

The problems that we witnessed within the scope of the training project for the teachers, subject to mandatory attestation

1. The first was the lack of awareness about the project, both among teachers and principals. When we mentioned that the Ministry of Education, Science, Culture and Sports (ESCS) sent the relevant circulars, they said that they had not received. The question then arises: How effective are the communication mechanisms between the state authorized body and all schools of the Republic developed?

2. Second, teachers are free to choose a training organization. This fact has been repeatedly mentioned by the ministry of ESCS, but our experience showed that this approach is used not in all schools. More than 40 teachers from different regions of the RA who applied for the training course in the use of ICT (information and communication technologies) in our organization. However, when they went to their schools to complete the appropriate application, they found out that the school directors had already chosen and signed contracts with other organizations or even if they hadn't signed the contracts yet, they made the teachers face with the fact. There were many teachers who felt uneasy to even mention the names of the organizations with which their school principals without informing them had reached agreement. Mostly a few names of organizations were mentioned by the teachers who addressed us, which had arrangements with the school directors to carry out training sessions without taking teachers' opinions into account. In this case, it is not right to blame the teachers again, who were not able to defend their rights because most of us know what approaches, ways of working, interpersonal relationships prevail at schools. So far what work has the ministry been carried out in order to exclude such cases and what mechanisms have been developed to prosecute the disorderly organizations?

3. The next issue concerns the existence of control mechanisms, which would check the quality and efficiency of training courses conducted by the guaranteed organizations. According to the existing mechanism, the training organization itself provides the appropriate reports which are mainly technical in nature, i.e. the organization represents the teacher participation registration book, training program, the agenda, the credit granting protocol, as well as an anonymous training evaluation summary sheet filled out by the teachers who had participated in the training sessions. The organization sends this information to the email address: secretariat@escs.am. Moreover, according to the ministry of ESCS, these teachers should have an opportunity to evaluate the work of the organization on education management information system (<https://emis.am>), but there seems no section for this feature. This testifies both the trained teachers and us as a training organization that does not have any access to this section of the platform. We have also asked about this issue to the representatives of this platform, but we have not got any response. Does this platform run properly, especially the mentioned section above?

To follow the procedure of the training sessions conducted by our organization, we sent the online course link both to the "National Center for Education Development and Innovation" foundation (NCEDI), and to the Ministry of ESCS, however, it should be noted with regret that the above-mentioned responsible bodies did not take any step at least once to join one of the sessions. Here the question arises, by what mechanisms are the quality and efficiency of training sessions provided by the guaranteed organizations checked? Technical reports presented by the organizations are not enough to provide insight on quality.

4. The next question concerns the planned amount of money for training sessions per teacher. To this day, it is not clear with what logic and mechanisms the Ministry of ESCS calculated the planned amount of money for training sessions per teacher.

The Ministry of ESCS has planned 24.000 drams for 92-110 hours per teacher. If it is online, they have planned 20.800 drams for the same number of hours. The distribution of the amount according to components is done in percentage ratio of class hours. (Decision No. 46-N of July 02, 2021 of the Minister of ESCS of the Republic of Armenia) <https://escs.am/am/news/9310>

According to the standard, training consisting of 8 sections is planned:

<https://escs.am/files/files/2022-03-09/0dad96dafbf022db2093d0566decd6c.pdf>

1. Legislation in the field of general education, 10 hours (1 credit)
2. Application of information and communication technologies in the educational process, 20 hours (1 credit)
3. Age psychology, 10 hours (1 credit)
4. Positioning and Value, 10 hours (1 credit)
5. General inclusion, 10 hours (1 credit)
6. Evaluation, 15 hours (1 credit)
7. Subject teaching methodology, 30 hours (2 credits)
8. Principles of research work, 5 hours (3 credits)

To conduct this kind of training, relevant specialists are needed particularly a specific subject specialist, ICT specific programs and platforms master, legal specialist and psychologist. It turns out at least 4 specialists are needed for the accepted standards to provide appropriate training and thus, they have to receive proper remuneration for their work. On behalf of the organization to plan the training sessions at least an organizer is needed, who also should be properly paid, as well as an accountant to carry out the function of financial, tax issues. The presented are the main expenses that the organization has to spend. Note, that according to the application form of the training

organization of the Ministry of ESCS, <https://www.arlis.am/documentview.aspx?docid=150851>, it is also important other expenses such as lunch and coffee breaks, an appropriate space for organizing it and if needed, even transportation for teachers. It should also be noted that the ministry prefers the offline format training, <https://escs.am/am/news/12613> therefore, the organization must also provide a necessary space for training and pay the appropriate taxes.

