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### Abbreviations and Acronyms

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<th>Abbreviation</th>
<th>Full Form</th>
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<tr>
<td>ADB</td>
<td>Asian Development Bank</td>
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<tr>
<td>CPD</td>
<td>Continuous Professional Development</td>
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<td>CSO</td>
<td>Civil Society Organization</td>
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<td>CSWE</td>
<td>Center for Social Work Excellence</td>
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<td>DP</td>
<td>Development Partner</td>
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<tr>
<td>EDCM</td>
<td>Education Donors’ Consultative Mechanism (Equivalent to LEG)</td>
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<td>EEC</td>
<td>Education Evaluation Center</td>
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<td>EFA FTI</td>
<td>Education for All Fast Track Initiative</td>
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<td>EMIS</td>
<td>Education Management Information System</td>
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<td>EPSSim</td>
<td>Education Policy and Strategy Simulation Model</td>
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<td>ESDC</td>
<td>Education and Social Development Center</td>
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<tr>
<td>ESMP</td>
<td>Master Plan to Develop Education of Mongolia (in 2006-2015)</td>
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<td>ESMTDP</td>
<td>Education Sector Mid-Term Development Plan</td>
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<td>EU</td>
<td>European Union</td>
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<td>FGD</td>
<td>Focus Group Discussion</td>
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<td>GDP</td>
<td>Gross Domestic Product</td>
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<tr>
<td>GiZ</td>
<td>Deutsche Gesellschaft für Internationale Zusammenarbeit (German Corporation for International Cooperation)</td>
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<td>GoM</td>
<td>Government of Mongolia</td>
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<td>GPE</td>
<td>Global Partnership for Education</td>
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<td>HEI</td>
<td>Higher Education Institution</td>
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<td>HENB</td>
<td>Higher Education National Board</td>
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<tr>
<td>ICT</td>
<td>Information and Communication Technology</td>
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<td>IIIEP</td>
<td>International Institute for Educational Planning</td>
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<td>ISCED</td>
<td>International Standard Classification of Education</td>
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<td>ITPD</td>
<td>Institute of Teachers’ Professional Development</td>
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<tr>
<td>KPI</td>
<td>Key Performance Indicator</td>
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<tr>
<td>LEG</td>
<td>Local Education Group (See EDCM)</td>
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<tr>
<td>M&amp;E</td>
<td>Monitoring and Evaluation</td>
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<tr>
<td>MECSS</td>
<td>Ministry of Education, Culture, Science and Sports</td>
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<tr>
<td>MICS</td>
<td>Multiple Indicator Cluster Survey</td>
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<td>MIER</td>
<td>Mongolian Institute of Education Research</td>
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1. Introduction

This appraisal has been undertaken to meet a requirement of the Global Partnership for Education (GPE) in considering the application of the Government of Mongolia for funding for the implementation of the Education Sector Mid-Term Development Plan 2021 – 2030 (ESMTDP). The version of the Plan considered was that of March 2020.¹ It should be noted that the development of the sector plan was quite far advanced before it was decided to seek GPE funding, which would explain why GPE guidelines appear to have been ignored in some areas of the plan.²

The sector analysis for the ESMTDP is covered in a study covering the entire sector,³ one addressed at policy,⁴ one at finance and investment,⁵ and separate studies which each focus on a subsector.

¹ Since the appraiser was working from an English translation of the plan, it is possible there might have been some misinterpretations of what was intended in the original version of the plan in the Mongolian language.
² Information provided by a DP representative.
⁵ Education Finance and Investment Report. [Lacks title page]
The Education for All Fast Track Initiative (EFA FTI) (subsequently the GPE) had previously supported the implementation of Mongolia’s Master Plan for the development of the sector from 2006 to 2015.\(^6\)

No comprehensive plan was prepared for the Mongolian education sector to cover the years 2016 to 2020.

**The ESMTDP is a sector-wide plan**, the context being set in the first two chapters, covering policy development, international trends in education, and the implications of socio-economic development in Mongolia for the education sector over the decade to 2030. Chapter 3 outlines the medium term development goals, with Chapter 4 elaborating the priorities and strategies for each of the four education subsectors. The fifth chapter contains the implementation plan for the years 2021 to 2025, the sixth chapter the cost projections, and the seventh the monitoring and evaluation framework.

**This appraisal was conducted according to the Guidelines for Education Sector Plan Appraisal.**\(^7\) A list of documents consulted in the course of the appraisal is included as an Annex.

A summary of recommendations is given at the end of the Appraisal. This is followed by the “Key aspects of credible education sector plans” checklist.

The Appraisal recommendations were discussed on April 16, 2020, with participation by the Ministry of Education (MECSS), the drafters of the ESMTDP, Development Partners, and Civil Society Organizations active in the sector, and the independent appraiser.\(^8\) The appraisal report was subsequently amended by references to additional sector analysis resources, and by elaboration of the reasoning behind some of the recommendations. No changes were made to the recommendations themselves.

### 2. Leadership and participation

The plan preparation process has been country-led, participatory, and transparent.

**Leadership and ownership**

The planned objectives are broadly aligned with the priority objectives of the government. As will be illustrated below, access, education quality, and management within the sector, are covered, but with insufficient attention to detailed strategies to address specific weaknesses that have been identified in the sector analysis.

The national team displayed consistent leadership in developing the ESMTDP. The process, from 2018, was led by the Senior Adviser to the Minister of Education, Culture, Science and Sports. A Core Technical Team and six Sub-Technical Working Groups consisting largely of government officials met regularly, together with local and international technical consultants supported by the Asian Development Bank. Ministers of State attended some of the meetings.

There was no “Local Education Group” (LEG) before the process of developing the ESMTDP was started. Since then a group, consisting of development partners (DPs) working in the sector and civil society organizations (CSOs) together with government officials, has participated in all the stages of

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\(^7\) UNESCO, IIEP and GPE, 2015.

\(^8\) The discussion was conducted remotely, using Webex, since the Covid-19 pandemic prevented travel or gatherings of large groups.
sector analysis and plan preparation of the development of the plan. The group has expressed the desire to continue working together.\textsuperscript{9}

\textbf{It is recommended} that the Local Education Group be formalized as a consultative body, with defined membership (Government, DPs, CSOs), meeting at specified regular intervals and more frequently should circumstances warrant this.

\textbf{Participatory process}

\textbf{The sector analysis studies and the ESMTDP were shared and discussed in the course of development.} Participation in these activities included representation from the Ministry of Education, Culture, Science and Sports (MECSS), and the Ministry of Labor and Social Protection (MoLSP); and state institutes and councils playing a role in the education sector; development partners and CSOs; higher education institutions (HEIs); other ministries and government offices, including.

\textbf{The consultations included representatives of the decentralized Education and Culture Departments in the aimags,\textsuperscript{10} and Education Divisions in the districts of Ulaanbaatar.} There was a presentation on the draft plan specifically for the local level education offices. The heads of all 21 aimags and all nine districts of Ulaanbaatar participated, and were requested to disseminate the information in their own areas and provide written feedback to the Ministry.\textsuperscript{11}

\textbf{The Ministries of Labor and Social Protection (MoLSP) (which shares responsibility for the Technical and Vocational Education and Training (TVET) subsector), and Finance (MoF), participated in plan preparation,} as well as the National Development Agency (NDA) the National Statistical Office (NSO), the National Security Council (NSC), the Cabinet Secretariat and Parliamentary Standing Committee.

\textbf{The financial projections are those provided by the NDA.} While the MoF participated in the development of the ESMTDP, there is no indication of their confirmation of 20 percent of the national budget to the education sector.

\textbf{The sector analyses and ESMTDP have been discussed with stakeholders.} Participant lists and PowerPoint presentations\textsuperscript{12} from meetings held during 2018 on June 7, August 10, and December 21, and in 2019 on March 18 and 26, September 18-19, October 8, October 21, November 29, and December 3, are available.\textsuperscript{13} The ESMTDP includes comments and suggestions from the “Data validation workshop for education sector studies” held on April 19-20, 2019, and the “Finalization workshop for education sector studies”, held on May 24, 2019.\textsuperscript{14} In December 2019 (at which stage the full financial scenario had not been developed) the MECSS placed the draft plan on their website and invited comments from education agencies and the wider public. Many comments were received and taken into account in the further drafting of the plan\textsuperscript{15}. The World Bank submitted written comments in January 2020.\textsuperscript{16}

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\textsuperscript{9} Information provided to the appraiser on request.
\textsuperscript{10} Provinces.
\textsuperscript{11} Information provided to the appraiser on request.
\textsuperscript{12} Some of which are not available in English.
\textsuperscript{13} Smaller technical group meetings with development partners present were held in 2018 on February 1, March 18, November 19, November 29-30, and in 2019 on February 20-21.
\textsuperscript{14} ESMTDP, Appendix 2.
\textsuperscript{15} Information provided to the appraiser.
Written comments submitted by DPs and other stakeholders on an earlier draft of the plan have been attended to by those drafting the plan. There has been a high level of cooperation in preparing the plan.

Capacity development

Ministry personnel have worked alongside hired consultants, both international and local, in the preparation of the sector analysis reports. The Asian Development Bank (ADB), the World Bank and UNESCO supported consultants undertaking this work. The Country Report, in which the full sector is analyzed, is largely the work of the Mongolian Institute of Education Research (MIER). Development partners have provided technical support where required. The development of the sector financial projections was largely undertaken by a local consultant. The capacity of ministry staff has been increased through this partnership.

The Ministry was supported by consultants in the preparation of the ESMTDP 2021-2030. The Asian Development Bank (ADB) provided a team of consultants to assist the Ministry in drafting the plan. While the actual drafting was done by consultants, Ministry staff provided the data as required and discussed the content of the drafts. Presentations by Heads of Ministry line departments on the sector analysis and the plan should also be regarded as building their own capacity and that of the other Ministry staff and others participating in the discussion. Specific training, which included the use of the simulation model, was provided by UNESCO and UNICEF. On-line training in monitoring and evaluation by the International Institute for Educational Planning (IIEP) is being arranged to take place during April and May 2020.17

The capacity developed will be put into practice as Ministry personnel develop the detailed annual plans.18

The appraiser is not able to indicate which activities lent themselves best to the development of staff capacity.19

3. Soundness and relevance

The plan is based on a thorough analysis of the sector. All objectives in the plan are supported by the information base, but objectives are generally not broken down into specific strategies and activities. The financial framework has been methodically prepared, but where the activities to achieve an objective have not been clearly specified, the cost implications might not be fully understood. The years of implementation (2021 through 2025) for each of the objectives are indicated, but the detailed annual plan is left for the implementation unit to compile.

Evidence-based education sector analysis

The Mongolian Institute for Education Research (MIER), in cooperation with UNESCO, prepared an analysis covering the full education sector.20 This was supplemented by separate analysis reports,

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17 Information provided to the appraiser.
18 The ESMTDP uses the term “detailed annual plan” for what the appraisal guidelines refer to as an “action plan”. The ESMTDP uses the term “action plan” for a table that is insufficiently detailed to meet the appraisal requirements for an action plan.
19 The spread of the Covid-19 pandemic precluded travel to Mongolia and face-to-face discussion with Ministry staff and other stakeholders.
each focusing on one dimension of the sector. Footnotes in the ESMTDP indicate where these reports were used in preparing the plan.

The policy analysis report contains 68 recommendations grouped under three themes and eleven policy domains. The themes are (1) improving quality and relevance, (2) improving equity and inclusion, and (3) sector-wide policy and governance. Under the first theme recommendations are made on improving the professional development of teachers and external assessment of “learner achievement”; on adapting education to herder families; on transitions between types and levels of education; and on mainstreaming ICT (Information and Communication Technology) in education. The second theme addresses disparities in educational opportunities in society, with specific attention to urban and rural relations, learners from vulnerable groups, including those with disabilities, and members of national minorities. The third theme covers research and planning capacities, the promotion of innovation in policy, and inter-sectoral approaches towards policy, planning and governance. The structure of the report emphasizes the importance of recognizing that policy and decisions on a specific sub-sector have implications for the other sub-sectors. Going beyond this, it draws attention to the need for inter-sectoral planning where this will better enable the implementation of education policies and programs.

The finance and investment analysis acknowledges progress in a number of areas, but expresses concern at “unstable” decisions on educational finance, stating that the combination of internal and external financial resources could suffice if managed “effectively and purposefully”. Programmatic budgeting needs to take account of geographic and demographic factors in arriving at an education Medium Term Expenditure Framework (MTEF) with clearly defined priorities and targets. It suggests that the budget is too limited to do justice to the hoped-for expansion of e-learning.

The analysis of the pre-primary sub-sector is followed in the report by recommendations in the areas of policy; increasing the efficiency of public spending; improving the quality of services while eliminating disparities; building capacity and enhancing parental involvement; and managing and using data more effectively. The use of data, down to individual school level, is illustrated, for example, in Appendices 1, on costing the sub-sector for the MTEF; 3, on calculating the costs of nutritional needs; and 7, on improving the efficiency of spending on private kindergartens.

