Independent Joint Anti-Corruption Monitoring and Evaluation Committee

VCA Report on the Certificate Issuance Process in Four Central Universities in Kabul

(translated from Dari)

Kabul

October 2013

Acronyms

IARCSC	Independent Administrative Reform and Civil Service Commission
MEC	Independent Joint Anti-Corruption Monitoring and Evaluation Committee
MoHE	MoHE
NPP	National Priority Programs
MSI	Management Systems International
USAID	United State Agency for International Development
UN	United Nations
VCA	Vulnerability to Corruption Assessment

Contents

The VCA objective

The purpose of conducting a VCA on the certificate issuance process is to identify the forms, sources, implications, and extent of corruption and vulnerabilities to administrative corruption; present appropriate recommendations in order to improve and speed up the working process; and to protect the process from potential vulnerabilities to administrative corruption.

Introduction to MEC

i.   The Committee

As suggested by its name, MEC is an independent joint Afghan/international committee. The Committee was established based on the Presidential Decree 61 (March 18, 2010) after the need to monitor efforts to fight corruption was identified. The Committee is composed of six reputable experts, three of whom are Afghan and three who are international. National members of the Committee are appointed by the President of Afghanistan and the three international members are proposed by the international community.

The purpose behind the establishment of MEC is to oversee the Afghan government and international community's performance in the fight against corruption independently and in a precise manner. Additionally, the Committee is responsible for developing recommendations and benchmarks directed to national and international institutions and to monitor their implementation. The Committee prepares reports on the progress of the benchmarks and its activities every six months and presents it to the President, the National Assembly, the Afghan public and international community. Likewise, the independence of MEC has been recognized as an irrefutable principle by the Afghan government and international community that has provided the Committee with power to conduct its work effectively.

ii. MEC Secretariat

MEC is supported by a technical secretariat comprised of national and international staff. The Secretariat is led by an Executive Director and is divided into three main pillars (Governance, Prevention, and Law Enforcement) consisting of an international expert, a national advisor, and a national officer, with over-arching policy expertise provided by a Senior Policy Advisor. The Secretariat works closely with the parties implicated by the recommendations and benchmarks to ensure that they are implemented. The Secretariat also consists of a VCA Unit responsible for undertaking the VCAs.

iii. The VCA Unit

Part of MEC's mandate is to provide recommendations to institutions to improve their working procedures and processes in providing public services. This objective requires precise identification of vulnerabilities to public services and other agencies' functioning procedures. In 2012, MEC, in partnership with MSI, established a VCA Unit within the MEC Secretariat to conduct VCAs covering a variety of public service areas.

VCAs are a mechanism used to identify susceptibilities to corruption in government processes and develop strategies to reduce the vulnerabilities. The VCA Unit began operations in September 2012.

I. Report Summary

i. Context

In light of the challenges caused by more than the three decades of internal war, Afghanistan is unfortunately a country with a high level of illiterate people. After the collapse of the Taliban regime in 2001 and the establishment of the interim administration, reconstruction and reform of universities and higher education institutes have been a focus of the Afghan government. Development of education has paved the way for the more than 8 million of the youth and teenagers of the country and has visibly increased the demand of the new generation for higher education. However, the newly established government could not satisfy the expectations of the young generation in gaining higher education at the beginning, but MoHE has facilitated higher education for more than 250,000 Afghan students both inside and outside of the country despite the challenges in doing so. A large increase in the number of students in universities is an achievement for the government - especially MoHE - but there are still obvious challenges, such as low quality education, and low attention to students' problems and corruption. Therefore, some problems and deficiencies in the issuance of educational certificates in universities and the MoHE have come to exist, which in some situations leads to corruption or increased opportunities for corruption.

The issuance of educational certificates is a service that should be provided by the universities to the graduating students. The role of MoHE in this area is to design and compile rules, regulations, policies and procedures. To fulfill this role, the Ministry prepares and distributes circulars in different areas for universities to execute. In addition, MoHE monitors their implementation in universities and higher education institutes and maintains coordination between higher education institutes and the rest of national and international institutions in order to address problems.

The VCA Unit has assessed the legal framework; organizational structure and human resources; de facto practices; and the document information management system of the process. As the specific objective of the VCA team is to identify and specify the vulnerabilities to corruption in the process, it has not confined itself to one research method, but has used all the tools and research methods required to reach its goal.

ii. Findings

The VCA Unit has tried to collect study and analyze all relevant legal documents in the process of issuing educational certificates with the cooperation of assigned officials. The legal documents provided to the VCA Unit dated March 3, 2009 by MoHE staff relate to the procedure of issuing certificates to students of higher education in Afghanistan and to students across the border and the procedure of issuing certificates date on April 2009. In addition, the organizational structure, job descriptions and a case study based on a processed file from the archive is included in the data collected.

After study and analysis of the documents collected the VCA Unit identified two valid written documents, the first of which is the certificate issuance procedure 2009. Despite being a good document, it has some ambiguity in the third sub-article of article two, the first sub-article of article four and article eight which results in problems for the applicants when applying to get

certificates. That being said, the other procedure of distributing certificates is regretfully unprofessional and very simple which makes the process ineffective.

Furthermore, the VCA Unit in order to identify the vulnerable points to corruption in this process has assessed the organizational structure, human resources, actual performance and the documents and information management system. In addition to the collected legal documents and sample file; information was collected by conducting a focus group with the participation of professors, students and different levels of employees involved in the process from five central universities; special and individual discussions with relevant senior officials of the universities and MoHE; observations of the actual performance of various employees; and interviews with 10 people including the employees and applicants.

The information collected from the different sources shows that there is a structural deficit in the administration of universities; a lack of required equipment in a number of universities; low capacity of employees; and a mix of administration and academic sections leading to weak performance in the certificate issuance process and less attention being paid to the problems of the applicants. Based on these observations, the only thing noticed in the legal framework of the process is that students applying for English certificates should provide proof showing their serious necessity for having certificates in English. Applicants should provide documentation from a credible national or international authority indicating that they are actually required to provide documents in English. In the case of scholarships outside of the country they should have a formal letter from the relevant authority. In addition to all of this, the applicants sometimes wait a long time for the responsible person, who is teaching at the same time, to come back to the office and sort out the applicant's problems.

The unorganized and dated filing and information management system given rise to the accumulation of documents which on one hand has inhibited access to the required documents and on the other hand endangered their security in case of fire or any other incident. In addition, gaining access to the documents takes a long time and is time consuming taking weeks to provide the required documents to the applicants from the archive.

iii.   Vulnerabilities to corruption

Generally, the responses of employees and applicants to the questionnaire and the rest of the information collected from different sources clearly highlights the points in the process vulnerable to corruption. Despite being part of the administration professors and employees confessed that the process is vulnerable to corruption in most situations. The weak legal framework; the tens of applicants who get no result after one to three months - specifically in English - due to various reasons such as the lack of paper to print certificates; the interference of Parliamentarians, high level judicial officials, and government officials in the internal affairs of universities, particularly in issuing certificates; and the lack of blank copies of the certificates in English are notable points which have led the process to corruption. Facts such as time consuming delays the process of work and causes dissatisfaction to the visitors.

