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DEUTSCHE ZUSAMMENARBEIT

Implemented by

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# Transferring Education Functions in Battambang

Lessons learned from the implementation process



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## **Abbreviations**

D&D:	Decentralisation and Deconcentration
DMAs:	District and Municipal Administrations
DMC:	District/Municipal Councils
DMK:	District/Municipality/Khan
DoEYS:	District/Municipal Offices of Education Youth and Sport
ECE:	Early Childhood Education
GKC:	Government of the Kingdom of Cambodia
MEF:	Ministry of Economic and Finance
MoEYS:	Ministry of Education Youth and Sport
Mol:	Ministry of Interior
NCDD:	National Committee for Sub-National Democratic Development
NFE:	Non-Formal Education
PDCS:	Provincial Department of Civil Services
PDiHRM:	Provincial Division of Human Resources Management
PDoEYS	rovincial Department of Education Youth and Sport
PE:	Primary Education
TNA:	Training Needs Assessment

## Executive Summary

This report reviews the implementation process of assigning education functions (Early Childhood Education/ECE, Primary Education/PE, and Non-Formal Education/NFE) to District/Municipal Administrations (DMAs) in Battambang according to the Sub-Decrees 182-184 of December 2019. The review is based on field observations, interviews with key informants of the sector at provincial and DM-level, and the analysis of relevant regulations/guidelines. The report also examines the supporting institutions that are necessary for enabling the DMAs to implement the assigned education functions successfully. Based on this review, the report summarises important lessons learned from the assignment of functions to the DMAs in Battambang and offers related policy recommendations for a further roll-out of the assignment modality in the education sector to other provinces of the country.

The use of the assignment modality in transferring education functions to the DMAs in Battambang was a pilot initiative: for all other provinces, the delegation modality had been used. The use of the assignment modality has not weakened, in a significant and observable manner, the delivery of education services in the 14 DMAs. Overall, respondents were positively accepting the new roles and responsibilities that came along with the assignment of functions. Obviously, such a change process will include challenges and pitfalls which need to be addressed.

First, clearer administrative guidelines and instructions are needed to guide DMAs. Different practices from DMAs suggest that there are vague and sometimes contradictory instructions and guidelines, such as how to use a stamp, how to request a leave of absence, or how to issue/adjust administrative procedures in education offices. Second, for the transition phase a support mechanism is needed at the provincial level which can respond timely to queries from the DMAs or facilitate communication between the national level and the district level. Third, extensive awareness-raising and information sharing about the transfer of education functions and its implications shall be made at the district and commune levels. Besides the need to understand the new arrangements, the direct implementors and beneficiaries of the transfer process (such as sector officials, other DMA officials, members of the DM councils, etc.) need to be convinced of the benefits so that they are ready to take part and contribute to the new way of delivering education services as part of a unified local administrative system. Fourth, a technical training manual on education functions needs to be developed as soon as possible as DMAs are waiting for such a document so that they can confidently implement their new responsibilities. Lastly, capacity development is still a key to success. Staff at DMAs are new not only to the education functions but also to the position and tasks they are performing. The staff needs both technical and interpersonal knowledge. Likewise, elected representatives need to understand what the assignment of education functions to the DM level means for the role and responsibility of the local council.

Although still limited, the available experience from Battambang does not provide evidence that implementing education functions under an assignment modality creates significant risks and pitfalls for the sector. However, it highlights important aspects how the national and provincial sector institutions need to manage the transfer process and provide support and guidance during a transition phase.

# 1. Introduction

## 1.1 Purpose and Background

This report summarises lessons and implementation experiences from the assignment of education functions that were transferred to District/Municipal Administrations (DMAs)<sup>1</sup> in Battambang. Key questions explored were what was implemented well, what was not, and what needs to be improved both in Battambang and in any planned scaling-up of the Battambang arrangement in other provinces.

On 2 December 2019, the Government of the Kingdom of Cambodia (GKC) issued Sub-Decrees No. 182 and 184 ANK.BK on “Functions and Structures of Municipal Administrations” (No. 182) and “Functions and Structures of District Administrations” (No. 184), respectively. The Sub-Decrees aimed to “promote the efficiency of the administration management, public service delivery, and local development” at municipality and district levels, with the objective to “determine the functions, structure, roles, responsibilities, working relations, and accountabilities” of the administrations. The two Sub-Decrees also showed significant progress in the Sub-National Democratic Development (SNDD) reform process by transferring several functions, including education, from the national level to the sub-national administrations, to the District/Municipal Administrations (DMAs). The transfer of functions was done in two modes: assignment and delegation. In the assigned mode (known also as ‘devolution’), sub-national administrations have wide authority to manage and perform the functions for which they have become responsible and are accountable to the citizens of their jurisdiction (Organic Law 2008, Art. 225). In the delegated mode, however, sub-national administrations are more bound to perform functions as determined by the delegating entity, and they remain accountable mainly to that sector ministry or institution (Organic Law 2008, Art. 226).

Education functions were transferred in the delegated mode to all provinces and capital in Cambodia, except in Battambang, where three education functions, namely Early Childhood Education (ECE), Primary Education (PE), and Non-Formal Education (NFE) were transferred in the form of assignment.

Battambang is considered a testing ground for implementing the 2016 Policy on Decentralisation and Deconcentration (D&D) Reform in the Education Sector as formulated by the Ministry of Education Youth and Sport (MoEYS). The goals of the policy are to strengthen the autonomy and responsibility of the sub-national administration (especially at DMAs level) and public education institutions so that they can deliver quality education services transparently and equitably to the citizen. Transferring functions and resources in education, youth and sport has gradually been made in a cautionary way. It is envisaged that experiences and lessons learned from the implementation process in Battambang will provide valuable insights for future full-scale assignment of education functions to the DM level in other provinces in Cambodia.

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<sup>1</sup> DMAs in this document is referring to the district/municipal councils, the governing board, and staff at the office of administration, finance, and personnel.

## 1.2 Methodology and Limitations

The study utilised semi-structured interviews with key stakeholders (see Appendix 1 with a list of key informants) and reviewed legal documents and other materials relevant to the implementation process in Battambang. Field observation of the policy implementation at DMAs in Battambang was also made from June 2020 to December 2021. From time to time, key informants were requested to share their reflection on the implementation process. One national reflection workshop was conducted online on 29-30 July 2021; another follow-up reflection workshop was also done on 24 March 2022 (see Appendix 2 for details).

The findings and observations of this report have to be seen in the light of some constraints and limitations: since the approval of the Sub-Decrees (182-184) in late 2019, Covid-19 outbreaks consumed most of the efforts of the DMAs and District/Municipal Offices of Education Youth and Sport (DoEYS) in Battambang. Nearly all schools were closed and converted into quarantine and/or treatment centres. Against this backdrop, the primary attention of both national and sub-national levels was focusing more on the effective response mechanism to such an emergency rather than on the assigned education functions. In other words, exercising the assigned education functions since early 2020 took place in a very specific and unusual context, and probably not with the level of concentration one can normally expect.

This report furthermore focuses on the experience, observations and insights gained by sector officials at provincial and DM level. As responsibility for the three education functions was transferred to the DMAs, officials were confronted with various legal, administrative and financial issues for which often no established procedure existed. The report identifies such issues and how they were solved (or sometimes were left unresolved). The report does not venture into evaluating the impact or outcome of the devolution process, i.e., it does not provide an answer whether quantity and quality of education services improved or declined after devolution to the DMAs. Nor does it attempt to compare the outcome of the functional transfer by the modality used.

## 1.3 Outline of the report

The remainder of this report is structured as the followings:

- Section 2 provides an overview of the regulatory framework for the transfer of education functions.
- Section 3 assesses the institutional arrangements and describes challenges found during the implementation of the transfer of education functions between early 2020 and late 2021.
- The last section (Section 4) presents the lessons learned generated from the observation and assessment. It also offers a few recommendations for consideration.



## 2. Regulatory Framework

Several educational policies and Sub-Decrees guide the decentralisation of the education sector in Cambodia. Most important are the Sub-Decrees 182-184 of December 2019. In addition, there are several implementing administrative regulations that were formulated in response to certain practical implementing experiences. This section provides an overview of the relevant policies, regulations, and guidelines to gain a better understanding of the legal and policy context of sector decentralization in education.

