Education Sector Support Programme in Nigeria (ESSPIN)

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Note on Documentary Series

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The documentary series is arranged as follows:

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ESSPIN 0	Programme Reports and Documents
ESSPIN 1	Support for Federal Level Governance (Reports and Documents for Output 1)
ESSPIN 2	Support for State Level Governance (Reports and Documents for Output 2)
ESSPIN 3	Support for Schools and Education Quality Improvement (Reports and
	Documents for Output 3)
ESSPIN 4	Support for Communities (Reports and Documents for Output 4)
ESSPIN 5	Information Management Reports and Documents

Reports and Documents produced for individual ESSPIN focal states follow the same number sequence but are prefixed:

JG Jigawa KD Kaduna KN Kano KW Kwara LG Lagos

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Acronyms and Abbreviations

ESSPIN Education Sector Support Programme in Nigeria

FMoE Federal Ministry of Education

IFMIS Integrated Financial Management Information System

LGEA Local Government Education Authority
MDA Ministries, Departments and Agencies
MoU Memorandum of Understanding
MTSS Medium Term Sector Strategy

SAVI State Accountability and Voice Initiative
SBMC School Based Management Committee

Public Financial Management

SMoE State Ministry of Education

PFM

SPARC State Programme for Accountability, Responsiveness and

SUBEB State Universal Basic Education Board
UBEC Universal basic Education Commission

Introduction

1. The approach paper on public financial management (PFM) (John Kruger, May 2009) provided an elegant and comprehensive review of the literature on PFM issues in the Nigerian education sector and a systematic review of instruments and interventions potentially available to address these issues at different stages of the budget cycle. In November 2009, the incoming PFM task leader (John Gray) prepared an initial PFM position paper (dated 3 November 2009), which set out an overall approach based on the experience to date and defined a three-step process to clarify the issues and define the intervention approach in each State. During November and December 2009, this approach was applied in Lagos, Kano, Kaduna and Jigawa, in addition to earlier work in Kwara. Building on the results of these reviews, this document is a revised PFM position paper intended to guide ESSPIN PFM interventions in the 18 months up to July 2011.

Preliminary: what is PFM?

2. PFM is concerned with the proper management and application of public financial resources to achieve the set of objectives established for the public sector. PFM, accordingly, covers a broad range of fields of public sector activity including all the stages of the planning and budgetary cycle, the functioning of public sector agencies responsible for the discharge of public funds, and the laws, regulations and systems established to ensure transparency accountability and full reporting on the use of public sector resources and funds. In terms of ESSPIN activities, PFM embraces several workstreams established in the period since the start of the project (including legal reform, planning / MTSS, organisational review and M&E) since all of these activities are directed towards improving the efficiency and effectiveness of the use of public funds to achieve objectives.

The core PFM problem

3. From a PFM point of view, the core problem afflicting the education sector in most if not all the ESSPIN states is the inadequacy of the systems for financial management and control and a pervasive lack of transparency and accountability for funds. Where there are major loopholes in systems for ensuring accountability there is a high probability that a significant proportion of the resources being made available for basic education are not being used effectively, in extreme situations are being stolen and are, accordingly, bringing little or no benefit to the developmental aims of the sector. The challenge for PFM in the BE sector is to help the states to put in place effective systems covering all stages of the planning and budget cycle – including (a) improved strategic formulation as the basis for achievable and prioritised plans based on sound analysis of the actual situation on the ground and underlying trends in the sector; (b) the formulation of annual and multi-annual budget proposals based on the strategies adopted and on realistic forecasts of likely resource

availability to the sector; (c) sound systems of budget execution which ensure that budgets are executed a planned and that public funds are utilised for the purposes for which they are appropriated, (d) systems for monitoring and reporting on progress achieved in the implementation of plans and budgets. In many of the agencies responsible for basic education planning and service delivery these basic elements of any reliable budget cycle management system exist in only the most rudimentary form, if at all. In this situation the risks are very high that public funds will not be applied effectively and that even very substantial budget allocations will have only limited impact on the learning experience at the school level. There is a large body of evidence that this is the actual situation prevailing in the basic education sector.

4. The inadequacies of the systems for budgetary cycle and financial management in the state agencies are compounded by an environment characterised by a lack of transparency and accountability.