Additionally, structural challenges like long and complicated bureaucracy; asking for official letters to get English certificates; the cross-checking of letters with the Afghanistan Investment Support Agency to verify the companies giving letters to the applicants; the low capacity of the employees; the non-existence of working material and equipment; scattered filing and

information management system; lack of a clear mechanism to follow up activities of employees; lack of a clear procedure and guidance for the applicants and the absence of Assistants of Students Affairs Department due to the engagement with teaching simultaneously during official duty hours are all issues that have been extracted and identified.

iv.   Recommendations to address vulnerabilities

Recommendations presented in this report based on the identified vulnerabilities in the four areas covered by the VCA concentrate on policies, procedures, and regulations in the Ministry; the assessment of employees and solving their problems; the development of programs and for building the capacity of employees; equitable distribution of privileges and salaries to the employees of the process and the rest of the Ministry; developing a monitoring mechanism for the process; simplification and rationalization of working procedures; reform of the current archive system to guarantee the security and confidentiality of the documents and information; establishing an electronic system for documents and information management and most importantly setting up a "one stop window" system in order to disrupt the contact between employees and applicants; and the determination of a specific time period for processing applicants' requests.

II.   Preface

Three decades of war did not just destroy the infrastructures of Afghanistan with the death of thousands of people, but it also destroyed the cultural and academic institutions of the country which once had significant status in the region. In addition, the war has changed the atmosphere of academic institutions to one of an undesirable political and ethnic environment. Forced migration of intelligent and experienced professors to neighboring countries and other parts of the world; the involvement of professors in unprofessional activities to secure their livelihoods; and unreasonable interference of governing regimes have all attributed to the disorder of academic institutions.

After the collapse of the Taliban regime and the emergence of international forces in 2001 and the establishment of Afghanistan's Interim Administration, some professors and academics have received higher education at a superior level from around the world. These individuals understand the situation and inspire hope that the country is going towards development and is returned to the country with the framework of academic institutions as a top priority. The recent leadership policies of the Government of the Islamic Republic of Afghanistan based on support and innovations in academic institutions has brought new changes in the construction of these institutions.

NPP 3 – with a priority of paving the way for higher education within the human resources development section - has been approved by the Afghan government and the international community. It concentrates not only on the challenges of higher education, but all the development areas of human resources and has opened the door to the hope of having quality academic institutions for the future of Afghanistan. The special attention of the President of Afghanistan in developing higher education resulting in hundreds of youth going abroad on scholarships to attain Bachelors of Arts, Masters, and PhD degrees in different faculties demonstrates the interest of senior government officials in higher education. Despite all the

efforts higher education - like other government sectors – faces challenges paving the way for corruption in the academic institutions of Afghanistan.

i. Situational analysis of the certificate issuance process

The MoHE like other bodies of the government has a series of significant challenges like the lack of capacity and the lack of sufficient equipment to address issues faced by students studying in universities inside and outside of the country. The issuance of certificates to graduates in the context of the current challenges in the Ministry and at the university level, the large number of students in the country, and the level of fabrication and alteration of documents, are examples of the problems that contributed to the challenges in the process of issuing certificates.

In addition, corruption has emerged due to various reasons like the security situation, weakness in the rule of law, weakness in implementation award and punishment system, lack of sufficient employees in providing services, inexistence of an administrative and standard system, unreasonable influence and pressures and the other vulnerabilities and problems mentioned in this report.

ii. The need for a VCA

The certificate issuance process is not only encountering various challenges, but all the activities done by the government to improve and develop academic institutions is under the purview of a number of opportunist and corrupt people. This problem has led to graduates who are not able to get their certificates easily and within a specified time speaking out. MoHE as the responsible authority has recently developed and compiled a procedure in order to arrange everything accordingly and to prevent corruption to influence the administration. However, the temporary policies of the MoHE related to certificate issuance, despite being effective in preventing corruption, have in some cases led to challenges that compel graduates to pay bribes.

In order to identify the vulnerabilities of this process to corruption, MEC has developed and conducted a multilateral assessment and presented its professional and technical recommendations to the MoHE and academic institutions for the tangible improvement of the process. The task has been identified as a top priority for the Committee and the vulnerability to corruption assessment has been conducted by the VCA Unit.

iii. Entities involved in the certificate issuance process

MoHE including universities in Kabul, polytechnic, Kabul Medical University, Educational University of Martyred Professor Rabbani and Kardan and other higher education institute have been directly assessed in relation to certificate issuance vulnerabilities to corruption.

iv. Areas covered by the VCA

After a preliminary assessment which included consultation with relevant high ranked employees, the VCA was developed in relation to the following four areas of the process:

- Legal framework
- Organizational structure and human resources

- De facto practices
- Document and information systems

v.   VCA methodology

a. Data Collection

Since the objective of the VCA Unit is to recognize and identify vulnerabilities to corruption, it has not limited itself to one specific research method, but has exploited many research methods where needed. The VCA aims to identify specific corruption vulnerabilities within the process with full confidence based on logical reasoning, not just in the payment of bribes or embezzlement as highlighted under article (3) of the *Anti-Corruption Law* or the United Nations Convention Against Corruption.

The VCA Team has used the following resources and methods to obtain information:

- General media studies using desk research;
- Open discussions with key officials and individuals involved in the process;
- Study and analysis of legal and procedural documents;
- Exclusive interviews with 20 people involved as beneficiaries or service providers;
- Focus group meetings;
- Daily observations of the team members.

b. Data evaluation and analysis method

Given the importance and sensitivity of the assessment, the VCA team tried to reflect the vulnerable points objectively based on the collection of available information without any gaps or through the assessment and analysis of all the information collected from different sources.

c.   Methods for identifying vulnerabilities

The process for identifying vulnerabilities to corruption is based on the contents of article (3) of the *Anti-Corruption Law*. Article three identifies the following acts as corruption: Bribery, embezzlement, stealing documents, wastage of official records, transgressing the legal scope of authorities, misuse of duty, hampering the process or disrupting law enforcement, using governmental facilities and official time for personal affairs, refusing to perform duties without legal justification, concealing truth, illegal increase of asset, forging documents, pretending to have the power to do an act which is outside the scope of official power, receiving gifts to perform a job, negligence, lack of observation of the organization's regulations, involving ethnic, regional, religious, linguistic, partisan, gender and personal considerations in performing assigned duties, and performing or refusing to perform other acts stipulated under the *Anti-Corruption Law*.

In consideration of all the documents obtained throughout the assessment process and the standards required for the identification of vulnerabilities to corruption, the vulnerabilities identified are stated in this report numerically with essential explanations. The identified vulnerabilities have been reasonably assessed in accordance with cause and effect.

d. Methods of providing recommendations

Solutions to remove vulnerabilities to corruption commonly come to light naturally as concepts that are opposite to the identified vulnerabilities. Recommendations must be meaningful and free of ambiguity and contain substantive managerial and implementing approaches.

e. Methods of ordering and arranging main titles

This report is prepared and organized based on the contents of the questionnaire. The questionnaire has been administered to twenty (20) people and is comprised of four sections with every section containing a minimum of five (5) questions. In this report, those four sections are represented as main titles and its questions as sub-titles. The qualitative information in relation to every question of the interview has been reflected briefly with omission of repetition. The remaining information collected from different sources was considered in the analysis and assessment and in identifying the vulnerable points. Some parts reflect information without mentioning the source.