### 2.1 Main policy guideline: Policy on Decentralisation and Deconcentration (D&D) Reform in the Education Sector

MoEYS published its policy on D&D reform in education on 7 September 2016 to strengthen the autonomy and responsibility of sub-national administration and public education institutions. The policy is set to achieve four main goals. The first one is to develop the necessary legal framework and education management mechanism in accordance with the SNDD reform of the government of Cambodia. Second, the policy aims to transfer education functions and resources to sub-national administration and educational institutions. It is also to capacitate the institutions and the administration to manage and deliver education services. Finally, it is to enhance social equality, inclusion, participation, and responsibility from the education staff, parents, and citizens to deliver and take quality education services.

In its strategic plan (2019-2023), MoEYS briefly states its commitment to the D&D reform by highlighting key responsibilities of certain institutions as the followings:

- MoEYS is responsible for examining functions and resources to be transferred to sub-national administration. It is the duty of MoEYS to formulate legal guidelines and to recruit, train, and develop new teachers.
- Provincial Department of Education Youth and Sport is an intermediary between MoEYS, DoEYS, and schools. It is also to assist MoEYS according to its defined roles (to be reviewed by MoEYS according to the D&D reform) in facilitating and support DoEYS and schools in implementing the education policy. What is more, it is also to assist Provincial/Municipal/Capital Administrations in the name of the technical facilitation committee member.
- District/Municipal Offices of Education Youth and Sport (DoEYS) is an intermediary between MoEYS and schools. It is to facilitate, support, and report to MoEYS according to the role as a back support unit in delivering education functions. It is to observe any decision made by the government in the unitary state functions reform.
- Educational institutions are acting as a front unit in providing education services to citizens. Schools so far have their own autonomy in planning and managing their resources. MoEYS has been transferring budget directly to the school accounts since 2000.

## 2.2 Main legal instruments: Sub-Decrees 182-184 ANK.BK

The Sub-Decrees 182-184 dated 2<sup>nd</sup> December 2019 on “Functions and Structures” of DMAs deepen the SNDD reform policy by transferring responsibilities and resources for a wide range of sector functions to the DMAs in Cambodia. The Sub-Decrees also integrate a dozen of sector offices into DMAs’ management and leadership and thus create a unified administration at the DM level. For Battambang, special arrangements were made for transferring education functions as assigned (or devolved) functions (Chapter 7 and Annex 4), compared to the other provinces where those functions were transferred as delegated functions.

Article 59 in the Sub-Decrees stipulates that “Early Childhood Education Management, Primary Education Management, and Non-formal Education management are assigned” to DMAs of Battambang while “Secondary education management, youth development, and physical education and sports are delegated”. The sub-functions and activities of the assigned and delegated functions are also articulated in the Sub-Decrees. Article 60 provides that the public kindergarten schools, public primary schools, and community learning centres of the Ministry of Education, Youth and Sport at the municipality and district level shall be integrated into the DoEYS of the respective DMAs. The National Committee for Sub-National Democratic Development (NCDD) is authorised to plan, lead, coordinate, and evaluate the implementation process so that it could provide recommendations to GKC for any future roll-out of the assignment mode.

## 2.3 Administrative Regulations/Guidelines

In the process of transferring education functions to the DMAs, several administrative regulations and guidelines needed to be formulated to address practical issues. Some of these dealt with the specific situation of DMAs in Battambang, which were handling transferred education functions in an assigned mode, while others dealt with issues common to all DMAs handling education functions in a delegated mode. These regulations include the following:

### 2.3.1. Ministry of Interior: Instruction No. 055 SNN

The Ministry of Interior (MoI) issued an instruction No. 055 SNN dated 25 December 2019 on “Ensuring continuity in administrative work and delivering services in the process of managing the new municipal, district, and khan structures” to all DMAs in Cambodia. The instruction aims to ensure the continuity of administrative work and delivering the services while supporting legal instruments relevant to administrative, personnel, and financial procedures of the new arrangements are still missing. The instruction asks all capital, province, khan, municipal, district administrations, provincial sector departments, sector offices, and related units of ministries and institutions District/Municipality/Khan (DMK) level to cooperate in recording the transfer and acceptance of duty and responsibilities including the tasks, documents, property, assets, income, expense, debt, and budget.

Section 1 of the instruction describes how DMAs should manage the continuity of the administrative work and delivering services. It is required that, if necessary, the technical offices



responsible for administrative services, public services, and financial affairs can continue doing what they used to do until further notice. Section 2 encourages all DMAs to list down all tasks that they have been doing for the purpose of transferring them. Section 3 obliges that the DMAs make an inventory list of all the properties they have. Section 4 instructs the DMAs to prepare a report on contracts, obligations, and finance. Section 5 asks DMAs to compile and report a list of any legal documents they were issuing before the transfer of functions. Finally, Section 6 describes the implementing mechanism that the governing board of each DMAs shall perform to prepare for such a transfer of tasks.

### 2.3.2. Ministry of Interior: Notice No. 1622 SCN

On 4 June 2020, Mol issued another notice No. 1622 SCN on “Strengthening administrative management at municipal, district, and khan”. The notice observed that each office integrated into DMAs still communicates to its line departments at the provincial level in the same way as before the transfer of functions), which is not in line with the Sub-Decrees 182-184. The notice instructs that all official letters must be routed through the DMAs and must have the signature and seal of the DMAs. The line departments at the national/provincial level are also requested to communicate through DMAs if they want to contact the sector offices at DMAs level. Each office integrated into DMAs cannot sign or seal as they used to do anymore. It is now the district/municipal administration office to decide where to sign, seal, and send communication to external recipients.

The notice, however, does not have a separate section aiming specifically at DMAs in Battambang, where education functions had been transferred both in the assigned and delegated mode. It is noted that before the transfer of functions, DoEYS had its own stamp, and they could use it to communicate with external partners and their schools. After the transfer, unfortunately, there is no explicit instruction yet on how the office stamp can be used. This causes some confusion that the later sections of this document will highlight.

### 2.3.3. Joined Inter-Ministerial Prakas No. 521 SHV.BK

Mol, Ministry of Economy and Finance (MEF), and MoEYS issued a Prakas No. 521 SHV.BK dated 15 June 2020 on “Financial and technical conditions and financial procedures for financial transfer with conditions to all 14 DMAs in Battambang to implement education functions of ECE, PE, and NFE”. The purpose of this Prakas is to transfer conditional finance to DMAs in Battambang so that they can use and manage the assigned education functions effectively, efficiently, accountably, and transparently from 2021 onward.

The Prakas describes the roles, responsibilities, and accountability of DMAs and DoEYS. DoEYS shall act as the assistant and must be accountable to DMAs. With technical assistance from the Provincial Department of Education Youth and Sport (PDoEYS) and guidance from DMAs, DoEYS would plan the budget and use it according to the financial guidelines and instructions available. The budget plan for ECE, PE, and NFE has to be annexed to the DMAs budget. DMAs shall request MoEYS through PDoEYS for teacher recruitment and teacher capacity building if needed. If there is a need to reduce or increase any budget line in response

to the economic situation, MEF will inform DMAs to adjust accordingly. It is noted that before the transfer of the education functions, PDoEYS was responsible to plan and implement the budget with assistance from DoEYS; however, after the transfer, this responsibility lies with the DMAs.

#### 2.3.4. Ministry of Interior: Decision No. 2994 SSR

Mol issued another Decision No. 2994 dated 8 July 2020 on “Establishment of a working group to prepare a training document on the management of education functions at municipal, district, and khan administrations”. The director of the National School of Local Administration (NASLA) is the head of the working group, together with nearly thirty members from MoEYS, NCDD, and Mol. The main duty of the group is to write a manual on the management of education functions and to conduct training for DMA officials. The group has been tasked to:

- Plan activities to conduct technical training on education functions for all DMAs
- Develop a guiding manual on managing education at DM level
- Develop a training manual on education functions in DMAs
- Conduct training on education functions
- Perform any necessary and related tasks.

The tasks of the group do not reflect the specific challenges of DMAs in Battambang which manage education functions in an assigned mode. The group has met several times to discuss the technical education functions. By the time of this writing, the guiding and training manuals had not been developed yet.

#### 2.3.5. Ministry of Economic and Finance: Instructional circular No. 001 SHV

On 16 February 2021, MEF issued an instructional circular No. 001 SHV on “Implementing procedures of budget, accounting, and credit movement of the financial transfer with conditions to 14 DMAs in Battambang to implement the management ECE, PE, and NFE functions”. There are two main parts of this circular. The first one highlights the implementing procedures of budgeting and accounting for the implementation of the assigned functions while the second one is about the credit movement, instructing which part of the account that DMAs can move and use the budget.

