

Date: May 16, 2014

To: Executive Secretary, the Inspection Panel
1818 H Street NW, MSN 10-1007, Washington, DC 20433, USA

Who we are:

[REDACTED]

[REDACTED]

N.B. We do not authorize you to disclose our identities.

Subject of the Claim

On March 13, 2014, the World Bank Board of Executive Directors approved a US\$30 million financing for the Education Improvement Program in Armenia.¹ This financing continues two previous loan programs² and is supposed to build on the latest program, the 2009-2013 Education Quality and Relevance II Loan Program.

We started working on this Claim before the approval of the Education Improvement Program in Armenia with the purpose of postponing its approval and initiating a revision of the scope and purpose of the proposed financing. Our analysis indicates that the Education Quality and Relevance II Loan Program resulted in substantial harm to the Armenian education system, particularly in the areas of accountability, governance, quality, and accessibility.

We, all the above signed, believe that the main directions of the Education Improvement Program in Armenia loan project are designed in such a way as not to address failures of the previous program and pose a threat of greater harm to the education system of the whole country and hence each and every one of us.

Simultaneously, among the signatories of this claim there are people who are immediately affected by the harmful effects we identify below. Namely, there are those whose career is harmed because of the created and supported governance structure where lack of academic freedom and multiple layers of conflicts of interest are not conducive to the right to critical thinking in research and teaching. There are others, who were simply fired for ideological reasons. There are parents who had to move children to private schools, hire tutors as the high school in its form is not suited to provide adequate education for future higher learning and career (see Attachment).

It is important to note that the individual cases are reflection of systemic problems that we prioritize given the nature of our organizations' missions. The need for additional tutoring even for best students is so widespread that the children admitted to universities without private expensive tutoring are exceptions rather than a norm

To support the statement, a blitz survey conducted among 95 first and second-year students (i.e. graduates of newly established high school) of one department of Yerevan State University showed that only 4 of them had not had additional tutoring. That is only 1% of all graduates were able to continue higher education at the university with knowledge and skills gained in the high school.

We believe the new financing in its current scope and form does not properly account for the vast governance and accountability problems in Armenia's education sector and would exacerbate the harm caused by the previous loan rather than improve the quality of and access to education in Armenia.

We believe any new loan needs to take into account the problems with the previous loan program. Simultaneously in view of existing governance inadequacies demonstrated in dubious and conflicting legislative and regulatory frameworks and numerous obvious conflicts of interests (institutional, not personal) at the highest levels of governance, certain preconditions need to be established to satisfy minimal accountability standards before the World Bank moves forward with any new financing.

¹ The project will support the improvement of school readiness for children entering primary education and the physical conditions in upper-secondary schools. It will also promote greater links between higher education institutions and labor market in Armenia. Retrieved from <http://www.worldbank.org/en/news/press-release/2014/03/13/world-bank-supports-improvements-in-education-in-armenia>

² Education Quality and Relevance I Loan Program, World Bank, 2003-2009. Education Quality and Relevance II Loan Program. World Bank 2009-2013.

We presented our facts and analyses to senior World Bank staff in both Yerevan and in Washington DC³.

The fact that the World Bank unconditionally approved the new program is particularly surprising given that the Bank's own assessment⁴ of the previous project concluded that in Armenia there are vast and systemic problems with education governance that hamper any potential for improvement. The World Bank's assessment alone, even without other credible supporting research commissioned by OSF Armenia,⁵ provided conclusive evidence that the objectives of the previous financing had not been achieved and that these failures posed risks for further improvement.

A detailed chart below specifies how concrete deliverables were not attained and the particular failures of the World Bank procedures in relations to each objective that we believe was not achieved (Chart 1).

In general, both the World Bank's and above noted outside researchers identified the main systemic problems that caused stagnation of the reform process and degradation of the quality and equity of the tertiary education system, including its key aspects - learning and teaching, research, relevance to the economy, relevance to the needs of a democratic society and sustainability. These flaws are: poor governance and quality assurance, inadequate financing and overly-tight political control and a resultant lack of academic freedom. It is our contention that without a serious effort to address these problems in advance the World Bank's plan to support research through selected university grants will not contribute to improving Armenian universities' research capabilities or their sustainability (from either the financial or credibility points of view), development or contribution to industry and the labor market.