Major ESSPIN PFM concentration areas

- 5. The different elements of the approach to PFM are closely related to each other and the greatest impact is likely to be achieved through an overall approach which brings together several elements. It is, however, useful for the purpose of clear conceptualisation of the programme to identify some core concentration areas. In this context, the following six main concentration areas for improving PFM in the basic education sector in the ESSPIN States have been identified:
- (i) **Budget cycle reform**: Strengthening the budget cycle for the MDAs involved in the application of public funds in the sector *Characteristic activities include*: strengthening of planning through the MTSS process; activity planning leading to programmatic budgeting in the MDAs and agencies; supporting development of budget monitoring
- (ii) Organisational reform: Support for making the key enabling and service delivery organisations more fit for purpose and more effective in discharging their responsibilities. Characteristic activities include: organisational reviews and visioning; organisational restructuring; management systems development (including accounting and financial management systems); tightening of procurement practices to conform to federal and state regulations; human resources development
- (iii) Transparency: Support for increased transparency in sector management and the flow of resources to beneficiaries
 Characteristic activities include: setting guidelines and benchmarks for ex ante and ex post publication of intended and actual resource flows, especially those passing through SUBEBs and the LGEAs; promotion of the MoU concept to strengthen sector-wide stakeholder buy-in and enforcement of greater transparency

- (iv) Direct funding to schools: Advocacy of direct funding for schools in support of strengthened school and community participation in sector management Characteristic activities include: initial research on experience with direct funding schemes; support for Federal Ministry of Education to move towards an explicit policy on direct funding for schools; advocacy with State governments and the main agencies to adopt direct funding for a substantial part of the total resource flows to schools
- (v) Legal framework: Strengthening of the legal framework to provide clarity on institutional mandates and the necessary framework for sector oversight and accountability Characteristic activities include: legal reviews of Federal and State UBE and related legislation; support for reform of these legal instruments
- (vi) **Monitoring and evaluation**: Support for strengthening the information base for planning *Characteristic activities include*: support for annual census of schools, teachers and classrooms; development of the annual education sector review as an instrument in support of planning; support for monitoring and evaluation of MDA and agency programme effectiveness; budget expenditure tracking

Anti-corruption as a cross-cutting theme

6. Corruption and lack of accountability has been identified above as a core problem which ESSPIN must help the states to address if the wider ESSPIN objective of assisting the States to make more effective use of existing resources is to be achieved. It should be noted, however, that the theme of supporting improved accountability is one which cuts across all the concentration areas outlined above. The table below summarises the specific contribution which each of the concentration areas can potentially provide to supporting increased accountability. The annex provides an analysis of the corruption issue in basic education and sets out a range of approaches which can be adopted to limit the scope for corruption.

Table 1: Contribution of PFM activity groupings to improved accountability

Activity grouping	Specific contribution to enhanced accountability and anti-corruption
Budget cycle reform	Improved planning reduces wastage of sector resources on frivolous
	projects
	Strengthened budget execution reduces scope for diversion of funds to
	other purposes within or external to the sector
	Enhanced value for money by making the budgetary management more
	results oriented
	More effective role of the State House of Assembly Finance and Public
	Accounts Committee
Organisational reform	Strengthened internal accounting, financial management and reporting
	systems
	Promotion of corporate culture of honesty and whistle-blowing

	Compliance with procurement regulations and procedures	
	Properly managed payrolls (especially for teachers) to reduce losses	
	through ghost teachers and schools	
Transparency • Conditions for establishment of expenditure tracking systems as		
	identification of areas of embezzlement	
	Ex ante expectations on resource flows among beneficiaries	
	Enhanced stakeholder buy-in to accountable sector management	
	Marshalled media as watch-dogs	
	Enhanced role of civil society in critiquing sector policies and their	
	implementation	
Direct funding to	Broken up large concentrations of funds at the SUBEB level which are	
schools	tempting bait for large-scale corruption	
	Establishment of communities, SBMCs and head teachers as watch-dogs	
Legal framework	Clarity on accountability of MDAs and financial reporting requirements	
Monitoring and	Analysis based on sound information to help identify where resources are	
evaluation	not reaching their targets and positive results are not being achieved	

Diversity in the ESSPIN States

7. The framework of intervention on PFM set out above is intended to provide a common approach for all the ESSPIN States for PFM. At the same time, it must be recognised that the circumstances, constraints and opportunities for reform are different and peculiar to each State. This is expected to result in work programmes at the State level, which differ in terms of the concentration afforded to the various activities, the pace of reforms, the level of support, and the sequencing of activities.

