financing under component 4 will use an input-based financing mechanism.

Component 1: Improving quality and increasing inclusion in formal basic education schools

18. The component will support the transfer of additional funding to formal basic education schools; improvements in the planning, management, and use of these funds; and enhancement of the skills, competencies, and practices of teachers through CPD. Targeted results are reflected in DLIs 1 to 8 and, along with other indicators, in the Results Framework (Section VI).

Subcomponent 1.1: Improving planning and funding of basic education schools

19. Aligned with NESP chapter 6, strategy 3 (components 1 and 2), this subcomponent will build and improve upon the ongoing SISP. Since 2014, the nationwide SISP has provided a transparent, reliable, flexible source of funding to all formal government and monastic basic education schools. The yearly amount of School Improvement Funding (SIF) ranges from USD400 to USD15,000 per school, following a formula based on student enrollment. School heads and head monks receive regular training and prepare a yearly school quality improvement plan (SQIP), a detailed plan identifying priority actions, with associated budgets (publicly disclosed on school notice boards) and timelines for the school to implement, and manage the funding received in collaboration with a representative school committee. However, the

\textsuperscript{16} Because monastic schools’ curricula and language of instruction (Myanmar) are mostly aligned with the government’s, they are included in several state-financed programs. This is not the case for ethnic providers.

\textsuperscript{17} The school year starts in June and ends in February-March, depending on level.
self-assessment to identify needs and priority actions could benefit from more guidance and the current formula limits MOE’s ability to support schools that face additional constraints unrelated to number of students enrolled. Furthermore, major repairs and upgrading of school facilities is managed outside the SISP framework, and proper guidelines for training, engineering support and quality assurance, and monitoring are lacking, which raises concerns regarding strategic planning, transparency, land use, and completeness and structural soundness of facilities.

20. Key activities to be conducted under this subcomponent are to introduce the use of quality and inclusion standards in the planning, management, and monitoring process, increase the amount and flexibility of funding, and encourage better and more inclusive planning and spending.

(a) Introducing the use of quality and inclusion standards in the planning, management, and monitoring process. The School Quality Assurance Standards Framework (SQASF)\(^\text{18}\) is a framework defining quality and inclusiveness standards of formal basic education services, articulated around six domains,\(^\text{19}\) along with indicators to assess to what extent schools meet these standards. The standards will cover aspects of social inclusion such as consultation with community members and parents and non-discriminatory practices.\(^\text{20}\) This framework will be progressively introduced, and schools will use it as a guide to better identify their needs and design priority actions of the SQIP; monitor results; reinforce the role of parents and communities in school decision making; and build capacity at the township, school, and community level.

(b) Increasing the amount and flexibility of funding. Additional funding (SIF 2.0A) for operational expenses will be transferred to schools in the form of a supplement to the current SIF (~USD1,000 on average) to help schools that, despite efforts, face challenges in achieving expected standards of service delivery. The SISP will also be expanded to include the school-managed “major repairs” funding stream (SIF 2.0B). A maximum of MMK 20 million (~USD15,000) per request will be available under this funding stream. After their request is accepted, schools will benefit from capacity building, engineering support, and quality assurance, for the renovation, rehabilitation or extension projects financed. Given Myanmar’s vulnerability to natural disasters such as floods, cyclones, and landslides, all of which climate change will exacerbate, major repairs will incorporate resilient designs and construction materials wherever feasible. In addition, efficiency measures such as light-emitting diode lighting and efficient designs that reduce energy consumption will be considered in the school repairs.

(c) Encouraging better and more inclusive planning and spending through the use of local social assessment and outreach to marginalized populations, extensive communication campaigns regarding the SISP and school’s commitment to social inclusion and non-discrimination,

\(^{18}\) MOE is developing the SQASF with support from the Myanmar Education Quality Improvement Program (Department of Foreign Affairs and Trade).

\(^{19}\) Learning and teaching, professional development, leadership and management, infrastructure and physical resources, expenditure and financial management, parent and community participation.

\(^{20}\) Nondiscrimination is defined as fair and unprejudiced treatment of different categories of people identified by, for example, gender, ethnicity, citizenship, religion, and disability.
rewards for the most improved schools and school clusters, expansion of the roles of parents and communities in assessing needs and monitoring achievements.

21. **The Department of Basic Education (DBE) will lead implementation the subcomponent and revise SISP OGs and training modules to guide other actors.** DBE will work in close collaboration with the Department of Education Research Planning and Training (DERPT) and Department of Monitoring and Evaluation—Research (DM&E-R). Day-to-day implementation will be managed by the TEOs with support from the state and regional and district education offices. Local (township-level) engineers contracted by states or regions will train for and monitor school-managed “major repair” projects. DBE will revise SISP OGs and training modules to include SIF 2.0A and 2.0B. These documents will cover topics related to assessing and monitoring changes in achievement of standards; developing and monitoring implementation of the SQIP; and budget planning, execution, and reporting. In relation to SIF 2.0B, OGs will expand upon without duplicating the existing child-friendly school guidelines.

This subcomponent will contribute to achieving the PDO through higher standards of education services, including more inclusive practices, especially in the most deprived townships and underperforming formal basic education schools. Improved quality of basic education services will follow from achievement of higher standards of services because of strengthened technical guidance and incentives, additional equity-enhancing funding, and new eligible expenditures (major repairs). More inclusive access to quality education services will be achieved through the use of local social assessment and inclusive consultations; targeting of the most deprived townships and, within these townships, of underperforming schools; and the use of inclusion standards designed to promote nondiscrimination in enrollment, attendance, and in-school practices and gender-responsive pedagogical strategies.

**Subcomponent 1.2: Enhancing skills and practices of teachers and head teachers**

22. **Aligned with NESP chapter 9, strategy 3 (components 1 and 2), the subcomponent will strengthen CPD of teachers and headteachers through system improvements and delivery of priority in-service training programs.** There were nearly 325,000 basic education teachers in 2018–19, and their training, competencies, and practices vary widely and are unevenly distributed across townships, geographical areas, and grades. In-service teachers receive mostly ad hoc, sporadic professional development, and there is an urgent need for a cohesive framework, including ties to career progression and promotion. Poor-quality teaching is especially problematic in the early grades and in remote and conflict areas, where less experienced, less qualified teachers are assigned, as well as in communities with a significant proportion of children who are not fluent in Myanmar language.

23. **Key activities to be conducted under this subcomponent are to strengthen oversight, coordination, and management of CPD and pilot a large-scale in-service training program focused on strengthening two competencies.**

   (i) **Strengthening oversight, coordination, and management of CPD.** A harmonized national CPD system will be established that includes recruitment of relevant expertise, development of pedagogical frameworks and maps aligned with the Teacher Competency Standards

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21 Following from the literature showing that gaps in achievement in early grades tend to be magnified over time, disparities in teacher competencies are likely to have the most lasting effect on children in early grades.
Framework (TCSF),\(^{22}\) prioritization of content development and delivery, development of a menu of mechanisms for drafting training curricula and materials and delivering professional development activities, and preparation of guidelines on monitoring and evaluating processes and outcomes.

(ii) *Piloting a large-scale in-service training program focused on strengthening two competencies:* (i) teaching literacy and numeracy in early grades and (ii) teaching in a way to promote peace, ethnic and cultural diversity, and the overcoming exclusion through conflict-sensitive, inclusive approaches in education. The two in-service programs will be delivered through multiple platforms, including face to face at the state or regional, township, or school cluster levels; in school by mentors and coaches; and through online platforms (using web and mobile technology). The programs will follow the CPD principles of needs assessment and alignment with the teacher and head TCSF and preservice training curriculum and will track trainees’ progress for eventual linkages to career progression.

