

**Recommendations for the U.S. Government Strategy on
International Basic Education Draft for Public Comment**
July 2018

We applaud USAID and all government agencies involved in the development of the whole of government education strategy. We are pleased to see that many of our initial recommendations were addressed. In particular, we applaud the language around inclusion, specifically for children with disabilities, girls and marginalized groups, the references to alignment and coordination with multilateral partners, the focus on education in conflict and crisis settings, the inclusion of early childhood education, and the commitment to data and reporting. We have outlined our topline recommendations for the whole of U.S. Government Strategy on International Basic Education below in Section One. Section Two outlines additional feedback at USAID's request with recommendations for strategy annexes by agency and future documents, including the accompanying USAID policy and implementation guidance.

Section I: Key Points for the U.S. Government Strategy

1. **Ensure Sustainable Development Goal 4 (SDG4) is at the heart of the new education strategy:** Align education targets and indicators with SDG4.
2. **Avoid privatization:** the strategy should **prioritize free, quality, and inclusive public education**. The strategy should explicitly clarify that **U.S. government resources will not support harmful education models of school fees** (a form of private finance) **or for-profit schools**, because of their track record in excluding poor and marginalized populations.ⁱ The strategy should tread very cautiously in supporting public-private partnerships for education provision, where there is a limited evidence base and strong equity concerns.ⁱⁱ **Controversial terms and models to avoid when possible:** non-state actors, for-profit education actors, "low-fee" private schools, and performance-based assistance. We strongly recommend adding cautionary and safeguarding language in relation to public-private partnerships to avoid causing unintended harm.
3. **We are particularly concerned about performance-based assistance**, especially when performance is linked only to achieving specific learning outcomes. This approach risks damaging equity, particularly when rewarding test-based outcomes by funding those schools and programs that serve better-off populations. It can also undermine local ownership and government accountability to citizens.ⁱⁱⁱ Such approaches create disincentives to invest in students who struggle with learning and those who are out of school, including children with disabilities, and can result in practices where certain children are discouraged from attending school and/or from participating in assessments. If performance-based approaches are used, they must reward practices that result in increased access to learning, support to learners



with disabilities and those who struggle with learning, **and** with overall improved learning outcomes for all.

4. Please add beneficiaries more explicitly to the strategy including children and youth participation. When including the importance of engaging with parents and communities, this can be addressed by adding (recommended text to add in **bold**): “parents, **children, youth** and communities” and by prioritizing a **child-centered approach** throughout the strategy.
5. When describing the “global context,” we recommend a paragraph that discusses “the continuing **enrollment** crisis,” as a companion to the section on the “learning crisis.” This would serve to highlight the unfinished work to reach out of school children, including girls, children affected by conflict and crisis, and other vulnerable and marginalized children, which in every nation includes children with disabilities.
6. Thank you for including early childhood education, preschool and nutrition in the strategy. Please add: “nutrition **and parental support**” as a focus area to ensure parenting support early in life, which brain science shows is critical to support children learning outcomes. Under preschool efforts, we urge the U.S. Government to explicitly work with partners to overcome the data gap globally for stronger information across countries about the quality, equity, and inclusion of all children in early learning and preschool. On page 18, please add “children that receive a strong foundation at an early age **at birth**,” and include “**appropriate cognitive stimulation** and nutrition”.
7. Financing of multilateral partners: the U.S. should not simply seek to influence and leverage, but should **robustly fund multilateral mechanisms to finance education, particularly the Global Partnership for Education (GPE) and Education Cannot Wait (ECW)**, as these efforts ensure that the countries and populations where assistance is most needed receive adequate resources. U.S. bilateral assistance should be aligned with country Education Sector Plans, where they exist, as developed through the GPE process, to ensure country ownership is supported and to avoid fragmentation of efforts. In the **multilateral section** of the strategy, we strongly recommend adding more specific, bolder language to clarify maximum leverage and impact that includes **partnership, funding, resource mobilization and goal/program alignment**. For example:
 - “partnering and aligning goals with GPE as a platform for country-level engagement”
 - “partnering and aligning goals with ECW as a platform for education in crisis and conflict”
 - Please add the **United Nations** in addition to the World Bank, including key education actors such as **UNICEF, UNHCR and UNESCO**. Please add “**international organizations**” as that phrasing includes UN agencies.
8. On page 16, please specify that **poverty** will be included when determining priority for U.S. resources in response to country needs and opportunities, so that the greatest need within countries and communities is explicitly reached.
9. On pages 16, 28 and when referencing the annual report to Congress, please specify “An annual report to Congress **and the public**” so that future annual reporting will be published for the public, as detailed in the READ Act.
10. Under education in crisis and conflict, formally incorporate education into plans and strategies for agencies currently implementing programs in **emergencies, conflict and crisis settings**. Improve coordination across agencies currently implementing programs in crisis and