While quality assurance was a major component of the previous WB education project, the Central European University's Higher Education Observatory reports that higher education reforms in Armenia have not had a significant impact on the quality of teaching and learning in higher education, or on the content and substance of administrative or governance practices in the field.⁶ Moreover, the overall impact of the quality assurance reforms has not been positive; instead quality assurance changes are carefully and fully controlled by the government and ruling political party with no dialogue or consultation possible among relevant stakeholders.⁷ Disingenuous quality control is exercised by the state with no nationally defined performance indicators or a comprehensive database to monitor and evaluate higher educational institutions' (HEIs) performance.⁸ Both the CEU's and the World Bank's own reports strongly emphasize the pernicious practice of the government directly influencing higher education governance by appointing a majority of the members of HEIs' governing Councils.⁹ The reports further highlight systemic problems pertaining to conflicts of interest in the governing of HEIs, widespread corruption, and nepotism in the field.¹⁰ Quality assurance reforms have been carefully controlled, designed and carried out bureaucratically in a purely top-down manner, and are therefore

³ Meeting with Mr. Jean-Michelle Happi, Country Director, World Bank Armenia office in November 2013. Official correspondence to Mr. Happi following the meeting dated December 9, 2013. Meetings with education team, Armenian ED's office and a round-table presentation at the the World Bank Washington office in DC, February 2014.

⁴ Kataoka, S.; Shahverdyan, A.; Harutyunyan, H. 2013. Addressing Governance at the Center of Higher Education Reforms in Armenia. Washington DC. World Bank. Retrieved from <http://documents.worldbank.org/curated/en/2013/01/17748657/addressing-governance-center-higher-education-reforms-armenia>

⁵ Matei, L., Iwinska, J. & Geven, K. 2013. Higher Education in Armenia Today: a focused review. CEU Higher Education Observatory. Budapest.

⁶ Matei, L., Iwinska, J. & Geven, K. 2013. Higher Education in Armenia Today: a focused review. CEU Higher Education Observatory. Budapest. Pp 9-11.

⁷ Ibid page 11.

⁸ Kataoka, S.; Shahverdyan, A.; Harutyunyan, H. 2013. Addressing Governance at the Center of Higher Education Reforms in Armenia. Washington DC. World Bank. Page 17.

⁹ Matei, L., Iwinska, J. & Geven, K. 2013. Pp. 11, 12-14. Kataoka, S.; Shahverdyan, A.; Harutyunyan, H. 2013. Pp. 24-9.

¹⁰ Kataoka, S.; Shahverdyan, A.; Harutyunyan, H. 2013. Pp. 4, 12. Matei, L., Iwinska, J. & Geven, K. 2013. Pp. 3, 24

met with distrust if not open opposition and simply lack of understanding by most intended beneficiaries¹¹, eventually resulting in poor quality reform of higher education in Armenia.

An additional obstacle to quality-based higher education is created by **poor financing schemes** in the field. Successful reform of existing financing mechanisms, which the government has already committed to implement, will require not only effective allocation of available funding, but a substantial increase in total public funding for higher education. In that case reforms can be expected to have a measurable impact on the quality and competitiveness of higher education.¹² This will only be possible when there is a broad public consensus on the direction of the reforms and trust in HE governance.

Another significant structural problem is the **overly tight political control of the sector**. The reports by CEU and the World Bank indicate identical channels and means through which exaggerated and severely counterproductive control over higher education institutions is exercised. Regulatory ambiguity is consistently mentioned as a factor that allows state control over universities.¹³ Moreover, the 2002 Charter of the Ministry of Education and Science establishes that the state is nominally in control of universities despite the fact that the proportion of funds allocated to the sector by the state is very limited.¹⁴

Regarding **secondary education** — and particularly high school development as planned by the new loan — there are equally strong arguments against the unconditional new funding. The government and the ruling party (Armenian Republican Party) assert political control of the sector through control over the appointment of school principals¹⁵, the composition of school governing bodies¹⁶ and financing mechanisms.¹⁷ Secondary educational institutions and their employees serve as an important administrative resource that is systematically and vastly abused for political ends during elections.¹⁸

The system of student aptitude evaluation is hugely problematic in principle and provides conflicting or even mutually exclusive results for student learning and skills evaluation. It does not enjoy broad support and trust among either the public or professional educators, a fact amply demonstrated by expert interviews and research.

Below in Chart 2 we present in greater detail problematic issues that arose during the implementation of the previous loan and failures by the World Bank to address underperformance and the causes that hampered development.

¹¹ Matei, L., Iwinska, J. & Geven, K. 2013. Pp. 7, 11, 15-16.

¹² Kataoka, S.; Shahverdyan, A.; Harutyunyan, H. 2013. P. 23.

¹³ Kataoka, S.; Shahverdyan, A.; Harutyunyan, H. 2013. Pp. 8-10. Matei, L., Iwinska, J. & Geven, K. . 2013. P. 13.

¹⁴ Matei, L., Iwinska, J. & Geven, K. 2013. P. 13, 25.