Linkages between PFM, other ESSPIN outputs and other SLPs

8. Given the breadth of scope of the PFM activities, it comes as no surprise that there are important linkages and synergies, with within ESSPIN with the other Outputs, but also with the other State Level Programmes. Table 2 attempts to identify some of the most important linkages.

Assessment of progress

9. The monitoring of progress in implementation of the activity groupings discussed above is going to be increasingly important as the project proceeds. Table 3 below proposes some governance indicators for use by the project in the area of PFM.

Table 2: Linkages between ESSPIN Output 2, other ESSPIN outputs and other State Level Programmes

Activity grouping	Linkages with other ESSPIN outputs	Linkages with other State Level Programmes
Budget cycle reform	Output 3	SPARC
	Budget allocation issues relating to application of	Strong link with support for MTEF in states
	resources for teacher quality vs. increased numbers	Activity planning/programmatic approach to budget
		SAVI
		Support for State House of Assembly and strengthening of
		budget oversight role of its committees
Organisational reform	Output 1	SPARC
	Synergy with support for UBEC reforms to make UBEC	Support for improved budget execution across MDAs
	more effective in oversight of and support for SUBEBs	
Transparency	Output 4	SAVI
	Synergy to be developed	Synergy to be developed
Direct funding to schools	Output 1	SPARC
	Mobilise UBEC and FMoE to achieve policy shift in explicit	Coordinate decentralisation efforts
	favour of direct funding to schools	SAVI
	Output 4	Cooperate to support this cause
Legal framework	Output 1	SPARC
	Review and reform UBE legislation at Federal / State level	Promotion of reforms to clarify relation of agencies to
		State governments in terms of oversight and budgetary
		management
Monitoring and evaluation	Output 3	SPARC
	Synergy with quality assurance	Synergy with wider State government information and
		performance measurement systems

Table 3: ESSPIN PFM governance indicators

Area	Current status	Process changes supported by	Objectively verifiable indicator
		ESSPIN	
1. Budget credibility: Aggregate	Substantial under-spending on	Align MTSS and budget through	For each state:
expenditure out-turn compared to	sector MDA budgets	imposition of budget constraint on	(i) Ratio of first year of MTSS to
original approved budget	• Up to 2 year lag in accessing UBE IF	MTSS and more careful linking to	budget appropriated for education
(i) budget-expenditure variation,	Budget in several states was not	the budget	(ii) Ratio of total sector budget to
including absorption of federal funds	aligned with MTSS (partly because	Support MDA workplans to help	total education expenditure
(ii) MTSS-budget variation	MTSS was prepared without budget	justify release of funds in support	(iii) Ratio of annual planned to actual
	constraint)	of MTSS activities	drawdown of UBEC funds by state
			(iv) Gross value of undisbursed UBE
			IF funds held by UBEC awaiting
			drawdown by states
2. Budget comprehensiveness: state	Some state budgets only reflect	Support inclusion of the full SUBEB	Is the full SUBEB budget in the State
budget includes information on all	the matching grant to SUBEB and do	budget in the State Government	Government budget? (Yes/No)
funds	not include SUBEB expenditure in	budget, including both UBE IF	
	the budget	releases and matching grants with	
	Donor activities typically off-	detailed breakdown on both the	
	budget except where matching	revenue and the expenditure side	
	grants are required		
3. Transparency of inter-	Transfers from UBEC to SUBEBs are	Support UBEC to set minimum	Are SUBEB Action Plans in the public
governmental fiscal relations	published monthly	standards of both ex ante and ex	domain? (Yes/No)
	No information published on	post transparency for SUBEBs and	
	utilisation of funds available to	LGEAs, including publication of the	
	SUBEBs at LGEA level	full SUBEB Annual Action Plans	
		(after approval by UBEC)	

