

GOVERNMENT GAZETTE NO. 28134 DATED 14 OCTOBER 2005

GENERAL NOTICE

NOTICE 1865 OF 2005

DEPARTMENT OF EDUCATION

SOUTH AFRICAN SCHOOLS ACT 84 OF 1996

NATIONAL NORMS AND STANDARDS FOR GRADE R FUNDING

CALL FOR COMMENT ON THE DRAFT NORMS AND STANDARDS FOR GRADE R FUNDING

I, Grace Naledi Mandisa Pandor, Minister of Education, after consultation with the Council of Education Ministers, hereby invite comment from the public and interested parties on the proposed policy contained in Annexure A.

All comments should be in writing and must reach the Department of Education no later than 30 November 2005.

Written comments, which should indicate the name and postal, e-mail and telephone contact details (if available) of the person, governing body or organization submitting the comments, may be sent to:

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GNM Pandor, MP

Minister of Education

ANNEXURE A



Proposed policy amendments for the resourcing of publicly funded Grade R in accordance with White Paper 5

16 August 2005
Version 3.5: Draft for discussion

WHAT ARE THE IMPORTANT THINGS COMMUNITIES SHOULD KNOW?

Here, we summarise what the new sections of the *National Norms and Standards for School Funding* titled ‘Grade R in public schools’ and ‘Public funding for Grade R in independent schools’ mean for communities. Importantly, what follows here is not the policy itself, but a summary of the policy, especially insofar as it affects parents.

This section has been translated into four official languages other than English to encourage more people to discuss the proposed policy changes, and to submit comments to Government.

GRADE R IN PUBLIC SCHOOLS

What the Government’s aims are

For a number of years, Departments in provinces have been funding Grade R in a few public schools. In 2001, Government released *White Paper 5*, which explained how Grade R could be expanded and improved across the country. Government does not have enough funds to introduce Grade R to all public primary schools in the country all at one time. For this reason, the *White Paper* explains that Government will gradually introduce Grade R across more schools, in such a way that by the year 2010, all public primary schools will offer Grade R funded by Government. When new schools are included in the new system, Government will make sure that it is the schools in the poorest areas that will be given preference.

What Provincial Departments of Education will do

Each year, in September, the Provincial Education Department will produce a ‘roll-out plan’ that will say which schools receive Government funding for Grade R in the next school year. This roll-out plan will be made available to the public, so that everyone can see which schools are offering the service, and which schools are not.

As was explained, the poorest schools will be given preference. In order to plan properly, Government has divided all schools into five quintiles, quintiles 1, 2, 3, 4 and 5. Quintile 1 schools are those schools serving the poorest communities, and quintile 5 schools are those schools serving the least poor communities.

What schools must do

Schools that receive Government funding for Grade R must offer Grade R to their communities according to the rules laid out in this funding policy, and in other policies such as the *South African Schools Act*.

Schools that receive Government funding for Grade R must first offer the Grade R places to members of the community surrounding the school. The Department will fund a particular number of places in each school, for example 30 places. This number will be more or less equal to the number of Grade 1 learners in the school. A school may offer more Grade R places than the number set by the Department, but up to a limit. The limit is 10 per cent, so a school receiving funding for 30 places, may use the same funding to cover up to 33 places. If schools enrol too few Grade R learners, they must return some of the funds to the Department. For example, a school that fills only 25 places, when the Department is funding 30 places, would have to return some of the funding to the Department according to the rules of this funding policy.

How much funding will schools receive?

The funding that a school receives for Grade R is known as the 'allocation for Grade R'. The allocation for each school is worked out using an amount for each learner. This amount for each learner is always equal for all the learners inside one school. The amount will be lower than what Government spends on Grade 1. This is so that Government can afford to expand the service faster, to more schools. This is also because Government has found through studies into Grade R that it is possible to offer quality Grade R at a cost that is lower than the existing costs in Grades 1 to 7.

The amount for each learner is about R3 600 in quintile 1 schools, and R3 000 in quintile 3 schools. The amount may differ slightly from one province to another. Quintiles 1, 2 and 3 schools will receive enough funding to provide quality Grade R without needing to charge fees. Schools in quintiles 4 and 5, which will begin to receive Government funding only after the first three quintiles have been covered, will receive less than R3 000, and may therefore charge fees in order to cover all costs. By providing less funding to better off schools, Government has more funds to spend on poorer schools, where it is more difficult for parents to pay privately for Grade R.