The primary sub-sector is addressed in two reports. The first, commissioned by the World Bank, focuses on identifying challenges and making recommendations on (1) the management of teachers, (2) curriculum and learning assessment, and (3) equity in access to education and learning. The more detailed recommendations under these broad headings cover teachers’ pre-service and in-service training, planning teacher reserves and establishing a database to allow schools to recruit from the pool of unemployed teachers, and teachers’ working hours and remuneration; uniform student assessment practices and better alignment between curriculum and assessment; and establishing a database of children with different needs, together with suggestions as to how some of these needs

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21 The appraiser did not see copies of the analysis reports on Life-long Learning, TVET, Higher Education, Sector data and information, or the School mapping project report.
22 Footnotes indicate which report was used, without adding page or section references.
28 Mongolian Education Alliance. Pre-primary Education Sector Analysis, pp.84-89.
29 Mongolian Education Alliance. Pre-primary Education Sector Analysis, pp.90-91, 95-96, and 98, respectively.
30 Education and Social Development Center (ESDC) of Mongolia. Primary Education Sector Analysis in Mongolia. Final report. October 2019.
may be met. Apart from a desk study of relevant data and research studies, the authors of the report conducted a survey of 28 sample schools and 427 teachers, supplemented by Focus Group Discussions (FGDs) and interviews with various officers in the education structure. Statistical data up to 2018 from the MECSS is used in the report.

The second, by the ADB, covering both primary and secondary education, was made available in an incomplete version. While it does not contain firm recommendations, it contains a list of “challenges” relating to the context, to access and internal capacity of schools, to education quality, to capacity and management, and to equity. There is a fair amount of overlap in the findings of the two reports.

The government’s 2019 report on the implementation of the Sustainable Development Goals (SDGs) identifies limited access to school for children from herding families, children with disabilities, children from poor families, adolescent girls, and young mothers as an ongoing challenge. Also problematic are inadequate school facilities and a shortage of learning materials, and frequent curriculum changes, which place additional demands on the teacher and impair the quality of education.

The technical and vocational education and training (TVET) sub-sector is covered in a 2019 study report and a 2019 policy review. It should be noted that the subsector falls jointly under the MECSS and the Ministry of Labor and Social Protection (MoLSP), with the MECSS contributing less than ten percent of the costs of the subsector. The sub-technical working group preparing the TVET sections of the sector plan was chaired by the MoLSP, with no representatives of MECSS.

The subsector study identifies a mismatch between the training offered and the requirements of the labor market, leading to graduates being unable to find employment. This is the result of a number of factors, such as the regulatory system, the curriculum, the training and re-training of teachers, and outdated training materials. The policy review refers to insufficient funding and to inefficiency resulting from political appointees, and to a survey finding that less than a third of the graduates found employment in jobs relevant to their studies.

An analysis of the higher education subsector examines access, equity, and internal efficiency. Apart from describing the situation within Mongolia, it makes a number of international comparisons. In the 2018-2019 academic year 59.4 percent of student enrollment was female. Recommendations include the establishment of a national qualifications framework based on the International Standard Classification of Education (ISCED), which is also the subject of a 2016 study report.

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31 ESDC. Primary Education Sector Analysis in Mongolia, pp.107-112.
33 ADB. Primary and Secondary Education Sub-Sector Study Report. Most of the Figures have not been translated into English; there is no narrative for Tables 66 to 81 or 91; and the final chapter, headed “Projections and proposed priorities by 2030” contains only projections.
36 TVET Policy Review Mongolia. 2019, gives the MECSS share in 2016 as six percent. Page 97, Figure 6.4.
37 ESMTDP, p.133.
38 ADB. Study Report of Technical, Vocational Education and Training Sector, p.34, p.100.
39 ADB. Study Report of Technical, Vocational Education and Training Sector, pp. 99, 106, 100, 103. (Incidentally, on p.101 the report appears to use the terms “school drop-out” and “expulsion” as if they are equivalent expressions.)
41 “Chapter two. Higher Education Sub-Sector, Accessibility, Equality, Internal Efficiency”.
42 “Chapter two. Higher Education Sub-Sector, Accessibility, Equality, Internal Efficiency”, p.5.
recommendation developed under the ADB-supported Higher education reform project. Further recommendations relate to collaboration with international universities, relating the curriculum to market requirements, make greater use of the online learning environment, and improving the competence of university teaching staff.

**A report on gender issues in the sector** draws attention to factors affecting boys’ enrollment and performance relative to that of girls. As measures of performance it cites the results in state examinations in the 5th, 9th and 12th grades. In the TVET subsector boys outnumber girls, while in higher education institutions the gender ratio varies by subject and study course.

**The report on lifelong learning** acknowledges that lifelong learning is cross-sectoral, not only in relation to the education subsectors, but also to other sectors. At the same time it makes a case for recognizing lifelong education as a subsector with a dedicated budget, which will more effectively be able to meet the needs of those who do not have access to formal schools and training institutions.

**Parents’ satisfaction with educational provision** was tested in a survey conducted by the Mongolian Institute of Education Research. Eight recommendations were made for implementation during the plan period. One of the findings was that parents feel they do not have access to sufficient information on the school or on non-formal learning options, which inhibits their involvement in the education of their children.

The Education Management Information System (EMIS) provides comprehensive data for the pre-primary and primary-secondary subsectors. For example, for the pre-primary and primary-secondary subsectors, gender-disaggregated data is available up to the 2018-2019 academic year, on enrollments in the various categories of educational provision (public, private, alternative (in the case of preprimary), urban, rural) at national, regional and school level. Information is provided on disabled, nomadic and orphaned children. Equally detailed are data on school personnel. The number of classes and teachers are given by aimag, capital city, and for each school. Sample data for the other subsectors was not seen. An *Education Data Analysis Report* draws out some of the data relevant to the development of the ESMTD, and notes areas where data would need to be collected through an additional survey. No gender-disaggregated data are presented in the report, but Appendix 1.1 to the report indicates the areas for which gender-disaggregated data are available. There is, however, no adequate analysis of the performance on the sector plan covering the period to 2015 (ESMP 2006-2015). It is likely that a number of the goals were unrealistically broad, and few were quantified. A careful review of the reasons for failure on many of the goals would have been useful in avoiding similar weaknesses in the current plan, which also appears to be overly ambitious and difficult to monitor. A formal review meeting shortly after the end of the plan period (some time in 2016) would have provided the opportunity to examine the reasons for success or shortfall on each of the targets and activities.

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46 CSWE. *Gender Analysis in Education Sector of Mongolia.* Focus on Boys’ Education.

47 ADB. *Sub-Sector Study Report on Lifelong Education.*

48 MIER. *Preliminary Survey Report on Parents’ Satisfaction on Education Services.*

49 Pages 32, 31.

50 Reporting in the ESMTDP (p.15-17) on the implementation of the ESMP 2006-2015 provides less information than one would hope for, given that there is no full implementation evaluation to which reference may be made.
Other local and international reports and initiatives have also been referred to in the preparation of the plan, such as the UNESCO initiative for future education, the OECD’s\(^{51}\) Starting Strong report of 2018, NSO statistical data (including MICS\(^{52}\)), TVET graduate follow-up studies (Research Institute for Labor and Social Protection) and UNICEF’s End-user Sample Survey on Education Sector Services Final Report (2019).

All subsectors are covered in the analysis, with all areas of access, internal efficiency, participation, equity, quality, management, costs, and financing receiving attention.

The sector analyses draw attention to threats to the system.

Relevance of policies and programs

In the discussion of overarching issues and the introductory discussion to each of the subsectors, the plan draws on the empirical evidence contained in the sector analyses. Gender analysis is almost completely ignored in the plan. Although there appears to be a good understanding of the reasons for restricted access and educational outcomes of poorer quality in the rural areas, school mapping is listed in the plan as an urgent need “to enable better planning for the forecast demographic shift”.\(^{53}\)

The ESMTDP takes some account of lessons learned from past policies, and also expresses dissatisfaction with some of the work done. It is stated, for example, that the 2016 Law of Education has had “numerous policy amendments”, but “an education policy review will be necessary as the current legal framework is not forward thinking”.\(^{54}\) While the UNESCO Education Policy Review Report makes 68 recommendations, and one of the overarching principles applied in preparing the plan has been “horizontal and vertical interlinkage between education policies”,\(^{55}\) there are no clearly defined activities in the plan to improve policy. Despite a great deal of background information on policies that are lacking and policies that are not correctly implemented in the areas of the appointment of school management, ICT in education, learning materials production, the curriculum cycle, lifelong learning and easy transition between learning programs, higher education enrollment,\(^{56}\) and others, only three activities referring to policy are included: redefining MIER “as the key policy analysis institution” in the sector; establishing “an education sector human resource database within the current structure of EMIS”, so that the data may be applied to “education policy and financial planning”; and developing a TVET EMIS database to be used for “policy and investment planning”.\(^{57}\) None of these, even when implemented, will directly address any of the identified policy deficiencies.

The ESMTDP’s strategies are not clearly informed by lessons learned from past plan implementation. Although the sector analysis reports give reasons for the failure of some strategies, in the absence of a comprehensive implementation report\(^{58}\) on the MP, the implementation information contained in the ESMTDP is insufficiently detailed. However, the thorough sector analysis undertaken during 2019 goes a long way to making good this deficiency.

The previous “Master Plan” (MP) for the sector covered the years 2006 to 2015. There was no revision or formal extension of the plan to cover the years 2016 to 2020. Strictly, to demonstrate

\(^{51}\) Organization for Economic Cooperation and Development.

\(^{52}\) Multiple Indicator Cluster Survey.

\(^{53}\) ESMTDP, p.32. A footnote refers to a “School mapping” Project report, which was not seen by the appraiser.

\(^{54}\) ESMTDP, p.30.

\(^{55}\) ESMTDP, p.41

\(^{56}\) ESMTDP, pp.30-46 passim.

\(^{57}\) ESMTDP, pp.71, 69, 78.

\(^{58}\) ESMTDP, p.15 states “from the education sector performance of the academic year for 2018-2019, it is concluded that a substantial part of the overall goals is successfully implemented while some of them are not yet realized”. 

that lessons learned are being applied would need reference to the reasons where implementation fell short. For example, it is reported\textsuperscript{59} that “52 percent of the targeted goals included in the pre-primary education plan are fully implemented, 36 percent are not realized up to the quantitative target and 11 percent are partially implemented”, and “33.3 percent are fully implemented out of total 18 targeted goals related to the primary and secondary education, 22 percent are partially implemented and 33.3 percent are not implemented at all”.\textsuperscript{60} In TVET none of the goals was achieved. For higher education the aim of increasing the proportion of students in the fields of engineering and technology, natural science, teaching and agriculture was not met; on the contrary, there was a decline in three of these areas. Quality assurance goals were also not met. While it is likely that implementation was hampered by financial constraints, there may have been other factors playing a role.

**The comprehensive knowledge base could have been better used.** National population projections and school enrollment data, gender disaggregated, appear to be up to date and reliable. Figure 2.1, for example, indicates a potential increase in grade 6 enrollment of 25,600 students between 2018 and 2025, and a corresponding increase in grade 7 of over 33,000.\textsuperscript{61} In the latter case this would equate to a 71 percent increase. There is no target in the plan to ensure full (or near-full) enrollment in those areas of the country where enrollment ratios are lowest, and while the plan and budget provide additional classrooms at primary and secondary schools, geographical areas of greatest need are not specifically targeted. This would be of even greater importance in the event of a shortfall in the budget. In fact, information on migration from rural to urban areas seems to be completely disregarded, in that the plan proposes greater utilization of the facilities which even under ESMP 2006-2015 were emptying because of urban migration.\textsuperscript{62} There is no targeting of schools running more than one shift for additional classrooms, or for additional schools in the vicinity to relieve the pressure.

**Activities in the plan are not clearly linked in an explicit causal chain; and are generally too broad in their scope and wording to have the expected impact.**

**One example, “curriculum and learning”, is explored at some length.** The first strategic “action” for primary and secondary education, to be implemented jointly by MECSS and MIER during the first two years of the plan, reads “In order to increase the quality of primary and secondary education services, to improve the efficiency of the curriculum implementation, to increase the adjustment between curriculum, textbook management cycle and curriculum content, to clearly identify and verify the roles and shared responsibilities of relevant stakeholders”.\textsuperscript{63} The first phrase is an objective (“in order to ... education services”). Three strategies follow, and the first two, on curriculum, affect each other.

A further two strategic actions on curriculum provide for childhood development studies to inform the curriculum (to be implemented in years one and three), and for the curriculum to be adapted to the needs of 21\textsuperscript{st} century citizens.\textsuperscript{64}

There are already three “actions” relating to curriculum in the “sector-wide” section of the plan, the second of which reads “To improve the relevance of curriculum and assessment at all levels of education”,\textsuperscript{65} assigned jointly to MIER and EEC (Education Evaluation Center) for the first year of the

\textsuperscript{59} ESMTDP, p.16-17.