This instructional circular proved to be very helpful to DMAs and DoEYS in Battambang as it provided detailed procedures that were only vaguely mentioned in the joined Prakas No. 521 SHV.BK issued 15 June 2020 on “Financial and technical conditions and financial procedures for financial transfer with conditions to all 14 DMAs in Battambang to implement education functions of ECE, PE, and NFE” (see 2.2.3 above).

## 2.4 Observation and Assessment

While Sub-Decrees 182-184 of 2019 provide the basis for transferring education functions to the DMAs (both in assigned and delegated mode), the sub-decrees alone are not sufficient to guide and steer the implementation process at sub-national level. More instructions and guidelines have

emerged to clarify issues and to respond to certain challenges in the implementation of the transfer of functions. It is likely that more detailed and specific instructions and guidelines will have to be issued based on feedback from the implementation processes.

### 3. Supporting Institutions

Institutional arrangements are crucial to strategically support, facilitate, and implement the transfer of education functions. While noting the complex institutional set-up in Cambodia, this section indicates the important role of several institutions that can coordinate and strengthen the implementation process at two administrative levels: Provincial and District/Municipal Administrations.

#### 3.1 Provincial Department of Education Youth and Sport (PDoEYS)

All Provincial Departments of Education Youth and Sport act as the secretariat of MoEYS and are supposed to explore, implement, and disseminate relevant sector policies and guidelines formulated by MoEYS to improve the quality of education service in their jurisdiction. They are expected to act on behalf of MoEYS and manage staff, assets, and educational institutions in their province. They are also to cooperate and coordinate with the relevant authorities in their respective territory. To be accountable to MoEYS and observe the current policy on D&D, PDoEYS in Battambang has produced several significant documents responding to the strategic plan and road map designed by MoEYS. These include Provincial Education Strategic Plan 2019-2023, Three-year Rolling Budget Plan 2020-2023, Yearly Budget Plan, and Yearly Operational Plan. Reviewing available documents and meeting with key informants from PDoEYS, the study notes several challenges that need to be addressed:

- 1) First, PDoEYS is not functioning yet according to the latest policy on D&D. For example, its role and responsibility outlined in MoEYS's decision issued in 1999 are not in line with the 2016 D&D Policy on Education and the Sub-Decrees 182-184 on the transfer of functions in education. It is noticed that MoEYS is still in the process of reviewing and issuing a new Prakas to highlight key roles and responsibilities of PDoEYS, aligned with Sub-decree 182 & 184 for support the implementation of the transfer of education functions to DMAs in Battambang.
- 2) Second, efforts have been made to capacitate schoolteachers and principals but not the sector officials who are managing and supporting the education sectors at PDoEYS. There is no plan or budget allocated yet to build the technical and managerial capacity of core supporting offices such as the office of administration, planning, personnel, and training, or inspection. Still, the field observations identified several initiatives and support activities conducted by the PDoEYS in Battambang:

- a. The Office of Administration created an informal Telegram group to communicate and disseminate relevant information to all DMAs; this group includes district/municipal governors, deputy governors responsible for education, and district/municipal administrative directors.
  - b. In an EU-funded program, the Office of Accounting and Treasury travelled to a few districts (e.g., Kamrieng, Phnum Proek, Sampov Lun from 13 to 17 July 2021) to train staff at DoEYS/DMAs on how to plan budgets to support schools.
  - c. The Office of Planning conducted a survey to improve the Instruction on formulating a yearly plan to enable DoEYS/DMAs to do it independently. It also conducted a few workshops to present on how to formulate a strategic education plan 2019-2023 that could be integrated into DMAs' yearly operational plan and to orient and refresh the 2022 Annual Action Plan of the Office of Education, Youth and Sports of the Municipal/District Administrations.
  - d. The Office of Personnel and Training conducted an online workshop to present how to manage multi-class teachers<sup>2</sup>, two-shift teachers<sup>3</sup>, and contracted staff/teachers.
  - e. With the instruction from the MoEYS and support from UNICEF, the Office of Early Childhood Education offered trainings on how to establish a school community strategic team and a pre-school management committee in all DMAs.
- 3) Finally, there will be a financial deficit of about 5% from 2021 to 2023 as seen in the three-year budget plan of PDoEYS. This could suggest that PDoEYS would face more challenges to implement the existing operational plan which has a direct impact on capacity building and inspection that has already been limited.

## 3.2 Provincial Division of Human Resources Management (PDiHRM)

Following Sub-Decree No. 216 ANK.BK dated 14 December 2009 on “Roles, responsibilities, and relationship between the provincial councils and governing board, municipal councils and governing board, and district councils and governing board” and subsequent Prakas No. 4274 BK of Ministry of Interior dated 30 December 2009 on “Establishment of offices in provincial divisions, municipalities, districts, and roles, responsibilities, and working procedures of each office”, the PDiHRM has a crucial role to support DMAs in managing personnel-related issues. An interview with the director of the division in Battambang<sup>4</sup> revealed that he had only partially involved in recent meetings or workshops on the transfer of education functions or D&D reform updates in general. However, he received complaints and noticed some different practices at DMAs in the province, especially in appointing school principals in which he could not give a definitive answer

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<sup>2</sup> Multi-class teacher is referring to a teacher who teaches two or three grades in a class at the same time.

<sup>3</sup> This is referring to a teacher who teaches two shifts – morning and afternoon. Normally, a teacher teaches only either in the morning or the afternoon.

<sup>4</sup> Interview date: 18 Jan 2022

when requested to comment by some DMAs. He normally suggested DMAs to consult with the Provincial Department of Civil Service (PDCS).

As shown in Box 1 below, the confusing issue in appointing a school principal is largely caused by not being able to follow the updated policy guidelines and instructions from the national level. This requires that responsible persons in the related offices compile and disseminate the related legal guidelines as soon as possible to relevant staff at DMAs.

**Box 1: Confusing guidelines on appointing a school principal**

Guideline No. 21 issued by MoEYS dated 27 March 2014 on “Selecting and Appointing Staff” requires that 80% of the education staff participate in the evaluation process when appointing a school principal. The guideline, however, was based on Sub-Decree No. 497 dated 6 November 2013 which was nullified by Sub-Decree No. 240 dated 27 December 2017 on “Delegating Power to the Governing Board of Capital, Province, District and Municipality in Managing Sub-National Staff”. Based on the later Sub-Degree and the Royal Degree (NS/RKT/0416/373) on “Particular Statute for Staff at Sub-National Administration” dated 4 April 2016, the Ministry of Civil Service (MCS) issued several guidelines to detail the process to manage staff as described in Guideline No. 788 and No. 789 dated 22 February 2018 and No. 1232 dated 20 March 2018. Despite these, different practices were observed. Some DMAs, together with DoEYS, managed to appoint staff quickly without any issues. Others, in contrast, faced disagreements towards the appointing process between DMAs and DoEYS. A few DMAs decisively appointed the school principal although there was dissatisfaction among teachers and staff at DoEYS.

### 3.3 Provincial Department of Civil Services (PDCS)

One of the key responsibilities of the PDCS is to legalise a Deika issued by DMAs – be it appointing, dismissing, or integrating new staff. In 2021, DCS legalised 177 Deika, including 533 staff (212 females). There was no issue found in the education sector, as there was no complaint made so far about appointing or transferring the education staff. It is generally observed that the appointment of a school principal is faster since sub-national administration can decide, yet the appointing process is notable lengthy due to certain issues as described in Box 2 below.

**Box 2: Delay in staff appointment**

One notable example was the appointment of a pre-school principal. To successfully complete the appointment process, it is a requirement that the pre-school is acknowledged by a Prakas from MoEYS; unfortunately, there was no such a Prakas for some of the pre-schools. Therefore, although the staff was an acting principal for several years, s/he still could not be appointed to be a school principal. PDoEYS also acknowledged such cases. It was informed that PDoEYS requested acknowledgment from MoEYS since 2018 but remained unheard.

### 3.4 District/Municipal Administrations (DMAs)

DMAs in Battambang are facing several challenges (See Appendix 3) in finance, personnel, and organisational management since a dozen of offices were integrated according to the Sub-Decrees 182/184. Staff at DMAs experienced fear, anxiety, and nervousness as the result of the increased workload and limited resources. Confusion was also noticed while attempting to enact the sub-decree 182/184. Most of the staff admitted that they were new to the tasks and mentioned that clear instructions or technical guidelines on how to implement the education functions that had been assigned were still missing. While they were happy to assume this new responsibility, they also noted several constraints as follows:

#### 1) Personnel issues

Most staff responsible for the Personnel Office at DMAs were new to the position. Some admitted that they lack experience on how to manage education staff -- contracted teachers, two-shift teachers, or multi-class teachers. So far, the dominating tasks at DMAs were the issuances of Deikas to appoint school principals and new teachers, adjust the current status of teachers, and salary increment. Complaints received were mainly on the slower process and the increased number of supporting documents compared to when handled by PDoEYS. Teachers, for example, needed to copy a lot of relevant documents and get them legalized at the One Window Service Office before sending it to DMAs. This was costly and time-consuming. Yet, DMAs justified that they were just following the guidelines.