How will schools receive their funding?

Because different provinces have slightly different ways of organising Grade R, and because not all schools are the same, this funding policy allows for three different ways of funding Grade R in public schools:

- If a school has been granted Section 21 functions by the Department, according to the *South African Schools Act*, the Department may transfer all the Grade R funds straight into the bank account of the school. The school would then use the funds to provide Grade R. This means that the Grade R educator becomes the employee of the School Governing Body. The Department may, if it believes this is necessary, organise the payment of SGB-employed Grade R educators in such a way that funds are transferred straight from the Department to the bank accounts of the educators.
- If a school has not been granted Section 21 functions, the Department will not transfer funds straight to the school. Instead, the Department will purchase the things the school needs to offer the Grade R service, using the allocation for Grade R for that school. In addition, the Department will pay SGB-employed Grade R educators directly, using the Grade R allocation for that school.
- Whether a school has Section 21 functions or not, the Department may establish posts for Grade R educators. This means that the Department, and not the School Governing Body, becomes the employer. The Department may then subtract from the school's allocation for Grade R, the salary that is paid to the Department-employed Grade R educator. The school would then obtain the remaining part of the allocation to purchase things such as furniture and teaching and learning materials needed for Grade R.

How parents can become involved

Parents should find out if the primary school near to them will be offering Government-funded Grade R in the following year, or in some future year. The roll-out plans of the Provincial Education Departments will provide information on which schools are funded in the next year, but also in the years that follow. Parents who enrol their children into Government-funded Grade R must ensure that their children attend school regularly. Government is not making it compulsory yet for all parents to send their children to Grade R, because not all schools offer Grade R. But it is important that those parents who do enrol their

children in Grade R, take the matter seriously. For this reason, the *South African Schools Act* will in future make it compulsory for those parents who have enrolled their children in Government-funded Grade R, to keep their children in school for the whole year.

Parents can and should influence the way Government-funded Grade R is organised in the school, through participation in parents' meetings, and through their SGB representatives. Although Grade R funding falls under rules that are slightly different to the rules that apply to other school funding, the School Governing Body has the usual powers when it comes to deciding what the money should be spent on, and how the money is managed.

PUBLIC FUNDING FOR GRADE R IN INDEPENDENT SCHOOLS

Government has in the past funded Grade R in community-based sites. In future, all community-based sites receiving Government Grade R funding must be registered with the Provincial Department of Education as independent schools. This they must do whether or not they have Grade 1 or any other grade. This is to improve quality controls over the community-based sites.

Government will fund Grade R in independent schools only if the service cannot be offered in a nearby public school, or if the Department believes that the independent school is offering the service in a special and innovative way that Government believes deserves funding. In other words, Government funding of Grade R in independent schools is not automatic. The Provincial Department of Education will make it clear to the public what its policy is on the funding of Grade R in independent schools. In addition, it will make it clear in a public register which independent schools are receiving funding for Grade R, and which ones are not.

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1 Introduction and background

Section 4.3.1.13 of White Paper 5 (WP5) states that we will give attention to ‘The review and amendment of all relevant policies, norms and standards, legislation and regulations to give effect to our policy proposals contained in this White Paper’. What follows are specific proposals for doing this for the South African Schools Act, or ‘SASA’ (Act 84 of 1996) and the National Norms and Standards for School Funding (Notice 2362 of 1998). (This policy is referred to by its short name, the School Funding Norms, abbreviated as SFN, in the rest of this document.)

This document does not cover important policy and other regulatory amendments required for establishing a Grade R curriculum, benchmarking quality service delivery on the part of ECD practitioners and specifications for acceptable physical spaces for Grade R.

1.1 Inputs considered so far

This document is the result of in-depth analysis and interpretation of the White Paper. Various groups and organisations have made inputs that have shaped this document.

- Managers and officials in relevant directorates in the Department of Education.
- Outside technical assistants working on the Grade R funding policies (Dr Luis Crouch and Martin Gustafsson).
- Finance and ECD officials from Provincial Departments of Education (written inputs from FS, GP, KN and NC were received and verbal inputs were made by all provinces at the Hedcom Sub-Committees on ECD and on Finance).
- South African Congress for Early Childhood Development.