\textsuperscript{60} ESMTDP, p.16. Reference is made to the ADB report on the Pre-primary subsector.

\textsuperscript{61} ESMTDP, p.20.

\textsuperscript{62} ESMTDP, p.24-5. 264 out of 655 (p.25 gives 656) public schools were less than fully utilized in the year 2017-2018, with 83 of them less than half-full. 87 were running two or more shifts for at least some of their classes.

\textsuperscript{63} ESMTDP, p.74. Action 3.1.1.1.

\textsuperscript{64} ESMTDP, p.74. Actions 3.1.1.2 and 3.1.1.3.

\textsuperscript{65} ESMTDP, p.69. Action 1.1.1.2.
plan. The background to these “actions” is a desire for a “flexible, needs-based curriculum” which “recognizes that each student has his/her own learning path”, and for “ICT-in-education” to be integrated with curriculum.\textsuperscript{66} But the curriculum developed between 2012 and 2018 includes “concepts such as sustainable development, holistic human development, and continuous (life-long) learning, and green environmental issues”.\textsuperscript{67}

There is a conflict between (a) a sense that the curriculum requires frequent revision to meet societal needs and (b) the recognition that revision of the curriculum undermines the teachers’ ability to deliver the curriculum as intended. The current “curriculum cycle is relatively inflexible to emerging learning needs” – the 10-year cycle “is not suitable”;\textsuperscript{68} yet “the quality of primary and secondary education is often affected by the frequent changes made in the curriculum”, and a weakness regarding implementation is that “School-based teacher curriculum implementation support is lacking”, from which it follows that there is a need of a “strategy” to “Implement Curriculum Management Cycle and review the implementation”.\textsuperscript{69}

It is recognized in the plan that teacher capacity needs to be strengthened,\textsuperscript{70} but universities responsible for pre-service teacher training “operate with different, unaccredited pedagogical curricula that affect the quality of teachers graduating from these schools”.\textsuperscript{71} There is no consistency in in-service training provided, for which the remedy is a continuous professional development (CPD) plan that can be accessible online. Yet preprimary teachers (and perhaps those teaching at primary and secondary level?) are discouraged from improving their professional capacity on account of an excessive workload.\textsuperscript{72}

The plan has been caught on the horns of a dilemma: 21st century needs are changing so rapidly that the curriculum needs frequent updating, but frequent changes to the curriculum undermine the competence of teachers in the classroom. If the teacher is unable to teach the curriculum, the learners suffer. Curriculum change requires adequate, well-designed and correctly timed in-service training for teachers. It may be possible to deliver some of this training remotely, provided that teachers are motivated, have internet access, and have the time to spend on working through the training material.

Definite conclusions need to be drawn from the different perspectives on curriculum revision and reflected in the plan in specific and mutually consistent activities leading to measurable targets.

MIER already has responsibility for curriculum revision as one of its core functions. It is the deficiencies that need to be addressed in the plan.\textsuperscript{73}

\textbf{It is recommended that the plan include clear, targeted activities, covering the following areas, to ensure that teachers can teach the curriculum.}

\begin{itemize}
\item The development of training program or modules needed to enable teachers (and especially rural teachers) to teach the current curriculum
\item A plan to provide this training
\end{itemize}

\textsuperscript{66} ESMTDP, p.10, 15, 30.
\textsuperscript{67} ESMTDP, p.35.
\textsuperscript{68} ESMTDP, p.30, 56.
\textsuperscript{69} ESMTDP, p.56, 35.
\textsuperscript{70} ESMTDP, p.42.
\textsuperscript{71} ESMTDP, p.55.
\textsuperscript{72} ESMTDP, p.55, 51.
\textsuperscript{73} The TVET subsector has three activities on curriculum, one of them to be implemented in cooperation with Higher Education (Activities 4.1.1.1, 4.1.1.4, & 4.3.2.2). Higher Education has two activities, one of them related to “accelerating” curriculum development in selected study areas over years 2 to 5 of the plan. There is no indication as to when the curriculum of other study areas will be addressed (Activities 5.1.1.3 and 5.1.1.4).
• Assessment at the end of the training (or rounds of training) that will demonstrate its effectiveness
• Remedial measures if the training has not been effective
• Set standards to which all pre-service training of teachers should conform
• Action to ensure that all universities training teachers offer only courses that meet the set standards
• Availability in schools of textbooks and other teaching materials and equipment relevant to the curriculum
• Means of learner assessment relevant to the curriculum
• A curriculum revision cycle that will allow teachers to have had the necessary in-service training and schools to be equipped with the needed materials when implementation starts.

The timing of all the activities would have to be carefully phased and coordinated.\textsuperscript{74}

\textbf{The actions relevant to access, especially for rural and otherwise vulnerable children, need to be reviewed and made more specific and measurable, as do those for improving quality and effective management within the schools.} A blanket objective of moving within the plan period to 100 per cent enrollment, for example, requires strategies aimed at those currently excluded from attendance at school or participation in an alternative program; these need to have defined target numbers and implementation dates. It might also be necessary for the objectives of increasing enrollment and retention to specify different strategies for girls and boys.

\textbf{The planned school mapping} comes from a goal that was not implemented in the earlier plan.\textsuperscript{75} The intention of using school mapping to establish which schools require WASH\textsuperscript{76} facility upgrades\textsuperscript{77} seems misplaced: this information should either come through as administrative data from the schools or via EMIS routine data collection. But the mapping exercise that is proposed\textsuperscript{78} appears to move well beyond the remit of an education ministry. The nature of the data sought – “geographic location, lifestyle characteristics of that particular population, income generation, the projected growth rate of population”\textsuperscript{79} - appears to lie within the province of a National Population and Housing Census. It is too late now to expect questions to be added to the questionnaires for the 2020 population and housing census, but there should be discussion with the National Statistics Office on extracting the data which would be of interest to the education ministry without using MECSS resources on duplicating the work.

\textbf{The risks are discussed in the relevant section below.}

\textbf{Soundness of the financial framework}

\textbf{The plan includes a quantitative scenario in the form of a budget} generated by the UNESCO EPSSim simulation model. It is therefore based on the projected growth in school-aged population and “variable costs” applicable to the pre-primary, primary and secondary (“general education”) public schools and dormitories.\textsuperscript{80} This approach provides, with growing enrollments, for “more of the same”. Activities not covered by the variable funding are budgeted for separately on what is

\textsuperscript{74} Even the curriculum and learning aspect cannot be isolated from issues such as teachers’ working conditions (overworked?), school management, and supervision by local education departments.
\textsuperscript{75} ESMTDP, p.16. The report on school mapping was not seen.
\textsuperscript{76} Water, Sanitation and Hygiene.
\textsuperscript{77} ESMTDP, p.32.
\textsuperscript{78} ESMTDP, p.32.
\textsuperscript{79} ESMTDP, p.53. Actions 2.3.1.1 and 3.3.1.1 for which MECSS and MIER will be jointly responsible.
\textsuperscript{80} ESMTDP, p.22-3, and Chapter 6, p.80 ff.
presumed to be an actual cost basis. In establishing baseline data, it must be appreciated that population projections are based on 2011 census data. Enrollment data from EMIS is available, most recently, for the 2018-2019 academic year. The Finance and investment report recommends program-based and gender-sensitive budgeting, but these approaches have not been incorporated into the current plan.

The costing covers all subsectors included in the plan. It is not clear whether the relative share of the budget per subsector, which heavily favors the primary and secondary subsector, has been accepted by all parties. The following table sets out the share of the budget (recurrent and capital) for the five years 2021 to 2015 allocated to each subsector.

<table>
<thead>
<tr>
<th>Subsector</th>
<th>2018</th>
<th>Budget 2021-2025</th>
</tr>
</thead>
<tbody>
<tr>
<td>Preprimary</td>
<td>23%</td>
<td>24.90%</td>
</tr>
<tr>
<td>Primary and Secondary</td>
<td>46%</td>
<td>60.87%</td>
</tr>
<tr>
<td>TVET</td>
<td>4%</td>
<td>9.33%</td>
</tr>
<tr>
<td>Higher Education</td>
<td>9%</td>
<td>3.72%</td>
</tr>
<tr>
<td>Lifelong Learning</td>
<td>-</td>
<td>0.35%</td>
</tr>
<tr>
<td>Management and Scientific Organizations</td>
<td>18%</td>
<td>0.83%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>100%</td>
<td>100%</td>
</tr>
</tbody>
</table>

Enrollment projections as percentages in public and private schools have been generated by the simulation model (UNESCO EPSSim), and converted to number of enrollees for each of the years 2021 to 2030. In higher education the financing assumption is that enrollment will decline from 63 percent to 45 percent for 18-21 age group population “due to the amalgamation of HEIs and strict admission policies”. This is not adequately explained in the discussion of the subsector in Chapter 4 of the plan.

It cannot be judged whether the quantitative scenario is consistent with the appropriate strategies, programs and targets since these are not clearly defined in the plan.

Financial calculations for the subsectors appear to be based on clear and reliable assumptions of unit costs. For the “Education and science policy and administration” component it is not clear whether total recurrent costs for 2020, adjusted annually for inflation, will be realistic for subsequent years.

The plan has indicated that MIER has insufficient resources to visit schools to “identify problems related to the curriculum and its implementation due to lack of budget and too much unnecessary workload”, and that the staff “lack professional development opportunities”. From financial information in the plan it is not possible to determine whether MIER will be adequately funded between 2021 and 2025. A new structure may bring about increased staffing costs. Costs for the

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81 ESMTDP, p.96 ff. Table 6.5.1.1.
82 Education Finance and Investment Report, p.4-5.
83 ESMTDP, p.23, Figure 2.5.
84 Appraiser’s calculations based on Table 6.2.7.1 on page 93 of the ESMTDP.
85 The share of the TVET budget covered by the MoLSP is not reflected in the ESMTDP. According to the TVET Policy Review Mongolia, in 2016 the MECSS provided 6% and the MoLSP 58% of the TVET budget (p.97).
86 ESMTDP, p.80 ff.
87 ESMTDP, p.87.
88 ESMTDP, p.66.
89 The basis for determining costs in primary and secondary education, for example, is clearly explained on page 90 of the ESMTDP, and for “Education and science policy and administration” on page 92.
restructuring exercise (of MIER, ITPD, EEC, NCEA,\(^90\) and education departments at local level) have been allocated only for the first year of the plan. There does not seem to be enough information in the plan to be translated into an adequate detailed annual plan with funding for clear targets.

**The funding gap is not based on the cost of the full sector plan.** A small number of activities are indicated in Table 6.5.1.1 as “new projects to be implemented by international organizations”, with costs calculated outside the projections.\(^{91}\) These total MNT 89,336.82 million (USD 34.1 million).\(^{92}\) There are also small amounts allocated to “local budget”, and MNT 11.4 trillion allocated to HEI “campus project” outside the projected costing and calculated funding gap. An ADB project and a GiZ (Deutsche Gesellschaft für Internationale Zusammenarbeit) project for which funding has already been pledged are also excluded.

The funding gap is identified as MNT 2,777.52 billion (USD 1,060.12 million) if the government allocates to education a share of its budget consonant with the medium level projection in the MTEF (which varies between 15.44% and 17.32% for the years 2021 to 2025); or MNT 332.47 billion (USD 126.9 million) if the government allocates 20 percent of its budget to education for each of the five years.\(^{93}\) Once the cost of activities not included in the projected budget is added, the gap as a percentage of the budget is 17.21 percent, which would reduce to 2.06 percent if government were to allocate 20 percent of its spending to the education sector.\(^{94}\)

There is no indication that the Ministry of Finance has validated the assumption that the government will allocate 20 percent of its budget to the education sector for each of the years 2021 to 2025. The evidence of past performance makes it unlikely. It is thus most likely that the funding gap will be the higher amount (USD 1,060.12 million) plus the estimated value of the projects to be funded (USD 34.1 million), a total of USD 1,094.22 million.

No information has been provided in the plan on current donor contributions to the sector. The contributions of development partners that are already aligned with components of the plan are those of the ADB (USD 30 million) and of GiZ (EUR 500 thousand).