conflict settings, including consistent mechanisms for reporting of results and funding across agencies.

11. On page 23 under Crisis and Conflict-Affected Children and Youth, please add to the bullets on U.S. government priorities more detail about how previous challenges in inter-agency coordination will be overcome through this Strategy to ensure that U.S. government resources, funds, programs and structures provide **life-saving education across the emergency/humanitarian-development continuum without gaps in coverage**.
12. Page 13 - Suggest flagging the particular role that refugee-hosting governments play in providing access to education for displaced populations. Encourage equity and integration in these efforts.
13. Page 20 - Suggest stronger language regarding U.S. Government support for post-secondary programs beyond “best efforts.” Also encourage explicit reference to post-secondary for those students seeking opportunities beyond secondary education and outside of vocational training. “Workforce development” is cited, but that might be too narrow.
14. On page 23 under Individuals Experiencing Identity-Based Discrimination and Marginalization, please clarify that other barriers are often faced, depending on the context. This could be fixed by expanding slightly, such as: “They are denied access to a safe, quality education because of their gender, location, poverty, ethnicity, disability, **and/or other barriers**.” This would allow for programs implemented in line with this strategy to include targeted approaches to overcome discrimination based on local context that are not mentioned here, including race, caste, religion, pregnancy, HIV status, etc.
15. On page 24 and wherever **teacher support** is mentioned, please add: teacher wellbeing and support as a priority rather than just skill building and motivation. It is critical to ensure that teachers are paid living wages and have the tools they need to succeed.
16. While some national governments are committed to providing a 9-year (6-year primary and 3-year secondary) free and compulsory basic education, there are many countries where public provision of basic education ends with primary school. The first three years of the secondary education school cycle are key formative years for adolescents and youth. The strategy could hold national governments accountable and endorse a 9-year basic education (at a minimum) continuous cycle that is free and compulsory.
17. Infrastructure and access to school facilities:
 - Each school facility must be fully accessible, crisis prepared, and have quality access to water, sanitation, and hygiene, with safe spaces and supplies for menstrual hygiene management.
 - On page 9 and when mentioning programs that involve the purchase of supplies, please add: “sourcing resources locally and regionally” in support of local and regional purchase and local economies.
 - Many children still live in places where they have to long distances to school and have no access to electricity, which affects learning.
18. Technology: We recommend adding safeguards to ensure doing no harm in the “Harnessing Technology and Innovation” section. It is critical that the strategy address the issues associated with technology and online access for children. While Internet access and online resources are increasingly used in education, online access can also lead to abuse and exploitation. We would like to see the strategy focus on **safeguarding children from abuse**

and exploitation. We would like to see the strategy consider the preconditions for introducing technology, including a focus on **teacher support and class size.** The strategy should address the associated issues, such as dependencies and the possible lack of interactivity. The strategy should support interactive technology and address safeguarding and standards. The strategy should also prioritize technologies that support school-based (over home-based) solutions to advance the **inclusion of students with disabilities.** Technology needs to be scalable and sustainable. The U.S. should support investments in **country-owned systems that equip governments and sectors to support their programs and technology.**