2 A few fundamental points

Some fundamental points had to be resolved before detailed amendments to SASA, and in particular the SFN, could be contemplated. Three such fundamental points are discussed below. It should become clear that many of the issues are not fully resolved yet, and that further consultation, analysis and experimentation will have to take place. It is quite possible that we will have to manage an iterative policy amendments process, whereby new learning becomes incorporated into further amendments down the line.

2.1 Compulsory or universal Grade R?

The White Paper makes it clear Grade R will become *universal* (section 1.4.3), but not that Grade R should be *compulsory*. If Government makes resources available by 2010 to make Grade R *accessible* to all children, and if all parents want their children to take Grade R, then one would have *universal* Grade R, with perhaps a small handful of exceptions where parents did not want their children to go to Grade R. White Paper *One*, like the Constitution, states that children have the right to a *basic* education, but does not say that this means ten years of schooling. SASA (section 3) states that for learners other than those with special educational needs, there are nine years of compulsory schooling, from age seven to age fifteen. The Act also states that Grade 9 is the upper limit of compulsory schooling, so one can deduce that Grade 1 (and not Grade R) is the lower limit, and that age seven corresponds to Grade 1. (The Act also defines a ‘school’ as an institution enrolling learners in any of Grades R to 12, but this does not imply that all these grades represent compulsory schooling.) It seems we have a choice between making Grade R to all intents and purposes *universal but not compulsory*, or *compulsory and universal*. If we choose the former, then the status of Grade R becomes a little like that of Grades 10, 11 and 12. If we choose the latter, then we should change SASA and specify clearly that Grade R is compulsory, and that the ages for compulsory schooling are six to fifteen.

The choice has practical implications. If Grade R becomes compulsory, then mechanisms for tracking out-of-school learners, and for taking action against parents in some cases (these are mechanisms that currently operate, or should be operating, at the Grade 1 to Grade 9 levels) would become applicable at the Grade R level. Moreover, the precedent of state provisioning in Grades 1 to 9 could expose the state to particular legal problems. It might be argued that because the state funds Grades 1 to 9 learners more or less equitably (with a pro-poor redistribution factor amounting to not more than 5% of the total), it would run counter to policy to fund rich Grade R learners at one-seventh of the level of the poorest learners *when parents are obliged by law to enrol their children in Grade R*. On the other hand, depending on interpretations of the Constitution and the law, it might be justifiable to force the rich to pay for most of the cost of Grade R provisioning. Parents who are rich are obliged by law to feed their children, and keep them healthy, so why should they not also be forced to provide them with an education using private means?

In other countries, both developed and developing, the predominant practice is *not* to make it mandatory for parents to send their children to a reception year, even if this service is universally available.

Making Grade R compulsory for *all* learners should be distinguished from making it compulsory for parents to ensure that their children made use of the service *after the children had already been enrolled*. In the policy proposals contained in this document, the position is taken that until Grade R is universally provided by the state, only those parents who have enrolled their children in Grade R, will be under the obligation to ensure that their children make use of the service for the duration of the year in question. This will assist in guarding institutions against irresponsible use of the service. It is only after the service has become universalised that enrolment in Grade R will become compulsory for all appropriately aged learners. The approach adopted here is therefore not the predominant practice in other countries. Yet making Grade R compulsory in the long run receives considerable support in South Africa, as reflected in the inputs made in the drafting of these proposed policy amendments.

2.2 The resourcing mode

The resourcing mode to be employed for Grade R in public ordinary schools is a key issue over which there has been considerable discussion and debate. The debates are reproduced in

some detail below. They are complex, and have a fundamental bearing on how publicly funded Grade R is to be provided, and indeed on the future nature of the bulk of public ordinary schools.

2.2.1 What the White Paper proposes

Section 4 of WP5 makes three key points relating to the resourcing mode for Grade R in public ordinary schools. All the WP5 extracts appearing in this section are from Section 4.

1. **Public funds into school funds from the outset.** WP5 envisages the transfer of funds which, in the case of poorer schools, will be sufficient to cover personnel and non-personnel items, straight to public schools. On which schools to target, the following is said:

School governing bodies of primary schools that respond effectively to the ECD challenge outlined in this White Paper will be provided with grants-in-aid by provincial departments of education to establish accredited Reception Year programmes.

Each department would select the poorest schools that are well-managed, and have Section 21 status, and begin to subsidise Reception Year places at those schools at the appropriate percentage of the cost of a primary per learner cost in the province (approximately 70%).