24. **The Department of Education Research, Planning, and Training (DERPT) will lead implementation of the subcomponent and prepare OGs and training modules to guide other actors.** DERPT will work in close collaboration with the teacher education section of the Department of Higher Education (DHE), the DBE academic and planning teams, and the Department of Myanmar Nationalities’ Languages. Academic teams from the state and regional, district, and township education offices will manage and supervise school-level activities according to their respective responsibilities as inspectorate and monitoring bodies of high, middle, and primary schools, respectively. OGs and training modules for the early grade teaching and peace and inclusive education in-service training will be developed in close consultation with decentralized offices, parents, and communities and build on MOE’s and nonstate partners experiences.

25. **This subcomponent will contribute to achieving the PDO through better teachers, including in their competencies in peace and inclusive education, especially in the most deprived townships and underperforming formal basic education schools.** Better quality of basic education services will follow from more teachers and head teachers achieving the expected competency standards. More inclusive access to quality services will be achieved by targeting the most deprived townships and the most underperforming schools and teachers and specifically training teachers and head teachers on ways to promote peace, enhance ethnic and cultural diversity, and overcome exclusion.

**Component 2: Improving access to quality education for children at risk of being excluded**

26. **The component will support expansion and improvement of services targeting children at risk of being excluded from the benefits of education because of non-enrollment, enrollment in low quality schools or centers, or nonrecognition of their credentials.** This includes over-age out-of-school children who could be enrolling in alternative education programs, children from displaced or migrant households who are unable to enroll in schools as a result of their displacement or who attend schools that face a surge in student populations and therefore can only provide poor quality services, and children enrolled

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\(^{22}\) The TCSF includes focus areas such as professional knowledge and understanding, professional skills and practices, professional values and dispositions, and professional growth and development. A competencies framework is also being drafted for nonteaching staff.
in programs delivered by EBEPs which are not formally recognized by MOE. Targeted results are reflected in DLIs 9 to 14 along with other indicators in the Results Framework (Section VI).

**Subcomponent 2.1: Expanding access to quality education services for marginalized children**

27. Aligned with NESP chapter 10, strategies 2 and 3 (components 1, 2, and 3 of each strategy), and chapter 6, strategy 2 (component 1), the subcomponent will strengthen and expand AE services and institutionalize a mechanism to better address the needs of displaced and migrant children. According to the 2014 census, approximately 23 percent of children aged 5 to 16 were out of school in 2015–16, having dropped out or never attended school. Some are working and over-age and are highly unlikely to ever enroll in formal schools. Others are from displaced or migrant households and face difficulties accessing schools because of their mobility and, when they do, generally receive lower quality services.

28. The AEP aims to provide achievable pathways to acquiring skills and nationally recognized credentials for over-age out-of-school children and youth. Under the AEP, accelerated learning classes, called nonformal primary education classes, are delivered through MOE-managed centers outside of formal schooling hours in 81 townships to approximately 8,000 students a year. Since 2016, nonformal middle school classes have been piloted but only on a small scale. Challenges currently facing AEP include limited supply (especially in some areas); presence of a few nongovernmental AE providers delivering idiosyncratic curricula following a diversity of models with no mechanism to ensure alignment with MOE based on common credentials and quality standards; and varying quality and lack of relevance (including little emphasis on noncognitive skills and competencies that employers value) leading to sporadic attendance, dropout, low pass rates, and low re-enrollment in the formal system.

29. Migrant and displaced children are from households who live in host communities and IDP camps or sites. More than 7,000 (as of May 2019) children from households internally displaced by active conflict in states such as Kachin and Shan attend government schools in host villages. However, there is no specific mechanism to quickly address the resulting sharp and sudden increases in the number of students in these schools, which reduces the quality of the education delivered. In IDP camps in Rakhine, approximately 22,000 children are enrolled in TLSs that humanitarian partners finance and manage, and an unknown number of school-aged children are not enrolled. Finally, children from migrant households, estimated to be more than 25,000, live in unofficial settlements near mines and construction sites, where education services are generally unavailable.

30. Key activities to be conducted under the AEP portion of this subcomponent are to strengthen and the coordination, management, and quality assurance of the AEP and to increase the number of classes offered in government-managed centers (where possible) and by accredited AE partners.

   (i) **Strengthening the coordination, management, and quality assurance of the AEP.** MOE will develop a partnership framework allowing for nonstate actors such as NGOs, civil society

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23 UNICEF is evaluating the nonformal middle school education pilot program, which will inform its future introduction and expansion.

24 During the 2018–19 school year, 1,700 displaced children were enrolled in government schools in northern Shan State and 8,601 in Kachin.

25 There were 82 TLSs in Sittwe, 27 in Pauktaw, and 11 in Minbya. TLS refers to the building. In some instances, the term “temporary learning classrooms” is used when referring to the classes being run in a TLS.
organizations (CSOs), and employers\(^\text{26}\) to become accredited AEP providers; design and introduce an Alternative Education Quality Standards Assessment Framework (AE-QSAF) defining quality and inclusiveness standards of AE services (similar to the SQASF for formal education services);\(^\text{27}\) set up an AE management database; and revise the student certification system to ensure equivalency of AE certificates.

(ii) *Increasing the number of classes offered in government-managed centers (where possible) and by accredited AE partners.* AE partners will be NGOs or CSOs that are legally registered to operate in Myanmar, have the necessary qualifications and experience to deliver AE classes as well as the necessary capacity and system to mitigate fiduciary and safeguards risks. Once these partners are accredited, MOE will transfer operational funds to them in the form of an implementation grant: the AEF. Applying this two-tier model (public AE centers and accredited nongovernmental AE providers) will allow the supply to be increased where demand is high but the government lacks the flexibility and expertise to meet it or where current AE providers do not achieve minimum standards.

31. **Key activities to be conducted under the ECMP portion of this subcomponent** will be to institutionalize mechanisms to ensure that formal schools are serving the needs of children from displaced and migrant households by providing additional financial and in-kind support to the existing formal schools, establishing new formal school, or improving the quality and inclusiveness of education delivered in schools or spaces serving IDP children. The ECMP will effectively allow MOE to reach the most marginalized children in the country who are currently falling between systems, in that they are not eligible for accelerated learning programs, such as the AEP, or are not able to enroll and participate meaningfully in permanent formal schools. Description of the ECMP mechanisms will be integrated into existing (when relevant) OGs or into separate ones, complementary to others, when more appropriate. The program targets three main groups of children and will operate in the following manner.

(i) *Children from households displaced by conflicts or natural disasters or from migrant households relocating to host villages already served by a formal school.* For these children, the ECMP will provide additional financial and in-kind support to the existing formal schools such as funding to build temporary facilities (using the major repair funding stream) to house one or more additional classrooms, additional teachers and teacher assistants (language) potentially receiving additional incentives, and additional SIF. The main objective is for the school to continue delivering quality services despite the increase in its student population. The program will be implemented according to a mechanism that allows for early identification of schools,\(^\text{28}\) quick availability and transfer of support, continuous monitoring

\(^{26}\) It is envisioned that various types of organizations and AE providers will be interested in partnering with MOE, including organizations which operates in EAO controlled areas. However, AE providers in this context are not to be confused with EBEPs, who primarily represent EAOs and parallel (ethnic) education systems.

\(^{27}\) The AE-QSAF will define expectations regarding provider and service characteristics (standards), such as management capacity, technical expertise, facilities, organizational structure, compliance, and consultations with parents and communities, and will be disseminated in wide-ranging communication campaigns. This framework will allow for local adaptations of the delivery model, medium of instruction, and pedagogical approaches to reflect local culture and language.