On the available information, the financing expectations are judged to be unrealistic. It must, though, also be acknowledged that the expected surge in student numbers between 2019 and 2024 places a heavy strain on available funding: “a huge mobilization of resources will be necessary to accommodate the surge in students by 2024”, by when the secondary school population will nearly double, with the impact felt largely in Ulaanbaatar.\(^{95}\)

School staff numbers have been calculated on the basis of enrollment projections and a student to teacher ratio (STR) of 30:1.\(^{96}\) This is at variance with the Sustainable Development Vision 2030 (SDV 2030) target of an STR of 20:1 or 25:1 for preprimary;\(^{97}\) these lower targets are not included in the table of strategies and activities. The second priority for primary and secondary education refers to

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90 Mongolian Institute of Education Research, Institute of Teachers’ Professional Development, Education Evaluation Center, National Council for Education Accreditation.
91 ESMTDP, p.96 ff. There are other new projects for external funding where it is noted that the costs are included in the relevant subsectors.
92 Exchange rate USD 1 = MNT 2,620, as on March 25, 2002.
93 ESMTDP, Table 6.3.3, p.94, and Table 6.4.2, p.95. If government were to allocate 20% of the national budget to education every year from 2021, the cumulative deficit for the first five years would be only MNT 9.56 billion, since there would be a surplus in the later years.
94 Or 0.06 percent if the deficit were calculated as cumulative over the five years. The “campus project” has been excluded from calculations.
95 ESMTDP, p.30.
96 ESMTDP, p.82 (pre-primary) and 84 (primary and secondary).
97 ESMTDP, p.52, 53.
an SDV 2030 goal of reducing class size to 20 students.\(^{98}\) Class size must necessarily be equal to or greater than the STR if some classes are not to be left without a teacher for part of the day. Again, the goal is not reflected in the table of strategies and activities.

**Soundness of the action plan (“detailed annual plan”)**

The operational plan for the first five years (Table 5.1)\(^{99}\) provides no more detail on the strategies and activities than do the subsector tables earlier in the plan. Shaded cells for each of the years indicate when implementation will take place, and the responsible unit (ministry or institution) is added. Responsibility for the development of detailed annual plans is assigned to the yet to be established Implementation Unit.\(^{100}\) The preparation of a detailed annual plan should not be left to the implementation unit, but should be undertaken by the same technical team that prepared the medium term plan, since they have insight into the detailed activities that will support the objectives of the plan. The possibility of a three-year rolling plan rather than an annual plan should be considered. When the second annual plan is prepared, implementation results for the first year are not yet available. A three-year rolling plan allows adjustments to be made to the third year of the plan while the second-year runs, based on implementation information that comes from a completed first year.

During the discussion\(^{101}\) of the Appraisal recommendations, the MECSS representative raised the difficulties of preparing a detailed plan prior to the national elections scheduled for June 2020. It is suggested that the best way of dealing with the challenge is to have a draft implementation plan prepared prior to the elections, which may then be adjusted after the elections. Subsequent to the elections there might be some re-prioritizing of activities; but since the broad objectives of the plan carry forward the vision of earlier plans, adapted to accommodate changing social and technological requirements, it is unlikely that extensive modification would be required. Similarly, Mongolia’s Vision 2050, which is likely to be adopted soon to replace Vision 2030, is unlikely to be so different that the objectives of the ESMTDP would no longer be relevant.

**It is recommended** that the detailed annual plan or, better still, a three-year rolling plan, be developed without delay by the same technical working groups that prepared the medium-term plan.

Most of the “activities” are phrased as objectives, insufficiently detailed for implementation to proceed without further work being done to unpack and sequence the implied activities.

The financing framework has had to make assumptions about activities where these are not sufficiently detailed in the action plan.

In the costing of the sector plan no reference is made to the structure of the education budget and MTEF, but the categories of expenditure are sufficiently clearly identified that cross-referencing should be relatively straightforward.

**All “activities”**\(^{102}\) already identified appear to be costed in one of three ways in Table 6.5.1.1.

- The costing may be indicated simply as “national budget”, for example Activity 1.1.2.2: “To update the job descriptions and required skills ...”. What is implied here is that education officials will consult as appropriate, perhaps convene small meetings, make use of the

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\(^{98}\) ESMTDP, p.56.  
\(^{99}\) ESMTDP, p.69 ff.  
\(^{100}\) ESMTDP, p.109.  
\(^{101}\) On April 16, 2020, by Webex.  
\(^{102}\) It has already been pointed out that few of the activities are clearly worded as such, with time-bound measurable targets.
internet to communicate with one another, and treat this as part of their normal responsibility. Their salaries are already covered; there are no significant additional costs.

- The costing may be indicated as “national budget” as well as specifying cost estimates, for example Activity 3.1.1.4: “To successfully participate in PISA student assessment ...”. Here the costs, which will be paid from the education recurrent budget, are additional to the normal routine activities (which also have a cost hidden in staff remuneration, etc.).

- The costing may be indicated in the same way, but the costs to be met from the education capital budget, for example Activity 3.2.1.1: “To increase the number of primary and secondary school buildings ... in phases, based on needs and demands”. Considering underspending from the capital budget in past years, particular care needs to be taken to ensure the funds are fully spent.

- The costing may be indicated as “A new project to be implemented by international organizations”, together with cost estimates, for example Activity 3.1.2.3: “... to implement nationwide program for improving professional capacity of primary and secondary education teachers ...”. Although “national budget” is not mentioned, it is presumed that these projects, if they are launched, will be in cooperation with ministry staff whose job descriptions give them a responsibility for the continuous professional development of teachers.

It is recommended that a paragraph or two be added as a preface to Table 6.5.1.1 explaining the way in which the costs should be interpreted.

Resources have not been identified for all activities. The wording of the “to be implemented by international organizations” does not imply that potential donors have been lined up to support the activity. There is no information in the plan on external (development partner) financial support to the sector over recent years.

A reliable estimate of the absorptive capacity of the ministry and other institutions has not been possible. There is little in the plan to indicate the capacity of the decentralized education offices, but the concern “to analyze roles and responsibilities, human and physical human resources and activities of the MIER, ITPD, EEC, NCEA and education and culture departments at local level” (Activity 1.3.3.1) suggests that human capacity might be lacking.

The implementing responsibility is generally allocated simply to the ministry or other institution, for example “MECSS” for Activity 2.2.1.1: “To ensure 100% enrollment of 5 years old children at preprimary education services.” It is not possible to estimate whether human resource capacity is adequate without knowing which units/departments in the ministry are involved and how they are staffed.

The structure of local departments and divisions of education varies from aimag to aimag, since the structure and number of staff is as approved by the Aimag Governor or Mayor of the City of Ulaanbaatar. The local department or division has a strong responsibility for ensuring that the Education Law (as amended) relating to access is implemented in its schools. In addition, it has subject specialists on its staff with responsibility for “professional and methodological support to all secondary schools and kindergartens irrespective of their ownership type, facilitate continuous development of teachers and staff”. Staffing, typically at around 28 for an aimag and 37 for Ulaanbaatar, might be too modest to do justice to the additional work implied by the plan.

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103 ESMTDP, p.98.
104 ESMTDP, p.73.
105 Education Law of Mongolia, Article 28.1.10.
106 Information provided by the MECSS on request.
by specifying which units or individual staff positions will be responsible for implementation of the different targets can it be determined where the capacity will be strained.

MIER is listed as implementing unit or co-implementer for twelve activities in the first year of the plan, at the same time that its roles, structure and capacity are being evaluated by the MECSS, with the uncertainty that accompanies such an exercise.

Indicators and target outputs for the activities are neither adequately defined nor clearly cross-referenced to the programs and activities. Some may well be performance indicators but cannot be considered “Key”. Few have a baseline, and many are without clear targets for 2025 or 2030. There is no disaggregation by gender, and little distinction is made between rural and urban areas. A few examples follow, with comments.\(^\text{107}\)

- “Average level of learning achievement among pupils of 10\textsuperscript{th} grade (in Math and Mongolian language)”. The data are to be collected annually from schools via a survey conducted by EEC. For this, and several other Key Performance Indicators (KPIs), there is neither baseline nor targets for 2025 or 2030, nor is there disaggregation by gender.

- The “Level of learning achievement of learners from rural areas”. The target for 2025 is “Learning gap less than 1%” (in Math, Mongolian language, natural science, and ICT). It is not clear which grade level performances will be compared; there is no baseline; and there is no gender disaggregation. EEC is to collect the data annually from training providers through a survey.

- “School preparedness of 5-year old child”. With no baseline the targets are 80 percent by 2025 and 100 percent by 2030. There is no gender or regional disaggregation. Information is to be collected by the EEC from preprimary education providers.

- “Percentage of teachers from rural areas participated in in trainings for capacity strengthening”. No baseline or gender disaggregation. Data to be drawn from administrative data by the ITPD. Participation in a training exercise is no guarantee of increased competence.

- “Number of added seats”. No baseline but the target level, expressed as a number, is to be interpreted as the “accumulated amount from 2021”. The MECSS will extract the data annually from administrative data provided by schools. No distinction is made between urban and rural schools.

- “Ratio of schools that have less than 1 in terms of profile shift coefficient”. A baseline of 49.3 percent is provided, with targets of 30 percent for 2025 and ten percent for 2030. The problem with this indicator is that the underutilized schools are in rural areas from which migration to urban areas is taking place. Their utilization can be increased only by reversing the migration trend, which is unlikely. But there is no target for reducing overutilization of schools (double shifts, or overlarge class groups) in urban areas.

- “Amount of investment done for equipment and tools” in the TVET subsector. There is no indication of a standard to be achieved, or how close the investment will bring training institutions to that standard.

\(^\text{107}\) ESMTDP, p.111-120.
“Percentage of VET teachers covered under re-trainings”. See comment above on gender disaggregation and on participation in a training exercise being no guarantee of improved competence.

“Percentage of male students” in higher education institutions (HEIs). This is the only gender specific target in the plan. With a baseline of 40.6 percent (overall?) the 2025 target is “50% of social science classes”, but even in the 2005 to 2016 plan the complaint was that too many students were enrolling in social sciences and too few in natural sciences, and that enrollments were not related to needs in the job market. These concerns are not addressed among the KPIs.

“Scale of entrants enrolled in the fields of new qualifications”. No baseline or gender disaggregation, and it is not clear when the courses leading to new qualifications will have adequately trained teachers appointed and be open to enrollment.

Reporting at annual review meetings will encounter the same problem of inadequately defined indicators and targets.

Units responsible for results are designated in the plan, but not at a level that would allow accountability to be assigned. Generally, it is only the ministry (MECSS) or institution (EEC, HEI, Training Providers) that is indicated as responsible. In the case of the MECSS it is not even clear whether responsibility for implementation or reporting rests with the central office or with departments at local level.

4. Equity, efficiency, and learning in basic education

Equity, efficiency and learning in basic education are all addressed in the plan, but the objectives are generally not taken to the level of specific strategic activities. The clear linkages required in a change strategy are missing. In the results framework many of the indicators need to be made more specific, with clear targets and baselines added. Although the focus in this section of the appraisal is on basic education, examples have also been drawn from other subsectors, since there needs to be coherence across the entire plan.

Robustness and relevance of the strategies

There is a wealth of data available in the sector analysis reports and in the EMIS database. EMIS enrollment data are disaggregated by gender, with some disaggregation by location. The sector analysis clearly identifies inequities in access between rural and urban areas. The gender dimension is not strongly emphasized, possibly because overall there is near equity for enrollment in general education, boys being slightly in the majority in primary and lower secondary grades, and girls more notably in the majority in senior secondary. Efficiency and learning are covered in the reports.

Attention is drawn in the sector analysis to the challenges brought about by the two successive changes to the structure of the school system and related issues. These issues have impacted negatively on efficiency and learning.

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108 MIER. Country Report, p.299 gives details of the development and extension of the scope of EMIS using the UNESCO Open EMIS platform, but notes (p.303) the limitation to its usefulness imposed by a lack of human capacity.

As already pointed out, the strategies in the plan are not sufficiently specific to address the underlying causes relating to equity, efficiency and learning. The evaluation of the sector plan running from 2006 to 2015 is not sufficiently incisive to explain why targets have not been met. There are some efforts to build on international best practices, but the strategies are not well enough focused.

It is recommended that the “strategies” and “activities” in the plan, which are mainly higher-level objectives, be broken down into actual activities in the detailed annual plan.

Specific marginalized groups are recognized in the plan, but the targets are too broad to ensure that adequate funding will be channeled to meet their needs.

It is not possible to assess the cost-efficiency and cost-effectiveness of the proposed interventions. It is proposed that a larger proportion of preprimary and general education students be accommodated in private schools, which are more cost-effective for government even though they are subsidized. There is also a suggestion that prefabricated classrooms be considered as a more cost-efficient way of providing for increased enrollment in public schools.

Learning outcomes are bound up with the curriculum and teacher competence. Problems with the approach to curriculum have been elaborated above; and planned efforts to improve teacher competence are not sufficiently well defined in the plan. In particular, the number of course participants is not a satisfactory measure the success of teacher-in-service training. Efforts to improve access to education and learning materials – for students and teachers – via the internet are appropriate but are not adequately converted to costed activities with clear targets. The participation in PISA in 2021 and 2024 will require strong efforts to address learning deficiencies in the classroom if the investment is to be cost-effective.

Change strategies

A “results chain” requires that the various steps required to reach the objective be arranged in a logical sequence. This is generally not the case in the plan. Since activities implicit in an objective have not been stated and arranged in logical sequence it is not possible to show how the objective is to be achieved.

In the area of education quality, curriculum development and teacher competence have already been used as an example. Concern about the relevance of the curriculum, the need for frequent revision to accommodate rapidly changing needs, and a simultaneous concern that frequent changes have affected the quality of primary and secondary education, appear to have paralyzed any feasible short-term action to improve quality. It is proposed in the plan that changes to the curriculum should in part be influenced by child development studies, which have yet to be undertaken.