Another complicated issue was during the election period. Teachers mostly were recruited to be an electoral observer by the National Election Committee. Both, DoEYS and DMAs, admitted that they could not find a substitute teacher to teach the classes which had to be closed. They even complained that it was unfair as the recruited teacher would get a double salary from the two working places, yet they could not reject the proposal. It was found out during the latest reflection workshop (24 March 2022) that these practices had been done for a long time since there was a Memorandum of Understanding between the Ministry of Civil Services and the National Election Committee.

#### 2) Financial issues

Since transferring the budget was not done in time along with the transfer of education staff, there were some delays in paying the additional allowance to education staff, for example, the maternity allowance in early 2021. However, ongoing payment was made after the year and things are getting better as the budget for the assigned functions was included in the DMAs budget. There was no issue with the school operational budget as MoEYS has been transferring this budget directly to the school accounts since 2000. In contrast, the operational budget of DoEYS was a challenge. Before the transfer of functions, DoEYS could spend its budget (about 30 million riels and was paid in a four-time advancement mode approved by PDoEYS) on (1) intra district/municipal missions and (2) office supplies (water, electricity, printing paper, writing material etc.). Funds for travelling and missions outside the district/municipal areas were usually



provided by PDoEYS. PDoEYS also supplied office equipment such as a printer, photocopier, printing papers, etc. This is no longer the case since the transfer of functions (and budget) to the DMAs was made. DMAs have a complex budgeting process regarding cash advancement, direct payment, and procurement. DoEYS can no longer travel outside their areas, for instance, to attend a training or a workshop in the province, due to the lack of travel allowance.

The procurement requirement also becomes more difficult for the DOEYS as 1. The number of companies submitting a bid is too low and 2. The purchasing power is declining. To complete one of the procurement requirements when purchasing things is to get a few companies to submit a quote. However, since the budget is small for such things, not many companies are interested to bid. What is more, the price of purchasing goods in some cases is also increasing. Before the transfer of functions, DOEYS may spend, for example, 100US\$ for a table, but after the transfer, the same table might cost double due to many factors that participants were reluctant to mention explicitly. The financial challenges are also mentioned in Appendix 3.

### 3) Asset management

The guideline on how to transfer school assets to DMAs is yet to come. Therefore, DMAs were reluctant to build, fund, or repair schools since receiving the new sector functions. DoEYS noted that some schools needed supplies such as tables and desks, or needed to be repaired, but they were not sure whom to ask for such support now. Previously these were funded by PDoEYS, but since the functions were transferred, PDoEYS asked DoEYS to contact DMAs for this matter. DMAs, on the other hand, refused to fund as there was no budget allocated for this particular case.

### 4) Working Relations and Procedures

Standard matters like using a stamp and an administrative form have not been determined and used in a systematic way yet. DMAs were reluctant to allow DoEYS to use its stamp to communicate internally (e.g., to schools) on the assigned functions and externally (e.g., to a development partner) on the delegated functions as they used to do before the functions were transferred. Although Mol issued a notice No. 1622 dated 4 June 2020 on “strengthening administrative management at municipal, district, and Khan”, question remained whether or not it was applicable to the education functions as DoEYS and schools have their own stamps. Some DMAs ignored the practices of DoEYS when they continued to use their office stamp to communicate internally to schools and partners, yet some DMAs strictly prohibit the stamp usage in any matter.

Bureaucratic delay was observed over the use of a formal request form or letter from DoEYS to DMAs. Some DMAs consistently required corrections repeatedly over a request letter without giving any clear format. Consequently, avoidable delay on the request, for example, for a salary adjustment or mission allowance was experienced.

Permission to take leave was also a notable situation. Sub-Decree No. 217 dated 2 May 2013 on “Procedure to take leave and permission of all kinds of leaves for civil servants in

Cambodia” outlined how a civil servant requests leave of absence from his/her supervisor. Following the Sub-Decree, MoEYS issued an instructional circular No. 3 dated 18 July 2013 describing details of what one needs to do to ask for such permission in the education sector. Mol, according to its decision No. 10029 dated 1 December 2015, also published a guidebook on “Administrative Affairs at Capital, Province, Municipal, District, and Khan,” mentioning how staff can apply for leave of absence. When transferring education functions to DMAs, the term “supervisor” in the above documents is clear for DoEYS, but not for schoolteachers and school principals. Before the transfer, DoEYS was given authority to approve from 3 to 5-day leaves of absence to its staff, school principals, and teachers. Leaves more than 5 days shall be submitted to PDoEYS through DoEYS. However, after the transfer, although some DMAs allowed DoEYS to continue the same practice as before (except that they needed to submit to DMAs for approval instead of PDoEYS), some DMAs obliged all kinds of leaves to be submitted directly to the DMAs. This meant that DoEYS had no longer the authority to authorize any kind of leave to school principals and teachers as they used to have.

Communication between DoEYS and DMAs is also found challenging. DMAs where the relationship between the chief of DoEYS and the governor as well as the director of administration is said to be better, operations are seen running smoothly. Some chiefs of DoEYS we met expressed concern that they were not sure about future communication in case e.g. a new governor would be appointed. When we questioned about whom they would go to when facing difficulty in implementing issues, each office pointed to different institutions. While DoEYS pointed to PDoEYS, DMAs pointed to PDCS and PDHRM.

#### 5) Knowledge of the Council Members

For all functions that have been transferred to DM level the District/Municipal Councils (DMC) will need to take responsibility, e.g., in determining priorities and providing budgets. Likewise, the administrative agencies (such as the DoEYS) discharging DM functions will become accountable to DMC. However, nearly all of the DMC chairpersons and members met, said to be not well-informed about the transfer of education functions. Questions of what was good, what was not good, and what needs to be improved were beyond their thought. They only knew that the education functions were transferred following the Sub-Decree No. 182-184, but they had no idea how these were implemented and what implications the transfer of the sector functions would have for the council. Most of them mentioned that the DoEYS only worked with the District/Municipal governors and deputies, not with the councils. Two districts described in Box 3 and Box 4, however, started to get the council members involved by issuing a decision to form a committee responsible for the education transfer functions. Interestingly, the committees consist of elected representatives (i.e., council members), and administrative officials, such as deputy governor or the DoEYS chief.

**Box 3: Supporting Committee at Thma Koul**

Thma Koul's council chairperson issued a decision No. 026/21 dated 3 November 2021 on "Establishment a committee supporting the education function transferring process". The committee consists of 23 members, including all the commune chiefs and a few council members. It is chaired by the deputy governor responsible for the education sector. A council member is assigned as a deputy and the chief of DoEYS is a permanent deputy. The decision also outlines key roles, responsibilities, and working procedures. Some of the key tasks are that the committee is to research and compile relevant legal framework and guidelines, study the challenges found during the implementation, and tackle the issues under its jurisdiction. The committee shall have its operational plan, budget, and concrete work plan. In the kick-off meeting on 15 December 2021, both of council chairperson and district governor determined that they operate the committee with full attention as this was the first time and first district that was ready to take charge of education transfer functions. By the time of this writing, the committee already had a second meeting to determine the monthly meeting schedule and activity plan.

**Box 4: Supporting Committee at Banan**

Like Thma Koul, a decision dated 15 November 2021 on "Establishment of a leading and managing committee in education transfer functions" was issued in Banan. This committee is chaired by the district council chairperson and deputized by the deputy governor responsible for the education sector and a few council members. The chief of DoEYS is a member of the committee together with all commune chiefs in the district. Not much different from the committee set up in Thma Koul, the roles and responsibilities of the committee are to facilitate and coordinate with different stakeholders in the district to make sure that education service is delivered equally and effectively. The committee had its kick-off meeting on 8 February 2022 where it created a Telegram group with all members. It is also decided that each member shall read the Sub-Decrees 182-184 and be ready to discuss in the next meeting. They plan to develop a concrete monthly meeting schedule and activity plan in the coming month.

### 3.5 Observation and Assessment

With the transfer of sector functions the role of the DMAs as an institutional player in planning, coordinating, and executing policies at the DM level becomes more important. The field observations and interviews indicate the challenges which the DMA in Battambang province are facing in implementing new responsibilities with a still limited degree of knowledge and resources. It is also obvious that the regulatory framework of the transfer is not yet complete and that the DMAs are still learning how to deal and interact with each other. While DMAs are strengthening themselves by equipping new staff, they are struggling to implement the education functions without having clear guidelines and limited support.