4. Public access to key fiscal	The State Government Recurrent	Support MDAs to prepare Activity	Is an Activity/Programmatic version
information	Budget Estimates are on a purely	Plans for use of the Recurrent	of the MDA budget available to the
	input basis and do not show	Budget and (eventually and in	State House of Assembly at time of
	activities to be undertaken by MDAs,	cooperation with SPARC) move SGs	presentation of the budget?
	so assessment of value for money is	to Programme Budgeting, using	(Yes/No)
	not possible for this budget part	Education as the pilot sector	
5. Multi-year perspective in fiscal	Prior to ESSPIN and the introduction	Two stages:	Does MTSS follow instructions of
planning, expenditure policy and	of MTSS there was no multi-annual	(i) Prepare multi-year MTSS	multi-annual ceilings set by (or, in
budgeting: state develops MTSS	framework for State Government	(achieved in all 5 states in 2009)	the absence of a formal MTEF,
	budgeting	(ii) Link multi-year MTSS to MTEF	agreed with) the MoF/MPB?
		prepared by State Government	(Yes/No)
		(under SPARC support)	
6. Competition, value for money and	State Government financial	Strengthen internal due process	Are audit reports on SUBEBs and
controls in procurement	regulations prescribe procurement	systems in MDAs and especially in	MDAs prepared promptly (within 6-
	systems for MDAs and SUBEBs but	the SUBEBs and LGEAs	months of year-end) and acted on?
	compliance and enforcement are		(Yes/No)
	largely non-existent		
7. Predictability in the availability of	Sector budgets liable to be pillaged	Engage at political level to get	Ratio of budgeted to drawn-down
funds for commitment of	to finance other sectors and	assurance of availability of	funds at MDA/SUBEB, LGEA and
expenditures	projects	budgeted funds to the sector	(eventually) school levels
8. Availability of information on	Very little information on funding	Encourage UBEC to set minimum	Are UBEC guidelines for SUBEBs on
resources received by service delivery	made available to service delivery	standards for transparency.	transparency developed and issued?
units	gents including LGEAs, and schools	Support sector MoU initiatives	Are SUBEB action plans published
		Support publication by SUBEBs	after clearance by UBEC?
		and LGEA of financial and non-	Are actual SUBEB expenditures by
		financial resources (e.g. teachers)	LGEA published within 2 months of
		available to each school	year-end? (Yes/No)
		1	

9. Resources are allocated to schools	Obscure system of resource	Support strengthening of the	Do LGEAs prepare annual plans for
based on assessment of needs	allocation generally not assessable	planning function in LGEAs and	service delivery to schools which
	for equity and appropriateness	SUBEBs and the application of	feed into the MTSS process?
		transparent and equitable rules on	(Yes/No)
		resources allocation for access and	
		equity	
10. Quality and timeliness of financial	Very variable; legal reporting	Support routine reporting from	Does SUBEB prepare a complete
reporting	requirements of SUBEBs confined to	SUBEBs to SMOEs	and timely annual report for SMoE?
	annual reporting to the	Support establishment of budget	Do departments within all MDAs
	Commissioner	monitoring in MDAs based on	and SUBEB prepare monthly and
		financing of activities	quarterly progress reports based on
			Activity Plans? (Yes/No)
11. Legislative scrutiny of external	SHA Committee receives reports	Having established activity-based	Do reports of the State House of
audit reports	prepared by Auditor-General, but	budgets in MDAs, encourage the	Assembly Finance and Accounting /
	these are generally late, of variable	State House of Assembly relevant	Public Expenditure Committee
	quality and do not form the basis for	committees to review value for	provide an effective scrutiny of
	follow-up action partly because of	money and ensure follow-up on all	reports of external auditors for
	limitations in the line-item-based	external audits of MDAs and SUBEB	education sector MDAs? (Yes/No)
	traditional budgeting system		

Annex – Concept note on corruption

Issue

- 10. The central aim of ESSPIN is good governance to help States make more effective use of their own resources. This can be achieved in several ways through clearer outcome-driven planning, through stronger budget cycle management systems, through capacity building in the organisations responsible for service delivery in the sector etc. ESSPIN is rightly pursuing all these approaches. However, as we get closer to the institutions there is accumulating evidence that, at least in some States, a core problem is that a large proportion of the funds already available to the sector are simply not being properly utilizes. For example, recent revelations indicate that roughly N400m a year was being skimmed off the teachers' salaries; a further N600m of funds for capital projects was simply embezzled under the guise of 'teacher development'. Doubtless further amounts have been stolen through corrupt procurement practices, short-changing schools etc. As a result, looking only at the SUBEBs, the losses to corruption are of equal magnitude to the total annual flow of funds from the UBEC Intervention Fund. In some states it has emerged that the sector budgets are substantially under-spent (substantial parts of the budgets have not even been requested to be released), and there is increasing evidence that the SMoEs capital budgets are slush funds for embezzlement.
- 11. ESSPIN cannot achieve its objective without getting to grips with this problem and working with the states to plug these gaps. At the same time, there appear to be some States and institutions which are under sound management. While one hesitates to name names and appearances may be deceptive, the SUBEBs in some states appear fairly effective in utilising the resources at their disposal. One feature differentiating SUBEBs (compared to other MDAs) is that they operate under UBEC rules, which in principle require accountability for use of funds in accordance with SUBEB Action Plans for each Intervention Fund tranche.
- 12. Transforming a long-standing and deeply ingrained environment of corruption is not going to be an easy task or one where rapid and uniform success can be expected. To have a good chance of overall success an essential requirement is that ESSPIN must have a plausible strategy which brings the available instruments to bear and concentrates on the large flows. Perfection is not attainable. This concept note tries to identify some elements of an ESSPIN strategy for addressing the problem of corruption in education.