Further examples may be drawn from the desire for 100 percent school readiness among five-year-olds, the need to increase mastery of basic literacy and numeracy, and to improve mastery of the Mongolian language.

The use of the Program for International Student Assessment (PISA) in 2021 may be regarded as an innovative way of establishing the standard of school education in Mongolia in relation to that of other countries. The hope is that three years later Mongolian students will have improved by five

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110 The Finance and Investment report points out (p.17) that “when planning financing and investment of the education sector, it [the sector] can’t define priorities and programs for each sub-sector and the outcomes, targets, and funding sources according to international standards based on scientific information”

111 ESMTDP, p.13.

112 Aspects of the curriculum have already been explored in the section above on “Relevance of policies and programs”.

113 ESMTDP, p.12.
positions in the ranks of participating countries. While the expectation is that Mongolian students will score quite low in 2021,\textsuperscript{114} there are no clear strategies in the plan to improve students’ creative thinking, reasoning and problem solving skills prior or subsequent to the first round of testing.

**In the area of equitable access,** where enrollment targets are set, there are implications for the provision of classrooms or “seats” in appropriate localities, together with the WASH and other facilities that will provide a child-friendly environment to children having special needs, and for qualified teachers and other staff to be appointed. A “program” would link these activities together in appropriate sequence with a clear indication of costs and responsible implementers. Currently infrastructure provision is a stand-alone activity, with no guarantee that the seats will be provided in the areas of greatest need. There is no specific arrangement to ensure that qualified teachers will be available in sufficient numbers, since this appear to be left to the initiative of HEIs, some offering courses of dubious quality.

**In the area of improved efficiency,** strengthening internal and external assessment of primary and secondary education institutions is the objective,\textsuperscript{115} covering all five years of the plan. Three institutions are identified as being responsible, but the relevant activities to be managed by each institution are not spelled out, nor the sequence in which activities are to be implemented. Funding from the national budget is allocated for the first two years, but not thereafter. The indicator is the proportion of schools that have done internal quality assurance, and had it approved by school boards, with a 50 percent target for 2025 and 100 percent for 2030. If the schools are to conduct their own quality assurance, there will be a need for training new school administrators as the years pass, but the budget will have been exhausted during the first two years.

**Results framework**

**Most of the expected results of the programs relate directly to improved equity, efficiency or learning.** Since many of the “activities” are worded as objectives, it will be difficult or impossible to measure progress towards their full achievement. Even where baselines and targets have been provided, the scope tends to be too broad, so that the specific challenges are not being addressed. While there should be some way of measuring implementation of all activities, “Key Performance Indicators (KPIs)” should be carefully selected to be strongly representative of the key area to which they apply.

In the following examples a quantified result has been specified, but these are not without problems.

- **Equitable access:** The preprimary Net Enrollment Ratio (NER) of 5-year old children: Baseline, 90%; 2025 target, 100%.\textsuperscript{116} This implies that all children of that age who have any disability will also be enrolled. The special measures that would be required in the training of teachers and provision of appropriate equipment are not specifically mentioned.

- **The preprimary access rate of herders’ children:** Baseline, 45.2%; 2025 target, 75%; 2030 target, 100%. This target is for a specified group but is ambitious. Various strategies have already been tried to increase enrollment of these children. The plan needs to be more specific about the numbers of children that will be reached by different approaches. Different strategies might be required for girls and for boys. Reference to specific localities would also be helpful.

\textsuperscript{114}ESMTDP, p55.

\textsuperscript{115}ESMTDP, Activity 3.3.2.1.

\textsuperscript{116}ESMTDP, p.114.
• Percentage of male students in Higher Education: Baseline, 40.6%; 2025 target, 50% in social science classes; 2030 target, 50% in education and health sector. Although male students are outnumbered, it is strange to encourage an increase in social sciences when the desire is to have increased enrolment in natural science and technology (p.17), for which the target has not been taken into the results framework.

• Efficiency: Ratio of schools that have less than 1 in terms of profile shift coefficient: Baseline, 49.3%; 2025 target, 30%; 2030 target, 10%. It seems these schools are largely affected by migration out of the area, and there are no strategies for more efficient use of these facilities. Yet there is no target for a reduction in the percentage of schools offering more than one shift, which is noted as a priority for capital investment.

• Learning: Level of learning achievement of learners from rural areas. No baseline. By 2025 “learning gap less than 1%”; by 2030 “learning gap between upper secondary and lower secondary less than 1%”. It is not clear to what the gap refers: difference in the average performance between all rural and all urban students at a particular grade level? Difference in the percentage of students achieving a defined “pass” standard?

• Quality: “Number of PPE teachers undertaken open, online and distance learning trainings”: No baseline; 2025 target, 50% of total teachers; 2030 target, 80% of total teachers”. There is a similar indicator, (p.116) with no targets, for primary and secondary teachers. Participation in a round of training does not guarantee that competence has been developed.

There have been revisions and elaborations of various areas of the plan (which is inevitable in plan development) but, because of time pressure, consistency checks have not been carried out. One illustration of this is the “KPI” for “Percentage of kindergartens in Ulaanbaatar that do not exceed number of children per classroom not more than 20”. Costing of the plan has been on the basis of a student to teacher ratio (STR) of 30. If the number of children is restricted to 20 per classroom, not every classroom will have a teacher.

Most of the expected results are not expressed as well-defined indicators, nor would it be possible to calculate them easily on a yearly basis. Two examples: “Average level of learning achievement among pupils of 6th grade” and “Scale of schools/training providers that have improved their ICT environment”. There is neither baseline nor numerical target for either. Data for the first is to be

117 ESMTDP, p.120.
118 ESMTDP, p.117.
119 MIER. Country Report, p.106. “Migration from countryside to the capital city is increasing from year to year. Social service institutes, including GSE [General Secondary Education] schools, which are not equipped with enough seats and capacities to catch up on population growth and migration increase. In recent years, intensive measures have been taken such as building new schools and school extensions, in order to eliminate 3 shifts, but without significant decrease.”
120 ESMTDP, p.23. “Currently, the education sector investment policy is aimed at ... eliminating 3 shifts of general education schools.”
121 ESMTDP, p.113.
122 ESMTDP, p.115. Code 2.3.1.
123 It is possible that the appraiser has misunderstood the intention, which is however not clarified in the text of the plan, and that assistant teachers will be taking care of classes without a professional teacher.
124 ESMTDP, p.111.
125 ESMTDP, p.112. This indicator may be inadequately related to “Smart and digital technology”, which is one of the “overarching principles” in developing the ESMTDP but is not adequately included in strategies. The analysis of the pre-primary subsector found that poor access to internet, computer and printer was having a serious negative effect on quality. If the ESMTDP is preparing students to cope with “industrial revolution 4.0”, internet connectivity for all schools and the ability of teachers and students to access it is needed.
collected by the EEC by means of an annual survey; for the second the MECSS and training providers will extract the information from financial reports.

Financial constraints often prevent an objective from being fully realized within the set time frame. It is important on the basis of indicators to be able regularly to monitor progress towards achieving the objective.

A check should be done on Chapter 4 to ensure that sector and subsector level priorities are realistically reflected in the “Implementation strategies and activities” tables as measurable activities. These will then be carried forward to Chapters 5, 6 and 7. In Chapter 7 the key indicators should be highlighted, those which will most clearly show progress towards implementing the objectives of the plan. A further check should then be applied to ensure that the activities in the plan will have adequate funding to achieve the targets (otherwise more modest targets should be proposed).

5. Coherence

The links between objectives in the plan are not sufficiently recognized. The costing has attempted to cover all planned activities. M&E indicators are reasonably consistent with planned strategies and activities, but lack precision.

Coherence among the strategies, programs, and interventions

The broad strategic policies and plan priorities are aligned with the empirical evidence presented in the sector analysis reports. However, sector analysis tends to uncover all deficiencies in the sector. Since financial resources and human capacity are restricted, the objectives and targets for a specific plan period must be limited to what is judged to be most important and feasible.

The plan also, and inevitably, falls short on its commitment to lifelong learning as integrating all that is done within the sector, with complete flexibility of movement between the different institutions and levels of delivery. At present this must be recognized as a vision which can be only partly achieved within the plan period. The parts of a broad vision have to be examined separately to determine specific interventions that can be made.

A lack of coherence is illustrated in the relationship between school and university in the plan. There are a number of objectives which impact on one another, but which are not provided in a coherent way in the plan. University admission requirements are to be renegotiated, university curriculum is to be revised and registered on the NQF126 (but only for a narrow range of university courses), revision of the teacher training curriculum is expected by the MECSS but is not included in the universities’ plan. The universities will not be able to enroll better prepared students unless the quality of school education is improved. The activities implied by the objectives and strategies have not been spelled out in the plan.

Universities are to “harmonize the university admission activities in line with secondary education graduation assessments” which have changed by the extension of the range of elective subjects available in senior secondary schools.127 Joint responsibility for achieving this rests with the MECSS

126 It is understood that for Mongolia the introduction of a National Qualifications Framework (NQF) is a new approach to setting standards and allowing recognition of prior learning. Although the ESMTP tends to give the impression that the mechanism is already operational, there would probably need to be careful planning on the procedures for establishing and expanding the framework to enable it to serve the intended purpose. (Information provided by DP representative.) See also the June 2016 ADB recommendation on the Establishment and Implementation of National Qualifications Framework.

127 ESMTP, p.78.
and “University Consortium”. The possibility that schools should prepare their students for a standard university admission examination appears to have been rejected, but some members of the consortium might prefer such an option.

Of concern to the universities are “graduates who do not meet the requirements of employers” and the small number of university entrants to the priority areas of science and economics. HEIs, it is stated, offer too many qualifications that are not aligned with priority areas of economics and labor market and new programs are needed. This implies a need for curriculum revision which will result in graduates with the skills required in the labor market. This might in part require incentives to ensure that sufficient students enter the degree courses in science and economics.

But at the same time, rather strangely, “students will be enabled to develop their own curriculum”. This seems to rest on a confusion about the philosophy of lifelong learning and recognition of prior learning. Lifelong learning may allow one to study anything one wishes, even if the learning does not match a set of knowledge or skills recognized on the National Qualifications Framework (NQF). Where a teaching institution recognizes prior learning, it can only be because it forms a part of a recognized qualification. A university might allow one to make up one’s own curriculum of unrelated courses, but this would not oblige the institution to award a degree. Any examining body can examine only subjects or components for which it has approved curricula.

It is thus necessary, if resources are to be used responsibly, for HEIs to offer degree courses which are recognized by the NQA and lead to a qualification needed in the labor market. It would also be responsible, so far as this is possible, to restrict entry to courses for which there is an oversupply of qualified labor.

The strategy would be to revise curriculum and register the qualifications on the NQF. Activities, which are not detailed, would involve a prioritization of the courses for revision; identifying teams of subject specialists grouped with specialists in the job market and others knowledgeable about the NQF definitions of levels; having the courses registered; preparing teaching staff to teach the new courses; developing teaching materials that would also be appropriate for remote delivery; and phasing the courses in to the teaching program. What the plan has is a more modest objective which ignores the needs of the greater part of the labor market: “To accelerate the process of curriculum update that is well fit into the national science and econom[ic] sector priorities, labor market demand and NQF”. In the plan the activities are not specified. Other subject areas are ignored. The most closely related indicator is “Scale of entrants enrolled in the fields of new qualifications”, but this does not necessarily relate to science and economics as degree courses.

The preprimary and general education subsectors also have an interest in higher education, since that is where the pre-service training of teachers and assistant teachers takes place, and the poor academic performance of school learners is linked to their teachers’ low professional capacity: the “universities operate with different, unaccredited pedagogical curricula that affect the quality of teachers graduating from these schools”. For both preprimary and general education there is a strategy to develop a “pre-service reference program”. The preprimary subsector also seeks an assistant teacher pre-service training program, developed “in cooperation with related universities”; the responsibility for developing the program becomes squarely that of the HEIs, with funding from

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128 ESMTDP, p.64-6.
129 ESMTDP, p.64.
130 The “heutagogical, connectivist approach”, mentioned on p.37 of the ESMTDP.
131 But see footnote 126.
132 ESMTDP, p.78, 105. Covering years two to five of the plan, with costs to be met from the HEI’s budget.
133 ESMTDP, p.119.
134 ESMTDP, p.55.
135 ESMTDP, p.53, 58.
tuition fees and the HEI budget. This is not recognized under the HEI strategies. The sought-for improvement would have to be brought about jointly by the MECSS and identified tertiary institutions, with the agreed curriculum registered on the NQF and thereafter offered only by universities that can maintain the set standard. It is not clear whether this level of cooperation between ministry and HEIs is currently possible, but the Higher Education National Board (HENB) to be established by 2025 will “increase the autonomy of HEIs” and reduce interference by the ministry and institutes. This might make it more difficult for the MECSS to insist on the inclusion of specific pedagogic skills and subject content in the teacher training courses. The HENB will provide coordination among the institutions, but this would require planning, discussion and phased implementation.