19. The strategy's objectives include improved educational learning outcomes, access and quality; "relevant education" is currently absent from the high-level objectives. For youth, a relevant education is key. Recommend that one of the strategy's high-level objective and accompanying narrative is revised to highlight educational relevance: "Objective Two: Expand access to quality and **relevant** basic education for all, particularly marginalized and vulnerable populations."
20. Inter-agency coordination:
 - A. **We strongly recommend adding budget transparency and budget coordination across agencies to the strategy,** with the USAID Senior Coordinator for International Basic Education Assistance leading the budgeting and coordination process in collaboration with all involved agencies and departments. If the data is not yet available to include a chart in the strategy with international basic education funding from the involved agencies, departments, and funding sources, we strongly advise publishing such a document by March 2019 at the latest (with the first annual report).
 - B. **The strategy should continue and strengthen inter-agency programs that expand educational opportunities for girls.** The strategy and agency annexes should explicitly build on the Let Girls Learn (LGL) initiative, under any brand, and education efforts should build greater capacity to expand educational opportunities for girls as well as boys in both quantity and quality. We urge adding explicit prioritization in the strategy of the work done through LGL and gender equity initiatives, including Peace Corps Let Girls Learn volunteer training and funding and work across agencies to ensure menstrual hygiene management and support for adolescent girls to safely stay in school.
 - C. For education in humanitarian settings, support via the Department of Defense creates a question of who is administering and running programs on the ground. We believe **USAID is the best placed agency to run international education programs.**
 - D. At the field level, we recommend specifying that USAID take the lead when possible and **include local civil society and non-governmental organizations in coordination and collaboration.** In addition, it will be critical to clarify how **local civil society organizations** can explicitly partner with U.S. government on international basic education implementation.
 - E. We recommend close coordination with other interagency priorities including water, sanitation and hygiene, and children in adversities.

Section II: Recommendations for Strategy Annexes and Future Documents

Capacity building:

- Revitalize USAID’s disability policy at both the leadership and country level, in accordance with SDG4 metrics.
- The strategy should increase local capacity in domestic resource mobilization.
- We recommend increasing USAID’s staff capacity in international basic education via reforms such as a staffing agreement and mechanism to allow more rapid scale up and effectiveness.
- Ensure full inclusion and capacity building of local stakeholders: We applaud the strategy’s focus on working with local stakeholders, usually governments, to determine country-level priorities and focus on outcomes that government stakeholders are committed to addressing - this is critical to changing systems in sustainable ways. We hope to see this openness to country partner priorities, including work in secondary education, maintained in the forthcoming annex with USAID's strategy and future documents.

Reporting:

- We encourage the development of other components for accountability, including regular public reporting and segmented reporting by outcomes for children with disabilities, girls, children in crisis settings, ethnic/linguistic minorities, and other vulnerable groups. These outcomes should be made more explicit.
- Please clarify that the annual reports to Congress will also be published and freely available to the public.

Data, results, indicators and metrics:

- To ensure inclusive education, targets, indicators and data should be disaggregated for disability, gender, age and background, including vulnerable groups. The desired outcomes of reaching all children and youth fully should be made more explicit in data collection and program design.
- It is necessary to measure intermediary results such as change in pedagogy, teacher behavior and practice.
- Though the previous education strategy prioritized gender equality as a cross-cutting goal, it did not emphasize how gender equity can be integrated into each goal’s results. Incorporating gender equity and social inclusion (GESI) indicators into each result and continuing to strengthen capacity of USAID staff will ensure GESI is targeted in solicitations, program descriptions, program budgets, and evaluations.
- Deploy disability indicators related to beneficiaries (disaggregated by type of disability, and other demographic markers).
- The strategy should measure results in communities, expanding on existing parent and community engagement work.
- It is important to measure progress being made in closing the enrollment gap. This could include the use of third party data, such as the UNICEF Multi-Indicator Cluster Surveys.
- The strategy should tread very cautiously in using Results-Based Financing (RBF) or performance-based aid approaches. RBF can risk deepening existing inequality and exclusion by rewarding those schools that are performing well, and leaving those in most need with

less support and funding. It can lead schools to engage in harmful behaviors that will improve performance on standardized tests, such as cream skimming of the best students, selectivity, cheating, and unnecessary expulsions of low-performing students.^{iv} RBF approaches that seek to directly address equity, for example, by rewarding schools for enrolling students from households living in poverty may be limited by low institutional and data capacity of local governments to verify income status; these resources could perhaps be better used in providing capacity for stronger school management and oversight.