¹⁵ According to largest Shirak marz data 70% of principals are of ruling Republican party. Policy Forum Armenia.2013. Corruption in Armenia. p31. Accessible from : <http://www.pf-armenia.org/document/corruption-armenia>

¹⁶ School boards are composed of 8 members, 4 of which are representatives of executive and/or local government. The responsibility of School Boards is selection of school principal, financial decisions, approval of suggestions on procurement/alienation of school property, etc. Despite the fact that school principals are selected by the School Boards, contracts with them are processed and signed by supervising body (marzpetaran or Yerevan municipality). Current way of Board composition gives the executive full control over decisions. Most of school Boards are chaired by high level officials from marzpetarans or Yerevan municipality.

¹⁷ Per-capita funding mechanism is not based on the measurement of necessary costs needed to ensure quality education of each student. As a measuring principle in educational service provision no quality based criteria are taken into account. Instead, each year available amount for secondary education is mechanically distributed amongst existing schools based on the formula developed and approved by the Ministry of Finances and the Ministry of Education. No clear methodology of these allocations is available, nor a content based list specifying costs associated with each students' educational needs. There is no comparative data on how existing financial mechanisms contribute to and correlate with the achievements of the state education standards and objectives.

¹⁸ Republic of Armenia Parliamentary Elections. 2012. OSCE/ODIHR Election Observation Mission. Final Report. Warsaw. p12. Republic of Armenia Presidential Elections 2013. OSCE/ODIHR Election Observation Mission. Final Report. Warsaw. pp 12-13. Observation of the Parliamentary Elections in Armenia. 2012. Council of Europe. pp30-38

By not addressing systemic problems and clearly identified failures the new loan threatens to exacerbate those and make the situation irreversible given the vast amounts that are supposed to be spent under flawed premise of reform. While further development of the high school system is stated as a priority in the new loan, it is limited to the physical refurbishment of a limited number of high schools (17 out of the existing 102¹⁹) and will not address the issue of quality and accessibility of high schools. Education standards, curricula and the entire system of high school are considered as deeply problematic by both the public and the education community. The curricula and education standards and teachers' professional capacity are of particular concern. The failures of previous standard development have already resulted in gender biased content of education materials and incompliance of civic education with human rights standards and Toledo principles.²⁰ Along with gender insensitive content and the constant messaging of traditional gender stereotypes, the teacher's deeply biased attitude is particularly damaging for developing the notion of gender equality in youth during their formative years. The level of bias is well demonstrated in a survey on gender socialization among teachers according to which a majority of teachers strive to instill docility and modesty in girls and leadership in boys. Equally troubling is their statement that the educational benchmarks they presume for boys and girls are different with the boys being held to higher standards, with a justification that they need education more than girls²¹.

This is in a country where the number of women with higher education has been greater than men for decades and women in technical and scientific specialties constituted almost half of workforce as recently as ten years ago.

The process by which the standards, the curricula and syllabus are reformed needs to become open and transparent; the benchmarks must exclude the possibility of propaganda of gender bias and discriminatory behaviors. Yet, there is no such guarantee as the same process that had created the problems is supported through the new loan.

In the two charts below we present major points of concern regarding implementation of the previous education versus its stated objectives and deliverables. We also underline particular failure of the WB procedures that contributed to unsatisfactory implementation/result, specifically meaning two things: firstly, the failure to properly identify some of the outlined systemic and damaging problems through proper assessment and hence address them in a timely manner; and secondly, most importantly, when a large number of systemic problems ranging from conflicts of interests, breaching of academic independence and integrity to abundant executive control over the education, had been identified and reported within the WB assessment, failure to not address those in any manner that the harm is minimized and the problems are resolved. Moreover, the problems being systemic and far-reaching into all aspects of governance and quality assurance inadvertently endanger any future support, whereas the World Bank approved the new financing without any reference to the problems and attempt to correct the wrongs.

¹⁹ Total number of general education institutions in Armenia in 2013-2014. <http://stat.amedu.am/?section=content&id=2&year=2013>

²⁰ Tsaturyan, R.2013. Gender Based Stereotypes in Pedagogical Domain. Yerevan. Accessible from http://www.osf.am/wp-content/uploads/2014/01/Policy_paper_Ruzanna_Tsaturyan.pdf; Hovhannisyan, H. ,Davtyan, A. 2013., 'Content Analysis of Armenian Church History Textbooks'. Yerevan. Accessible from <http://www.osf.am/programs/policy-fellowship-initiative/policy-papers/?lang=am>

²¹ According to the survey, for 96% of teachers, courage, determination and industriousness are among instilled characteristics for boys; whereas modesty and patience should be instilled in girls according to 94% of the same teachers. Also 66% of teachers consider boys more capable than girls, while 68% of teachers consider girls to be obedient and modest. Gevorgyan, H. ed. 2011. The Mosaics of Gender Relations. pp35-37.