Dissatisfaction has been expressed about in-service training: “Pre-service and in-service teacher development is not standards-based, and the relevance and coherence among these two areas is extremely weak;” further, there is “no linkage between in-service and on-the-job trainings organized at local and national level”. The ITPD, to be restructured, should be managing teacher in-service training. Updating of teacher in-service training programs will take place “in active cooperation with universities, government and NGOs”, and will include “flexible in-service training pathways.” The “updating” of programs is scheduled for year one of the plan for primary and secondary and years two to four of the plan for preprimary; the capacity building covers all five years, and the development of “flexible pathways” years two to four, to be implemented as a new project by international organizations. There is also a mentorship program to be implemented in schools for new teachers in 2023, supervised by IITPD. Measures to ensure coherence across these activities and the implementing institutions are not specified.

There is a logical sequence from the vision of the role of education in modern society to the broad goals for the education subsectors. Starting from a recognition of the knowledge-based society, the description moves to principles for the holistic development of human beings and on to policy directions underlying the plan. The broad educational objectives are outlined under the three headings of (1) quality and relevance, (2) equitable access and inclusivity, and (3) efficient governance, management and coordination, which are then briefly applied to each of the subsectors.

The three broad objectives (“sector level priorities”) are each discussed in a way which shows links among the subsectors, and highlights some of the challenges. The objectives (referred to as “strategies”) are elaborated separately for cross-cutting issues, and for each of the subsectors, in the form of “activities”.

The objectives (“strategies” and “activities”) are not fully coherent with one another within and across education levels.

The “strategies” and “activities” are mostly too broad to allow for specific time-bound, costed, and measurable targets. Most of these “strategies” would better be described as lower level objectives,

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136 ESMTDP, p.54, 73, 100.
137 ESMTDP, p.120. Funding allocated from the national budget for each year from 2021 to 2025. ESMTDP, p.106.
138 ESMTDP, p.66.
139 ESMTDP, p.30.
140 ESMTDP, p.55.
141 ESMTDP, p.50.
142 ESMTDP, p.73, activities 2.1.2.2 and 2.1.2.4 for pre-primary teachers, and p.75, activities 3.1.2.1 and 3.1.2.2 for primary and secondary teachers.
143 ESMTDP, p.100.
144 ESMTDP, p.74. Action 3.1.2.4 for primary and secondary teachers.
145 ESMTDP, p.41-44.
still needing to be broken down into strategies and activities. For example “To implement Mongolian language proficiency assessment and to introduce to all level of education” might require strategies such as (a) introducing the methodology of Mongolian language teaching to all or selected pre-service teacher training courses; (b) revising the school curriculum for the Mongolian language to adequately cover receptive and expressive spoken and written skills and the study of literature; (c) providing detailed guidelines and sample evaluation questions for assessing mastery of the language; (d) developing the necessary teaching and learning materials; (e) providing in-service training for practicing teachers; (f) phasing the introduction of the new curriculum into schools. Each of these would have a cost to be calculated, and each would be implemented via a range of activities.

The descriptive or quantitative outcomes that are laid out are in most cases insufficient to demonstrate impact. Two examples: “To identify and verify the required cross-sector financing mechanism to implement lifelong learning at all level[s] of education activities” and “To improve links between national and local in-service training content and timing, and engage professional universities, government and non-governmental organizations in the trainings” 146

There is no clear statement of links between inputs and expected impact, except that specified increased infrastructure should lead to increased enrollment without overcrowding.

The “action plan” for 2021 to 2025, which forms part of the ESMTDP, allocates “activities” across the five years and indicates the entity that will oversee implementation of each activity.147 Between the broader education sector plan and this action plan there is strong consistency. However, it has already been noted that the strategies are not adequately defined. The chapter on monitoring and evaluation provides for detailed annual plans to be prepared by a sectoral unit (representing ministry, government and non-governmental organizations, and international development institutions) yet to be established.148 There is no built-in mechanism to ensure that the intended implementers will be consulted by what would presumably be a fairly small unit.

Comprehensive costing aligned with the budget

The costing scenario is consistent with the “strategies”. General recurrent costs have been budgeted using the UNESCO EPSSim model. Capital costs have been calculated using the same modelled data together with standard construction costs. The costs of additional “activities” have been separately estimated. Estimated costs are shown in Table 6.2.7.1 (costs to be met from the national budget) and Table 6.5.1.1 (costs of additional activities, whether funded or to be funded).

The cost estimates cover the programs in all subsectors and are consistent with the level of detail in the objectives. The basis of all calculations, per subsector, is clearly set out in Chapter 6.149 The general recurrent and capital costs (totals across the five years 2021 to 2025) allocate 24.9 percent to the preprimary, 60.9 percent to primary and secondary, 9.3 percent to TVET, 3.7 percent to higher education, 0.4 percent to lifelong learning, and 0.8 percent to policy and administration.150 In 2018 the allocations were respectively 23, 46, 4, 9, and 18 percent.151

Cost estimates have been provided for all planned activities, but where activities have not been specified in sufficient detail, it is not possible to judge how realistic the costs are. Some of the costs to be covered from the national budget are not specified, being treated as normal recurrent expenditure for routine activities. This raises the threat that they may be squeezed out by other
routine business. Visits to schools, for example, should be a normal activity for MIER, but has been constrained (partly) by budgetary restraints. If there is no allocation specifically linked to an activity, it might not happen.

The plan does not appear to have been aligned to the national budget classification.

It is recommended that the detailed annual plan should follow the financial classification used for the Plan itself, and should be cross-referenced to the national budget classification. If the ESMTDP itself is revised, cross-referencing to the budget classification could be added.

Coherence of monitoring and evaluation indicators

The M&E key indicators do not adequately allow for monitoring and reporting. The key indicators are simply mostly the objectives (“activities”) in the sector plan. Few have clear targets. Priorities are not allocated. It has already been pointed out that activities are not specified in sufficient detail. Had the detailed annual plan for the first year been provided, this might have gone some way to meeting this deficiency.

6. Feasibility, implementability, and monitorability

The funding gap is large and unlikely to be covered. System capacity is difficult to evaluate, since implementation responsibility is allocated to large entities, whose capacity for specific tasks is not clear. There are a number of references to the need for capacity building, but there is no comprehensive capacity development plan. Means of communication are left to the implementation unit to organize; there are M&E arrangements are left to the implementation unit; there is no specific provision for a local education group (LEG) or periodic reviews. Risks to implementation and mitigation measures are included in the plan.

Financial feasibility

The magnitude of the funding gap depends on the total budget allocated by Treasury to the MECSS. The share of the education sector has been calculated based on the National Development Agency (NDA)’s medium level forecast of GDP, with government’s share growing from 30.6 to 31.4 percent between 2021 and 2025. The education sector is projected to receive 15.44 percent of government expenditure in 2021, rising to 17.32 percent in 2025 and ultimately 20 percent in 2030 “following WB recommendation”. (It is not clear whether the World Bank recommendation has been accepted by government.) This would result in a funding gap of MNT 928 billion in 2021, reducing to MNT 336 billion in 2025 (respectively 31.5% and 9.1% of budgeted needs).

The plan proposes that government allocate a 20 percent share to the education sector from 2021, which would reduce the financing gap to MNT 332.47 billion for 2021, after which there would be no gap. If government does not allocate 20 percent to education from 2021, the ministry would not have investment funds and might not even be able to cover recurrent expenditure.

Cost-cutting measures are not adequately provided for. The plan cautions that government may have to “cut unnecessary spending”; this should be done in any case. Concrete suggestions on cost-
cutting measures do not give an indication of the level of saving that would be achieved. Cost-saving measures include reducing the share of enrollees in public educational institutions; that is, increasing the share of private schools,\textsuperscript{156} increasing to 20 percent the proportion of preprimary learners, and to ten percent the proportion of primary and secondary learners in private schools by 2030 are already included in the plan as intended strategies (In 2019-2020 the proportions were 14.6\% for preprimary and 7.3\% for primary and secondary.).\textsuperscript{157} Should the government not allocate 20 percent of the budget from year one, there would need to be a great deal of cost cutting, which would be difficult since the activities in the plan have not been assigned priority rankings. It is assumed that new activities that are linked to the academic year (such as increased intake of children from herders’ families and other disadvantaged groups) would have to be funded from 1 September 2020, that is, before the start of the new fiscal year (or would they commence towards the end of the 2021 fiscal year, on 1 September 2021?).

**Staff remuneration represents a major cost.** The costing scenario for the plan envisages a student to teacher ratio (STR) of 30:1, despite the objective in the plan of reducing the ratio to 20:1. However, it would appear that for some levels of education the current ratio is lower even than 20:1. The *TVET Policy Review Mongolia* states that in the 2018-2019 academic year the actual average STR for the middle school was 15.0, and for high schools 11.7, in both cases lower than in the previous year.\textsuperscript{158} If this is so, more than half the teachers at these levels will be unpaid; or, what is more likely to happen, recurrent expenditure on teaching materials or on in-service training will be cut to release funds for remuneration.

**Some needs for financial support from development partners are quantified.**\textsuperscript{159} These include projects for the creation of flexible learning pathways for teachers and for learners, improving the capacity of preprimary, primary and secondary teachers employed at local level, improving the infrastructure of education institutions and lifelong education centers. GIZ has committed 500 thousand Euro to develop TVET EMIS in 2021, and the ADB USD 30 million for the development of research universities across the years 2021 to 2025. It is noted that if government is able to meet only recurrent costs, all capital costs in the plan may have to be met from external sources.\textsuperscript{160} On-budget support to the education sector does not appear to be envisaged. The plan does not include information on current donor support to the education sector, which makes it impossible to estimate what support might be provided over the plan period. The GPE contribution, if approved, would probably be USD 5 million over the ten years from 2021 to 2030. There is no indication that any other funds have been pledged, but in 2018 there were at least 24 development partner (DP)-funded activities in the sector, at least six of which continue to 2021 or beyond.\textsuperscript{161} The financial support has been in the form of grants, loans and technical assistance. The plan should give an indication of current support from DPs and the best estimate of support that might be expected during at least the first five years of the plan. This will give an indication of the extent to which it may realistically be expected that the funding gap might be covered.

**The cost of the implementation unit is not indicated in the plan.**

**System capacity**

There is no mention of an existing capacity development plan. In proposing the setting up of an implementation unit for coordinating and monitoring the implementation of the ESMTDP, it is

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\textsuperscript{156} ESMTDP, p.94. It is not indicated whether the private sector would be in a position to take up the slack, and there would still be a subsidy that the ministry would have to provide.

\textsuperscript{157} ESMTDP, p.81, 84.

\textsuperscript{158} Page 61.

\textsuperscript{159} ESMTDP, Table 6.5.1.1.

\textsuperscript{160} ESMTDP, p.94.

\textsuperscript{161} Information provided by the MECSS on request.
indicated that there should be capacity development for those taking on new roles in “the structure”. Human resource capacity is identified as a challenge affecting the sector as a whole.

Reference is made to the replacement of staff for political reasons “every four years”, but it is not clear to which categories of staff this applies. Depending on how extensive the practice is, capacity development might be of little lasting value to the system.

An awareness is expressed of a general need to improve the capacity of staff of “local educational institutions at all education levels”. This should be “needs-based” and attended to through “new projects funded by international organizations due to the insufficient existing expertise and scope of the activities”. If the local education departments and divisions have a role to play in implementing the ESMTDP, these expectations should be spelled out when the full arrangements for implementation are set out. The expected responsibilities should be linked to the positions in the departmental/divisional structure, and an estimate made of the additional skills and additional personnel required for smooth implementation. This should not be delayed to the setting up of a new project.

It is recommended that the responsibilities of the local education offices (departments and divisions) for plan implementation be set out clearly in Chapter 7 of the plan. This should be taken to the level of the positions in the office, and skill deficiencies should be identified.

For central ministry personnel, no specific proposals are made for capacity development, other than training for EMIS staff to enable them to make EMIS more user-friendly. Responsibility for this training is assigned to EMIS. Elsewhere it is stated that “EMIS lacks capacity to analyze the data”. A lack of capacity is identified at statutory bodies within the sector. This is exacerbated by the “frequent change of officers” and the problem of staff retention. These problems are not elaborated. In 2021 the “roles and responsibilities, human and physical and human resources and activities” of MIER, ITPD, EEC, NCEA are to be analyzed and redefined by the ministry, and over the following two years higher education institutions (HEIs) will establish a “university-based human resource development and professional capacity building system” for the staff of these institutions. The plan falls short of indicating when the capacity building itself will take place, but indicates that costs will be covered from “tuition fees”, which suggests that those receiving in-service training will be required to pay for it. Costs for the analysis of roles and responsibilities of the institutions will be met from the national budget.