Work with SPARC to strengthen financial management systems in MDAs

13. As it operates at the State government central agency level, it is at the heart of SPARC's mandate to be supporting reforms which constrain the opportunities for corruption in the State governments. The main instruments being applied include: cash and payments management (reducing the number of bank accounts exercised by MDAs with the eventual aim of passing all payments – except petty cash payments - for all MDAs through a single account using electronic payments); development or strengthening of Integrated Financial Management Information Systems (IFMIS)

with built-in checks to ensure payments are only possible for budgeted items; strengthening of procurement (due process) through enforcement of existing federal and state laws; routine budget monitoring and bank reconciliation to identify irregularities quickly. The SPARC programme of reforms in this area is already having some effect but will in general take 2-3 years to put the full set of instruments and controls in place and this will still only be successful where they enjoy strong support from the central agencies (Accountant General/MoF/MPB). The SPARC approach is the correct approach for long-term and sustainable control over corruption in the MDAs.

14. The challenge for ESSPIN in this area is to work with the education sector MDAs to support and facilitate the accounting system changes which SPARC is leading. This is necessarily a second fiddle role, but is nonetheless important.

Use MDA activity planning to ensure funds are applied to the correct purposes

- 15. The main contribution which ESSPIN can make relates to the planning, preparation and execution of budgets in terms of the activities to be funded by the budgets of the sector MDAs. The task involves enhancing the awareness of the responsibility of MDA managers (especially at Permanent Secretary and Head of Department level) to have clear plans for the use of budgeted funds, to monitor the implementation of those plans and to report on the results achieved. One reason why it is possible for large parts of MDA funds to be stolen is that there is no accountability for the use of funds. The Finance Committees of the State Houses of Assembly potentially have an important role here in terms of holding MDA permanent secretaries to account for the use of funds and the results achieved.
- 16. ESSPIN actions under Output 2 in 2010 will concentrate on working with the sector MDAs to prepare activity plans for main departments, to prepare activity-based, programmatic versions of their recurrent and capital budgets, and to set up monitoring of the MDA activity plans within the MDAs.

Strengthen UBEC support for accountability in SUBEBs

- 17. Under the existing system for the management of the UBE Intervention Funds, UBEC has responsibility for ensuring that each SUBEB submits an Action Plan (for each annual Intervention Fund tranche), that the required matching grants have been deposited by the State governments, and for releasing funds only as previous period releases have been accounted for. Clearly if the UBEC oversight function was working effectively there would be no scope for the irregularities actually observed in the SUBEBs.
- 18. Under Output 1, ESSPIN is now rapidly developing a strong relationship with the senior UBEC management team aimed at reorienting UBEC towards an appropriate and achievable mandate and mission compatible with the Federal UBE Law. The central thrust of ESSPIN's work with UBEC is now emerging, following the November retreat in Obudu with senior UBEC management and the subsequent follow-through activities. This thrust is to transform UBEC from an essentially policing body, which controls the flow of funds to SUBEBs and takes direct control of transactions where

there is evidence of poor accountability by SUBEBs, into an organisation which has at the heart of its mission the role of supporting the SUBEBs to conducts their affairs transparently and accountably in a context of anticipated increased flexibility in the purposes to which Intervention Fund money can be applied in support of basic education.