Moreover:

Second, this White Paper proposes that the provision of the Reception Year in public primary schools take place via direct grants-in-aid from provincial departments of education to school governing bodies.

Prior conversion to section 21 status is envisaged:

The grants would flow directly to the school governing bodies under the coverage of Section 21 of the South African Schools Act and will be specified through an amendment of the Norms and Standards for School Funding.

The funds would be highly fungible:

Though one of the policy recommendations arising from previous studies would call for ring-fencing financial allocations to ECD, in this White Paper we take a more cautious approach. We propose to study more closely the ring-fencing of allocations since discussions with public finance experts suggest that ring-fencing is becoming a source of real or perceived allocative inefficiency in the use of public resources within provinces. In addition to deciding on the further study of ring fencing of allocations, we are calling for actual service delivery targets in terms of coverage.

2. **School employment of ECD personnel.** Flowing from the above, is the imperative that Grade R staff should be employed by the school:

Under this finance mechanism, ECD care providers in the Reception Year of public schools would be employees of the school governing body. However, for purposes of quality enhancement and assurance, they would be required to fulfill certain training and registration requirements as discussed above.

3. **Public funding on a per learner basis.** The total Grade R funding for targeted schools would be relative to the number of Grade R learners.

These grants would flow on a per-learner basis. This would encourage a focus on efficiency of provision.

2.2.2 The advantages of the White Paper approach

WP5 explains why the resourcing mode described above was selected. However, there are also motivations for the approach which are not very clearly expressed. Below, the arguments in favour of the WP5 approach are summarised.

It is useful to think of the benefits of the WP5 approach in terms of efficiency and equity.

On the efficiency side, three major arguments stand out.

- **Lower cost and faster roll-out for the system.** Clearly, if the service is made less costly, then roll-out can occur at a faster pace, and as long as there are checks on the side of quality, we can achieve more with a limited pot of state funds. Allowing resourcing flexibility in the system, permits us to take a less costly modus operandi that already exists, and bring it into the public schooling system. WP5 emphasises the importance of quality controls to ensure that outputs are of an acceptable standard.

The justification for this mechanism is to enable a combination of the lower cost of the community-based centres, but holding the possibility of greater quality control and accountability, as well as putting ECD provision under easier administrative reach of provincial departments of education.

The policy goal is to keep costs low, while maintaining or improving the accountability and information networks that improve quality, thus increasing value-for-money.

The National ECD Pilot Project on community-based sites demonstrates that costs can be reduced using community energies and relative informality.

Considering that WP5 envisages publicly funded Grade R to cost around 70% of the cost of Grade 1, in per learner terms, a considerable improvement to the current levels of investment is implied. In some provinces, the R2,000 per learner level proposed by WP5 represents a doubling of what has up till now been spent in publicly funded centres.

It would not just be lower per educator cost, linked to the flexibility of the resourcing system, that would make Grade R less costly to deliver. The traditional post provisioning approach is costly both in terms of unit costs, and in terms of the high cost of administration and in terms of paying excess staff whilst alternative posts in the province are found.

- **School level determination of resource mix.** Because schools will have considerable control over how funds are spent to deliver the Grade R service, efficiency at the local level will be enhanced. In particular at the Grade R level, it is impractical and inefficient to impose a one-size-fits-all approach on all schools. The trade-off between class size and the pay and qualifications level of educators would be interpreted differently in different schools. One school may prefer two classes of fifteen learners with less qualified educators, whilst another may prefer one class of thirty learners with one better qualified and better paid educator. The trade-off between educators and non-educators (e.g. classroom assistants) works differently in different contexts. The personnel versus non-

personnel expenditure trade-off is another variable. The school context varies partly because the history of public and private ECD provisioning varies greatly from one community to the next. In many instances, it will be preferable and efficient to bring local Grade R services that exist and work well into the new public school Grade R system, and this underlines the need for a flexible resourcing system.

- **Space for experimentation relating to best practice.** Strongly linked to the previous argument, is the argument that the country needs a flexible system to allow for experimentation and the emergence of best practice. It is important to understand that there has been too little research into and piloting of how best to deliver quality Grade R in schools, for us to say at this stage that approach X or approach Y is optimal for South Africa. In some years, there ought to be greater certainty in this regard, but currently our knowledge in this area is limited. Establishing a single national modus operandi without a better understanding of what works best would arguably be irresponsible on the part of Government. If the WP5 resourcing approach is accompanied by serious and ongoing research, valuable lessons can be gained that can assist schools across the country to improve the service.