\(^{28}\) A process to regularly collect data on the number of children from displaced and migrant households in different areas and to make decisions regarding ECMP support will be established for this purpose.
for course correction and return to normal status when displaced households leave the host community, and the ability for students to transfer to other formal schools.

(ii) *Children from households displaced by conflicts or natural disasters or from migrant households relocating to new settlements without a formal school.* For these children, the ECMP will support the establishment of a new formal school (most likely a “branch” school of another formal school) near the settlement (e.g., mine, construction) managed under DBE. The school will be housed in temporary facilities but receiving the same financial and in-kind support (e.g., teaching and learning material, SIF, teachers, textbooks and uniform, etc.) as other branch formal schools. If the targeted migrant families move frequently (e.g., they follow a road construction), consideration will be given to using mobile facilities such as adapted buses. The program will be implemented according to a mechanism that will, when possible, seek contributions from the employer(s) for constructing temporary school facilities in the context of, for example, corporate social responsibility initiatives. The mechanism will include provisions for the continuous monitoring of these schools to allow for course correction and return to normal status when displaced households leave the settlement and for ensuring that students are able to transfer to other formal schools.

(iii) *Children displaced by conflict and living in IDP sites in Rakhine.* For these children, the ECMP will frame the progressive transfer of financial and management responsibilities of the TLSs from humanitarian partners to MOE and improvements in the inclusiveness of services delivered by MOE schools already operating in IDP sites. It therefore applies to all schools or TLSs serving IDP children whether they live in a location called a camp, a village, or a transit site. This framing will take the form of “plans for inclusive education service delivery” that the World Bank will review and the Education and Technical and Vocational Education and Training Sector Coordination Group (ETVSCG) will endorse. The plans must be consistent with the positions of relevant development partners for this particular site and be compliant with the World Bank safeguard policies. For schools/TLSs in an IDP site to continue to receive ECMP support, M&E data must confirm that the plan is implemented satisfactorily. The above-mentioned conditions are set out in the ECMP OGs. They must be met before schools/TLSs in an IDP site is considered eligible to receive financial or in-kind support under the project.

32. **Department of Alternative Education (DAE) and DBE will co-lead the subcomponent and prepare OGs and training modules for the AEP, ECMP as well as adapt the SISP OGs to account for the ECMP.** DAE will be responsible for the implementation of the AEP and the preparation of related OGs and training modules. DBE will be responsible for the implementation of the ECMP and the preparation of related OGs and training modules. Both departments will oversee consultations with state and regional authorities and nonstate actors; design of OGs and training modules; and monitoring of overall implementation and progress. At the state, regional, and township levels, SREOs and TEOs will be tasked with coordinating and overseeing implementation of the AEP and ECMP in accordance with the relevant OGs.

33. **This subcomponent will contribute to achieving the PDO by increasing by promoting and protecting children’s access to quality education even in the middle of political and armed conflicts and**

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29 It is likely that this will include mostly children from migrant households relocating to unofficial settlements.
expanding education opportunities for out-of-school children and youth. The subcomponent will do so by targeting townships and communities where most out-of-school children and youth reside, including those of displaced and migrant families, by explicitly reaching out to children who would otherwise be excluded from permanent formal schools or AE centers. Better quality of basic education services will result from achievement of higher standards by AE providers and ensuring appropriate levels of support in schools serving children from displaced and migrant families, by allowing for local adaptations of the curriculum, medium of instruction, and pedagogical approaches to appropriately reflect cultural and/or linguistic characteristics.

Subcomponent 2.2: Moving toward partnerships with EBEPs

34. Aligned with NESP chapter 5, strategy 2 (component 1), the subcomponent will support MOE’s progress toward establishing formal partnership agreements with Ethnic Basic Education Providers (EBEPs). The term EBEP covers a wide array of non-state organizations delivering education to approximately 300,000 children. Different EBEPs express different degrees of willingness to engage with MOE. EBEP systems and schools deliver service to students in Kayin, Mon, Kachin and Shan States, as well as in Bago and Tanintharyi Regions. They are associated with EAOs, such as the Karen National Union, New Mon State Party, Kachin Independent Organization and Restoration Council of Shan State, and partner CSOs. It is estimated that three major EAOs (Restoration Council of Shan State, Karen National Union, New Mon State Party) administer over 2,000 ethnic or mixed schools serving approximately 300,000 vulnerable children who might otherwise be denied education. In addition to these well-established systems operated by EAOs, there is also a wide diversity of community and religious organizations also managing schools. Substantial differences between providers (in terms of curriculum, language of instruction, management, teacher recruitment and development) means that the quality of services varies significantly. Furthermore, the lack of official recognition of the education that EBEPs provide represents a substantial barrier for students wanting to transition to other systems (government or otherwise) or access the labor market (Asia Foundation 2016). Historically, EAO education departments have had little or no contact with MOE. In the context of ceasefires and the NCA, this is changing. MOE and some EBEPs collaborate and interact to varying degrees, but none have reached the level of formal partnership agreements.

35. Key activities to be conducted under this subcomponent will be to engage in facilitated dialogue between MOE and EBEPs, pilot joint technical initiatives, and develop a coherent unionwide education partnership framework, partnership agreements, and roadmaps. The subcomponent will build on preparatory work30 which included assessment of the state of ethnic education across Myanmar and the degree and circumstances under which the EBEPs will be willing and able to collaborate and engage with MOE; several high-level workshops between MOE, local education authorities at the state or regional and township level, and EBEPs (Karen Education Department, Mon National Education Committee, Karen Peace Council); and the design of two pilots of joint technical initiatives.

(a) Engagement in facilitated dialogue between MOE and EBEPs. The subcomponent will support continued dialogue between MOE and EBEPs aiming to find ways to connect their parallel

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30 The complete desk review from this study was completed in early June 2018, the final report was completed in March 2019, and a policy note was drafted in July 2019.
systems. These discussions will be held in workshops, seminars, and meetings and during field visits, and experts that the Bank hires will facilitate them (see below).

(b) **Piloting of joint technical initiatives.** Concrete ideas for technical collaboration emerging from the dialogue will be piloted to test their feasibility and assess their value for both parties. These initiatives could include, but are not limited to, joint design and oversight of teacher in-service training targeting government and EBEP teachers; definition, use, and monitoring of common standards of service delivery (e.g., SQASF); design and use of common or equivalent (core) curriculum and competencies; design and implementation of policy regarding language of instruction (mother tongue–based multilingual education, mother tongue–based teaching); and joint teacher recruitment and management. Pilots under this project will not include transfer of funds or in-kind or goods contribution from MOE to EBEPs.

(c) **Development of a partnership framework, partnership agreements, and roadmaps.** Through the sustained dialogue and lessons learned from the pilots, MOE and EBEPs will develop a coherent unionwide education partnership framework that will define the areas to be included in partnership agreements, which are based on the framework. The roadmaps are the “how to”—moving from the framework to the principle agreements with the individual EBEPs. The agreements will stipulate the implementation pathway and milestones. It is highly unlikely that the subcomponent will result in one all-encompassing partnership agreement acceptable to all parties (EAOs, EBEPs, MOE). It is expected that different partnership agreements with different roadmaps will be signed with EBEPs in environments more conducive for collaboration and could later serve as models for partnerships with other EBEPs.

36. **The DBE will lead the subcomponent in close collaboration with other departments playing key roles in the introduction of potential pilots such as the teacher education section of the DHE (training), DERPT (training, curriculum), Department of Myanmar Examination (certification), and Department of Myanmar National Languages (languages).** Given the sensitivities regarding the issue, the World Bank, using funding outside project financing, will contract independent experts to facilitate continued dialogue and consultations and compile lessons learned from the pilots. To ensure that EAOs can enter the conversation with MOE on equal footing, the World Bank will also coordinate with a range of partners, such as the Myanmar Education Consortium, European Union,31 Ethnic Education in States and Regions Group,32 and United Nations Children’s Fund, which has expressed interest in directly supporting EBEPs in this process.