Suggestions to the WB

- Suspend implementation of the newly approved financing for education. Initiate thorough revision of the project with genuine involvement of local education community, public policy experts in design and consultation process.
- Condition the WB support upon elimination of conflict of interest, government representation and political control in higher education governance through resignations of high ranking officials (i.e. the president, the prime minister, etc.) from university governing boards, establishment of periodic public reporting mechanisms and separation of political and educational spheres via internal university regulations.
- Use clearly defined conditionality tools while working with the Armenian Government. The main conditionality tool in the given context is the reform of the legislative framework to the effect of guaranteeing freedom and independence of HEIs in accordance with the requirements of Armenian Constitution and the Law on Education. Particular legal norms include: SNCO law that allows exercise of undue executive control over university financial management, university board governance and management, government Decree that allows appointment of political figures and government officials as board chairs and majority representation in the university governance.
- In addition to institutional enhancement of internal quality assurance, address internal quality improvement *in practice* based on clear measurement tools, such as number of internationally competitive research projects and research outcomes by the faculty and students, random sampling of academic papers written by faculty and students and checking of those against criteria of academic honesty, practice of academic freedoms, continuous and holistic plan of the training of faculty and staff, etc.
- In consultation with a wide scope of beneficiaries design quality measurement tools of specialized high school staff, its professional capacity, school facilities, and access to high schools in support of high school reform. Design further WB support to high school reform based on the measurement.
- Prior to deciding main directions of WB support, create a platform where wide circles of beneficiaries will come to reflect upon the directions and means of reform implementation consecutively contributing to the popularization of the education reform agenda itself.

Chart 1. Tertiary Education components of the WB Second Loan with described harms and bank procedure failures

Description of the Bank Loan component	Harm	Failure of the bank procedures
<p>1. Establishment and Strengthening of the National Quality Assurance System</p> <p>The main goal of the sub-component is to establish National Quality Assurance System of Higher Education, as well as support the establishment and strengthening of its capacity. Two major components will be supported:</p> <p>a) establishment of external quality assurance in line with QA principles under European standards, support to the establishment and functioning of ANQA according to the government charter and its capacity building</p>	<p>In our assessment (coinciding with the WB's conclusion) the newly established institution, Armenian National Quality Assurance Agency allows for political control mechanisms and lack of integrity in the system. It does not meet standards for independence and its scope of authority is insufficient to fulfill its mission both per European standards and versus its own charter.</p> <p>Details:</p> <p>Established in 2008 Armenian National Quality Assurance Agency (ANQA) functions a consultative body for external quality assurance. There are serious irregularities in its mission, composition and functions. The mission of ANQA is stated in its Strategic Charter²² as "independent from the RA Government and accreditation subject institutions". However, it is neither independent nor has the accreditation authority, but is rather consultative to the Armenian government. Moreover, it is chaired by the Prime Minister, who in his turn is the board chair of the Armenian State Pedagogical University. Moreover, ANQA is a consultative body only and the final decision on accreditation lies with the Government. Additionally, ANQA is an associate member of ENQA and aspires for its full membership. However, the level of political control in its composition and failure to adhere to the external quality assurance principles are major violations in the functions of the Agency. Namely, the principle of independence as defined in the Standards and Guidelines for Quality Assurance in European Higher Education Area, as "Agencies should be independent to the extent both that they have autonomous responsibility for their operations and that the conclusions and</p>	<p>The Bank failed to address the identified problems to the borrower to resolve them. Moreover, establishment of ANQA is considered as a major achievement of the loan project, despite its criticism by the Bank itself.</p> <p>Details:</p> <p>ENQA principles, ANQA own mission statement have been identified by the Bank as undermining the credibility of the agency.</p>

²²ANQA Strategic Plan 2010-2015. P11. Retrieved from: [http://www.picqa.org/en/Portals/0/PicqaFiles/1.2%20ANQA Transitional Period strategic plan.pdf](http://www.picqa.org/en/Portals/0/PicqaFiles/1.2%20ANQA%20Transitional%20Period%20strategic%20plan.pdf)