On the side of equity, another three arguments stand out:

- **Pro-poor funding pattern.** Funding of Grade R would be pro-poor:

A further justification is that by putting the entire funding under the highly progressive targeting approach used in the Norms and Standards for School Funding, a greater share of total educational resources would flow towards the poor.

Making total funding of the service progressive, or pro-poor, would not be possible unless the resourcing mode were a flexible one, which allowed for different expenditure patterns, including personnel spending patterns, in different schools.

- **Greater equity in service delivery amongst the poor.** Because the WP5 approach allows for relatively swift roll-out across poor communities, there will be less inequality between poor people. Currently, public Grade R service delivery is patchy, and does not provide similar levels of service for the similarly poor.
- **Income redistribution.** Although learners and households gain from the value of the Grade R service, it is the educators and other staff who deliver the service who experience the public expenditure as income. By pushing this public expenditure towards ECD practitioners who for a variety of historical reasons are usually not fully qualified educators, instead of towards fully qualified educators, who are in any way already beginning to be in short supply, we ensure that the roll-out of Grade R supports income redistribution in the country. The fact that the great majority of ECD practitioners are women strengthens this argument.

Lastly, though not emphasised in WP5, the expected under-supply of fully qualified educators in coming years is one of the strongest arguments against simply extending the current delivery mode used in Grade 1, down to Grade R.

2.2.3 Variations to the White Paper approach

In order to deal with some of the concerns around the WP5 resourcing mode, a number of variations have been suggested. Some of these variations are in fact pursued in the proposed policy amendments that follow, for reasons that will be explained. Nevertheless, the matter is

so complex, in terms of the economics, logistics and legalities of the issues, that we should probably debate the options further, before the proposed policy is written into law.

The following variations are arguably all fully within the scope of the White Paper.

- **Phasing in of school financial responsibilities.** Although WP5 assumes a one-model transfer of financial responsibilities to schools in terms of the Grade R service, a two-model approach exists for Grades 1 to 12, whereby section 21 schools receive monetary transfers, whilst in the case of the less managerially ready non-section 21 schools, the state spends the school's public funds on behalf of the schools. Applying this two-model approach to Grade R gives PEDs some manoeuvrability where the development of financial management capacity in poor schools lags behind the planned roll-out of publicly funded Grade R. This in turn can strengthen the PEDs hand in combating fraud and corruption. A two-model approach for Grade R is in fact incorporated into the policy proposals appearing in this document. However, we should bear in mind the administrative complexities, and possible legal problems, stemming from the fact that Grade R school funding is expected to cover personnel costs (which is not the case in Grades 1 to 12). There is a possibility that the state could be defined as the factual employer during the first phase, when the state procures for the school, and that this would be difficult to undo in the second phase, when the school assumes full control over the public funds.
- **A resourcing advantage for small schools.** WP5 does not deal with the issue of small schools. The proposed policy amendments make provision for a favouring of small schools in the resourcing formula, as a provincial option, but do not specify what the level of the small school advantage should be.