37. **This subcomponent will contribute to achieving the PDO by leading to agreed-upon equivalency (based on common standards) between the government and (some) nonstate programs formalized through student certification.** This will lead to higher-quality basic education services and ultimately

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31 The European Union is likely to continue to support the Rural Indigenous Sustainable Education network, an organization representing indigenous peoples across Myanmar established by a collective of indigenous education-focused organizations that work together and support their own communities in remote, often conflict-affected areas across Myanmar. The organization promotes the interests of indigenous peoples and children in Myanmar and their right to provide and access a culturally appropriate, quality education.

32 This group for dialogue and discussion relating to coordination between organizations supporting education in ethnic states and regions was newly established. The Myanmar Education Consortium and the Adventist Development and Relief Agency cofacilitate it, with broad participation from civil society and development partners.
higher completion rates and better economic return to education on the labor market. Inclusive access to quality education services will also be enhanced. Most of the poorest and most disadvantaged populations live in areas affected by or emerging from conflict where EAOs and affiliated CSOs provide some or all education services.

Component 3: Strengthening systems

38. The component will support strengthening of MOE systems, processes, and institutional capacity in PFM (including procurement) and HRM with the goal of increasing efficiency in the sector. These results will be reflected in DLIs 15 to 22 along with other indicators, in the Results Framework (Section VI).

Subcomponent 3.1: Strengthening public financial management systems

39. Aligned with NESP chapter 13 (especially strategy 2, component 3), the subcomponent will support increasing institutional PFM capacity and strengthening systems in the education sector. Substantial progress in PFM has been made over the last four years, but MOE (and other line ministries) has been mostly left out of ongoing MOPF reforms. In education, PFM systems are cumbersome and inefficient but overall comply with government rules. Given the budget formulation process, which, although being formally bottom-up, is mainly incremental and consolidated manually, planning and budgeting are often disconnected from educational outcomes. There are also several bottlenecks in budget execution, including a high level of cash transactions (and associated risks of misappropriation or loss), manual- and paper-based accounting and financial reporting, income and expenditure recording using a single-entry cash basis system, and inflexible budget rules that do not allow for reallocation of funds between budget lines to reflect changing needs. Finally, the regulatory framework supports effective control functions and promotes financial accountability but limits timeliness and flexibility in budget execution.

40. Key activities to be conducted under this subcomponent will be to prepare a process-driven road map, introduce a multiyear performance-based approach and output-based planning and budgeting, align MOE accounting system with MOPF reforms, and define an adequate internal control framework.

(i) Preparation of a process-driven road map, including cascading of a basic PFM curriculum for decentralized budget and finance officers and a process-driven road map (year 1).

(ii) Introduction of a multiyear performance-based approach and output-based planning and budgeting, which will involve expanding the scope of the NESP planning platform, current e-submission of budget templates, and consolidation of output-based budget information (year 2).

(iii) Alignment of MOE accounting system with MOPF reforms to strengthen budget execution and reporting. This will be done by piloting automation (software) for transaction recording and financial reporting with relevant standard operating procedures, establishing an e-payment method.

33 Mapping of the horizontal and vertical financial management functions and debottlenecking analysis during project preparation will inform this.
system, and producing consolidated financial reporting (including budget execution data) at
the state, regional, district, and township levels, as well as according to education level and
economic classification (year 3).

(iv) **Definition of an adequate internal control framework** based on the updated set of financial
rules and regulations, in addition to production of audited consolidated financial statements
and preparation of user-friendly budget reports to be presented to the Joint Public Accounts
Committee for oversight (year 4).

41. **The Finance Department of the Minister of Education’s office will lead the implementation of
the subcomponent, following the PFM road map, in close collaboration with other relevant MOE
departments.** They will ensure that the work is performed in consultation and in alignment with other
initiatives that MOF, other line ministries (especially the Ministry of Health, which faces similar
challenges), the Office of the Auditor General of Myanmar (OAGM), and Parliament are implementing.

**Subcomponent 3.2: Strengthening human resource management systems.**

42. **Aligned with NESP chapter 13 (especially strategy 2, component 3) and chapter 9 (especially
strategy 1, component 3), this subcomponent will support strengthening HR institutional capacity and
systems in the sector.** HR policies and norms exist and are generally well enforced, but their relevance
and efficiency are at times questionable. Each MOE department plans following a bottom-up approach,
but no systematic analysis of staff availability and needs forecasts is being conducted. In terms of
recruitment, the limited supply of new graduates from teacher education institutions and increasing
demand for teachers pose substantial challenges, which provisions that regulate personnel transfers that,
despite being clearly defined, are used inefficiently and difficulties in deploying and retaining quality staff
in remote and conflict areas compound. Finally, the current teacher career path (based on a single linear
ascending salary scale and promotion decisions disconnected from competencies, professional
development, or performance) leads to a continuous drain of expertise, low motivation, and uneven
distribution of the workforce in terms of age, experience, and qualifications, to the detriment of primary
schools and lower grades.

43. **Key activities to be conducted under this subcomponent will be formalize the use of the
standards, institutionalize systematic analyses of HR data, revise policies and processes, and deliver
training for more systematic and transparent application of new processes.**

   (i) **Formalizing use of the standards** after an assessment of current staffing criteria and
thresholds and ensuring that they allow for adaptations to meet local contingencies and foster
strategies to promote recruitment, deployment, and retention in hardship or remote areas
(year 1)

   (ii) **Institutionalizing systematic analyses of HR data** to improve planning and support all staff
management functions, including recruitment, deployment, transfer, and promotion (year 2).

   (iii) **Revising of HR policies and processes**, starting with the recruitment and deployment and
following with transfer and promotion. The processes will use new weighted criteria and
thresholds to better align human resources with the needs of schools and offices, to introduce
separate career paths and salary scales which encourages specialization within a level and links to professional development and participatory performance appraisal (year 3).

(iv) Delivering training for more systematic and transparent application of new processes to ensure more systematic and transparent application of deployment, transfer, and promotion policies and processes (years 3 and 4).

44. DEPRT will lead the implementation of the subcomponents, following the HRM road map, and prepare HR OGs to guide other actors once changes in processes are defined. DERPT will work in close collaboration with the teacher education section of DHE, DBE, Department of Monitoring and Evaluation—Research (DM&E-R), and other relevant departments. DEPRT will be responsible for coordinating and ensuring alignment with other initiatives that MOPF, the Union Civil Service Board, Parliament, and teacher unions are implementing. Given the potential political barriers to HRM reforms, significant efforts will be made in consulting extensively and transparently with all these non-MOE actors and beyond.

45. The subcomponent will contribute to achieving the PDO by helping relieve pressure on the PFM and HRM systems, increasing the quality and equity of education service delivery. New PFM guidelines, regulations, and processes will improve management of and control over financial resources from the union to school levels and participation of education stakeholders, including civil society, in planning, budgeting, and monitoring processes. New HR policies and processes will lead to standards at different levels being better aligned with the workload and more efficient deployment of staff (including teachers and administrative staff) across the country and across grades and will contribute to increasing staff motivation.

Component 4: Operational Support

46. Component 4 will finance technical assistance and goods to complement and strengthen MOE’s capacity to achieve results under components 1 to 3. Technical assistance will include consultancy services from local and international individuals and firms; non-consultancy services, including township-level engineering support for subcomponent 1.1 and software development (e.g., e-learning, accounting software, phone-based applications); and information technology hardware (goods). Individual consultants will generally be recruited on a short-term basis, with the possibility of some being recruited for longer terms if they are identified as the best solution for resolving implementation bottlenecks, build MOE capacity, or mitigate implementation or fiduciary risks. Specific areas of support to be financed under this component are described in Annex 1.