<p>b) Internal quality assurance system with policies and procedures for internal mechanisms, and establishment of QA units in universities</p> <p>Outcomes: Strengthened capacities of ANQA, MoES Higher Education and Licensing Departments, HEIs;</p> <p>Ensuring day-to-day effective operation of newly established bodies (ANQA, IQA units in HEIs) in accordance with the Bologna</p>	<p>recommendations made in their reports cannot be influenced by third parties such as higher education institutions, ministries or other stakeholders²³. This has also been commented in the ENQA report of ANQA's work in November 2013, where the direct conflict of interest, lack of authority to make accreditation decisions and coaching work have been mentioned as diverted from main mission of an independent external accreditation agency²⁴.</p> <p>The current set up of university governance is regulated through ambiguous legal documents that allows overrepresentation of political entities in various ways into both education content and management, and uses as a tool for political/ideological control, brings to top down reform implementation, non-inclusive approaches for academic community.</p> <p>Details: The governance boards of state universities, state education agencies are represented by government officials, MPs, and by the administration of the President at the level of no less than 50%.²⁵ Universities are managed by Law on Education, Law on Higher and Postgraduate Education, Law on State Non Commercial Organizations, which are in direct contradiction with one another and allow for interventions by the state over their finances, management appointments, specializations, and admissions. Such intervention is in itself anti-constitutional</p> <p>The establishment of internal QA units was mostly done at formal</p>	<p>Despite own assessment of the tertiary sector governance issues and irregularities, failure to make corresponding changes in program design/concept and continuing to fund fragmented components that have little likelihood to sustain the system.</p> <p>To address qualitative, in addition to quantitative, measurement in Program Result Report and make adjustments for future activities.</p> <p>Details: The internal QA centers supported by the Bank program only structurally follow the policies and procedures on formal level. Whereas the goal is on the</p>
--	--	---

²³ Standards and Guidelines for Quality Assurance in European Higher Education Area.p25.Retrieved from: http://www.enqa.eu/wp-content/uploads/2013/06/ESG_3edition-2.pdf

²⁴ <http://www.anqa.am/argata/Portals/0/documents/ANQA%20Reports/ANQA%20Proof%20Review%20PanelReport%2028.11.13.FINAL.pdf>

²⁵ The full list is available in Kataoka, Sachiko; Shahverdyan, Anush; Harutyunyan, Hovhannes. 2013. Addressing governance at the center of higher education reforms in Armenia. Washington DC. World Bank. Retrieved from <http://documents.worldbank.org/curated/en/2013/01/17748657/addressing-governance-center-higher-education-reforms-armenia>

objectives; Establishment and strengthening of internationally compatible Quality Assurance system in Armenia.	level with little capacity and internalization of the required tasks. A status report on Bologna in 2012 shows that 56% of universities do not have a QA concept for their university development ²⁶ . Moreover, the report shows only 18% of universities in Armenia develop important documents in consultation with faculty and mid-management, which shows that these papers are developed in narrow circles, do not reflect needs of practitioners and are not brought down to this level.	development of internal QA mechanisms, the measurement for this is only done through the number of QA units established. However, the quantitative indicators cannot be considered as measuring the quality system and quality per se.
<p>2.</p> <p>a) Designing a sustainable strategy for public financing of HE with components of legislative changes for the implementation of the higher education financing strategy's recommendations; financing new methods and mechanisms; expansion of students' financial aid; proper pricing policy and methodology of tuition fee formation</p> <p>b) Designing a competitive innovation fund</p>	<p>Constraints in financial autonomy, control over university finances restrict universities and fragmented funding for research and modernization cannot assist in ensuring sustainable funding system, especially considering decreasing public expenditure on education.</p> <p>Details: The financing strategy does not address the decrease in the public spending and does not offer ways for universities to engage in various activities due to legal framework regulating the finances of universities²⁷. The state controls directly the budget of state universities, despite the fact that the proportion of state allocation is very limited. State universities receive only between about 9 and 30% of their budgets from the state; the rest of their funding comes from student tuition fees²⁸. The latest Medium Term Expenditure Framework 2012-2014 indicates that total education spending will continue declining in the next three years down to 2.6 percent of GDP, placing Armenia back to among one of the lowest education spending countries in the region.</p> <p>Details: Absence of research and complete separation of research and teaching is one of the major shortcomings of education system. Not only do universities disregard the importance of research, but</p>	<p>Key risks were identified with recommendations to the country government to resolve them, however no actions were taken other than "closing eyes" on the risks.</p> <p>Details: Situation with governance and funding principles was assessed as a major problem with the higher education sector. Despite CWRU assessment, the Bank bypasses this situation and directs funding into compartmentalized sector, which given the current situation cannot soar.</p>

²⁶ Current Status of Bologna Reforms in Armenia. 2012. National Center for Strategic Research in Higher Education. (report available in Armenian only)

²⁷ Kataoka, S.; Shahverdyan, A., Ha rutunyan, H.. 2013. Addressing governance at the center of higher education reforms in Armenia. Washington DC. World Bank.