III. Assessment of the Legal Framework and Legislative Documents Related to the Process

The legal framework of a process consists of all legal and administrative documents including articles of law, regulations, legislative decree, and approvals of Council of Ministers, ministries' approved procedures and other policies which are obligatory to be followed by the institutions.

The existence of a proper legal framework will help in a particular area of work and will be more operational to conduct a process. It is also considered as an effective preventive method to corruption. Sometimes a misinterpretation of an article or a term in a legal frame can cause confusion and help perpetuate corruption. Therefore legislators are responsible to anticipate whole concepts and reflections of an article when developing law, regulation, decree and procedures.

While understanding the significance of the issue, legislators prepare legal documents; legal documents can weaken the effectiveness of a legal framework and introduce vulnerabilities due to the passage of time, administrative changes, lack of tools for the execution, and improper understanding. Accordingly, the occurrence of this phenomenon is likely to happen in the process of universities and higher education institutions' certificate issuance. Therefore, the VCA Unit takes into consideration its legal frame to distinguish challenges and vulnerabilities to corruption in addition to assessing other aspect of the process.

i. Interviewees' perspective of the legal framework

Six questions have been raised amongst 10 people concerning the legal and administrative framework of this process, including professors, graduates and high ranking officials. Having received their responses, all dimensions of legal and administrative frame become evident. In addition, sources such as the views of focus group participants, the observations of researchers, and the study and analysis of legal and administrative documents have been considered in the analysis.

Picture 1 provides an overview of responses of interviewees
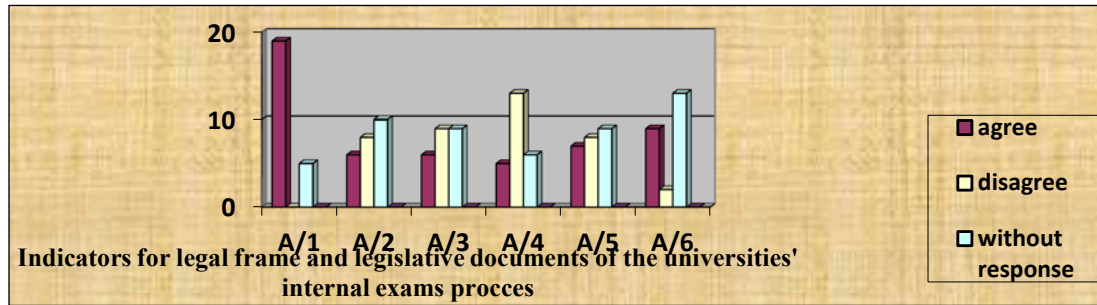
ii.   **The existence of legislative documents**

This question has been put to 10 interviewees, of which 8 were aware of the procedure in this area. One interviewee denied the existence of procedural and legislative documents and the last one expressed ignorance of the issue. In reality, the findings validate the existence of legal and administrative documents.

The VCA Unit tried to gather and analyze all related legal and administrative documents relevant to the certificate issuance process. The legal documents provided to the VCA team by officials from the ministry and Kabul based universities are below:

- Regulation for educational certificate attestation

- Procedure for the distribution of diplomas for the graduates of higher education institutes in Afghanistan and abroad

- Guidance for the distribution of diplomas

iii.   **Sufficiency of the legal framework**

This question was raised with 10 people, of which two interviewees believe that the documents are insufficient. Two people thought that the documents and procedures were perfect and the rest expressed ignorance about the matter. The following vague and vulnerable points have been identified in the three legal and administrative documents based on information received from other sources.

a.   **Regulation to attest educational documents, October 17, 2011**

The VCA's study and analysis indicates that this regulation is particularly for the attestation of educational documents from abroad and does not include attestation and issuance of documents inside the country.

b.   **Procedure for the distribution of diploma to Afghanistan's graduates**

Study and analysis of this procedure shows that it is precise in relation to the current situation of higher education in the country and has less areas vulnerable to corruption. However, paragraph 3 of article 2 is one occasion in which students are likely to face challenges from officials. It states: "*To provide facilities for graduates who are applying for higher education.*"

This article highlights the goal of this procedure, which has been explained thoroughly in paragraph 1 and 2, but these facilities are being offered for graduates who would like to apply

for higher education only and creates barriers for students who just want to have their diploma in English and are not interested in higher education.

Accordingly, if an official wants to abuse this article they can ask the applicant to prove their intention to pursue higher education. As such, the student will find himself with difficulties in order to present a document sometimes resorting to create fake documents from the student's department or to paying-off the official. Either way can end up in corruption.

The other issue which had been raised as a concern by focus group participant's dated January 6, 2013 in Kabul University is paragraph 1, of article 4 which states:

> *Graduates who have not completed their thesis, seminars or related projects, will not be granted diploma and transcript and will not enjoy the benefit of it.*

This article sets seminar, thesis and other related projects as a pre-condition for the distribution of a diploma. However, thesis and any other related projects to diploma have different significances in universities based in Kabul. In some universities and faculties thesis is part of credit and curriculum, but in other cases is being demanded by universities which have no effect upon the total received marks. As a result, hundreds of students cannot obtain their educational documents and are wasting their time pursuing temporary certificates and educational documents despite having proper records and credits. This article stops universities from providing students with diplomas and deprives them of the benefit of their education. Participants of the focus group suggested that either the article needed to change to include thesis in the curriculum or remove it so as to ease the burden of presenting thesis.

The other point that needs more explanation and clarity is the ambiguity surrounding the required information in article 8 of this procedure which states:

> *Faculty and related higher education institutes are obliged to provide all necessary information for the department of students. In return the department is responsible to assess and ensure all reports in written or by email.*

Although forms have been provided to collect information in the majority of universities, the "required information" or "necessary information" needs to be clearly set out to avoid the subjectivity of officials and ambiguity of the information required.

c. Manual for the distribution of diploma dated March 2011

One more document which is currently in force in the process of diploma distribution is a "manual for the distribution of diploma" (March 2011). The philosophy of its existence is to simplify the working procedure for distributing educational documents. In fact, this document is the guidance for distribution process of diplomas. This document was discussed during the focus group meeting dated January 6, 2013. Unfortunately, it has been written so briefly without elaboration required for instructing officials. Therefore, it needs to be replaced by a new clear and comprehensive mechanism or it should be reviewed and broadly edited with additional forms and guidance developed and attached.

iv.   Personal decisions in the process

One person out of 10 with whom the question has been shared believes that the legal documents of the process are paving the way for personal decisions of directors and authorities of institutions. Two people denied the existence of personal decisions due to the clearness of legal documents and the rest expressed ignorance. Information coming from other sources establishes the grounds supporting the existence of personal decisions due to the inadequacy and unresponsiveness of the legal documents and current procedures.