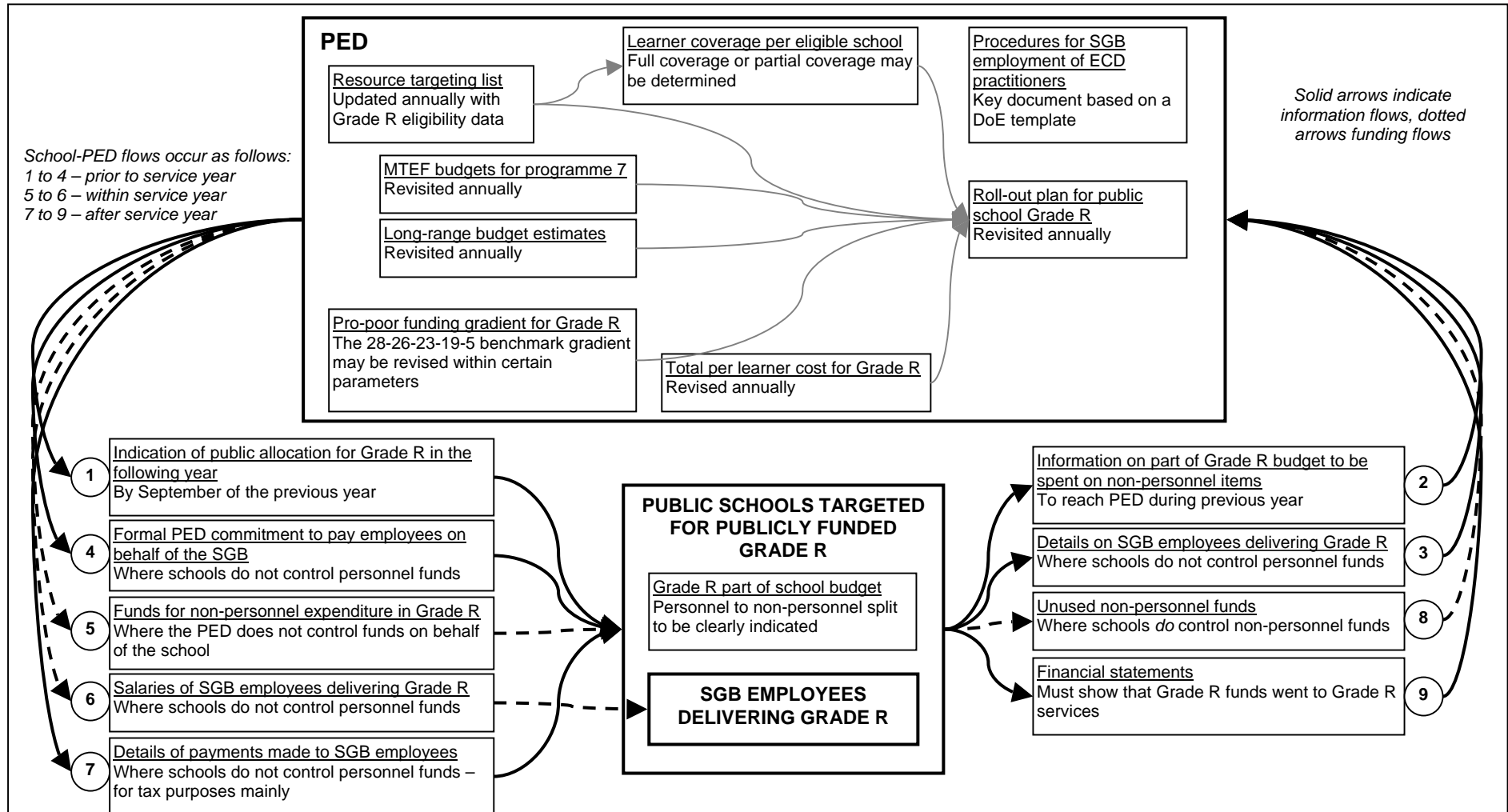
The following variation is arguably outside the original intent of WP5, though it does not explicitly contradict what WP5 says. As there is considerable support for this variation, it has been included as an option within the proposed policy amendments.

- **Provincial posts for Grade R educators in public schools.** It has been proposed that new posts in the public service be created that are less costly than regular educator posts, and that are designed with the new Grade R service delivery in mind. These new posts would then be distributed to schools, and filling of posts would occur in accordance with the Employment of Educators Act. WP5 focuses only on the transfer of fungible funds to schools, not educator posts. However, as long as posts are distributed to schools in line with the original WP5 criterion of funding based, firstly, on enrolment in Grade R and, secondly, on the poverty of the community, post provisioning can be accommodated within the resourcing mechanisms of the new service without any fundamental deviation from WP5. The proposals that follow allow for an option whereby a part of the Grade R grant to schools would be converted into one or more posts. The arguments in favour of using provincial posts are essentially that this would strengthen PED control over the quality of the service and promote labour relations stability. The arguments against would be that posts reduce the ability of schools to respond flexibly to needs on the ground.

3 A map of the new system

The following diagram illustrates the new system as it applies to public schools and as implied in the policy amendments that follow. This 'map' complements the policy amendments, and should be read with the amendments.

Figure 1: Funding and information flows in the new system



4 Amendments to the South African Schools Act relevant to Grade R

The approach followed here is to ‘correct’ the original policy. This is to facilitate reading. The published amendments, however, will contain only specifications on how the original policy changes, for instance that new paragraph B should come after old paragraph A, that new paragraph C should replace old paragraph C, and so on. What is not done here is a check on the consistency between these proposed amendments and other amendments that have been made to SASA after publication of the Act in 1996. It is very unlikely that there would be major inconsistencies, but a final check would have to be undertaken.