²⁸ Formulating the Financing Principles and Exploring Alternative Financial Mechanisms for Armenian Tertiary Education. 2008. CHEPS.

<p>to develop and implement innovative plans for modernizing their curriculum and pedagogical methods, develop ECTS, build their fund-raising capacity, create linkages with industry, and engage in international cooperation activities.</p> <p>Outcomes:</p> <ul style="list-style-type: none"> - Higher education sustainable financing strategy - Appropriate documents for designing CIF and legislative documents; package for submitting to approval 	<p>also do not create favorable conditions for faculty to participate in international programs and engage in research. The above mentioned control mechanisms undermine academic independence vital for credibility and sustainability of any research and scientific endeavor. Reports on how these control levers have been used to ban “politically incorrect” research projects even at the level of approval of topics are abundant. This makes competitive faculty leave universities and/or adjusts to antiscientific standards. The presence of research is a necessary condition for attracting competitive faculty, who otherwise prefer to leave the sector. Simultaneously, limited public funding for research (0.2 % of GDP) is primarily allocated to the Academy of Sciences, limiting university research capacities. However, the major problem with the component is that apart from lack of funding, there are no mechanisms for research development in universities²⁹. This is explained by the extreme workload for faculty/researchers, little resource available for full-fledge research, control over financial transactions, and incomplete internal mechanisms and contradictions to various policies and practices that bottleneck the autonomy of universities.</p>	
--	--	--

²⁹ Matei. L., Iwinska J., Geven K. Higher Education in Armenia Today: a focused review. Budapest 2013. CEU Higher Education Observatory

Chart 2. Enhancing General Education Component with harms and failures for bank procedures

What is bank loan component	Harm	Failure of the Bank procedures
<p>Component 1 Enhancing the Quality of General Education</p> <p>Subcomponent 4. Supporting the Implementation of High School Reform</p> <p>Goal: Increasing the education quality and relevance in high schools and establishment and improvement of the high school network by assisting in:</p> <ul style="list-style-type: none"> - Organization of teaching/learning process in streams. - Creation of methodological structure, curriculum, teaching and learning materials for the HSs according to the diversified streams. - Raising the professional level 	<ul style="list-style-type: none"> • High schools are largely inaccessible for students from rural areas. Hundred and two out of hundred and nine high schools are located in cities and only seven - in rural areas³⁰. In rural areas there are still schools that work based on 12- year curriculum which is not designed and does not provide specialization.³¹ These schools are not able to comply with the government's plan to transfer to credit system in high school courses. Thus graduates of high schools will have double advantage over those in 12-year curricula schools. Given higher rates of poverty and vulnerability in rural areas, as well as professionally and technically lower capacities of these schools compared to urban ones, the disadvantage is much greater and the risks for further limiting access to higher education is growing higher. • The existing per-capita financing mechanism does not ensure allocation of the relevant financial resources for provision of quality streaming education in high school. Students and parents still have to take private tutor classes for preparation to the final unified/admission exams.³² • Content analysis of school textbooks shows that asymmetric representation of gender roles prevails. Male and female characteristics, roles, attributes, professions are created and reproduced through images and texts. Discriminatory norms and perceptions are widely promoted both in textbooks, teaching process, and teachers' attitude. By the decree of the Minister of 	<ul style="list-style-type: none"> • Bank failed in setting proper monitoring and self-evaluation indicators for EQRP2 and relied on the borrower's M&E system (OP 13.60, point 4.) and reporting. Irrelevant baseline data were considered for measuring the progress of EQRP2. • The factual challenges of the high school reform were not taken into account during the development stage of the new Education Improvement Project (P130182), while the Bank Procedure, defines that "During appraisal, the task team assesses the adequacy of the proposed program to achieve its stated objectives." (BP 8.60, point 6). • The beneficiary and public feedback was ignored both during the implementation, monitoring and assessment of the EQRP2

³⁰ Distribution of general education institutions in Armenia in 2013-2014 per educational programs available in urban and rural areas <http://stat.armedu.am/?section=content&id=63&year=2013>

³¹ Total number of general education institutions in Armenia in 2013-14 per available implemented educational programs <http://stat.armedu.am/?section=content&id=2&year=2013>