v.   Execution of the legal framework

The 10 interviewees had different opinions regarding this question, with three believing in the observation and execution of the legal framework, four complaining about the non- observance of the legislative documents, and three expressing ignorance. Based on the information gathered from other sources, some wrong doing and non-observance of the procedure is due to vagueness of the procedure itself. In general, this procedure is in force in all universities except when internal influences get in the way and are imposed on officials.

vi.   Enforcement of the legal framework

This question was raised with 10 people, from whom one person has a positive response, four were against and five who expressed ignorance. The fact is that breaching administrative orders has punishment according to the *Civil Servant law*, which starts from giving feedback, or a warning and ends in termination.

vii.   Mandatory requirements of the legal framework

This issue was discussed with 10 people from whom five have positive responses and five expressed ignorance. Other informative sources indicate that obligatory provisions exist, but there are also exceptional circumstances that create obstacles in the implementation of legal framework with officials in charge having the ability to demonstrate flexibility.

viii.   Vulnerabilities related to the legal framework

The assessment indicates that there are two documents in force - the distribution of educational documents (diplomas) for graduates from higher education institutions in Afghanistan and overseas (March 20, 2009) and the guidance for the distribution of diplomas (March 2011). The vulnerabilities below have been identified in this legislative document as a result of analysis, interviews, observations of the execution of this decree and other informative sources:

The existing legal documents include the following articles that limit the distribution of diplomas to graduates based on illogical conditions which contribute to corruption:

- Part 3 of article 2 of procedure for distribution of diploma limits the distribution of diplomas to graduates who provide proof that they are continuing their higher education above a Bachelor's degree. Therefore, based on this article graduates who are not able to provide proof or who have stopped their education are not eligible to receive their diplomas.

- Paragraph 1 of article 4 stipulates the provision of thesis which has already deprived a large number of graduates from receiving their diploma and gives rise to administrative corruption.

- Article 8 requires ambiguous information which is not clear to graduates thereby allowing misuse by university officials to solicit bribes.

Shortfalls in the implementation mechanism of the legal documents also make the process vulnerable to corruption

- There is no mechanism in existence to implement the procedure of distribution of diplomas to graduates. The manual developed with the coordination of IARCSC is a good step taken to simplify the process, but does not include all aspects of the process and contains shortfalls and ambiguities

- Although this procedure is in force in all government universities, it is insufficient and irresponsive (as set out in this report) and lacks obligatory requirements that has given rise to subjective decisions of staff.

ix. Recommendations

a. MOHE in consultation with universities should revise and bring necessary changes to the articles related to the distribution of diploma and have it approved by the ministry, aiming to prevent the opportunity for corruption.

  - **Responsible entity:** MoHE and the Central Universities

  - **Deadline:** 1 month after issuance of the report

b. MoHE in consultation with the universities should operationalize a mechanism aimed at the effective implementation of the legal documents in the process which should include guidelines, timeframe for activities and standard forms and disseminate it via a circular to all public and private universities.

  - **Responsible entity:** MoHE

  - **Deadline:** 3 months after issuance of this report

c. MoHE in consultation with universities should come to a decision to either include submission of the diploma into the curriculum for all universities or dispose of the condition in which diploma distribution depends on the completion of thesis

  - **Responsible entity:** MoHE

  - **Deadline:** 1 year after issuance of the report

IV. Organizational Structure and Human Resources Related to the Distribution of Educational Documents

The organizational structure and human resources is the most important part of an entity, which becomes functional by having the necessary tools, skills, material, motivation, commitment and opportunity for the execution of planned activities and to help reach the goal of observing the legal framework and working procedures. The sufficiency of an organizational structure depends on foundations such as sound and smart human resources, a standard legal framework, political support, a comprehensive strategy and policies, proper working environment, appropriate terms of reference, leadership and healthy management.
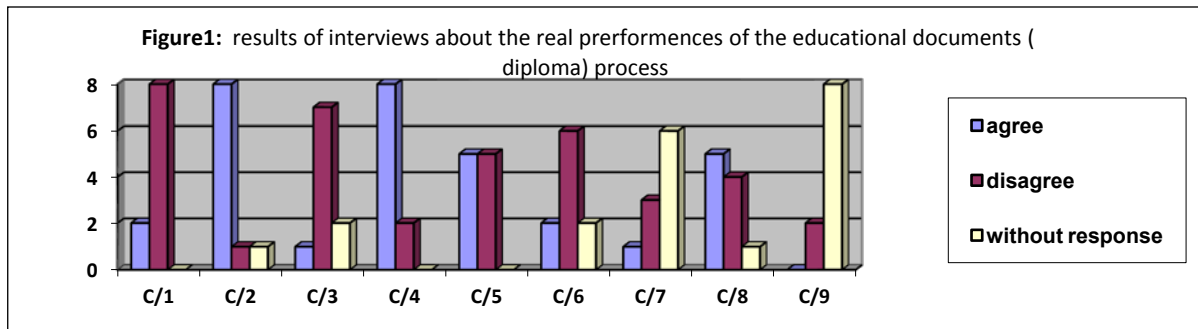
As such, attention was paid in this assessment to the organizational structure and human in order to reveal deficiencies and vulnerabilities to corruption and to identify necessary measures to improve and fill gaps through sound recommendations.

The results show that certain foundations are in place including an organizational structure, terms of reference, human resources, and other tools. However, a lack of a compiled policy and strategy, a comprehensive working procedure, political support, a working plan, and a lack of healthy leadership and management at different levels have all together contributed to the inadequacy of officials' activities in the process, which are elaborated below.

i.   Interviewee's perspective of the human resources structure

To identify vulnerabilities to corruption 7 questions were discussed with 10 people including high levels officials, teachers and graduates. The responses received, plus other documents and evidence from the ministry and observations in the course of assessment all helped to identify vulnerabilities to corruption.

Figure1: results of interviews about the real prerformences of the educational documents (diploma) process

ii.   Sufficiency of human resources

Four people out of 10 participants believe that the human resources are perfect and sufficient, while five people talked about insufficiencies in the human resource sector. One person expressed ignorance upon the issue. In general, on the basis of information gathered from various sources the current organizational chart is too limited and brief in comparison with the scope of work and number of visitors. Current staffs are under pressure and the work is not going fast enough to satisfy applicants' demands.

Based on the students' affairs section of some universities, no one has been recruited to fill the position for the grade five. Most challenges due to the lack of staff would be eliminated if posts were filed by qualified people.

iii.   Knowledge and experience of staff

In response to the question of whether the experience and knowledge of staff is sufficient to perform their duties, five people out of 10 interviewees had a positive answer and expressed satisfaction. Five people thought otherwise and believed that most staff in this process lack adequate knowledge and experience. However, other informative sources reveal differences between staff in terms of knowledge. Staff generally has necessary awareness, but there is need to enhance capacity.

iv.   Presence of terms of reference for staff

In response to this question nine people out of 10 are positive and informed of the existence of terms of reference for staff. One person expressed ignorance, but in recent years the staff have come under the rank and salary of the IARCSC resulting in the existence of terms of reference. The real question is whether the terms of reference contain deficiencies that hinder the process? Due to the mentioned limitations of the organizational structure, the amount of work in some positions adds a great deal of pressure and slows down the execution of duties. The issue of work pressure should be taken into account in any reform or modification of the structure.

