

## Executive Summary

MEC is independent, and is not subject to direction from either the Afghan government or the international community. It was created through Presidential Decree 61 after the need for an autonomous anti-corruption monitoring and evaluation body was identified at the London and Kabul Conferences.

MEC focuses on:

- Developing anti-corruption recommendations;
- Monitoring and evaluating the anti-corruption efforts of the Afghan government and the international community; and
- Reporting on a regular basis to the President, Parliament, and people of Afghanistan, as well as to the international community, about the state of the fight against corruption.

MEC is carrying out reviews of Ministries' anti-corruption plans. Almost all Ministries have developed such plans and so far MEC reviewed four of these plans.<sup>1</sup> In the 2017-2018, the Ministry of Higher Education committed to implementing an Anti-Corruption Plan. This MEC report is the review of that Plan.

During the review and analysis, MEC's findings indicate that to some degree the MoHE worked to implement their Anti-Corruption Plan which consists of 25 activities, and eight indicators to achieve eight objectives.<sup>2</sup> But these efforts are not meeting the MoHE's outlined in the objectives of the ACP and as well as some main issues that had to be focused on.

The activities and indicators in the Plan are largely relevant to those functions and processes of the Ministry which are potentially vulnerable to corruption. However, the problem with the Plan is its baselines, which are virtually non-existent.

One of the main findings of this Review is the need to properly collect revenues from private educational institutions. The Plan also stipulated the establishment of a board or committee to monitor and evaluate the Ministry's performance. However, during the research phase of MEC's Review, this had not been established. In addition, the problem of students not writing their theses still exists, and there are no actions in the Plan to address this.

MEC hopes that the recommendations contained in this Review will be properly looked upon by the Ministry and will be taken into consideration in drafting a new ACP.

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<sup>1</sup> <http://mec.af/index.php/reports/ac-plan-reviews>.

<sup>2</sup> Internal document, Parliamentary Legal Department, MoHE, August 29, 2017.

## Recommendations

1. To conduct comprehensive anti-corruption risk assessment in the Ministry in order to understand the main vulnerabilities;
2. To assign this risk assessment to an independent institution/organization; and
3. Based on the results of the assessment, draft a new comprehensive Anti-Corruption Plan for upcoming year(s);

No.	Recommendation
1	The MoHE in collaboration with the Ministry of Finance should develop a monitoring and evaluation mechanism to ensure that private institution revenues are properly collected.
2	The MoHE should develop a mechanism to solve the issue of later admissions of students (after the Kankor entry examination) in private higher education institutions.
3	The MoHE, along with the Directorate of Higher Education Institution (DoHEI), should develop a mechanism to ensure that the students are regularly participating in on-site program classes.
4	The MoHE, along with the DoHEI, should establish a mechanism to ensure that the students themselves are writing their thesis, and not paying others to do it. This is crucial for ensuring academic integrity.
5	The MoHE should recruit all director-level positions based on the Civil Service Law, Article 23.
6	The MoHE should fill the Acting Director positions through a competitive process using relevant qualified professional bodies.
7	The MoHE should establish an effective monitoring and evaluation mechanism for the entire processes of the establishment of private higher education institutions to prevent or reduce the risks to corruption in relevant process.
8	The MoHE should launch the regular follow-up in Ministry of Justice (MoJ) for the further process of higher education's regulations.
9	The MoHE should develop its budget based on its department's needs.
10	The MoHE should establish monitoring mechanism to make sure that the students' food allowance money is transferred to their accounts on monthly basis.