At the same time, PDoEYS remains a crucial actor for supporting the implementation process. Whereas it used to discharge such functions before, it now needs resource persons and institutional knowledge for supporting and guiding DMAs. The director of PDoEYS told us that he was ready to support DMAs when there was a request or an instruction from relevant authorities. However, there is no formal mechanism set up to support DMAs in a sustainable manner. PDoEYS itself is waiting to get clarity on its modified roles and responsibilities following the transfer of sector functions to the DM level.

The initiative to establish a council committee to support the implementation of transferred education functions as seen in Thma Koul and Banan is very promising. This shows that DMAs are accepting their important roles and responsibilities responding to the D&D policy in education and take proactive steps without waiting for instructions from upper levels of government.

## 4. Lessons Learned and Recommendations

Based on what happened in Battambang, we can offer the following lessons and recommendations to be considered in improving the implementation process and preparing for future rolling out to other provinces.

### 4.1 Lesson Learned

**Lesson 1: Clear Communication of the objective of the education functions' transfer.**

The smooth implementation of any new policy requires that everyone is on board and understands the new policy. While the field observations and interviews showed that staff of the DoEYS is not always happy with the transfer to the management and leadership of DMAs, they acknowledge that this move is necessary and useful for better education services at the local community level. To maintain a strategic balance of pressure and support, everyone directly affected by the transfer of education functions to the DMAs needs to be clearly informed about the expected benefits and

about the modified processes and procedures so that the implementing process will be more inclusive and effective. This requires substantial awareness raising and/or information sharing strategies not just with officials but also with the local communities, starting from the school support committee, commune chief and councillors, to district/municipal councillors.

## Lesson 2: Personal relation matters.

Despite the absence of clear guidelines and supporting mechanisms, most staff at DMAs and DoEYS showed that they can work well together on a personal relationship basis. Some chiefs of DoEYS are satisfied with the way they sit and work together with the district/municipal governing board. Understanding each other's roles and responsibilities facilitates the completion of tasks, such as issuing a Deika, approving a budget request, and signing documents. A few DMAs reported a lack of understanding of each other, or even a feeling of resentment. There are some cases where DMAs were found to strictly control DoEYS over office attendance and the use of equipment in the office. Staff at DoEYS, for instance, are requested to sign in and sign out at the district office four times a day. Office equipment requested by DoEYS is not given according to the needs. While some DMAs generously supply the equipment, some require the request to go through the procurement process which is less convincing. However, these seem to be teething problems which are bound to emerge when new institutional arrangements and institutional mandates are put in place; these issues are expected to become redundant over time as officials improve their understanding of the new procedures and responsibilities.

## Lesson 3: Ambiguity is a key to ineffective policy implementation

*Ultra vires acts* can be seen when authorities perform duties beyond their legal purview. But when someone dares not to act within his or her responsibilities (*intra vires*), it is usually argued that the legal instructions and guidelines are not clear. Even though more detailed technical guidelines and administrative procedures need to be developed further, Sub-Decrees 182-184 do highlight what DMAs can do to implement the education functions. For example, Article 30 in the sub-decrees 182 & 184 authorizes DMAs to establish a working group responsible for a specific sector. Although the language of the article is quite clear, some DMAs were still reluctant to do so and instead decided to wait for instructions. Some are worried that they would act beyond their legal powers or without having the authority to decide.

Lack of clarity is giving room for different interpretations and therefore implementation. The stamp usage at DoEYS is one example here: there are different interpretations of the instruction from Mol No. 1622. It is reported that the regulatory notice is unclear in regard to the education functions and therefore it is questionable if the DoEYS can use a stamp or not, and if a stamp can be used in regard to the delegated functions in distinction from the assigned ones. The practice seems to differ from one district to another. Some stopped using the stamp completely, others still use it for internal documents, and others continue using it internally and externally on a case-by-case basis.

Relevant national and provincial institutions (such as sector ministries) have been slow to respond. Although there was a strategic plan to revisit and develop legal instruments and

mechanisms to respond to the D&D policy reform in the education sector as envisaged in its 2016 policy on “Decentralisation and Deconcentration Reform in Education Sector”, MoEYS has yet to clarify and outline the updated roles and responsibilities of PDoEYS. Specific technical guidelines on the transferred education functions have also not been formulated yet even though a working group for this purpose was set up in July 2020.

#### Lesson 4: Supporting mechanism shall be established at provincial level

The institutional review above indicates some institutions that can play an important role to strengthen sub-national administration functions. Effective backup support mechanisms shall be set up and be on stand-by so that a call for clarifying and supporting related issues can immediately be answered. The responses to the question of whom the respondents go to when they are not certain about what to do with the implementation process provide mixed results. While staff at DMAs point to PDiHRM and PDCS, staff at DoEYS still point to PDoEYS. PDoEYS, on the one hand, usually asks DoEYS to listen to DMAs as the functions were already transferred to them. DMAs, on the other hand, are asked by PDiHRM and PDCS to discuss with PDoEYS and DoEYS to find a proper solution.

A situation at one DMAs can be taken as an example to elaborate the issue. Arguing that the education functions were already transferred, a DMA boldly acted on this by obliging that any administrative process that used to be under the supervision of DoEYS moves to DMAs administrative procedure. From approving a teacher leave of absence to appointing a school principal, the DMA is now in charge of everything and the DoEYS is ignored. Complaint about this is heard at different institutions (from PDoEYS to NCDD-S), but specific clarification or facilitation has not been made yet.

The situation of course, involves all the issues mentioned above -- from vague legal instruction to personal relations. Yet, imagine if there is a support group comprising of a technical education expert from PDoEYS, a HR/personnel expert from PDiHRM, and legal advice from PDCS, things could be better, and the level of satisfaction will arguably be observed as high. Although a few DMAs are setting up a committee responsible for the education transfer function, a similar working group at the provincial level needs to be established to support DMAs, at least for a certain period of the implementation process.

#### Lesson 5: Building capacity is a key to success

Capacity building is one of the empowerment strategies that must not be overlooked when facing issues in implementing education functions that have just been transferred. Institutional competency along with individual capacity needs to be analysed and built.

A training needs assessment (TNA) was done by PDoEYS with the support from DAR/GIZ from February to March 2021 with 286 participants of DoEYS and DMAs: it indicates that there are technical, technological, and personal development skills that need to be addressed, with staff management, planning, and finance and asset management being the main three priorities (see Appendix 3 for the executive summary of the TNA). Urgent needs for building



technical skills have been identified for basic computer training (typing, using MS Word, Excel, and PowerPoint). Finally, these three personal development skills are also identified for strengthening: leadership, time management and communication.

## 4.2 Recommendation

- Sharing information and awareness raising shall be made to local communities and District/Municipal councils

One workshop to disseminate the Sub-Degrees 182-184 and/or policy change at the national or provincial level is not sufficient to reach DMAs. Transferring education functions gives new roles and responsibilities to the DM level, and the main actors at this level need to be well informed about such changes. Dissemination workshops on such important transfers shall be made at the district and commune level besides the provincial level.

- There is a continuing need for clearer guidelines and instructions

Using Battambang as a pilot province for the assignment of education functions has helped identify some administrative issues which need to be clarified at the onset of a transfer process in order to avoid confusion and lack of orientation at DMAs level. The issues that emerged in Battambang (such as how and when a stamp at DoEYS can be used to communicate within and/or outside the schools; who approves a certain period of leave of school principals or teachers – DoEYS? the chief of personnel office at DMAs? or the district/municipal governor? What is the role and responsibility of PDoEYS in terms of support to DoEYS and DMAs? How can DoEYS get the required funding for missions outside the district/municipality as DMAs cannot support it?) appear rather simple; however, they have clearly disturbed a smooth implementation process at the DMA level. In addition to the lack of guidelines and regulations to remedy above issues, the inconsistency of existing guidelines and regulations needs to be addressed.

- Finalizing the education functions training manual

DMAs need to know how to lead and manage the education functions that were transferred and building those skills requires a focus on capacity building. It is understood that a working group established in July 2020 and led by NASLA is preparing such a training manual. It is second to none that a further rolling out of the assignment mode to other provinces requires the availability of such manual.