Furthermore, the following gaps have been identified within the terms of reference of the students' affairs manager, who possesses the second highest operational rank in the process of distributing diplomas:

- It is noticed that some duties which should have been included in this post, are not listed in the terms of reference. For instance, nothing has been seen about the role of students' affairs manager in distributing diplomas, while the students' affairs manager himself is in charge of the distribution of educational documents section.

- Some items listed in the terms of reference for this post are not applicable. For instance, article nine of the terms of reference states: "controlling the process of mid and semester's exams of faculties in order to ensure transparency of the exams process". This is regarded as interference into academic affairs by the administrative staff.

- There are areas that constitute an interference of the students' affairs section with faculty`s academic management unit.   For example article 7 of the terms of reference for the students' affairs manager states: "organizing and execution of lectures and scheduling for mid and semester exams of faculty's falls within the remit of students' affairs manager". This is something which appears ineligible because of interference in faculties' affairs.

- Article 4 of the terms of reference for the students' affairs manager stipulates: "dealing with the differences and disputes between students and teachers". This should be the responsibility of the head of faculty and faculty`s academic management unit. If the problem persists, the departments of academic and students' affair are likely to be dragged into the matter.

v.   Professionalism of staff

In response to this question, nine people out of 10 who are mostly staff of different sections, have a positive attitude and considered staff's behavior towards visitors to be professional. One interviewee had a negative perception and complained of staff's unprofessionalism. Additionally, information from other sources confirms that the attitude towards diploma applicants - particularly Polytechnic University - have been professional and polite except for some occasions when the pressure of visitors offends the staff. Ultimately the professional behavior of staff has been assessed relatively positively and the way that applicants respond to the disorder of daily routine creates staff's nervousness. Therefore, a one stop shop method should be practiced to avoid the entry of applicants to the departments.

vi.   Staff engagement

This question was raised with 10 people of whom eight - mostly government officials - speak of their interest in their jobs, while two interviewees feel otherwise. Information from other sources

shows that most staff is happy despite having lower salaries and is inclined to serve their people. There are also people who are not interested in their work for different reasons.

vii.   Abuses of the process

In response to this question nine people out of 10 had a negative answer and believe that staff is of high character. They insisted that the staff would not demand anything from visitors. One person expressed ignorance on the issue. In light of information and observations, the majority of staff are trustworthy and never abuse their positions for something personal, but sometimes the policies of high level authorities such as the directorate of the university and the ministry cause them to be irresponsive to applicants and make the visitors discontent.

viii.   Vulnerabilities related to human resources

Almost one year ago MoHE came under the reform of pay and grading program of the IARCSC. The results of this assessment indicate that an appropriate strategic plan and terms of reference exist. Nonetheless, vulnerable areas within the structure and terms of reference in the process have been identified after analysis of the terms of references for some departments, interview comments, observations and information from other sources. The resulting recommendations are as follow:

- Findings of this assessment show that the attitude of some heads of departments of the MoHE towards visitors is not that positive. Their engagement with teaching and meeting gives rise to putting off daily routines. Even the VCA Unit experienced such behavior and the team's urgent letter was processed in two weeks.

- A small organizational structure and inadequate salaries are damaging to the process. Apparently, based on the focus group meeting participants claim, organizational structures of all universities are at the same level while they are different in terms of students and teachers. It is necessary to have the administrative structure of universities appropriate to their needs.

- The terms of reference for the staff are new and applicable, but there are three issues give rise to problems:

    o The amount of work is beyond the ability of the position and causes work slowdowns for the customers;

    o Terms of reference are incomprehensive and do not list duties properly; and

    o Occasionally there is work interference between the teaching and students' affair directorates.

- According to statements of managers for the educational documents distribution sections of universities, the MoHE has not taken any necessary measures to register the documents and process them in the students' department. It is perhaps due to staff shortages, which requires the managers themselves to go through the whole process in the ministry.

- The capacity of staff is better than in other civil service entities. Nevertheless, some problems have been noticed due to low capacity. There is a need for English language training as well as proper knowledge and management skills, planning, and care of customers.

- Fortunately information from the assessment indicates that staff is committed and loyal, and have a positive attitude towards visitors. However, the following three staff related issues could make the process vulnerable to corruption in the long run :

- o Lack of incentives that could lower staff morale.

- o Insufficient salary, which the ministry could address by considering super skill salary for staff occupying grade 3 and 4.

- o Dispatching staff to training trips. Experience indicates that personal relationships dominate the selection of mid and low level staff, who is supposed to be sent abroad. In fact, there are differences between administrative staff, but regrettably the academic figures enjoy the whole benefits and there is less chance of promotion in administrative sections in the universities.

ix.   **Recommendations**

a. MOHE should fill unoccupied positions linked to the certificate issuance process during the financial year so that the workload pressures on staff are lowered and the process is sped up.

- **Responsible entity:** MoHE with the Central Universities
- **Deadline:** 3 months after issuance of the report

b. MoHE should make a proportionate administrative structure for universities in coordination with the IARCSC. The structures should consider the volume of work and the number of students and staff.

- **Responsible entity:** MoHE with Central Universities
- **Deadline:** 3 months after issuance of the report

c. Changes and reforms are needed to the terms of reference through universities' coordination with the MoHE and the agreement of the IARCSC. Appropriate measures could make terms of reference more operational and help get rid of confusion and vagueness in the process.

- **Responsible entty:** MoHE with Central Universities
- **Deadline:** 3 months after issuance of the report

d. The universities should provide training facilities for management and planning, ethics, and English language so that staff carry out tasks precisely and on time.

- **Responsible entity:** MoHE with Central Universities
- **Deadline:** 3 months after issuance of the report

e. MoHE should disseminate the regulation on civil servants' attitude to heads of departments and conduct a workshop with IARCSC to change behavior.

- **Responsible entity:** MoHE
- **Deadline:** 3 months after issuance of the report

f. Authorities in the universities should set a fair and transparent mechanism to distribute benefits and have it approved by MoHE. This mechanism should be disseminated to all universities to protect from potential corruption.

- **Responsible entity:** MoHE and the Central Universities
- **Deadline:** 3 months after issuance of the report

V. De Facto Practices in the Distribution of Educational Documents

The purpose of looking at the actual activities in distributing diplomas in universities is to sequence events from start to end, including challenges, departures from the legal framework and criteria, and other practices that contribute to corruption. Looking into actual practices will identify vulnerabilities to corruption and ways that it holds back the normal flow of work. It will allow the identification of methods to lead the process into a right direction through improvements to the process, ideally based on technical recommendations that are material and within the practical capacity of the ministry.

Before addressing the interviewees' comments, the steps are documented according to studies and assessments of actual performance:

i. Stages in the distribution process

The distribution phase of educational documents includes the entire operation which is demonstrated through the case file provided by a Kabul based university. This process involves all activities from when the applicants apply for a diploma until it is received by the applicant. The following table demonstrates the actual performance without additions. Please refer to the Annex for more details.