47. Requests from lead departments for technical assistance and goods under this component, including detailed terms of reference and bidding documents, will reviewed and approved to ensure proper coordination with other capacity-building efforts in the sector. The Project Steering Committee (PSC) will revise and approve the request for technical assistance and goods until the Capacity Development Management Committee (CDMC) is effective and its ToRs endorsed by the ETVSCG. To be endorsed, the CDMC should be a broader and more inclusive committee (in terms of its memberships,

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34 Capacity development covers all types of training, technical assistance, software, system design and development, study tours, exchanges, conferences, equipment, and related tools.
roles, responsibilities, etc.) that the current Capacity Development Fund management committee. When endorsed, the CDMC will revise and approve the request for technical assistance and goods.

48. **Financing of this component will be input based.** Technical assistance and goods will be financed under this separate input-based component to earmark European Union and GPE grants (as opposed to IDA credit) funding for these expenditures, in alignment the Development Assistance Policy (DAP) instructing to minimize use of loans for technical assistance expenditures. Following the practice within MOE, expected expenditures and resources will appear in the budget proposals of the departments leading or contributing to implementation of components 1 to 3. Departments indicating technical assistance and goods in their budgets will procure and manage them. If interested, departments may request support in handling the procurement process from DM&E-R’s Capacity Development Team, which has established a tender receiving and inspecting committee and prepared a procurement manual, which MOPF has approved, on which implementing departments can be trained.

**Support to education providers in Rakhine state will be channeled through every subcomponent but given the specific challenges faced in the state including the three northern townships of BMY as well as in townships where in IDP sites are located, specific mitigation measures will be put in place and funds destined to BMY will be ring-fenced using specific DLIs.** Several facets of the proposed project are designed to improve social inclusion which will be relevant for Rakhine. Furthermore, when relevant, variations will be adopted to address local challenges in the state and to ensure alignment with the recommendations of the Rakhine Advisory Commission and positions of relevant development partners for humanitarian and development assistance to IDP sites. To avoid intensifying social tensions linked to targeted benefits, a whole-state approach will be adopted in Rakhine i.e. all townships will be targeted (see section II.C). In BMY, specific DLIs (DLIs 23 to 25) and related legal conditions are used to ring-fence funds destined to these townships, specific safeguard arrangements will be used, and adapted versions of OGs including clear instructions for implementation in the three townships will be prepared and disseminated. To mitigate risks specific to support to education providers operating in IDP sites, financial and in-kind support will be considered on a case by case basis in line with the positions of relevant UN partners and subject to IDA’s prior approval and conditional on the preparation and implementation of plans for inclusive service delivery specific to each site prepared based on the criteria set out in the ECMP Operational Guidelines (see above description of subcomponent 2.1). Finally, to mitigate overall risks, a legal covenant of unrestricted access to all project sites, including in all of Rakhine state, for the Bank team and external agents that the Bank recruits to supervise and monitor implementation was included.

**E. Implementation**

**Institutional and Implementation Arrangements**

49. **Overall responsibility for implementation of this project will rest with MOE departments at the union level and MOE offices at the decentralized levels.** Project-supported activities will be included in MOE departmental budgets, following regular MOE budget preparation and approval cycles. Once budgets are approved and effective, funding will be available to departments for implementation. MOE will then make funding available to states and regions, districts, townships, schools, centers, and AE providers in accordance with government financial rules and regulations and OGs that the Bank will have previously approved.
50. **Four departments (DBE, DAE, and DERPT, and the finance department of the Minister’s office) will lead subcomponents that fall within the current definition of their functional roles, working in close collaboration with other contributing departments.** DBE will lead implementation of subcomponents 1.1, 1.2, and 2.2, and the ECMP portion of subcomponent 2.1; DAE will lead the AEP portion of subcomponent 2.1; the finance department of the Minister’s office will lead subcomponent 3.1; and DERPT will lead subcomponent 3.2. When the CDMC will be functioning according to agreed-upon terms of reference, it will coordinate component 4 but the relevant leading departments will manage procurement of technical assistance and goods.

51. **The governance arrangements for the project will expand on those for the DFSP and become joint governance arrangements.** This will ensure programmatic alignment within the MOE and between development partners given the wider scope of the IAQE-supported programs. It will also mitigate for risk of duplication and parallel committees with similar areas of focus. The overall governance structure will be as follows.

   (a) **A M&E working group**, which a project manager (deputy director general level) from one of the lead departments will chair, will meet every six months to review information on operational activities collected through administrative processes and M&E activities, summarize implementation progress and achievement, identify bottlenecks and craft potential solutions, and prepare an “issues and recommendations” note.

   (b) **A technical working group**, which the director general of one of the lead departments will chair (on a rotating basis), will meet every six months to review the “issues and recommendations” note prepared by the M&E working group and discuss progress and challenges on policy-level activities, decide on recommendations for which it has authority, compile a list of unresolved recommendations and a list of proposed request for technical assistance and goods (falling under component 4) to be submitted to the other committees, as described in the following paragraphs.

   (c) **A joint PSC for the DFSP and IAQE**, which the deputy minister will chair, will meet every six months to decide on higher-level recommendations emanating from the discussion at the M&E and technical working group levels. The joint PSC will be accountable for overall funding, implementation, and achievement of results.

   (d) **The CDMC**, chaired by the union minister, once established and endorsed by the ETVSCG, will ensure coordination with all other capacity development efforts in the sector by reviewing, coordinating, and approving requests from departments for procurement of technical assistance and goods under component 4. In the meantime, those requests will be reviewed and approved by the PSC.

**F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)**

The project focus for school improvement support, in-service training, and alternative or non-formal education activities will target be targeting one third most disadvantaged townships covering all states and
regions. Selection of townships are based on education, health, hardship and deprivation indicators. The project scope reflects that basic education in Myanmar faces identifiable social exclusion issues. Evidence points to conflict and remoteness, ethnicity, language, religion, disability, and poverty being important factors affecting access, completion, and learning. The project will also support needs-driven small scale infrastructure investments by MOE into schools at about 9,500 locations in response to specific infrastructure requests and proposals from schools such as in maintenance and repair to clear the maintenance backlog, major renovations and upgrades, and construction of complementary facilities such as latrines and new classrooms with a focus on kindergarten and/or to achieve student-to-class ratio targets. Townships in the following states and region will be considered for the support for infrastructure investment include Kachin, Kayah, Kayin: Mon, Chin, Thanintayi, Rakhine, Sagaing, Magway, Shan, Bago, Yangon, Mandalay, Ayerawaddy, and Naypyitaw. Since the project is national in scope, and the townships are purposefully selected based on needs, the beneficiaries and those impacted will be representative of the diversity of peoples that is Myanmar. The focus on the project on disadvantaged groups will include those likely to be more remote, closer to the border of the country, more ethnically diverse, and more likely to be affected by conflict than the average. Types of schools to be supported are equally representative of the diversity present in Myanmar: public, ethnic, monastic and non-formal schools. Risks related to working with in this complex social context are detailed in the social assessment as well as risk sections of this document. Consultations were held in all states and regions to ensure understanding and agreement of the process and resulting list of targeted townships.