- 19. An important strength of ESSPIN working with UBEC is the possibility of impacting not only on the 5-6 ESSPIN States, but on all 36 States.
- 20. At the moment it is still early days in ESSPIN's work with UBEC. In the coming months it is hoped that it will be possible to support UBEC in developing a stronger oversight function in respect of SUBEB accountability with a greater emphasis on providing follow-up support for SUBEBs which are falling short to strengthen their financial management and accountability systems. In this context, the experience ESSPIN is gaining through its direct support for Kwara SUBEB to address the immediate serious problems of accountability through the on-going review of financial management and reporting systems for accountability may prove very useful.

Increased accountability through greater transparency

- 21. There is currently almost no transparency in the allocation and application of resources to schools and communities, even in those States/SUBEBs which have apparently progressive senior sector managers. It is useful to distinguish 'ex ante' from 'ex post' transparency. Ex ante transparency aims to inform stakeholders and the public in advance that specific resources are to be applied (e.g. in the coming year) in support of particular schools, communities, LGEAs etc. The purpose of ex ante transparency is to create an expectation that funds or resources are on their way, thereby empowering the relevant stakeholders to press to ensure that the resources are indeed made available and are delivered efficiently and on a timely basis. Ex post transparency provides information after expenditures have been incurred and is aimed to empower stakeholders to confirm that their entitlements have actually been delivered. Both types of transparency can be useful in combating corruption, and ideally they should be used in combination.
- 22. There is great scope for increased transparency especially at the SUBEBs. Through the process of the detailing of the SUBEB Action Plans, which are a requirement for the release of UBE Intervention Fund tranches, the SUBEBs already have a very detailed view well in advance of expenditure of the anticipated beneficiaries of their expenditures (i.e. which schools or at least LGAs will benefit from new construction, rehabilitated facilities, delivery of textbooks etc.). Similarly the cost of almost all civil works is known in advance, since the SUBEBs apply standard costings (e.g. per classroom) in the allocation of contracts. There is, accordingly, a very great scope for the routine publication, in advance of expenditure, of the details of beneficiary schools, communities etc. Initial discussion with progressive SUBEB Executive Chairmen in the ESSPIN States indicates that they are not averse to providing such transparency.
- 23. There is at present no guidance from UBEC to SUBEBs on minimum transparency standards on resource allocation and application. This is an area where ESSPIN could work, both directly with SUBEBs in ESSPIN States and with UBEC on national generic guidelines.

Decentralise funds to the school level with local safeguards

24. The decentralisation of funds down to school level, apart from being a shift which is desirable in its own right as a part of the empowerment of schools and communities, is a potentially powerful mechanism for reducing the opportunities for grand corruption in the central agencies. Direct funding to schools breaks down the large blocks of funds which form a target for organised corruption in the MDAs through, for example, the allocation of civil works contracts. It must be recognised, of course, that decentralisation of fund management, while reducing the accountability problems at the centre, creates new problems at the school community and possibly LGEA level, so decentralisation is not necessarily a panacea for corruption. This threat must be addressed by timely and adequate establishment of financial management capability at devolved levels, notably in SBMCs.

25. To move forwards on this issue ESSPIN needs:

- to adopt a clear strategy on funds for schools, detailed on the basis of lessons learnt from the major piloting exercises carried out in recent years; terms of reference for a study activity under Output 2 to review the experience to date with direct funding for schools in Nigeria are currently under preparation
- to develop an advocacy approach for persuading high level stakeholders in the States to adopt direct funding as a major component of their application of both their own funds and funds derived from the UBE Intervention Fund; the response to such advocacy will provide a useful litmus test of commitment to cleaning up the sector

Break up the large tempting blocks of funding

26. Apart from direct funding to schools, there is the possibility of devolution of responsibility for funds management to LGEA level. This would have the advantage, once more, of breaking up the current very large and juicy blocks of funds held at the disposal of SUBEBs. Progress in this area, however, will be contingent on a major advance in terms of LGEA capacity-building. On current evidence, LGEAs are part of the problem rather than of the solution. It is expected that organisational development work under Output 2 will start to address function and capacity issues at LGEAs, at least in selected locations. The results of this initial work need to be factored into the formulation of a clearer policy towards the role of LGEAs in funds management.

Encourage a policy of name, shame and fire

27. There continues to be a dominant culture of acquiescence in embezzlement of public funds earmarked for education. At some point this needs to change. In Kwara the imminent signing of the MoU between all major stakeholders may provide a forum in which decisions could be taken and recommendations made to strengthen the sanctions against corruption.