³² Report on the State Policy on General Education Financing. 2014. Community Finance Officers' Association. Available at <http://www.osf.am/wp-content/uploads/2013/11/State-Policy-on-General-Education-Financing.pdf>

of high school teachers	<p>Education, the class for the subject of Technology should be divided into groups based on gender. For each group there is separate curriculum. About 30% of textbook themes are general and are meant for both girls and boys. Other themes are gender specific and are meant for differentiated teaching for boys and girls (e.g. the section on culinary, food security and nutrition is taught only to girls, so is the section on aesthetics, whereas the section on construction is taught to boys only). This is justified by further professional specialization for males and females, which does not provide a comprehensive development of individuals as specified in the standard and goal of the subject program³³.</p> <ul style="list-style-type: none"> • Development of subject standard for the Armenian Church History is singlehandedly controlled and supervised by Armenian Apostolic Church through its Center for Christian Education and Propaganda. During the teaching process the doctrine of the Armenian Apostolic Church is preached. Discrimination and ill treatment are widely practiced by both teachers and students towards religious minorities³⁴. • Substantial part of EQRP2 was aimed at the professional development and in-service teachers' trainings. Initial stated aim of the teachers' professional development was the increased quality of education, capability of using ICT technologies and e-content during the teaching process. However, the trainings conducted based on unified content and format, which was not efficient as teachers' professional and pedagogical skill, experience and needs vary³⁵. 	<p>results and development of new Education Improvement Project, while according to the procedure (OP13.60) in addition to working with borrower, the Bank should “work with other development partners to agree on the results expected from development activities and to harmonize the monitoring, reporting, and evaluation requirements”.</p>
-------------------------	---	---

³³ Ruzanna Tsaturyan. (2013). Gender Based Stereotypes in Pedagogical Domain. Yerevan. For full version of the paper available here http://www.osf.am/wp-content/uploads/2014/01/Policy_paper_Ruzanna_Tsaturyan.pdf

³⁴ Hovhannisyan. H., Davtyan, A. 2013. Content Analysis of Armenian Church History Textbooks. Yerevan. Accessible from http://www.osf.am/wp-content/uploads/2014/04/H_Hovhannisyan_Research-.pdf

³⁵ Khachatryan. S., Petrosyan. S., Terzyan. G. 2013. Assessment of Teacher Professional Development and Educational Content in the Context of General education Reforms in Armenia. Barev Scientific Educational NGO. Available at <http://www.osf.am/wp-content/uploads/2014/03/FinalENGAssessmentPDEC.pdf>

Attachment

Case 1: The case shows lack of academic independence for credibility and sustainability of research, censorship of research and politicization in academia

In 2012 I contacted the Head of Philosophy Department of National Academy of Science and expressed my wish to write a dissertation within political philosophy field on "The solutions of current problems in Armenia through political left". The head of the department was long trying to convince me that this is not a right topic to take and was cynically suggesting that I write about "The behavior of strip dancers in Armenia". Anyway, it took me three months to discuss and negotiate with him the topic I chose and eventually he refused my suggested topic reasoning that he was not going to help the current political opposition in Armenia. Just to note that there is in fact no political left in Armenia and the opposition he was referring is of neoliberal nature. Not only did the department head violate my basic rights, but he also positioned himself politically as well as cynically. I was long trying to get a written notification from him for rejection, but he kept refusing.

Case 2: The case is illustrative of lack of academic freedom in research, irregular mechanisms of research within universities, political control and violation of secularity of university.

In 2003 I was admitted as a PhD student at Armenian State Pedagogical University and in 2008 I presented for a pre-defense my thesis paper on "Characteristics of Spiritual Education for High School Students" and received a positive feedback on it. The public defense of my thesis was postponed for 3 years, so for that reason it was re-submitted for another pre-defense in 2011 and eleven months later on May 24, 2012 it was finally set. The Department of Theology at Yerevan State University, which was wrongly selected as a leading entity, provided negative feedback on the thesis, naming it as "something populist". This could not have been legitimate, since the above department had no relevance to pedagogical sciences and was not entitled to provide opinion on the thesis work. It took another 10 months to get the Department of Pedagogy of the same university to take over as a leading entity and to provide a second opinion. This department's opinion was largely influenced by the existing negative feedback of the first department. Also, it was influenced by the opinion given by Reverend Father Vardan Navasardyan, the representative of Apostolic Church and the Director of the Center for Christian Education. His opinion was non-scientific and should not have been taken into account for the defense of a scientific paper either legally or ethically, however it was accepted by the academic committee. The opponents claimed propaganda elements in the thesis without justifying their position. On February 28, 2013 the public defense eventually took place. Seven of the twelve members of the academic committee voted against my thesis and rejected granting me with a degree. I should note that my work has been presented to a number of scientific institutions at the National Academy of Sciences of Russia and the State Linguistic University of Novgorod and I have received offers to defend it in Russia or in Ukraine. In 2012 I was dismissed from my position at Armenian State Pedagogical University, which according to the university management was in the result of reorganization of the Chair of Social Pedagogy. I claim that the real reason behind this related to the issues of spiritual education in my thesis that was misinterpreted by the above communities as religiosity. I keep getting hints that the defense of my thesis work will never be possible, because I am a member of a religious organization and the academic committee will vote against.