G. Environmental and Social Safeguards Specialists on the Team

Martin Fodor, Environmental Specialist
Marcel Robert Frederik, Social Specialist
Alkadevi Morarji Patel, Social Specialist
Khine Thwe Wynn, Environmental Specialist
Thiha Ko Ko, Social Specialist

SAFEGUARD POLICIES THAT MIGHT APPLY

<table>
<thead>
<tr>
<th>Safeguard Policies</th>
<th>Triggered?</th>
<th>Explanation (Optional)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environmental Assessment OP/BP 4.01</td>
<td>Yes</td>
<td>Given the small scale of school construction works, the environmental category is 'B'. Proposed school civil works sub-projects will involve the need-based upgrading, rehabilitation and upgrading and expansion of schools in selected townships and will be confined to existing school premises. There are likely to be some concerns relating to</td>
</tr>
</tbody>
</table>
inconveniences or nuisances (e.g., dust, noise, and construction waste) to surrounding areas during construction. These potential human health and environmental impacts are regarded as minor, site-specific, and reversible in nature, and for which mitigation measures can be readily identified. School civil works is not specifically covered by the Myanmar Environmental Impact Assessment (EIA) Procedure, and sub-projects are therefore not subject to an EIA or initial environmental assessment (IEE) or required to prepare an environmental management plan (EMP). An Environmental and Social Management Framework (ESMF) and detailed Environmental Code of Practice (ECoP) has instead been prepared and will apply to all sub-projects.

Social risks related to the project are considered high, and have been described in more details, in the Summary of Key Safeguards Issues section below. They include risks related to community and worker health and safety during civil works, land acquisition, exclusion of ethnic groups or vulnerable groups, and conflict. The Social Assessment (SA) report prepared for the project describes these potential risks and adverse impacts, as identified through free, prior and informed consultations held during project preparation in 2018. In addition to the ECOP and to many processes integrated into project design for inclusion, the ESMF includes a Community Participatory Planning Framework (CPPF) and a Resettlement Policy Framework (RPF) to manage these risks and describes how the existing MOE grievance system will be strengthened across all activities.

There are also additional measures and eligibility criteria for Rakhine in the ESMF. Among other things, schools located in the three northern townships of Buthidaung, Maungdaw, and Yathedaung as well as those serving internally displaced populations in Rakhine will not be eligible to request a civil works sub-project.

<p>| Performance Standards for Private Sector Activities OP/BP 4.03 | No |</p>
<table>
<thead>
<tr>
<th>Category</th>
<th>Impact</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Natural Habitats OP/BP 4.04</strong></td>
<td>No</td>
<td>Within selected township, interested schools will submit a request to implement a civil works sub-project. Schools will be selected on the basis of the quality of their request, alignment with their school improvement plan and arrangements to respect the ESMF. Being limited to existing school premises, sub-project locations are likely to be located in or near to towns. The project will therefore not cause any degradation of natural habitats as defined under the safeguard policy.</td>
</tr>
<tr>
<td><strong>Forests OP/BP 4.36</strong></td>
<td>No</td>
<td>The project will not degrade critical forest areas as defined under the safeguard policy.</td>
</tr>
<tr>
<td><strong>Pest Management OP 4.09</strong></td>
<td>No</td>
<td>The project will not involve any procurement of pesticides nor cause any increased use of pesticides.</td>
</tr>
<tr>
<td><strong>Physical Cultural Resources OP/BP 4.11</strong></td>
<td>No</td>
<td>No significant impacts on physical cultural resources are anticipated. The ESMF includes information about the procedure for obtaining government clearance if physical cultural resources are affected. Moreover, the ESMF includes provisions for addressing chance finds should they occur.</td>
</tr>
<tr>
<td><strong>Indigenous Peoples OP/BP 4.10</strong></td>
<td>Yes</td>
<td>The project will be implemented in townships where ethnic minorities are present. The government has developed the CPPF to ensure that ethnic groups, as well as other vulnerable or hard-to-reach groups, have equal opportunities to participate in and benefit from the project. The principles and procedures of CPPF are being integrated in the government’s Operational Guidelines for the different programs. Local social/vulnerability assessments will be conducted in all schools and non-formal education centers and school- or center-level Community Participation Plans (CPP) will be prepared in line with the CPPF. CPPs will incorporate all elements of Indigenous Peoples Plan (IPP) as defined under OP 4.10, and ensure that there is broad community support for activities through free, prior and informed consultations. The CPPF also includes adapted requirements and eligibility criteria for schools in the three northern townships of Rakhine (Buthidaung, Maungdaw, and Yatedaung) including the added requirement that the Bank conducts a prior review and provides no objections to CPPs before program implementation and disbursement. It also stipulates that if prior</td>
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The World Bank
Inclusive Access and Quality Education project (P163389)

<table>
<thead>
<tr>
<th>Involuntary Resettlement OP/BP 4.12</th>
<th>Yes</th>
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<tr>
<td></td>
<td>The rehabilitation, upgrading, and expansion of existing schools may require minor land acquisition. This presents a risk of involuntary land acquisition. The RPF describes (i) activities supported by IAQE that can have land acquisition impacts; (ii) the objectives and principles of the RPF, the Myanmar national legal framework, and the gaps between Myanmar law and Bank policy; (iii) eligibility criteria, noting that any activity requiring involuntary land acquisition will be ineligible for project financing and prescribing specific eligibility criteria for any potential voluntary land donation; (iv) procedures to be followed for voluntary land donation; and (v) institutional arrangements, monitoring arrangements and the grievance mechanism. The RPF is not relevant for the schools in the three northern townships in Rakhine (Buthidaung, Maungdaw and Yathedaung) or for those in internally displaced person camps given that these schools will not be eligible for civil works sub-projects. Other project activities involve no risk related to land acquisition.</td>
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<table>
<thead>
<tr>
<th>Safety of Dams OP/BP 4.37</th>
<th>No</th>
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<tbody>
<tr>
<td></td>
<td>The project does not involve any dams.</td>
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<tr>
<th>Projects on International Waterways OP/BP 7.50</th>
<th>No</th>
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<tbody>
<tr>
<td></td>
<td>The project does not involve international waterways.</td>
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<tr>
<th>Projects in Disputed Areas OP/BP 7.60</th>
<th>No</th>
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<tbody>
<tr>
<td></td>
<td>The project will not be located in any known disputed areas as defined in the policy.</td>
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**KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT**

**A. Summary of Key Safeguard Issues**

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

   Environmental
The project is not expected to have any major environmental impacts and is therefore classified as ‘Category B’. OP/BP 4.01 is triggered and only partial environmental assessment is required. An ESMF including detailed ECOP has been prepared for the project. The project will involve civil works in selected townships and in schools to be identified during implementation. The expected civil works will involve upgrading, rehabilitation and expansion of existing schools. Potential construction impacts are expected to be minor, site-specific, and reversible in nature, and for which mitigation measures can be readily identified. Potential adverse impacts associated with school civil works may include community and construction worker health and safety arising from air pollution caused by dust generated by excavation, inappropriate storage of construction materials and site waste management practices, noise and vibration generated by construction equipment and trucks, solid waste generation and disposal, communicable disease, traffic safety, and lack of and inconsistent use of personal protective equipment. These risks are readily managed through the embedding of the ECOP and related aspects of the ESMF in the program operational guidelines and good construction practices. There is also a risk of the use child labor during construction which will be closely monitored. Other risks are associated with hazardous building materials such as asbestos containing materials, and paints used on the school buildings. Such risks will be addressed through application of good international practice relating to disposal of hazardous materials.

Social
The main potential social risks of the rehabilitation, renovation, and expansion of existing schools relate to possible minor land acquisition, health and safety risks and labor and working conditions risks during construction. Impacts are expected to be minor, not significant and reversible. Risks related to land acquisition are dealt with through project design, ineligibility criteria, screening, and clear guidelines on what is eligible. Furthermore, the Resettlement Policy Framework (RPF) makes clear that any involuntary land acquisition will not be eligible for project funding, includes screening procedures to exclude any involuntary land acquisition from project funding, and includes clear guidelines and eligibility criteria for voluntary land donation of minor strips of land, all of which will need to be monitored. Risks related to labour and working conditions and health and safety will be managed through effective implementation and monitoring of standardized ECOP across civil works with support through training.