- Better coordination of relevant institutions

A provincial support mechanism needs to be set up for a transition phase until the DMAs have fully absorbed the newly transferred functions and are confident in handling them. Such support mechanism will involve representatives of PDoEYS, PDiHRM, PDCS, and PDEF and serve as

platform where provincial stakeholders respond to queries and issues arising in the DM implementation process. Such mechanism can also facilitate communication and interaction with relevant institutions at the national level (such as NCDD, Ministry of Civil Service, sector ministry). DMAs and DoEYS can refer to this response mechanism when they have doubts about dealing with implementation challenges.

- **Building capacity**

Capacity is needed for any effective reform at both provincial and district/municipal levels. It is important that the technical staff at PDoEYS is equipped with technical knowledge and necessary skills to support DMAs/DoEYS in implementing education function process. Staff at DMAs is also needing both technical and interpersonal skills to lead and manage the assigned task. Technical knowledge of education and the ability to lead a team are important factors to improve the positive attitude not only to implement the education functions but also to serve the public.

Capacity building at the institutional level is also crucial to sustainability. A clear capacity building plan should be included in the yearly plan of PDoEYS and DMAs to improve existing institutional strengths. Strong institutions will be able to maintain and support the knowledge transfer process as well as knowledge sharing within and across the institutions.

## Appendix 1: List of persons interviewed

No.	Name	Position
Provincial Department of Education of Youth and Sport		
1.	Yi Songki	Director
2.	Phoung Mony	Deputy Director
3.	Kong Rachna	Chief of Administration Office
4.	Pork Rithea	Chief of Personnel and Training Office
5.	Tieng Visal	Chief of Primary Education Office
6.	Po Vannarith	Chief of Planning Office
7.	Ri Phalla	Chief of Non-Formal Education Office
8.	Seng Rasin	Chief of Early Childhood Education Office
Provincial Department of Civil Services		
9.	Ngoun Yur	Director
10.	Soa Rachna	Deputy Director
11.	Sok Chamroeun	Chief of Cadre and Training Office
12.	Thuk Borey	Deputy Chief of Salary and Re-adjustment Office
Provincial Division of Human Resources Management		
13.	Chheng Sarath	Director
Banan District		
14.	Chum Nhar	Council Chairperson
15.	Reach Burany	Council Member
16.	Noun Phirum	Deputy Governor
17.	Meat Seuny	Director of Administration
18.	Ma Srey Moa	Chief of Administration and Finance Office
19.	Seng Sothy	Acting Chief of Personnel Office
20.	Chea Vong Narin	Chief of Education, Youth, and Sport Office
Battambang Municipality		
21.	Khu Sukun	Deputy Governor
22.	Try Hak	Chief of Education, Youth, and Sport Office
Bavel District		
23.	Sem Pov	Deputy Governor
24.	Soun Veng	Chief of Education, Youth, and Sport Office
Ek Phnum District		
25.	Phok Sinnary	Deputy Governor
26.	Van Sokkoeurn	Director of Administration
27.	Yut Samban	Chief of Education, Youth, and Sport Office
Kaos Krala District		
28.	Chhoern Sopheany	Deputy Governor
29.	Ouch Sovan	Chief of Education, Youth, and Sport Office
Kamrieng		
30.	Sin Navuth	Deputy Governor
31.	Thoeurn Sophat	Chief of Education, Youth, and Sport Office
Moung Reussey District		
32.	Pich Malay	Council Chairperson
33.	Chap Sokun	Council Member
34.	Tep Horn	Governor
35.	Lek Roth Muny	Deputy Governor
36.	Heang Sophary	Director of Administration

37.	Horm Savin	Chief of Education, Youth, and Sport Office
Phnum Proek District		
38.	Puk Pum	Chief of Education, Youth, and Sport Office
39.	Chhin Tha	Chief of Administration and Finance Office
40.	Hun Leang Ay	Chief of Personnel Office
Ruk Kiri District		
41.	Sam Tab	Chief of Education, Youth, and Sport Office
42.	Reoun Ravy	Chief of Administration and Finance Office
43.	Rert Theara	Deputy Chief of Personnel Office
Rotanak Mondul District		
44.	Dy Samat	Deputy Governor
45.	Nop Bros	Chief of Education, Youth, and Sport Office
Sangke District		
46.	Siv Sovanna	Chief of Education, Youth, and Sport Office
47.	Nop Chenda	Chief of Administration and Finance Office
48.	Kong Channarith	Deputy Chief of Personnel Office
Samlout District		
49.	Kim Han	Deputy Governor
50.	Soun Thi	Chief of Education, Youth, and Sport Office
Sompov Lun District		
51.	Boeurn Savoeurn	Deputy Governor
52.	An Sam Art	Chief of Education, Youth, and Sport Office
Thma Koul District		
53.	Mok Sokhun	Council Member
54.	Boun Saren	Council Member
55.	San Chhong	Council Member
56.	Seong Sokha	Chief of Education, Youth, and Sport Office
57.	Tun Sopheak	Chief of Administration and Finance Office
58.	Chung Sinang	Deputy Chief of Personnel Office

## Appendix 2: National and local reflection workshop

- Event 1: Dissemination Workshop on Function and Structure of DMAs and Principles for Implementation Education Functions Transferred to Sub-National Administrations.
- Organizer: NCDD-S, MoEYS, DAR
- Date and Location: 29-30 July 2021, online/MS-Teams
- Objectives:
  1. To recognize new functions and structure of DMA and principles for implementation the education transferred functions.
  2. To discuss challenges in implementing the transferred functions.
  3. To explore supporting mechanism to facilitate the transfer process.
- Participants:

No.	Institutions/DMAs in Battambang	Gender		Total
		M	F	
1.	Provincial Department of Education, Youth and Sport	13	2	15
2.	Aek Phnum	4	1	5
3.	Battambang	6	2	8
4.	Banan	5	3	8
5.	Bavel	8	2	10
6.	Koas Krala	6	1	7
7.	Komrieng	11	1	12
8.	Moung Reusseï	5	1	6
9.	Phnom Proek	4	2	6
10.	Rukh Kiri	9	0	9
11.	Rotanak Mondul	4	3	7
12.	Sangke	5	2	7
13.	Samlot	7	1	8
14.	Sompov Lun	12	3	18
15.	Thma Koul	7	3	10
Total		106	27	136

- Event 2: Reflection workshop on the implementation of the assigned and delegated education functions to district/municipal administrations in Battambang.
- Organizer: NCDD-S, MoEYS, DAR
- Date and Location: 24 March 2022, Classy Hotel in Battambang and online/MS-Teams
- Objectives:
  1. Reflect the implementation of the assigned and delegated education functions to DMAs in Battambang
  2. Validate the lesson learned from the implementation process

3. Gather additional information and recommendation to improve the implementation of the education functions

➤ Participants:

No.	Institutions/DMA's in Battambang	Gender		Total
		M	F	
1.	Representative from NCDD-S	1	0	1
2.	Representative from MoEYS	2	0	2
3.	Representative from MCS	1	0	1
4.	Representative from NASLA	1	0	1
5.	Representative from the Provincial Department of Education Youth and Sport	1	0	1
6.	Aek Phnum	3	1	4
7.	Battambang	3	1	4
8.	Banan	3	2	5
9.	Bavel	3	2	5
10.	Koas Krala	4	1	5
11.	Komrieng	4	1	5
12.	Moung Reussei	4	1	5
13.	Phnom Proek	4	1	5
14.	Rukh Kiri	5	0	5
15.	Rotanak Mondul	3	2	5
16.	Sangke	3	2	5
17.	Samlot	5	0	5
18.	Sompov Lun	4	1	5
19.	Thma Koul	4	1	5
Total		58	16	74



### Appendix 3: List of challenges and suggestions collected

No.	Challenges	Reasons	Example	Comment/Suggestion from relevant partners	DMAs
Personnel Challenges					
1.	Lack of staff working with DOEYS	Retirement and Death	According to the standard No. 18 in 2018, DOEYS shall have 16-18 staff, excluding chief and his deputies.	Request DMAs to solve the issue (NCDD-S together with MoEYS and MCS will discuss and find solution)	Battambang Rotonak Mondol Bavel Thma Koul
2.	Some schools lack of teachers, but some schools overcrowded	Not yet spread teachers according to the number of the students		(NCDD-S together with MoEYS and MCS will discuss and find solution)	Battambang
3.	Lack of teachers	The number of students is increasing		(NCDD-S together with MoEYS and MCS will discuss and find solution)	Rotonak Mondol Phnum Proek Sampov Lun Rukh Kiri Kamrieng
4.	Promotion - Promotion to teachers and staff at DOEYS is delayed. - Some of the teachers' names are spelled wrong comparing to the list of the salary; thus, cannot be promoted.	- There are lot of teachers and staff; DOEYS did not check the documents properly before submitting to relevant offices. - Data entering was not properly done and lack of supporting documents.		(NCDD-S will discuss with related partners and find solution)	Sangkae Moung Ruessei
5.	Retirement	Not proposed before retirement		- DOEYS shall propose such a promotion or	Sangkae