By the way, according to the norms set by the Ministry of ESCS, to put it mildly, organizations are paid the inadequate amount after training sessions (the Ministry of ESCS transfers the money to the trainee teacher's school and then school after training transfers to the organization) which means that if the organization has no other income for the given project, then it is not possible to organize all training sessions because the training organization must pay salaries of specialists according to the services of the signed contract on time, not to violate the payment deadlines, therefore trainers must get their salary on time, which becomes impossible in the established system. <https://www.arlis.am/documentview.aspx?docid=162419>

In this case, the state institutions from the list of the guaranteed organizations are in a profitable position as they can use the territory and property under their authority and non-governmental organizations have to make an additional cost to adapt their area or in case of impossibility, rent a suitable area.

If no more than 30 teachers can be included in one group, in order to provide an individual approach and effective training, it takes 92-110 hours, about a month for a group if the training sessions are carried out every weekday lasting five and a half hours, then it turns out that the organization should work on the principle of charity, and trainers should get paid the minimum wage set in Armenia at the moment (as either hourly or fixed salary), while the job is extensive and highly responsible.

This is related to the conscientious organizations but what about unconscientious organizations, they will just work on quantity and not paying trainers properly, in this case the quality will suffer. And conducting training with separate components becomes impossible, for example, if a specialized organization wants to implement training on legislation in the field of general education, another organization on psychology, the other on any subject, the fourth on the application of ICT in the educational process, then it turns out that we divide the planned amount of money according to the component of the allocated hours. In that case, we get, for example, for the component of ICT training in the learning process - 4364 drams, and for the online one - 3780 drams per teacher and let's assume that no more than 30 teachers should be included in one group, then how will the organization manage the necessary expenses with that amount of money? A question arises: Hasn't the Ministry of ESCS calculated right the amount of money for training per teacher?

It should be noted that in 2021 the Ministry of ESCS allocated 56,000 AMD per teacher for distance training sessions of Diaspora Armenian teachers with the same number of hours (80-120 hours). By the way, distance training sessions of Diaspora Armenian teachers, second year in a row, is delegated to only one organization: FEATURE LLC, founded on March 13, 2020.

<https://www.cep-org.am/wp-content/uploads/2022/12/Report-Collaborative-Educational-Projects-ngo.pdf>

We presented the above problem to the State Commission for Protection of Economic Competition of the RA, noting that according to the norms set by the Ministry of ESCS, the state institutions from the list of the guaranteed organizations are in a profitable position as they can use the territory and property under their authority and non-governmental organizations have to make an additional cost to adapt their area or in case of impossibility, rent a suitable area.

<https://drive.google.com/file/d/11lcF4XV-eoTThhcYqRhpsKL1VwRRRdgc/view>

From the answer of the State Commission for Protection of Economic Competition of the RA, it seems that the raised issues were simply not understood by the committee members. A quote from the commission's answer: " As a result of the above legal norms of the systematic study, not only public and state organizations, but also private organizations carrying out educational services as entrepreneurial activities can be included in the list of the guaranteed organizations set by the Ministry. Moreover, private organizations providing complex services in the field of education as an implementation of entrepreneurial activity has its own features. In particular, it implies increasing the quality of educational services aimed at implementation of such economic activities by using organizational, labor and other resources effectively, which will contribute to the increase of the latter's business income. The area and property used by private organizations within the framework of various educational programs is also one of the manifestations of the mentioned above. It means that private organizations providing educational complex services, while carrying out the training sessions as a guaranteed organization for teachers, subject to mandatory attestation, can also use the space and property under their authority.

Moreover, as a result of this, the latter can gain a competitive advantage over organizations which currently do not provide a variety of education services.