No.	Stages of the process	No. of steps in each Stage	Grading of each stage based on its vulnerabilities		Remarks
1	Letter of inquiry from a reputable source	4	1		This grading is made based on the response of the interviewees.
2	distribution and processing application form for diploma	9	3		
3	Analysis of information included in the application form	2	4		
4	Diploma processing	18	4		
5	Registering diploma in MoHE	8	5		
6	Distribution of diploma to the applicant	2	2		
Type of vulnerabilities in each Stage:		Bribes, illegal influence, forgery and fraud etc.			
Note: 1= most vulnerable, 5= less vulnerable to corruption.					

It should be noted that this process is just to obtain a diploma in the English language. It would be easier if someone wishes to receive it in a national language. In this case the applicant for diploma just submits his application to the directorate of the university and there is no need for the letter of inquiry.

On the basis of the mentioned files findings, an applicant has to go through six phases to receive a diploma. Each phase has different steps which includes signatures of authorities in the

universities and MoHE. Sometimes these bureaucratic procedures have administrative logic, but on other occasions it relies on personal preferences and disclamation. In general the applicant must successfully complete all 43 steps to finally receive the diploma and enjoy its benefits.

ii.   Interviewee comments

As well as documenting the process of distributing educational documents (diploma) by using a file sample, the VCA Unit utilized other informative methods such as visiting mid-level authorities of the ministry and directorates, conducting interviews with visitors and observations of the working process of staff responsible for distributing diplomas.

Chart 3 demonstrates the summary of interviewees' comments about questions regarding the actual performance of the process.

Chart 3: The interviews' conclusions about the actual activities of the process of distributing educational documents (diploma)
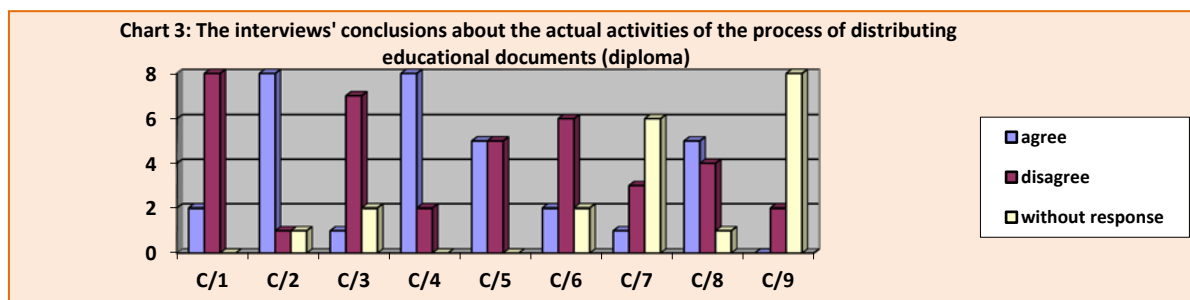
iii.   Personal activities of staff

Two interviewees out of 10 believe that staff as well as responsible officials, carry out personal affairs during official working hours. Eight people think otherwise and argued that the lack of staff and accumulation of work would not allow them to be occupied with other things. Other information reveals the large amount of work and the responsibility of staff to be occupied with their duties continually.

iv.   Management and control of the staff performance

In response to the question of whether there is sufficient control and management by staff in the course of their performance, eight people out of 10 believed that adequate internal control on different levels of the process is apparent. One person thinks that there is not enough control and the last one expressed ignorance in relation to the question. Other documents and evidence show a high level of control and proper management. Nevertheless, management practices must shift from current classic control and management to more modern ways.

v.   Unofficial distribution of rights, duties and responsibilities

In relation to this question, one person of 10 people spoke of the existence of the unofficial distribution of rights, duties and responsibilities.   However, seven interviewees did not accept this report and insisted that duties are being delegated to people in accordance with terms of reference and that there is no financial issue to cause such inequalities. Two people expressed ignorance on the issue. Information from other sources and the VCA Unit's research indicates that the accumulation of work inhibits the chance for the unofficial distribution of duties and

responsibilities. In regards to the unofficial distribution of rights, the employees are all civil servants and enjoy the benefit of overtime and supers skills salaries.

vi. Undue interference and improper direction

This question was discussed with 10 people, of which eight believed that unfair influence exists in the process, while the other two interviewees thought that there is no improper conduct. However, information from other sources suggests that there is extensive interference in the process by members of parliament, ministers, deputy minister and members of the judicial branch. Information received from other sources indicates that despite the pressure and unfair interference there is only a small possibility of influencing the process of distributing diplomas within universities as the deserving applicant would eventually receive the diploma. Nobody would receive documents that they were not entitled to through forgery.

vii. Gifts

This question was discussed with 10 people, of whom two thought that gift exchanging exists in the process, six believed that staff would not accept a gift or bribe, and two expressed ignorance. Information from other sources shows that the exchange of gifts between visitors and staff is not prevalent. Since presenting gifts in Afghan culture has sentimental meaning, there is no intention of misleading or influencing the process by offering gifts. Rather it is a means to strengthen their personal relationships and demonstrate kindness to each other.

viii. Staff awareness of corruption, immoral and unprofessional conduct

In response to this question 10 people commented, of which just one thought that staff involved in the distribution of educational documents have been made aware of corruption, immoral and unprofessional conduct in the process. Three people said that such thing have not happened officially, but did hear it through the media and personal studies. Six people expressed unawareness of the issues. The result of our individual interviews and meetings indicates that staff awareness is limited and there is a need for training on anti-corruption provided by active organizations in the area.

ix. Job security

This question was discussed with 10 people, of which five believed that staff have job security in accordance with the *Civil Service Servant's Law* and regulation of the Islamic Republic of Afghanistan. Four interviewees worried and argued that even though job security is provided for under the law, they see otherwise in practice. One person demonstrated an unawareness of the matter. Information from other sources indicate that staff have no issues in terms of job security, but that they are paid insufficient salaries to cover daily expenses.

x. Conflict of interest

This question was asked of 10 people, of which two people strongly denied that there are conflicts of interest and eight who showed unawareness of the issue. According to information gathered from other sources, conflict of interest is not broadly seen in the process and the likelihood of the conflicts of interest are more likely where financial grounds exist. However,

these circumstances are not observed in the process of distributing educational documents, therefore nobody accepts its existence.

xi. Vulnerabilities to corruption

- The first matter of importance in actual practices is sensible management of the diploma's distribution. According to the Student's Department file reviewed by the VCA Unit, there is some irrationality in the process. In general unnecessary bureaucracy in the current process is vulnerable to corruption and is a lucrative source of illegal income for companies and organizations to provide letters of inquiry for the students to receive their documents.

- There are less informal activities in the process. Teachers are in charge of departments have to take on teaching and still carry out administrative tasks which damages the process in four ways:
    o Teachers occupied with administrative tasks cannot take care of teaching as they should;
    o There is less attention to administrative duties giving rise to the accumulation of applications and delays;
    o Disorder and weak management and dissolve the organization; and
    o Since these administrative positions have not got any benefit apart from status, there are worries that it may pave the way for vulnerabilities to corruption.

- Information received from reports show that the Ministry lacks a thorough plan for the distribution of diplomas at the beginning of a year and it just prints diplomas on an ad hoc basis. This will not meet the requirements at the university level.