	- Not yet given honorary promotion to staff; consistent delay.	- The individual staff did not submit enough documents before s/he was retired		retirement at least 2 months in advance. - NCDD-S requested governor to deal with the issue.	
6.	Cannot issue a Deika to make staff retired	No name in the integration list with DMAs	Kong Sara, a teacher at Balat Primary School	NCDD-S asked governor to discuss among relevant partners to deal with the issue.	Sangkae
7.	Timely deleting staff from the list (salary list) - could not delete the staff who passed away from the list	DOEYS failed to report on time to DMAs		- Death certificate shall be made on time - DOEYS shall submit such a proposal to DMAs at least 2 weeks after the death of a staff.	Sangkae
8.	Difficult to upgrade the rank of educational staff	- Wrong name, date of birth, and sex in the payroll log-sheet - Some teachers' names are different from the documents (diploma, birth certificate)	Office officials and teachers	Request guidance on procedures for editing	Samlout Rukh Kiri
9.	Misspellings and error of gender of teachers in the salary log sheet		Wrong gender of two teachers and misspelling name of a teacher	NCDD-S asks the district governor to check with the relevant parties to solve this problem.	Rotonak Mondol Koas Krala Samlout
10.	Lack of skilful officials in the fields of human resource and financial management for HR office and Admin & Finance office			NCDD: Request the district governor to coordinate the work of officials in charge of finance at education	Battambang Banan Phnum Proek Koas Krala Moung Ruessei

				office and officials at administration and finance office	Sangkae Sampov Lun Samlout Rukh Kiri Aek Phnum
11.	The officials are lacking capacity on the new reform tasks.	Lack of skills, limited capacity	70% of total officers	Request for additional capacity building session. For example, the preparation of administrative letters to be fitted to the current context of sub-national level. (Request to have the same letter for both transferred entity and district administration) NCDD: Guidelines on the implementation of education functions will be issued soon; the guidelines on administrative procedures, as well as training contexts will also be revised soon	Banan
12.	Unable to change workplace outside the district and province (change according to spouse, to be close to the home)	Due to the letter from the Ministry of Civil Services		NCDD: Waiting for new instructions from the Ministry of Civil Services	Phnom Proek
13.	Do not understand well about the manner of appointment, provision, and changing the workplace of	Never participated in relevant training course		Request for staff and HR management training course. NCDD: Revising a personnel management	Phnom Proek Samlout Koas Krala

	public officers and educational staff.			guideline for sub-national level	
14.	Does not yet create the new forms related to the staff management	No clear template	Forms in education office and forms in administration office of the district administration are inconsistent (such as leave request form).	Request a training session for education officers, administration and finance officers, and human resource officers NCDD: National level is preparing new administrative guidelines and requesting district governors to mediate during this transitional period.	Aek Phnum
15.	<ul style="list-style-type: none"> <li>- The internal relationship between education office and other existing office is not yet smooth.</li> <li>- The transactional work of education office (who has many staff), admin &amp; finance office and human resource management office is not yet consistent.</li> </ul>	<ul style="list-style-type: none"> <li>- The integrated offices have not yet gained an in-depth understanding of the conditions and performance of the post-integration tasks.</li> <li>- Workflows, manners, procedures, and documents related to district administration works</li> </ul>		<p>Request for a training course and have detailed instructions on procedures, manners, especially letter formation and using district administrative letters by specifying specific forms.</p> <p>NCDD: National level is preparing new administrative guidelines and requesting district governors to mediate during this transitional period.</p>	Aek Phnum Kamrieng

Financial Challenges					
16.	Lack of maternity budget for teachers	Insufficient annual budget	35,000,000 Riels	Apply for additional credit or make amendment	Moung Ruessei
17.	Insufficient funds to support maternity leave	Unable to request	25 teachers	Budget amendment	Kamrieng
18.	Lack of bonus for New Year and Pchum Ben Days	No budget planned	66,300,000 Riels	Apply for additional credit or make amendment	Moung Ruessei
19.	Lack of incentive budget to encourage 10 community learning centres	No budget planned	6,000,000 Riels	Apply for additional fund or make amendment	Moung Ruessei
20.	Lack of retirement budget	Insufficient annual budget	9,000,000 Riels	Apply for additional credit or make amendment	Moung Ruessei
21.	There is no budget for some unplanned expenses.	Due to some teachers resigned unexpectedly.	Sub-account No. 64455; the amount for the teachers who resigned from the job is not in the budget book.	NCDD: Make amendment or request for additional credit	Sangkhae
22.	The spending procedure is not clear. (Financial Administration Officer)	Since there is no training for the expenditures of education sector, what are the kinds of payments and what are the payment attachments?	For example, spending on school operations on each sub-account.	Should have a training session on the payment procedures for each sub-account and what are the attachment requirements to be able to settle	Sangkhae
23.	Education officials often demand for immediate payments (settlement), but district finances are slower than expected to pay.	Because the district finance officer must pay according to the financial procedure		NCDD: Request to the Financial Administration to review the budget procedures for education sector.	Sangkhae
24.	Complicated payment procedure	Budget slow	Follow the principle	Advancement	Bavel

25.	<ul style="list-style-type: none"> <li>- The education officials do not have the cash advance to pay themselves the materials due to not receiving 100% of cash advance</li> <li>- Procurement: The education officers understood it as providing additional funding for post-procurement advancement.</li> </ul>	Waiting for a long time but still not getting full budget	Follow the principle	Advancement NCDD: Education officials must follow the municipal, district or national budget implementation procedures and review the principle for using the package of education budget.	Bavel
26.	Lack of budget for basic salary	Insufficient annual budget	26,220,000 Riels	Request to release the budget more than 30 million for the administrative expenses	Rotonak Mondol
27.	Lack of budget for the retired teachers		6,420,000 Riels		Rotonak Mondol
28.	Lack of bonus for Pchum Ben Days and Khmer New Year		1,100,000 Riels		Rotonak Mondol
29.	Lack of materials, technical equipment, and furniture		Computer, Printer, Photocopy		Rotonak Mondol
30.	Not yet clear about new tasks (as mentioned above)	Lack of legal documents related to the transfer of the three functions	Admin and Finance Office and Education Office	Request for Financial Management Training Course	Banan
31.	The processing of the operational budget for the Education Office was slowly done.	The payment/settlement through the procurement		Propose to pay or settle through the direct payment or advancement	Phnum Proek



32.	No fuel for the Office of Education, Youth and Sports	No budget plan for fuel		Request fund for fuel	Phnum Proek
33.	The processing of the operational budget for primary school and pre-schools were slow	No guidance or training on how to use the budget/finance		Request a training course on the financial procedures	Phnum Proek
34.	Procurement	There is procurement and tax	Deduct 11.01% of procured budget	Request that the budget for DOEYS not to procure	
35.	Lack of officials to help in financial tasks			Request the civil servants or contract officers	Samlot
36.	Lack of mission budget for education officials for their missions outside the district and province	The budget package of district administration is insufficient	There are 12 personnel of education office	Request for the mission allowance outside the district  NCDD: National level will review the budget of education office or the direct budget of district administration	Samlot
37.	The financial procedures are complicated, and the implementation is somewhat slow	New tasks, new procedures require new knowledge and skills	Admin and Finance Office, and Education Office	Request for Financial Management Training	Rukh Kiri
38.	Mission budget not yet paid by the district administration	Complicated procedures (professional officers lack experience)	18,000,000 Riels	Please deposit the money into the account of education office (pay as advance)	Kamrieng
39.	Sub-account (60021) for office operating budget	Admin and Finance office of District Administration committed the Procurement of Materials	5,450,000 Riels	Request to keep transferring budget quarterly as before the transfer	Aek Phnum

				NCDD: National level will review on how to use the budget of education office	
40.	Still do not understand the procedure for calculating the allowance for the contract teachers, non-formal education teachers and Thursday money <sup>5</sup> .	No yet got the training session on the clear procedure		Should have clear instructions on how to set the budget	Aek Phnum
41.	Not yet clear about school budget payment/settlement	There was no training session		Should have training course	Aek Phnum
<b>Asset and Material Challenges</b>					
42.	The property of education office and schools have not yet been transferred to the municipal administration	No specific instructions have been received yet.	There is 1 education office, 34 primary schools and 3 pre-schools	Request specific instructions and procedures for transferring assets	Battambang Moung Ruessei Rotonak Mondol Sampov Lun Rukh Kiri
43.	Some primary schools are very dilapidated	Lack of classroom	<ul style="list-style-type: none"> <li>- Pito Kilo 38 Primary School has a school building where 5 classrooms collapsed.</li> <li>- Sidare Primary School: roofing is rotten, and another part of the roof is collapsed</li> </ul>	<ul style="list-style-type: none"> <li>- Request for repair and construction of additional school buildings</li> </ul> <p>NCDD: Request the district administration to submit a proposal to Ministry/Department of Education for construction and/or reparation</p>	Rotonak Mondol Kamrieng

<sup>5</sup> Thursday money is given to a teacher who teaches on Thursday (12000riel/shift). Normally Thursday is a labour time; students do not study but MoEYS encourages teachers to teach where necessary. DOEYS is supposed to monitor and evaluate the class.