The original policy text appears in normal font, and with a strikethrough line if the proposal is to delete text. New wording is in italics.

It is assumed that the reader is highly familiar with WP5, and for this reason arguments for particular approaches made in the White Paper are in general not repeated here, and details on which paragraphs here link to what paragraphs of WP5 are also not specified.

	<i>Policy</i>	<i>Comments</i>
3	(1A) Where a parent enrolls a learner in publicly funded Grade R, offered in accordance with national norms and minimum standards for such a service, that parent must ensure that the learner concerned attends Grade R classes, unless a good reason, such as the relocation of the parent's household, changes circumstances substantially. Grade R is thus compulsory for those learners enrolled in Grade R, where the schools have been targeted for the offering of Grade R, and where the parent can reasonably be expected to comply with the requirement. When all schools offer publicly funded Grade R, Grade R will be compulsory for all learners, with no exceptions, in the same way as Grade 1 is compulsory.	<p>Motivation: Eventually, we want to have ten years of compulsory schooling, which implies making Grade R compulsory by 2010. In the interim, we want to ensure that parents who have accepted publicly funded Grade R places for their children in schools do not squander this opportunity, for instance by not taking attendance seriously.</p> <p>Discussion: Given the difficulty of changing the Act (see comments below), we cannot expect to get this key provision through in a hurry. This means that in the interim, we may have to roll out Grade R without the legal force to oblige parents to ensure that enrolled Grade R learners do in fact attend school. It is probably not possible to oblige parents to send their children to Grade R in the School Funding Norms (SFN) – the SFN deals so far only with the obligations of Government and schools, in other words public bodies, not private individuals. There doesn't seem to be any way out of amending the Act if we want to effect compulsory Grade R. The fact that there will be a lag is perhaps not very problematic, especially given the fact that the public demand for Grade R is high. There will probably not be many parents who abuse the service by enrolling their children, and then failing to enforce their attendance.</p>
20	(1) Subject to this Act, the governing body of a public school must- ... (l) discharge all other functions imposed upon the governing body by or under this Act; and (m) discharge other functions consistent with this Act as determined by the Minister by notice in the Government Gazette, or by the Member of the Executive Council by notice in the Provincial Gazette.	<p>Section not changed!</p> <p>Motivation: It is not necessary to make specific reference to the new Grade R service in SASA, as this service is covered by sections 20(l) and 20(m).</p>
21	(1) Subject to this Act, a governing body may apply to the Head of Department in writing to be allocated any of the following functions: (a) To maintain and improve the school's property, and buildings and grounds occupied by the school, including school hostels, if applicable; (b) to determine the extra-mural curriculum of the school and the choice of subject options in terms of provincial curriculum policy; (c) to purchase textbooks, educational materials or equipment for the school; (d) to pay for services to the school (dA) to provide an adult basic education and training class or centre subject to any applicable law or	<p>Section not changed!</p> <p>Motivation: This section has not been changed at all, despite some arguments made so far for including a section 21 function referring specifically to Grade R provisioning. Not changing this section is in line with advice received from our Legal Services Directorate. Changing an Act is a cumbersome process, a lot more cumbersome than amending the SFN. SASA as it currently stands does allow all schools, whether they have been declared section 21 schools or not, to employ staff using the school fund, and in fact obliges schools to deliver any additional services specified by the PED (see section 20 clauses quoted here).</p>

	<i>Policy</i>	<i>Comments</i>
	(e) other functions consistent with this Act and any applicable provincial law.	

5 Amendments to the School Funding Norms

The following recommendations are contained in two new sections to the School Funding Norms, which would be as follows (with sub-sections):

- **GRADE R IN PUBLIC SCHOOLS**
 - Introduction
 - Inclusion of Grade R information on the resource targeting list
 - Formulation of MTEF budgets for public school Grade R
 - Determination of per learner cost
 - Determination of coverage per school
 - Determination of a pro-poor funding gradient
 - Use of establishment posts for Grade R
 - Formulation of a roll-out plan for public school Grade R
 - School budgets for Grade R
 - Transfer of non-personnel funds to schools
 - Transfer of personnel funds to schools
 - School-level utilisation of public funds and publicly funded resources for Grade R
 - Public schools offering only Grade R
 - Pre-Grade R orphans in public schools
 - National alignment and the role of the Department of Education
- **PUBLIC FUNDING FOR GRADE R IN INDEPENDENT SCHOOLS**
 - Introduction
 - Registration of community-based sites as independent schools
 - Funding of pre-Grade 1 classes in independent schools

Existing Part 1 of the SFN is, in effect, an introduction to the norms themselves. Part 1 should perhaps be amended, so that it makes specific reference to Grade R. However, as it currently stands, there is no contradiction between that part of the SFN and the recommended policy on ECD appearing below. One could arguably leave existing Part 1 alone.