- The provision of diplomas in three languages on separate papers are undoubtedly challenging to the process in many ways:
    o Estimating the number of applicants for one specific language is difficult.
    o The majority of applicants would like to have their diploma in two languages English and one national language to use inside Afghanistan and abroad.
    o Printing expenses for applicants who are not satisfied to have it in national languages, as is the case in Kabul University.
    o Restricting applicants' wishes is regarded as something against the values of individual's rights.

- Using unfair influence is another issue that is mostly practiced by ministry authorities, Members of Parliament, and other government organizations. If the situation continues in this way it will degrade the quality of civil services and people will witness more chaos in the process. Subsequently, the process of diploma distribution will become vulnerable to corruption.

- The assessment shows that MoHE has made attempts to adapt methods in order to prevent fraud, misuse, and other forms of corruption, but it has given rise to the ignorance of applicants' rights and contributed to corruption. For instance the suspension of the diploma distribution process on the pretext of stealing blank diplomas or the unavailability of printed diplomas.

- Distributing diplomas to graduates of private higher education institutes is another challenge which remains unsolved and it is evident that authorities in the ministry have not paid proper attention to it. The other issue about private higher education institutes is the lack of proper monitoring of their management systems. There are concerns that

some students are not attending classes or even the exams, but their names added to the list of graduates. Such practices make private institutes vulnerable to corruption as it will reduce the value and quality of these institutions among the people.

- The accumulation of applications also gives rise to work pressure and disorder and sometimes results in conflict between visitors and staff. Though the professional manner of staff is relatively high, contact with visitors causes chaos and nervousness.

xii. Recommendations

a. MoHE should reform and simplify working procedures in cooperation with universities and should simplify the distribution process for diplomas.

- **Responsible entity:** MoHE and Central Universities
- **Deadline:** 6 months after issuance of the report

b. MoHE should separate administrative posts from the academic positions in cooperation with the IARCSC, which will help to improve the quality of both.

- **Responsible entity:** MoHE
- **Deadline:** 6 months after issuance of the report

c. MoHE should supply a certain number of diplomas to be responsive to the need of university students all over the country at the beginning of the financial year and also consider the proposals of the universities within its procurement plan to avoid consuming time and challenges due to a lack of printed diplomas. This will enable the ministry to provide universities with the necessary diploma in an appropriate time.

- **Responsible entity:** MoHE
- **Deadline:** continuously after issuance of this report

d. MoHE should address the problem of printing blank diplomas in its annual procurement plan in consideration of the needs of all higher educational institutions and universities.

- **Responsible entity:** MoHE and Central Universities
- **Deadline:** continuously after issuance of the report

e. MOHE should develop and execute a policy to mitigate all unfair influences of higher authorities of the government, Members of Parliament and the judiciary.

- **Responsible entity:**   MoHE and Central Universities
- **Deadline:** 3 months after issuance of the report

f. MOHE should not develop policies to suspend diplomas, which are the undisputable right of graduates, and avoid damaging graduates materially and intellectually.

- **Responsible entity:** MoHE and Universities
- **Deadline:** continuously - after issuance of the report

g. MoHE should reach an agreement with private universities and begin the distribution of diplomas to address the important concern that thousands of graduates are not enjoying their rights.

- **Responsible entity:** MoHE and Private Higher Education Institutes
- **Deadline:** 4 months after issuance of the report

h. Universities should establish One Stop Window method in the process to prevent the flow of applicants through its offices.

- **Responsible entity:** MoHE and Central Universities
- **Deadline:** 3 months after issuance of the report

i. Higher education institutions including the universities should develop a proper monitoring mechanism and report quarterly to the MoHE in order to ensure the successful implementation of all policies, laws and regulations relevant to higher education and to prevent corrupt practices.

- **Responsible entity:** MoHE and Central Universities
- **Deadline:** 3 months after issuance of the report

VI. Information Management System

The document and information management system is the fourth area of distributing the educational documents process which has come under assessment. The way in which documents and information are organized has significant implications for organizational performance. Undoubtedly negative impacts will be noticed in services if archived documents and evidence are kept in an outdated manner. If the opposite is true, it will result in higher service satisfaction, staff responsiveness, and speed of work.

The purpose in assessing this area is to identify challenges that can end up resulting in vulnerabilities to corruption. To identify deficiencies and how they result in corruption, the following questions were asked of interviewees:
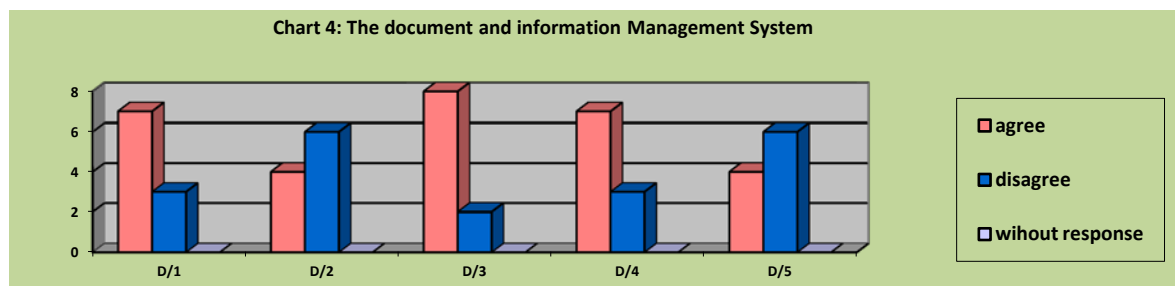
Chart 4: Interviewee responses to the answers related to the management of documents and information in the process

i. Current practices

Ten people were interviewed in regard to information management, of which seven described the current situation as outdated and in need of change. Three people thought well of the system and believed that filling documents in hard copy or hand writing is safer than the

electronically and can mitigate fraud, but information from other sources demonstrates dissatisfaction from the directorates of different levels. They assume that it would cause insecurity for the universities' documents against the potential incidents. Meanwhile, MoHE and the polytechnic university report on the establishment of an electronic resource center which perhaps takes time and ultimately changes the situation. Although the classic system has the advantage of keeping documents safer, it is disadvantaged by the length of time that it takes to access and process documents, which can take months.

ii. Document management

The issue of document management was discussed with 10 people, of which four believe that the current mechanism is clear and simple, while six believe that the current practice is of concern and argue that although the classic system of document management is based on history and subject. Regardless, the accumulation of documents has put obstacles in the way of accessing documents quickly.

iii. Time intensiveness of the system

In response to this question 10 people shared their views, of which eight thought that access to documents held by the educational documents section is time consuming. Two people disagreed with this assessment and believe that there is a clear method through which staff process and provide visitors with required documents. Nevertheless, information received from other sources, particularly the team's evidence, speak of a time consuming and chaotic practices in finding and accessing documents.

iv. Information security

Ten people were interviewed concerning the extent that visitors' documents are safe through the current document management system. Of these, seven believed that documents are safe in the departments and three thought that they were not. Information received from individual meetings shows that high level directors are worried about vulnerabilities in the system.