Other social risks relate to working with ethnic minorities and marginalized populations, the need for free, prior and informed consultations, and possible impact of the programs on conflict dynamics and local tensions in ethnic areas. The government has developed a Community Participatory Planning Framework (CPPF) to ensure that ethnic groups, as well as other vulnerable or hard-to-reach groups, have equal opportunities to participate in and benefit from the project. Local social/vulnerability assessments will be conducted and Community Participation Plans (CPPs) will be prepared in line with the CPPF. Measures include the preparation of detailed operational guidelines, which integrates principles and procedures from the CPPF, for all programs, including relevant guidelines on localized conflict risk mitigation as well as commitment to non-discrimination and implementation of inclusive consultations and outreach, to be regularly updated and disseminated with support from the fragility, conflict, and violence anchor of the Bank and building on the extensive stakeholder engagement conducted with relevant ethnic stakeholders across the country during project preparation. The social assessment report has documented the engagement process. There will also be training and monitoring, at various levels, on assessment of conflict sensitivity risks and on how to mitigate those risks, and opportunities to promote social inclusion and cohesion.

To ensure that benefits of the project also serve children educated by Ethnic Basic Education Providers (EBEPs), as part of project preparation, an assessment of the state of ethnic education across Myanmar and the degree and circumstances under which the EBEPs will be willing and able to collaborate and engage was undertaken. This assessment has formed the basis project subcomponent 2.2 which includes intrisic risk management through the planned engagement and facilitated dialogue with EBEPs, piloting of joint technical initiatives, and participatory
approach to development of a partnership framework, partnership agreements, and roadmaps.

In Rakhine, supporting of Temporary Learning Spaces (TLSs) serving Internally Displaced Peoples (IDPs) include risk of support to policies and/or practices of segregation, exclusion, and lack of freedom of movement and access to inclusive education services and potential mis-alignment with engagement of other partners with IDPs. Mitigations include: discussions and agreements during preparation and implementation on the best translation of the humanitarian position on engagement of partners in the IDP camps into concrete processes and criteria; stringent eligibility criteria based on the consultative preparation of a plan for inclusive service delivery reviewed on a site-by-site basis, requiring alignment with humanitarian partners and safeguards policies as well as endorsement by members (government; development partners, CSOs) of the education, technical and vocation training sector coordination group (ETV SCG) and yearly confirmation of the satisfactory implementation of that plan through rigorous monitoring and evaluation including site visits; ineligibility of expenditures to build permanent structures to serve IDPs; and, M&E strategies that include visits to all schools/TLSs for which plans are prepared or approved. Key M&E and supervision objectives in these schools/TLSs will focus on confirming that eligibility criteria are met (including holding appropriate consultations) and proposed strategies for promoting non-segregation are as ambitious as they can be.

Outside of the camps, risks relate to supporting discrimination and impact conflict dynamic and local tensions. Support to schools/centers in Buthidaung, Maungdaw, Yathehdaung potentially risk reinforcing the divide between communities and/or maintain/reinforce patterns of exclusion or bias toward marginalized groups. This could happen if, for example, activities are perceived as favoring one community over the other, funding is disbursed to schools/providers discriminating against certain students, or schools do not immediately receive the needed support (when trying to reopen upon refugee return.). Measures include ring-fencing of investment in Buthidaung, Maungdaw and Yatehdaug through specific set of disbursement-linked indicators (DLIs), M&E including WB-financed parallel M&E work through regular supervision mission and recruited external agent(s), as well as portfolio-level third party monitoring. In the state in general, M&E work will emphasize documenting and understanding access to education for different populations, the composition of parent-teacher associations and other school committees, impact of segregation of the student population within schools in mixed communities, and inclusiveness of the consultations embedded in programs’ design. All the information gathered will be analyzed and discussed on a bi-yearly basis at a minimum and will feed in improvement of processes and procedures to promote social cohesion and minimize potential negative impacts on the peace process. Legal covenants will be in place on access for implementation and monitoring to allow for remedy. Consultations will be undertaken with the Rakhine state government on implementation strategies.

Finally, nationwide, there is potential preferential treatment and exclusion from the benefits of some groups, including, but not limited to, ethnic minorities. These risks are addressed through project design including operational guidelines, capacity building, training, targeting and eligibility criteria. Indicators and participation by staff in at different level of selection on townships, schools, groups to be supported will further ensure inclusion.

The sections above on the social policies provide further detail as does the PAD which details how these risks will be managed through project design. A strengthened grievance redress mechanism (GRM) will need to be communicated and operationalized to ensure numerous channels to submit feedback and complaints and resolution in a timely manner, and which are documented, and reported.
2. Describe any potential indirect and/or long-term impacts due to anticipated future activities in the project area:

Due to the project’s nature, sub-project civil works will be limited to small scale construction and repairs of which do not pose significant environmental or safety risks. Potential environmental impacts are minor, temporary, localized, and reversible and can be avoided, minimized or mitigated through appropriate measures set out in the ECOP. Adverse indirect or long-term impacts are not anticipated.

The project expects to benefit the most disadvantaged communities and expects positive longer terms impacts for those communities and children that will benefit from the project. The context of working in remote areas, diverse communities and through different education systems, presents both challenges and opportunities. The project will have to address exclusion and potential for discrimination. These risks are mitigated through a parallel support to ethnic basic education providers (subcomponent 2.2), support to non-formal education services being delivered by non-state partners (CSOs, NGOs), use and monitoring of service delivery standards including non-discrimination, continued dialogue with MOE on the use of ethnic languages as medium of instruction including in the context of, for example, designing of the in-service training for teachers on early grade teaching and reforming human resource management, and continuous monitoring and evaluation.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.

Not applicable.

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.

Environmental

Given the nature and small scale of proposed civil works under the project, a formal EIA or IEE report or EMP is not required. For the purpose of enhancing environmentally-friendly measures and mitigating any adverse impacts caused by construction activities, an ESMF and detailed ECoP have been prepared. Once a sub-project is identified, the ESMF and ECoP will be applied. The ECoP will serve as checklist for construction and rehabilitation activities, and cover standard avoidance, minimization and mitigation measures. Specifications to address environmental issues, including construction dust and noise control, waste management and disposal, site management, and occupational and community health and safety measures are addressed in the ESMF and will be included in bidding documents.

The institutional capacity to supervise school civil works varies depending on the nature of civil works being undertaken. Standard design guidance is already available for new school buildings, but there guidelines for building rehabilitation remain to be prepared. Recommended measures to ensure satisfactory project environmental performance include: (i) development and consistent application of school rehabilitation and construction guidelines, (ii) building capacity at the township level on monitoring of good construction practice and safeguards implementation, and (iii) regular monitoring of construction work and quality assurance. Additionally, capacity building of township authorities to apply environmental avoidance, minimization and mitigation measures is considered necessary to ensure adherence with the ESMF and overall satisfactory safeguard performance. Capacity building, monitoring and quality assurance of school civil works, application of environmental avoidance, minimization and mitigation measures will benefit from the support of professional engineers specially recruited for this purpose by MOE and deployed to all selected townships.

In order to efficiently address identified environmental safeguard capacity gaps, implementation of the ESMF will be integrated into overall project implementation and the operational guidelines of subcomponent 1.1 and in the standard annual training curriculum delivered by MOE to all TEOs, and by TEOs to school principals and committees.
MOE is in the process of incorporating ESMF, RPF, CPPF, ECOP and grievance requirements into the operational procedures and training curriculum and will have these ready before the next school year, starting in May 2020.