44.	Lack of equipment/materials such as computer, printer, desk, file cabinet, and chairs	No budget for payment	3 computers, 3 printers, 4 desks, 4 chairs 2 filing cabinets	Request for equipment/materials NCDD: district administration should coordinate and find solution. National level should provide additional funding to the district	Phnum Proek
45.	Old Office of Education, Youth and Sports	broken roof, and broken doors	1	NCDD: district administration should coordinate and find solution. National level should provide additional funding to the district	Phnum Proek
46.	Broken and lost equipment/material/furniture (table, chair, blackboard, and accessories) (As mentioned above in the part of transfer property)	The school is used as quarantine place	6 schools	Request for school reopening	Kamrieng
Administrative Challenges					
47.	Some administrative procedures are not implemented coherently (letter and stamp)  Note: The district administration seems reluctant to allow education office to use the stamp for internal correspondence with schools and other stakeholders.	General administration unlike professional administration		Request a model format of letter and instruction and provide training  NCDD: National level will issue guidelines on new administrative procedures	Battambang

	Note: Female teachers applied for their maternity and long-term leaves by requesting directly to the district administration without passing the education office.				
48.	The administrative works of the education office still follow old routines (involving the preparation of other letters)	Not yet clear on how to implement new tasks		Request for dissemination and introduction of roles and responsibilities to professional/technical officers/teachers	Moung Ruessei
49.	Workflow is not good yet	New tasks are more complicated	District Administration and Office of Education	Request for a training course	Sangkhae
50.	Some administrative tasks have not been coherent			Request for a training course	Rotonak Mondol
51.	Administrative letter is not yet in accordance with the instructions	Officer capacity	Education office		Banan
52.	Disagreement on administrative form	No instructions		Request additional guidance	Sampov Lun
53.	Some administrative tasks are not clear	Some letters do not go through the education office	<ul style="list-style-type: none"> <li>- Maternity leave application form</li> <li>- Letter of guarantee from the head of unit</li> <li>- Leave application form (for secondary-school teacher)</li> </ul>	Request for a letter of instruction and training course	Thma Koul

54.	Some administrative work is not coherent	Not enough officers	2 officers	Request additional civil servants or contract officers	Samlut
55.	The implementation of administrative work is not yet in accordance with the manual on administration.	Continue to perform the old form of work		Request instruction/guideline and training session to the office	Rukh Kiri
56.	Some routine works not yet adapted to the guidelines/instructions or transferred functions.	Lack of clarity when to follow the principles/rules of the Ministry of Education or the Ministry of Interior	- Education Office	Disseminate additional instructions/guidelines to the teachers	Rukh Kiri
57.	Some administrative tasks are not coherent	General administration does not work well		Request guideline and training sessions	Koas Krala
58.	Document	Forms	- Achievement report - Other budget request form/report	Should have training courses NCDD: will issue guidelines on new administrative procedures	Kamrieng
Relationship					
59.	Good working relationship				Moung Ruessei
60.	Technical officials do not yet fully understand the new post-integration work procedures			Request for a training on transferred function under the structure of integrated district administration	Sangkae
61.	District administration difficult to control presence of staff at DOEYS	Location far apart	Office		Banan
62.	Some tasks were decided by the education office, without consulting with the council or board of governors	The education office thought that it was a technical task		Organize training courses on roles, tasks, and communication methods	Rukh Kiri

Others					
63.	Small and old education office building	Narrow, old, and dilapidated places	3 buildings 1 room for 10 people working together	Request for construction of 3 more buildings	Phnum Proek Sampov Lun Rukh Kiri Kamrieng Rotonak Mondol
64.	Request for a training course on the implementation of transferred functions – Nearly all DMAs.				

## **Appendix 4: Executive Summary of the Training Needs Assessment**

### **Background**

Battambang was the first province that its District/Municipal Administrations (DMAs) were assigned the tasks to manage and implement the education functions, namely Early Childhood Education, Primary Education, and Non-Formal Education transferred from the national level. With the respective sub-decrees, the District Office of Education Youth and Sport (DoEYS) is now under the direct supervision of DMAs.

A Training Needs Assessment (TNA) with DMAs in Battambang province was conducted from 9 February to 17 March 2021 to determine what kind of training is helpful for staff at both DoEYS and DMAs to implement the education functions. The result of this TNA also helps the Provincial Department of Education Youth and Sport (PDoEYS) in preparing the capacity development framework to support the DMAs where necessary.

### **Key Findings**

With a survey response rate of 68%, the analysis results indicate the following major findings in the areas of demographics, training topics, and training obstacles.

#### Demographics

- The survey had a respondent population of 286, which included 223 (78%) from DMAs, 55 (19%) from DoEYS, and 8 (3%) who declined to mention the office division.
- Of the 223 from DMAs, 162 (73%) were male, 51 (23%) were female, and 10 (4%) declined to mention the gender.
- Of the 55 from DoEYS, 40 (73%) were male, 9 (16%) were female, and 6 (11%) declined to mention the gender.

#### Training topics

The training topics were divided into three main categories: technical (10 topics), technological (5 topics), and personal development (7 topics). Participants ranked the topic of “Education staff management” in the technical knowledge as their top priority. “Basic computer” was also ranked top in the technological knowledge. Finally, respondents also prioritised the “Leadership skill” for their personal development training too.

#### Obstacle to training

Participants were also requested to identify obstacles hindering them to participate in any future training on a Likert scale if they strongly agree, agree, disagree, or strongly disagree to 8 statements.

#### Focus group correlation and discussion

The recurring themes found during the focused group discussion were correlated with the survey findings and grouped into the following categories:

### *Supporting mechanism and resources*

Participants complained about the lack of clear structural support from related authorities. This was further exacerbated with the limited resources of both personnel and budget at their local administrations.

### *Uncertainty*

Vague operating procedures was noticed, and this created some confusion over roles and responsibility among staff at DMAs and DoEYS.

### *Relationship*

The personal relationship was found important in dealing with the administrative issues that DMAs and DoEYS facing. More understanding and compromising strategies were identified where the relationship between the chief of DoEYS and DMAs was ranked high. One of the examples of the compromised methods used was that the DMAs ignore some rules by allowing DoEYS to do what they used to do and waited for further guidelines, for instance, issuing a mission letter.

### *Motivation*

Despite all the challenges, the motivation to learn and adapt to the new working process was noted. Participants were waiting for clear guidelines and structural support from relevant authorities and development partners.

## **Recommendations**

The recommendations below are by no means all-inclusive. However, the analysis of the TNA survey and focus group discussion leads to the following recommendation.

- Structural support that can provide a clear guideline of certain administrative procedures is needed. This could be done, for example, by creating a change management team that has authority to indicate the administrative approaches which are usually not well enunciated at both of district and provincial levels.
- A strategic approach to capacity development at DMAs and DoEYS is necessary. This requires proper budget allocation and training methods preparation. PDoEYS can play a leading role in this.
- Knowledge and skills learned earlier needed to be refreshed and updated frequently. Most of the DMA staff have less than two years of experience in their position; therefore, they need more time and proper support to fulfill duties effectively.
- DMAs need more capacity to manage the education functions. Education staff management is the prioritized course in addition to the basic computer training skill.
- Leadership, time management and communication skills are the areas to improve for both DMAs and DoEYS. These are critical to implementing the function effectively in a more cooperative and supportive manner.



**Published by:**

Deutsche Gesellschaft für  
Internationale Zusammenarbeit (GIZ) GmbH

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**Design/Layout:**

Decentralisation and Administrative Reform Programme (DAR)

**Photo credit:** @GIZ/Chim Mony

**Battambang, March 2022**