162 ESMTDP, p.109. This is understood to mean the sector as a whole, not the implementation unit itself.
163 ESMTDP, p.29.
164 ESMTDP, p.42-43.
165 ESMTDP, p.47.
166 ESMTDP, p.10.
167 When, such a project is launched, some of the identified skill deficiencies might be attended to through that project.
168 ESMTDP, p.72.
169 ESMTDP, p.47.
170 ESMTDP, p.25. It is not clear whether the changes of officers relate to political intervention.
171 This is another demand being made on the universities for new training programs for education staff at the same time that they are criticized for inadequate pre-service training of teachers.
172 ESMTDP, p.50, 71.
173 ESMTDP, p.98.
174 ESMTDP, p.98.
The plan indicates that job descriptions “for all positions” require updating.\textsuperscript{175} The roles and responsibilities of local education and culture departments are to be analyzed in 2021,\textsuperscript{176} which would possibly lead to the revision of some job descriptions, although this is not stated.

There is no information in the plan on resource allocations to decentralized levels or their adequacy. This should be explained in the chapter on Sector needs and cost projections. If most of the implementation in the preprimary and general education sectors will be the responsibility of local education departments and divisions, there need to be assurances that they will be able to meet the costs they incur.

It is recommended that an explanation of the mechanism for transferring funds from the central ministry to local departments and divisions and to institutions which depend on government subventions be added in Chapter 6. The explanation should refer to the formula for sharing funds among the entities, the predictability of the disbursements, the requirement for release of funds (recurrent and capital). It should also indicate whether there are human capacity constraints to the smooth operation of the system.

The MECSS has already been receiving support from international and civil society organizations\textsuperscript{177} in the preparation of the sector plan, and it may be presumed that they will continue to assist during the implementation phase. The ADB, GPE, JICA, UNICEF, UNESCO and the World Bank have provided financial assistance to the development of the ESMTDP. No details are included in the plan of ongoing financial support to other activities, The ADB and GIZ support indicated for the first five years of the sector plan may represent activities already initiated. The Save the Children Fund has also participated in discussion of the sector plan. The Finance and Investment report refers to international financial support to the sector between 1997 and 2012, but not to more recent assistance.\textsuperscript{178}

Universities that have been represented in the development of the plan include Etugen University, the Mongolian University of Life Science, the National University of Mongolia, the National Academy of Governance, the National Education University, Otgontenger University, and the State Conservatory University. Civil society organizations participating in development of the sector plan are the Education Alliance, the Japanese Children’s Foundation, the “Lorinet” Education Foundation, the Mongolian Association of Parents with children with disabilities, the Mongolian Employer’s Association, the Mongolian Teacher’s Association, the National Coalition for “Education for All” NGO, the National Institute of Ethics, the “Tugeemel khugjil” independent life support center, and the “Vocational and Training Education Partnership NGO”.\textsuperscript{179} The universities are included as one of the education subsectors in the plan, and are identified as having a role in the professional development of staff in their own and the other subsectors. No clear role for civil society organizations is indicated in the sector plan.

**Governance and accountability**

The plan proposes that the implementation unit should “Develop a communication strategy and well prepared written materials to inform all people in the education sector and the wider

\textsuperscript{175} ESMTDP, p.45.
\textsuperscript{176} ESMTDP, p.71. Activity 1.3.3.1. To be undertaken by the MECSS in 2021, costs to be met from the national budget.
\textsuperscript{177} UNESCO, UNICEF, the Japanese Embassy, the ADB, JICA, the World Bank, the Education Alliance, the Mongolian Association of Parents with children with disabilities, the Mongolian Teacher’s Association, and the Mongolian Employer’s Association have been members of the Core Technical Working Group. ESMTDP, p.138.
\textsuperscript{178} Page 8, Table 1.6, which is elaborated on page 32. It notes that “Investment of ... international organizations and donors in the education sector is increasing” (p.18).
\textsuperscript{179} ESMTDP, p.129-137.
community of the changes and their timing”,\textsuperscript{180} which suggests that there is currently no effective communication strategy.

The transfer of funds to units below the national level is not addressed in the plan, beyond mentioning the payment of a subsidy to private institutions, a “transfer in goods and services”,\textsuperscript{181} student stipends,\textsuperscript{182} and scholarships and education loans for tertiary studies.\textsuperscript{183} These are not new transfers or subsidies. The budget allows for them to be adjusted upward for inflation. The mechanism of transfer is not explained. Specifically, the funding of local departments for education and culture is not explored.

Gender balance has been almost totally ignored in the plan. It is not addressed in relation to educational management. Disaggregation of the school population by gender is commented on in a very limited way, and gender-specific targets are not set for increasing the enrollment of children from herders’ families and other disadvantaged groups. There is a comment on the gender imbalance among university students, and a comment on the predominance of female teachers. Disadvantaged groups, although mentioned in the plan, do not enjoy specific access-related targets among the plan activities, except for children of herders and from vulnerable households.\textsuperscript{184}

Accountability to beneficiaries is not considered in the plan. There is no mention of joint annual reviews. The communication strategy is intended to allow the education sector and wider community to be informed about changes, but no mention is made of reporting widely on the results. The implementation unit has a monitoring function but is required to report only to the Minister of Education, Culture, Science and Sports.\textsuperscript{185}

Similarly, the plan includes no measures to promote transparency. There are no references to periodic reviews.

It is recommended that a mechanism for continuing supervision of plan implementation and periodic reviews be included in Chapter 7 of the plan. Apart from reporting to the Minister of Education, Culture, Science and Sports, the implementation unit should report to a group representative of those who supported the development of the plan (a Local Education Group (LEG), convened and chaired by a Ministry official), and annually to a review meeting with representatives of all stakeholders.

No strategies are included to monitor education expenditure and leakage. Considering the need for additional school seats and dormitory beds, especially in the early years of the plan, it should be noted that over the period 2008 to 2017, only 34 percent of the capital budget was actually spent. This is attributed to “a lack of financial management”.\textsuperscript{186} From the plan it is not possible to conclude whether this reveals a lack of competence within the finance office of the MECSS, or whether funds were not transferred from Treasury. The plan also notes that accumulated income from textbook rent has not been used for the intended purpose, namely for reprinting required textbooks;\textsuperscript{187} and calls for a mechanism to be devised to allow this to happen.\textsuperscript{188} With the magnitude of the projected funding gap, every effort should be made to ensure that there is no leakage, that all available

\textsuperscript{180} ESMTDP, p.109.
\textsuperscript{181} ESMTDP, p.89, 90, 91.
\textsuperscript{182} ESMTDP, p.90.
\textsuperscript{183} ESMTDP, p.91-92.
\textsuperscript{184} For example, Activity 2.2.1.2 on page 73.
\textsuperscript{185} ESMTDP, p.109.
\textsuperscript{186} ESMTDP, p.24.
\textsuperscript{187} ESMTDP, p.57.
\textsuperscript{188} ESMTDP, p.76. Responsibility is assigned to the MECSS and “MOH”, which should presumably be “MOF”.
financial sources are tapped, and that funds available for a limited period are used before they expire.

Risks to implementation and the mitigation of risks

The sector plan contains a table listing five possible risks to successful plan implementation, offering mitigation measures for each and indicating the bodies responsible for overseeing them.\(^{189}\)

The first risk is an insufficient budget which might result from weak economic performance or from government failure to allocate the proposed budget. The plan proposes that the education sector be allocated 20 percent of government spending. This is higher than the allocation in any earlier years. In past years there has also been significant underspending of the allocated capital budget. The proposed mitigation measures are the application of rigorous fiscal discipline, or to look to donors for greater support. The risk that the budget will be lower than hoped for is significant; and there is no evidence in the plan of the level of donor support to the sector in past years, apart from the value of two projects currently being implemented.

The most important mitigation measure to financial risk has not been mentioned, namely, to prioritize the plan objectives and strategies in such a way that, should there be a budget shortfall (which might be beyond the control of government), it will immediately be clear which of them should be delayed. If this prioritizing is not done in advance, it is possible that funds will be committed early in the implementation period to lower priority objectives and activities at the ultimate expense of those that are more important.

The second risk is that of an unstable political and governance environment. The plan reports that education management has been changed “every four years” for political reasons, leading to new managers “abandon[ing] continuity of the previous policy and suspend[ing] the implementation” and initiating “new policy without proper evidences and facts”; this has been “an obstacle for development of the sector”.\(^{190}\) The potential problem appears to relate not to differences in policy between the main political parties.\(^{191}\) As mitigation measure it is proposed “to implement the relevant laws”; earlier in the plan it was proposed to implement a merit-based human resource policy. While the latter suggestion is sound, it requires political will to authorize the policy and allow it to function. It is to be hoped that ministerial involvement in the development of the plan will go some way to ensuring that implementation will not be derailed for political reasons, and that, with national elections looming, the new government will respect the plan and allow mechanisms for appointment on merit to proceed.

Natural disaster is a risk for which it is difficult to plan mitigation measures in advance, as has been shown with the Covid-19 pandemic.

It is recommended that priority rankings be allocated to all activities in the plan, since the strongest guarantee that the most important objectives in the plan will be realized is to have them clearly prioritized. The plan has a logical structure, which should not be disturbed. Each of the objectives or sub-objectives should have attached to it a priority ranking of 1, 2 or 3. Where appropriate, notes should be added to indicate that the level of implementation of a particular strategy might be scaled down by a suggested percentage if insufficient funds are available, but not completely abandoned (or delayed). When the detailed annual plan is developed, similar priority rankings should be allocated to the lower level activities which support the objectives.

\(^{189}\) ESMTDP, p.109-110.

\(^{190}\) ESMTDP, p.42-43.

\(^{191}\) MIER. Country Report, p.60: “Mongolia’s main political parties have unified vision on pre-school education” – although this comment relates to only one subsector.
Another possible risk to plan implementation, which has not been mentioned but should be considered, is the authority chain from the implementation unit to the entities actually responsible for implementation: autonomous or semi-autonomous institutions and education offices at local level. Since much of the funding is from the national budget, there will already be channels for disbursing funds and some degree of choice in how they are spent. The extent to which the implementation unit will be able to override these decisions in the interests of the integrity of the plan needs to be defined. A number of activities in the plan do not have assigned costs but are to be regarded as normal expenditure from the national budget. There is a high risk that these activities will not be fully implemented.

Although human resource capacity has been highlighted in the plan in a general way, there might be a small number of specific threats to implementation arising from the capacity of staff members. If so, these should be identified and prioritized for early attention. The seconding of competent staff to the implementation unit might leave serious capacity gaps elsewhere in the structure of the ministry.

It is recommended that the precise structure of the implementation unit be defined, with an indication of the skills required for each of the positions so that potential candidates may be identified at an early stage and arrangements made to cover their absence from their permanent units. There should be regular liaison with the MoLSP on implementation of TVET activities.

Robustness of the monitoring and evaluation framework

The Results Framework is set out in Table 7.3. Key indicators have not been identified. Indicators are not disaggregated by gender. There are indicators which are specific to the children of herders and “children from vulnerable group”. Beyond this, disaggregation by socio-economic status has not been undertaken. The disaggregation of indicators by gender, where this is possible, should be added.

It is recommended that all indicators in Table 7.3 should identify a clearly measurable result, with clear baseline and targets. Key Performance Indicators should be selected as representative of the main broad objectives of the plan.

The indicators and targets in the results framework are in general affected by not being sufficiently specific and lacking baselines. Potential key indicators, like “Average level of learning achievement among pupils of 1st grade” lack a baseline, targets, and gender disaggregation. It is to be reported on the basis of survey data. This is an indicator which could also distinguish between performance in urban and rural schools, or between different social-economic groups. A specific target for a disadvantaged group is “PPE Access rate of special need children”, with baseline and ambitious targets, but unfortunately not gender disaggregated. While there are indicators to

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192 The recent approval for the establishment of a Department of Strategic Planning within the MECSS, mentioned during the discussion of the Appraisal recommendations on April 16, 2020, offers the possibility of embedding the coordination of ESMTDP implementation and M&E in a department of the Ministry, rather than in a unit outside the Ministry’s structure.

193 ESMTDP, p.111 ff. Table 7.3. Examples: 1.2.2 “Scale of schools/training providers that have improved their ICT environment”; 1.3.1 “Number of educational provisions executed by other parties”; 1.3.4 “Number of additional modules developed for the Education Management System”; 2.2.2 “Number of parents involved in the process of checking food safety in kindergartens”; 3.1.1 “Benchmark for the development of child aged 6-18”; 3.2.1 “Number of schools with enabling environment”; 4.2.2 “Amount of investment done for [TVET] equipment and tools”; 5.1.1 “Scale of entrants enrolled in the fields of new [higher education] qualifications”; 5.2.2 “Number of students in non-degree courses”.

194 ESMTDP, Table 7.3. This relates to “activity” 2.2.2.3 “To increase infrastructure of pre-primary education institutions by incorporating child-friendly and enabling environment for children with special needs.”
measure the rate of participation in teacher in-service training, there are no indicators to
demonstrate an improvement in teacher competence as a result of training.196

It has been noted that everything in the plan is a priority at the same level. If priority levels (1, 2
and 3) are assigned to the objectives, it should be possible to identify key indicators and targets for
each of the subsectors in equity, efficiency, and learning.