Social
The project has drafted a Social Assessment (SA) report, a Community Participatory Planning Framework (CPPF), and a Resettlement Policy Framework (RPF) before project appraisal. These social documents and the ECOP have been grouped together under an umbrella Environmental and Social Management Framework (ESMF) for easier operationalization by MOE.

These documents build on the lessons learned in the current Myanmar decentralizing funding to school project (DFSP) and other projects, summarize extensive stakeholder engagement in project preparation with ethnic groups, donors and civil society, expand the scope of social risk management measures, include measures to strengthen the existing grievance system, and include enhanced monitoring measures. The safeguards instruments can be summarized as follows:

(a) SA report. (i) Describes activities supported by IAQE, (ii) reviews legal and institutional framework applicable to project, (iii) summarizes baseline information on social, cultural and political characteristics of ethnic groups and vulnerable groups, (iv) describes consultations had with ethnic groups and vulnerable groups during project preparation, (v) based on these free, prior and informed consultations, identifies potential adverse and positive effects of the project, and (vi) identifies measures necessary to avoid negative impacts or ensure that positive benefits are culturally appropriate. It includes a BMY-specific annex on recent developments and related social risks and the MOE’s current and anticipated challenges to ensure quality education services to all communities in the three townships.

(b) CPPF. (i) Describes activities supported by the IAQE, (ii) presents relevant lessons learned from other project implementations, (iii) identifies potential positive and adverse impacts, (iv) proposes a framework for conducting local social/vulnerability assessments; (v) describes the CPPF processes to be carried out at the different levels, to identify ethnic minorities and marginalized populations, ensure free, prior and informed consultations and formulate Community Participation Plans (CPPs) during project implementation (vi) describes the grievance mechanism and monitoring mechanism, and (vi) explains the institutional arrangements for the implementation of the CPPF. It also includes BMY-specific requirements and eligibility criteria for schools in the three townships, including the non-eligibility of BMY schools for SIF 2.0B (major repairs) and added requirement that the Bank conducts a prior review and provides no objections to CPPs in BMY before program implementation and disbursement.

(c) RPF. (i) Describes activities supported by IAQE that can have land acquisition impacts, (ii) describes briefly the objectives and principles of the RPF, the Myanmar national legal framework, and the gaps between Myanmar law and Bank policy, (iii) defines eligibility criteria, noting that any activity requiring involuntary land acquisition will be ineligible for project financing and prescribing specific eligibility criteria for any potential voluntary land donation, (iv) describes procedures to be followed for voluntary land donation, (v) describes institutional arrangements, monitoring arrangements and the grievance mechanism. The RPF is not relevant for BMY given that schools in these three townships will not be eligible for SIF2.0B funding.

(d) GRM. MOE has an existing grievance mechanism, which is largely limited in scope to grievances on financial management and is not systematic in response to, resolution of or documentation of other types of feedback. The ESMF, CPPF and RPF propose measures to strengthen this grievance system in an integrated manner. Such measures include (a) communication leaflets to be hung in all schools/centers indicating that people can submit grievances/questions through multiple channels; (b) grievance boxes in all schools/communities; (c) detailed process...
for submitting, reviewing, resolving, escalating, documenting, and reporting grievances/feedbacks so that this is part of the regular reporting as described in the OGs, and including this process in the training material for all township education officers and school heads; and (d) assigning a union focal point for collecting and documenting grievances received and producing a quarterly report. Furthermore, a call center approach will be put in place and piloted in the 2019–2020 school year (with BETF funding). The approach will include both upstream (hotline that individual can call) and downstream (systematic calling and texting to request feedback) options. Provision will be made for anonymous reporting.

MOE knowledge of specific World Bank policies is not extensive. However, MOE has demonstrated its capacity to effectively implement elaborated safeguards arrangements in the context of the stipends program since 2014-15 and by expanding the local social assessment process and development of CPPs to all schools in 2019-20. MOE also has extensive capacity in conducting cascading training on its Operational Guidelines on an annual basis, reaching all township officers and school heads.

Building on this success of the DFSP, CPPF, RPF and grievance measures will be operationalized through this system, incorporated directly into the MOE’s Operational Guidelines for the different WB-supported programs and training of all townships officers and schools heads. Once integrated into its own system, it is assessed that MOE also has good capacity to monitor application of these safeguards arrangements and report on these through aggregating school-level reporting at the township, state/region and union level.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.

In preparation for the project, consultation meetings and other stakeholder activities were conducted in 2018, covering project beneficiaries, parents and students, school teachers and committees, union, state/region and township level MOE staff, ethnic basic education providers, civil society organizations, alternative education providers, donors and development partners across the country. The Social Assessment summarizes these extensive consultations and includes a map of all the townships covered under consultations. Overall, stakeholders expressed strong support for measures that aim to ensure that the project will benefit vulnerable and ethnic groups, and measures that aim to increase dialogue and cooperation between MOE and ethnic basic education providers.

The SA report and the ESMF, comprising the CPPF, RPF and ECOP, was disclosed by MOE on January 25, 2019. Consultations on all safeguards documents were carried out in Naypyitaw, Yangon, Rakhine, and Shan state between February 16 and May 2, 2019. This included Naypyitaw (February 24), Yangon (February 27), Rakhine (February 16), and Shan East (February 20). Feedback from consultations have been integrated into relevant safeguards documents and finalized versions will be re-disclosed by the government and by the Bank.

**B. Disclosure Requirements**

<table>
<thead>
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<th>Environmental Assessment/Audit/Management Plan/Other</th>
<th>Date of receipt by the Bank</th>
<th>Date of submission for disclosure</th>
<th>For category A projects, date of distributing the Executive Summary of</th>
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Mar 12, 2018
<table>
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<tr>
<th>Date of receipt by the Bank</th>
<th>Date of submission for disclosure</th>
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<tr>
<td>18-Jan-2019</td>
<td>08-Mar-2019</td>
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"In country" Disclosure
Myanmar
25-Jan-2019

Comments

Resettlement Action Plan/Framework/Policy Process

Indigenous Peoples Development Plan/Framework

Date of receipt by the Bank | Date of submission for disclosure |
-----------------------------|----------------------------------|
18-Jan-2019                 | 08-Mar-2019                      |

"In country" Disclosure
Myanmar
25-Jan-2019

Comments

C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting)

OP/BP/GP 4.01 - Environment Assessment

Does the project require a stand-alone EA (including EMP) report?
No
### OP/BP 4.10 - Indigenous Peoples

Has a separate Indigenous Peoples Plan/Planning Framework (as appropriate) been prepared in consultation with affected Indigenous Peoples?

Yes

If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?

Yes

If the whole project is designed to benefit IP, has the design been reviewed and approved by the Regional Social Development Unit or Practice Manager?

NA

### OP/BP 4.12 - Involuntary Resettlement

Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?

Yes

If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?

Yes

### The World Bank Policy on Disclosure of Information

Have relevant safeguard policies documents been sent to the World Bank for disclosure?

Yes

Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?

Yes
All Safeguard Policies

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?
Yes

Have costs related to safeguard policy measures been included in the project cost?
Yes

Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?
Yes

Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?
Yes

CONTACT POINT

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APPROVAL

<table>
<thead>
<tr>
<th>Task Team Leader(s):</th>
<th>Marie-Helene Cloutier</th>
</tr>
</thead>
</table>

Approved By

<table>
<thead>
<tr>
<th>Safeguards Advisor:</th>
<th>Peter Leonard</th>
<th>21-Nov-2019</th>
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<tbody>
<tr>
<td>Practice Manager/Manager:</td>
<td>Toby Linden</td>
<td>21-Nov-2019</td>
</tr>
<tr>
<td>Country Director:</td>
<td>Gevorg Sargsyan</td>
<td>21-Nov-2019</td>
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