- There is need to define the transition pathways and targets for children. Because post-primary educational options are still limited in many countries, we need to be clear about what transition pathways and expectations there are for children. This affects both their permanence and persistence in basic or primary education, but it also affects families' decisions on the opportunity cost of education.
- When considering the learning outcomes targeted for children and youth, it is important to consider both the traditional cognitive learning outcomes as well as non-cognitive learning outcomes. Evidence shows us that student increases in non-cognitive outcomes such as leadership and agency lead to higher learning outcomes in areas such as literacy and numeracy.
- Better defining and delineating the gendered approaches and goals will strengthen the strategy's ability to reach both girls and boys alike. This will require better metrics going beyond disaggregated data, to also look at better gender and power analyses incorporated into ongoing programming.
- As the metrics and indicators are defined at the agency levels, areas for consideration include: better gender lenses (see bullet above), and a push from U.S. Government to support complex and triangulated data analyses that track change over longitudinal cohorts of learners.
- In implementation guidance, please include applied learning and defined metrics around gender.

Inclusion:

- We applaud the focus on disability-inclusive education, including the reference that a sub-group of the Agency Advisory Group will be formed to address this issue. It is important that the strategy recognize that all students have different abilities and learn at different paces. Therefore it is critical to also include differentiated instruction and adaptive learning, and recognize that inclusive education and differentiated instruction are for all students, not just those with disabilities or learning differences. Differentiated learning is beneficial for all students and inclusive education should be addressed as "inclusive education for all."
- We encourage the addition of a separate "spotlight" on the education of children with disabilities that could highlight factors important to achieving greater access and inclusion, such as: addressing the range of abilities and disabilities including hidden disabilities, the removal of barriers and addressing stigma and discrimination; pre- and in-service teacher training on inclusion and disability; the involvement of parents of children with disabilities; accessible learning materials; fostering safe and welcoming learning environments; the development of teacher and staff skills to promote inclusion; and policies and practices that strive to place each and every student in the most inclusive setting possible.

- Focus is especially needed on reaching children not yet in school or even counted, including children with disabilities living in impoverished households and rural areas.
- Prioritize inclusion, including sexual orientation: We urge you to strengthen U.S. Government policies and programming for inclusive education, and ensure support and inclusion of LGBTQIA persons.
- We recommend that USAID make induction and refresher training regarding disability and inclusive education mandatory for all USAID education staff, including successful completion of an updated version of USAID's Disability Inclusive Development E-Learning course. This training is particularly pertinent for staff representing USAID in Local Education Groups and education sector planning.
- The strategy needs to address pre-conditions for disability-inclusive education, including classroom management, and should not look at students with disabilities as an isolated group.
- The previous education strategy addressed children with disabilities somewhat, but did not allocate budget, disability indicators, and other resources to achieve impact. The new USAID education policy and strategy documents should include a strong focus on disability-inclusive education, requiring funding for inclusion of persons with disabilities as part of the selection criteria, program design, monitoring and evaluation, and reporting for education projects.
- While there was some language in the last strategy on these issues, there was not enough accountability for implementation. We would like to see that built into the process, guidance and reporting.
- When discussing vulnerable populations and determining locations of education funding, please specify the need to equitably reach each tribe and village, avoid exacerbating any ethnic tensions in the local context.
- Peace Corps volunteers should help identify out of school children, which could be included in the Peace Corps annex.

Equity and low-fee private schools:

- The strategy and accompanying materials should avoid supporting for-profit, low-fee private schools, a model that deepens poverty, harms equity, erodes quality education, and increases gender inequality. The World Bank's recent World Development Report on education clearly states that "there is no consistent evidence that private schools deliver better learning outcomes than public schools." Another study on for-profit K-12 education operators in the IFC portfolio found that the 'low' fees charged are a barrier to the poor, that commercial operators are prone to put business interests above education, that quality of education is determined by what families can pay, and that these schools do not drive up quality in the public sector.^v Furthermore, new studies raise concerns about the practices of prominent commercial school chains, which keep costs low by hiring untrained, poorly qualified teachers; using scripted, standardized lessons based on a narrow curriculum oriented to standardized tests; and actively seek to avoid government regulation.^{vi} A review of literature on private schools funded by DFID found evidence that "private schooling is not equally accessed by boys and girls."^{vii}