There is no clear link between outputs and outcomes.

The output indicators do not in general allow for adequate monitoring of progress.

No arrangements are described for stakeholders to review and validate sector results and
performances.

Whether human resources are sufficient to implement M&E arrangements is not clear, since the
plan assigns overall responsibility to the yet-to-be-established unit. “Responsible bodies” for the
collection of the data are assigned, and include statutory bodies like the EEC, MIER, ITPD, RILSP;
EMIS; Universities; Training providers; the NSO; and the MECSS and MoLSP. Monitoring is to be
based on annually collected administrative or financial data, or through surveys. There is a great deal
of coordination required.

It is recommended that the identification of bodies responsible for implementation in Table 5.1
should be taken to a lower level. “MECSS”, for example, should specify which division will be
responsible. Where responsibility is shared, the lead unit should be identified. Unless this is done, it
will not be possible to determine whether capacity is adequate for implementing the plan or to hold
staff accountable for implementing the plan. Leaving this to a later stage may result in serious delays
in implementation.

The “Local Education Group” (LEG) is styled the Education Donors’ Consultative Mechanism
(EDCM). It has met regularly since February 2018, playing a role in the development of the sector
plan.197 Since it is not mentioned in ESMTDP, it is not clear whether a monitoring role is envisaged
for it during plan implementation. This should be indicated in the plan, together with an indication of
the nature of its membership.

Annual joint sector reviews are not mentioned in the plan. No information was available on a
formal review of the implementation of the previous (2006 to 2015) plan.

The plan includes possible actions to mitigate the potential threats to the implementation of the
plan, but they are not robust.

7. Summary of recommendations

1. DETAILED ANNUAL PLAN. Work on the detailed annual plan for the first year should be
commenced without delay. The possibility of having a three-year rolling detailed plan
rather than an annual plan should be considered.

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196 ESMTDP, Table 7.3. 2.1.2 “Number of PPE teachers undertaken open, online and distance learning
trainings” (Baseline should be indicated as zero; targets 30% and 80% for 2025 and 2030 respectively); 3.1.2
“Percentage of teachers from rural areas participated in in trainings for capacity strengthening” (No targets).
197 Information provided on request.
2. **PRIORITY RANKINGS.** Priority rankings (1, 2 or 3) should be allocated to all “strategic activities” in the plan in a column added to Table 5.1.\(^{198}\)

3. **PRECISELY DEFINED ACTIVITIES.** The “strategies” and “activities” in the plan, which are phrased as objectives, should be broken down into actual activities. This can be done in the detailed annual plan for the first year, which should be developed immediately by the same technical working groups that developed the plan itself.\(^{199}\)

4. **COHERENCE.** “Strategies” in the detailed annual plan should be checked for coherence with other strategies for the same subsector and with strategies in other subsectors. This will allow activities to be structured in the best sequence for effective implementation.\(^{200}\)

5. **INDICATORS, KPIs, AND TARGETS.** All indicators in Table 7.3 should identify a clearly measurable result, with clear baseline and targets. Key Performance Indicators should be selected as representative of the main broad objectives of the plan.\(^{201}\)

6. **IMPLEMENTERS IDENTIFIED.** The identification of bodies responsible for implementation should be taken to a lower level. “MECSS”, for example, should specify which division will be responsible. Where responsibility is shared, the lead unit should be identified. The responsibilities of local departments and divisions should be defined, with implementation roles linked to specific positions within these offices. Unless this is done, it will not be possible to hold staff accountable for implementing the plan. Leaving this to a later stage may result in serious delays in implementation.\(^{202}\)

7. **FINANCIAL CLASSIFICATION.** The detailed annual plan should follow the financial classification used for the medium-term plan, with cross-referencing to the national budget classification.\(^{203}\)

8. **COSTS TABLE INTERPRETED.** The way in which the costs in Table 6.5.1.1 should be interpreted should be explained in a paragraph or two prefaced the table in Chapter 6.\(^{204}\)

9. **TRANSFER OF FUNDS.** The mechanism for transferring funds from the central ministry to local departments and divisions and to institutions which depend on government subventions should be added in Chapter 6. The explanation should refer to the formula for sharing funds among the entities, the predictability of the disbursements, and the requirement for release of funds (recurrent and capital).\(^{205}\)

10. **IMPLEMENTATION UNIT.** The precise structure of the implementation unit should be defined, with an indication of the skills required for each of the positions. This will allow

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\(^{198}\) The plan has a logical structure, which should not be disturbed. Where appropriate, notes should be added to indicate that the level of implementation of a particular strategy might be scaled down in a suggested manner if insufficient funds are available. See pages 32-3, above.

\(^{199}\) See page 24, above.

\(^{200}\) This should be done in Chapter 4 and, as needed, carried forward to the later chapters. An example of the level of detail that is needed for the description of the activities if given on pages 11-13. See also pages 23-25.

\(^{201}\) See page 33, above.

\(^{202}\) See pages 29 and 34, above.

\(^{203}\) See page 27, above.

\(^{204}\) See page 17, above.

\(^{205}\) See pages 30-1, above.
potential candidates for these positions to be identified at an early stage and arrangements put in place to cover their absence from their permanent units.\textsuperscript{206}

11. ACCOUNTABILITY AND TRANSPARENCY. The mechanism for continuing supervision of plan implementation and periodic reviews should be included in Chapter 7 of the plan. Apart from reporting to the Minister of Education, Culture, Science and Sports, the implementation unit should report to a group representative of those who supported the development of the plan (a Local Education Group (LEG), convened and chaired by a Ministry official), and annually to a review meeting with representatives of all stakeholders.\textsuperscript{207}

\textsuperscript{206} It is assumed that staffing will be largely by secondment. See page 33, above.

\textsuperscript{207} See page 31, above.
ANNEX 1: Documents Consulted

**Guidelines for Sector Plan Preparation and Sector Plan Appraisal**


**National Policy Documents**


Organizational charts for (1) NCEA (Accreditation), (2) MIER, (3) National Council for Lifelong Education, (4) Institute of Teachers’ Professional Development, (5) Foundation of Education Loan, (6) Education Evaluation Center, (7) MECSS.

**Education Sector Analysis**


ADB. *Sub-Sector Study Report on Lifelong Education*. April 2019


“Chapter Two. Higher Education Sub-Sector, Accessibility, Equality, Internal Efficiency”. [No title page]

Education and Social Development Center (ESDC) of Mongolia. *Primary Education Sector Analysis in Mongolia*. Final report. October 2019.

*Education Finance and Investment Report*. [Lacks title page]


**Education Sector Planning Documents**


IEG. MN - GPE Early Childhood Education (P125445). Implementation Completion Report (ICR) Review. Closing date June 30, 2015. [Intended to construct 37 fixed equipped kindergartens in urban areas, but only 25 constructed because of rising cost of materials; and 100 mobile kindergartens provided.]


Agendas, attendance lists, and PowerPoint presentations (some not available in English translation) for a number of sector meetings from the time the decision on the development of a sector plan was taken in mid-2018.
## ANNEX 2: Key aspects of credible education sector plans

The questions listed in the table represent critical elements of a credible ESP. Please indicate whether these elements are present in the ESP (including the action plan)\(^\text{208}\) and provide any comments on the aspects that are missing or need to be improved.

<table>
<thead>
<tr>
<th>Questions</th>
<th>Yes</th>
<th>No</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Sector-wide</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. Does the plan cover all subsectors including non-formal education,</td>
<td>√</td>
<td></td>
<td></td>
</tr>
<tr>
<td>literacy, and higher education?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Based on a sector analysis</strong></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>2. Does the ESP summarize key results of the sector analysis and identify</td>
<td>√</td>
<td></td>
<td></td>
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<tr>
<td>key challenges based on those results?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Coherent and consistent strategies</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. Do the general objectives, specific objectives, and activities address</td>
<td>√</td>
<td></td>
<td>Strategies are insufficiently detailed. Coherence within and across subsectors is lacking, for example in the approach to curriculum and teacher competence.</td>
</tr>
<tr>
<td>the key challenges and their underlying causes?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4. Are there any major inconsistencies in the presentation of general</td>
<td>√</td>
<td></td>
<td>The objectives are not converted to clear strategies and activities at “action plan” level, and the “detailed annual plan” has not as yet been developed.</td>
</tr>
<tr>
<td>objectives, specific objectives, and activities across different sections</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>of the ESP (e.g. narrative of the strategies, logic framework, action plan)?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Sound cost framework</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. Has the plan been costed?</td>
<td>√</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6. Are the data presented by education level?</td>
<td>√</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7. Are the data presented by year?</td>
<td>√</td>
<td></td>
<td></td>
</tr>
<tr>
<td>8. Does the cost framework specify the capital and recurrent expenditures</td>
<td>√</td>
<td></td>
<td></td>
</tr>
<tr>
<td>as well as the staff salaries share?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Sound financial framework</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9. Is the financial framework based on official macro-economic</td>
<td>√</td>
<td></td>
<td></td>
</tr>
<tr>
<td>assumptions?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10. Does the financial framework specify the domestic and external</td>
<td>√</td>
<td></td>
<td>External resources are not specified.</td>
</tr>
<tr>
<td>resources allocated to the education sector?</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

\(^{208}\) What the Appraisal guidelines refer to as an “Action Plan” is referred to in the ESMTDP as the “Detailed Annual Plan”.

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39 | Appraisal of Mongolia’s ESMTDP 2021-2030 | April 21, 2020 | Robert West
<table>
<thead>
<tr>
<th>Question</th>
<th>Action Taken</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>11. Does the financial framework specify the financial gap?</td>
<td>√</td>
<td></td>
</tr>
<tr>
<td>12. What is the level of the funding gap as a percentage of the total resources available (including external aid)?</td>
<td>√</td>
<td>Apart from two projects, no pledges of external aid have been recorded in the plan. Funding gap is 17.21%, which would reduce to 2.06% if government were to allocate 20% of its annual expenditure to the education sector.</td>
</tr>
<tr>
<td>Simulation model</td>
<td>√</td>
<td>It would seem so.</td>
</tr>
<tr>
<td>13. Was a simulation model used for testing the policy targets and informing the policy dialogue?</td>
<td>√</td>
<td>The data-filled version of EPSSim was not seen.</td>
</tr>
<tr>
<td>Sound action plan</td>
<td>√</td>
<td>“Activities” are allocated to years. There is, however, a problem in that the activities are more in the nature of objectives.</td>
</tr>
<tr>
<td>14. Was a simulation model used for devising the financing framework?</td>
<td>√</td>
<td>Yes, but the allocation to too broad, e.g. MECSS rather than a specific unit.</td>
</tr>
<tr>
<td>15. Does the action plan contain a precise timeline for each activity?</td>
<td>√</td>
<td></td>
</tr>
<tr>
<td>16. Does the action plan contain a responsible authority for each activity?</td>
<td>√</td>
<td>But the “activities” are not broken down to the level of genuine activities.</td>
</tr>
<tr>
<td>17. Does the action plan contain the total cost and source of funding for each activity?</td>
<td>√</td>
<td></td>
</tr>
<tr>
<td>Monitoring tools and mechanisms</td>
<td>√</td>
<td>The whole matter of monitoring is left to the yet-to-be-established implementation unit, with no guidance on structure.</td>
</tr>
<tr>
<td>18. Does the ESP contain a description of the monitoring tools and mechanisms that will be used to monitor progress, or mention a plan to develop them?</td>
<td>√</td>
<td></td>
</tr>
<tr>
<td>Clear roles and responsibilities defined for the implementation and monitoring of the ESP?</td>
<td>√</td>
<td>Not sufficiently clear.</td>
</tr>
<tr>
<td>Sound indicators</td>
<td>√</td>
<td>Most of the indicators are not well defined. Most targets are not clear or measurable.</td>
</tr>
<tr>
<td>20. Are most of the indicators well defined, meaning they contain a target, a timeframe, and are measurable?</td>
<td>√</td>
<td></td>
</tr>
<tr>
<td>21. Do most objectives have corresponding outcomes, and do most activities have corresponding outputs?</td>
<td>√</td>
<td>Broad outcomes are given, but there are few defined outputs.</td>
</tr>
<tr>
<td>Capacity development</td>
<td>√</td>
<td>The capacity of the Ministry at local levels, for example, is not analysed. A need for restructuring is expressed. But the structure is the responsibility of the respective aimag governors.</td>
</tr>
</tbody>
</table>
| Strong government leadership  
23. Did the ESP’s preparation process demonstrate strong leadership of the government? | ✓ |  
|---------------------------|---|  
| Broad stakeholder participation  
24. Did the preparation of the ESP involve a participatory process that included a broad range of stakeholders: central government, decentralized levels of government, civil society, teacher unions, nongovernmental organizations, and development partners? | ✓ | The evidence points to participation of a broad range of stakeholders at central level, but limited participation from decentralized levels (both government and stakeholders). |