Case 3: This case demonstrates that due to dubious legislative field executive control over universities is made possible

On April 6, 2012 the Rector of Yerevan State Linguistic University after Brussov received a reprimanding letter from the Minister of Education and Science Mr. Armen Ashotyan. The Minister referred to the breach of duties and unexcused absences by the Rector whereby he, despite the Minister's rejection, participated in a conference in Strasbourg, France from March 19 to March 23, 2012. The Rector received a second reprimand by the Minister on April 17, 2012. The same day the Minister suspended the rector's responsibilities and terminated the employment contract.

The Rector's dismissal is a violation of RA Constitution and his labor rights. Firstly, the university autonomy principle specified by the RA Constitution and the Law on Higher and Postgraduate Education was violated that allowed the executive to intervene into the hiring and firing of the university head (by the above laws such a function is prescribed to the university governance board). The Rector's dismissal was, however, possible due to the irregular legal framework, namely the RA Law on State Non-Commercial Institutions that regulates Armenian universities and allows the founder, i.e., the Ministry, to appoint and dismiss rectors and board members. This law therefore conflicts the independence of universities. Moreover, the labor right of the Rector was violated since the termination of his duties and the contract was not done by the relevant body, i.e. his employer. The minister is not entitled legally or practically to draw penalties, since according to the RA Labor Code this function is vested into the employer, i.e., the university board.

Parents' authorization letter

Subject matter: the cases support the claim that high school as designed and supported by the WB loan has not been realized to the extent that it does not provide minimal sufficient learning outcomes and skills to the students to continue education at universities, which is the main mission of the high school as stated by the Education Quality and Relevance Second Loan Program.

We the undersigned parents – citizens of the Republic of Armenia, have suffered a significant harm in the result of insufficient implementation of the high school reforms that were initiated and implemented within the scope of the Education Relevance and Quality II Loan Program funded by the World Bank. We believe that this harm is a result of World Bank's non-compliance with its operational policies on monitoring and evaluation and improper control over the implementation of the ERQP II. In particular:

1. High schools, where our children study/ studied do/did not ensure provision of quality education services. All of us have had to either apply for additional tutoring or transfer children to private schools to get better quality education and preparedness to enter universities. We believe that our children would have never gotten quality education and enter the university if they had stayed at the state high schools.
2. High schools do/did not provide for the quality streaming education that would ensure professional orientation for our children. High schools are not equipped with the necessary technical capacities and do not have proper equipped laboratories and libraries that would provide for the quality education. Computer classes are not fully accessible for children. Teachers do not use the computers during the class.
3. The textbooks and teaching are/were of low quality. Some of textbooks, like Social Science textbooks for 9 to 11 grades, include discriminative norms and are gender insensitive. . For example, in the 10th grade textbook the hypothesis of psychologist U.F.Harley is given according to which there are five basic needs of men and women, fulfillment of which guarantees stability of marriage, while dissatisfaction of those needs may lead to the conflict and even to divorce. The needs of a man are in sexual satisfaction, rest companion, a charming woman, household management and admiration. For a woman the needs are expressed in tenderness, conversation, honesty and frankness, financial support and devotion to family. The textbook and teaching process do not provide children with opportunity to discuss and argue these statements. Hence there is real risk that children may accept them as norm and apply later in life. Another example from the same textbook says that "the societies, such as western ones, where women are fully involved in social life, turn to have a significant decrease in birth rate". Children can take the statement as granted and think that the only mission of women is to ensure population growth, thus making her reproductive function a priority in contrast to women's wish to become a fully integrated member of society.
4. We all bear the harms that result from professionally unqualified teachers, their discriminatory attitudes and practices towards school children, unawareness of and incompetence in applying innovative teaching methods in classrooms. Some of the teachers in our schools do/did not take any action to promote interest of our children in

particular subjects (e.g. physics) which resulted in zero motivation among children to study that subject.

5. We faced the situations when teachers proposed us out-of-class private tutoring of our children, which in fact was the compensation for the under-taught content in the classroom.

Taking into account that some of our children are still enrolled in high schools, and in order to avoid their undue discrimination or harassment, we would request the Inspection Panel and the World Bank to keep our data in strict confidentiality.

We hereby authorize above organizations to apply to the World Bank Inspection Panel on our behalf. In consultation with us, the above organizations will embark on compiling and submitting the Claims to the WB and Inspection Panel.

Respectfully,

Claimants:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]