Program duration:

- *What is the current program duration for international basic education programs coordinated outside of USAID?*
- A long-term vision to improve and ensure inclusive learning environments is key. The strategy should look to longer project timeframes rather than short-term transactions.
- We urge you to specify that education needs strategies, multi-year plans and programs that are long-term, with the full support needed for communities and countries to ensure quality, universal, inclusive education for all.

Budgeting and funding:

- Ensure gender equity, disability inclusion and social inclusion are targeted in solicitations, program descriptions, program budgets, and evaluations.
- USAID should provide catalytic support by allocating seed funds for countries to ensure the needs of children with different abilities are met.
- When applicable in partnership with countries and the Global Partnership for Education, we recommend that USAID allocate additional direct funds toward government integrated work, identifying governments that are in process of reforming nationally, and providing funds and outside expertise to support them in building national capacity.
- Require specific budgets and program allocations for inclusive education.

Teacher training:

- Inclusion of all children should also require the creation of safe learning environments for children in conflict and crisis countries by including psychosocial support for teachers and students and other supports that promote positive school climate.
- Teachers must be equipped with early warning signs of vulnerable children and those who are at risk of dropping out.
- Colleges and universities are rightly identified as important partners for building the evidence base on basic education. In addition, partner country colleges and universities also play a key role in pre-service teacher preparation. Expanding partnerships with them to improve and expand teacher preparation is critical to address the teacher shortage.

Education systems and community relationships:

- Coordination with court, police, and other judicial systems can help to protect vulnerable girls specifically.

Next steps:

- Please provide at least two weeks for consultation, civil society participation and public comment in upcoming processes, including **indicators, policy, implementation guidance and reporting**.
- Please share more information about **pilot countries**.

We greatly appreciate these critical efforts across the U.S. government and involved partners to implement the READ Act and ensure quality, universal, safe, inclusive education for all children and youth.

Endnotes

ⁱ For example, see Global Campaign for Education (2016) “Private Profit, Public Loss: Why the push for low-fee private schools is throwing quality education off track.”

<http://www.campaignforeducation.org/en/news/global/view/690-private-profit-public-loss-gce-s-report-shows-scant-evidence-that-low-fee-for-profit-private-schools-are-better-than-public-schools>

ⁱⁱ For example, see Verger, A. and Moschetti, M. (2017) “Public-Private Partnerships as an Education Policy Approach: Multiple Meanings, Risks and Challenges.” Education Research and Foresight Series, No. 19. Paris, UNESCO. <https://en.unesco.org/node/268820>

ⁱⁱⁱ UNESCO Global Education Monitoring Report (2018) “Walk before you run: the challenges of results-based payments in aid to education” Policy Paper 33.

<http://unesdoc.unesco.org/images/0026/002611/261149e.pdf>

^{iv} Ibid.

^v RESULTS Educational Fund (2017) “From Free to Fee: Are for-profit, fee-charging private schools the solution for the world’s poor?”

http://www.results.org/uploads/files/From_Free_to_Fee.pdf

^{vi} See also East African Centre for Human Rights, (2017) “Low Cost Private Schools: School Choice for the poor at the expense of Quality?”

<http://eachrights.or.ke/images/2017/Homa%20Bay%20Research%20Report.pdf>; and

Education International and Kenya National Union of Teachers (2016) “Bridge vs. Reality: A study of Bridge International Academies’ for-profit schooling in Kenya.” http://download.ei-ie.org/Docs/WebDepot/Bridge%20vs%20Reality_GR%20Report.pdf

^{vii} Day Ashley L, Mcloughlin C, Aslam M, Engel J, Wales J, Rawal S, Batley R, Kingdon G, Nicolai S, Rose P (2014) The role and impact of private schools in developing countries: a rigorous review of the evidence, DFID.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439702/private-schools-full-report.pdf