This question of the probability of theft was discussed with 10 people, of which four did not deny that there is theft of applicants' documents. Six people denied the possibility on the ground that information is retained in different sections and departments. Information received from other sources states that theft of information and documents is rare and is more likely to happen in the faculty academic management unit, which is the initial point of information collection.

v. Vulnerabilities to corruption

- The use of a classic information and filing system and lack of a database management system has complicated access to documents for employees and applicants. Accessibility to documents and information is difficult and there is no consolidated mechanism available to the applicants, who is needed by employees and applicants.
- The current document and information management system lacks confidentiality and safety, which makes the documents vulnerable. In general there are two threats facing documents: first is the possibility of catching fire, and second – which is most threatening - is the destruction or deterioration because of moisture.
- The probability of document and information theft is very rare and appears to happen mostly in faculties' academic management unit.

- The issue of corruption in some private universities in allowing students to acquire diplomas is evident as some students will not be prohibited from taking exams in spite of continued absences as they can pay bribes. The alteration of marks is also a cause for concern.

vi.   Recommendations

a. It is necessary to set up a modern system of document and information management in the universities, supported by hardware and software. Universities should in cooperation with MoHE outline a new method for managing documents and information in its archives and put it in place.

- **Responsible entity:** MoHE and Central Universities
- **Deadline:** 9 months after issuance of this report and continuously thereafter

b. Universities should set up access to the system in cooperation with MoHE and present it to the public via their websites so that the one who requires documents and information can be familiar with the original sources.

- **Responsible entity:** MoHE and Universities
- **Deadline:** Simultaneous with the establishment of the system

c. Leadership of universities and MoHE should computerize documents and information and provide suitable places for archiving to better protect them.

- **Responsible entity:** MoHE and Universities
- **Deadline:** 3 months after issuance of this report

d. Universities should stop individual access to the documents and information and recruit decent people for the exam and archive sections. In addition, universities should include necessary articles in the procedure to contribute to this aim.

- **Responsible entity:** MoHE and Central Universities
- **Deadline:** 1 month after issuance of the report

e. MoHE should monitor the attendance sheet and the process of enrolment of private universities to mitigate situations where documents are being issued fraudulently.

- **Responsible entity:** MoHE and Central Universities
- **Deadline:** Immediately after issuance of the report – continuously

Sources

- Attestation of educational documents by law dated 25 Maizan 1391

- rule of procedure Certificate issuance to graduate students from Afghanistan higher educational institutions dated 13 hot 1387

- Guide line for diploma issuance process dated Hamal 1390

- Minutes of focus group meeting conducted by VCA team dated 6th Jan 2013 in Kabul University with the participation of four governmental central universities and Kardan University

- Especial interviews with the ministry of Higher Education senior officials four governmental central universities, Bamyan, Badakhshan and Kardan universities' presidents

- Interview with 24 interviewees who are including employees and graduate students of the mentioned universities

- Websites

  www.mohe.gov.af

  www.ku.edu.af

  www.kmu.edu.af

  www.kpu.edu.af

  www.keu.edu.af

  www.kardan.edu.af

Annex: University working procedures

Resources	This process has been documented by the VCA Team of MEC based on the verbal description of mid-level officials engaged in the process and actual performance of officials engaged in the process and a sample file from the polytechnic university.
Purpose	Identification of vulnerabilities to corruption in the process of distributing educational documents (diplomas) and presenting recommendations to improve the situation.

No	Stages and Steps of the process	Responsible entity
First Stage: Letter of inquiry from a reputable source		
1	Provision of letter of inquiry from a reputable entity addressed to a university	Official of reputable entity
2	Signature and stamp of reputable entity's head	Head of reputable entity
3	Order of deputy of university in students affair addressed to student' directorate	University's Deputy of Students
4	Reference of student's directorate to the general directorate of educational documents	Directorate of students affair
Second Stage: Processing and distribution of diploma application form		
5	Distribution of forms to applicants	General directorate of educational documents
6	Filing the form with required information	Diploma applicant
7	Referring the form to the related faculty to collect information	Deputy of student affairs
8	Filling in required information in the second part of the form	Official of teaching directorate of faculty
9	Signature of faculty academic management unit	Faculty academic management unit
10	Signature and stamp of the directorate of faculty	The dean of faculty
11	Handing form to the directorate of graduates	Applicants
12	Confirmation of graduates directorate of applicant's graduation	Graduates directorate of students' affair department
13	Handing required documents to the directorate of educational documents	Graduates directorate
Third Stage: Analysis of information included in the application form		
14	Scrutinizing the date of birth and change it from Hejry Shamsi to the Christian calendar	Directorate of educational documents
15	Distributing ticket to the applicant to receive diploma on a fixed time	Directorate of educational documents
Fourth Stage: Diploma's processing		
16	Test print of diploma on normal paper to scrutinize the included information in it	Directorate of educational documents
17	Scrutinize and review of the information and instruction of deputy of students' affairs to print diploma on original paper	Deputy of student affairs
18	Printing of the diploma on official paper	Directorate of educational documents
19	Attaching photo on the main page of the diploma	Directorate of educational documents
20	Sending diploma to the faculty academic management unit	Directorate of educational documents
21	Recording diploma in the registry book of diplomas with the detail of date, registry number at the back page of diploma	Directorate of educational documents
22	Note and stamp of faculty academic management unit	Faculty academic

		management unit
23	Signature of the dean of faculty on the main page of diploma	The dean of faculty
24	Resend diploma to the Directorate of educational documents	Directorate of educational documents
25	Recording diplomas in the registry book of directorate of student affairs and putting the number and date at the back page of diploma	Directorate of educational documents
26	Signature and stamp of students' directorate at the back page of diploma	Students' directorate
27	Signature and stamp of deputy of students' affairs at the back of diploma	Deputy of students' affairs
28	Stamp of university	Secretariat for the office of head of university
29	Signature of head of university on the main page of the diploma	Directorate of university
30	Registering diploma in the list of documents being processed in the ministry	Directorate of educational documents
31	Making official letter addressing the ministry to register diploma in the department of students' affairs	Directorate of educational documents
32	Signature of director of students' affair on the copy of the letter	Director of students' affairs
33	Signature of deputy of students' affairs on the letter	Deputy of students' affairs
Fifth Stage: Registering diploma in MoHE		
34	Sending diploma with the attached official letter to the ministry	Directorate of educational documents
35	Sending letter of the university to the directorate of graduates	Head of students department
36	Registering diploma in the registry book of diplomas of the ministry and putting number and date at the page of diploma	Graduates department of students' directorate of the ministry
37	Signature of graduates department at the back page of diploma	Graduates department of the ministry
38	Signature and stamp of head of students' department of the ministry	Head of students' department of the ministry
39	Engraving the stony stamp of the ministry on the photo of the diploma	Graduates' department
40	Transferring diploma to the university once more	Directorate of educational documents of the university
41	Making one copy of the diploma and filing it	Directorate of educational documents
Sixth Stage: Distribution of diploma to the applicant		
42	Signature of the applicant on the receipt book of diplomas	Diploma's applicant
43	Distributing diploma to the applicant	Directorate of educational documents