In this case, the question raised in your letter, accordingly, can give an advantage not only to the public, but also to the private organizations, which is systemic to the above-mentioned legal norms as a result of the study has objective and reasonable grounds, therefore does not contain an offense in the field of economic competition apparent features."

Before writing such an answer whether the State Commission for Protection of Economic Competition of the RA has researched how many non-governmental organizations in the field have the same property opportunities as state institutions, which meet the standards set by the Ministry of ESCS. The State Commission for Protection of Economic Competition stated in the answer that non-governmental organizations are in the list of the guaranteed organizations , but its statement formed based on the comparison of private organizations providing a state and educational services as entrepreneurial activities.

To what extent is the above answer adequate to the raised issues and corresponds to the existing reality. Full answer in the following link:
https://drive.google.com/file/d/1XEWmQXkYEckLI_ieMBR-CsKAJeCVsSAh/view

5. The next issue is related to the activity of the "National Center for Education Development and Innovation" foundation (NCEDI) authorized by the Ministry of ESCS, which verifies the modules of the training courses conducted by the guaranteed organizations, whether its structure and content meet the standards and sends to the approval of the minister, who also performs the function of the supervisor. How is it possible in the NCEDI foundation, which performs a controlling function, there are employees who work as well in the training organizations or a member of the current organization?

This fact creates uneven conditions between training organizations, the NCEDI is also following the quality and effectiveness of training sessions and provides information to the Ministry of ESCS so that the latter determines whether the organization's activities meet the established standards and may continue organizing training sessions or not. Given the above observations, does the Ministry of ESCS have no fear that this training system will remain within the framework of several organizations, including state ones.

The new system will not be attractive under unequal competitive conditions for organizations that can regularly bring positive changes and effective approaches to the system and contribute development of the system. By the way, there is no public data yet in which organizations, how many teachers have been trained, based on which the teachers have also been certified.

When a reform-oriented project is introduced, but there is no consistent approach to ensure quality and efficiency

Still in 2022 in response to our organization's report on the problems and gaps in the implementation of the training system for teachers subject to regular (mandatory) certification, at the meeting of the public council attached to the RA Minister of Education, Science, Culture and Sports held on June 9, the current minister Zhanna Andreasyan, who holds the position of deputy minister, stated that a differentiated training policy will be applied for the beginning and experienced teachers; in terms of different mechanisms, timing and content she assured that with the application of the new system, most of the issues raised during the report will be removed from the agenda, she also assured that unconscientious organizations will be removed from the list of teacher training organizations, emphasizing the appropriate ethics and practices formation and informed that by the end of the year (2022) the appropriate information platform will be ready to ensure full digitization of works, as well as accessibility and transparency.

<https://escs.am/am/news/12867?fbclid=IwAR1S6dCWvgDQJTN4nuJfogj59HR6RDJ8hnx3R65EGHJIRu2nxT4zWtthEml>

In order to find out what work has been done to improve the newly introduced teacher training system since June 9, 2022, we sent a request to Mrs. Andreasyan, who clearly outlined the content of the reforms last year.

https://drive.google.com/file/d/1XcAuLZldrK7DXhHH5faxG0_xtaID0q7b/view?fbclid=IwAR12ZomguFf8_P2F23rKKp4Y1yLJmVzV0HxMKFevQA1exPjMwwrK7Xtz9s

Our inquiry was answered by Deputy Minister Araxia Svajyan, from whose answer it becomes clear that nothing has been done in the ministry for almost 1 year in the direction of Zhanna Andreasyan's planned and promised reforms.

The answer was just technical quotes from the law "On Public Education" and government decisions adopted before 2022.

The full response of the Ministry can be found in the following link:

https://drive.google.com/file/d/1VlkdQF9wpXOB20hYMqbTEdKSH_sK_zTp/view?fbclid=IwAR2IeN1ObE0vm57UP4fSI0EveZuzDG7tvSy8JVdBIZrxhKuKcWloUZ692Mg

If the necessary reforms are not carried out, then this year again teachers will be trained due to the existence of many shortcomings and gaps in the system.

According to the new state standard of general education <https://www.arlis.am/documentview.aspx?docid=149788>, the state authorized body, the Ministry of Education, Science, Culture and Sport, demands new skills and abilities from teachers, but it is unable to organize and provide proper support.

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