In order to minimise confusion, paragraph numbers appearing in the previous draft of this document have not been changed. This means there may be numbers missing (where entire paragraphs have been removed), or numbers such as 101a and 101b (where paragraphs were inserted).

The proposals include cross-references to the SFN Grades 1 to 12 amendments released for public comment in December 2004, as if those amendments had already been promulgated. If those amendments are not accepted, then clearly adjustments would need to occur accordingly in the proposals that follow.

<i>Par.</i>	<i>Policy</i>	<i>Comments</i>
	7 GRADE R IN PUBLIC SCHOOLS	
	Introduction	
161	<i>In accordance with the proposals of Education White Paper 5, published in 2001, the state will follow a phased approach to introduce publicly funded Grade R classes across the whole public schooling system by 2010.</i>	Motivation: Paragraph 160 is currently the last paragraph on the SFN, and it is proposed that the sections on ECD be added to the end of the policy, so that numbering of paragraphs becomes easier.
162	<i>This section lays down the approach adopted by the state in funding Grade R in public schools. The approach favours the most disadvantaged in society. This occurs by virtue of the fact that poor schools will be brought into the programme first, and due to more favourable per learner funding for poorer schools. The pro-poor approach is informed by two factors: it costs more to educate learners from disadvantaged backgrounds, and non-poor communities are in a better position to supplement the state's resourcing through private resourcing. Moreover, the approach laid down in this section places a significant degree of responsibility at the level of the school, whilst emphasising the need for capacity building and delineating a clear service delivery framework within which schools must operate. The state will promote quality in the provision of services, firstly, by promoting adequate levels of funding and, secondly, by monitoring the quality of the service directly. The norms contained here deal with the promotion of quality through adequacy of funding.</i>	
163	<i>The function of offering publicly funded Grade R laid down in this section is an obligation on the part of schools in terms of sections 20(1)(l) and 20(1)(m) of the SASA.</i>	
	Inclusion of Grade R information on the resource targeting list	
164	<i>Provincial Departments of Education (PEDs) must adapt their resource targeting lists described in paragraphs 101A to 101G¹ of the National Norms and Standards for School Funding ('these norms') in order to plan the pro-poor roll-</i>	Implication to note: Integrating the Grade R process into the current resource targeting list will mean that each quintile will not contain precisely the same number of Grade R learners. There is no reason why this should cause any

¹ Paragraphs reproduced at end of this document.

Par.	Policy	Comments
	<p><i>out of publicly funded Grade R in the province. This roll-out will use the national quintiles described in paragraph 102D of these norms as the basis for pro-poor funding and phasing in of the service.</i></p>	<p>problem, however.</p> <p>Process point: The norms governing school funding are currently under review. The approach taken here is to assume that the proposed amendments released for public comment in September 2004 are accepted. Where there are references to paragraphs of the <i>National Norms and Standards for School Funding</i>, these paragraphs (with amendments, if applicable) are reproduced at the end of this document.</p>
166	<p><i>Values for the following four indicators should be determined for all schools on the resource targeting list referred to in paragraph 98C.</i></p> <p><i>(a) An indicator of which schools are eligible for Grade R targeting. Any school which offers Grade 1, and only such schools, are eligible for Grade R targeting</i></p> <p><i>(b) An indicator of which schools that are eligible for Grade R targeting, also possess management readiness for the implementation of publicly funded Grade R. This management readiness indicator should be based on three considerations: (1) Quality of financial management in relation to the school fund; (2) General effectiveness of the school governing body; (3) Quality of teaching and learning relative to the level of disadvantage of the school community. The precise measures used must be determined by the PED, and may be the same as the measures used to determine eligibility for the various forms of section 21 status. Initially, it would be sufficient to assess the management readiness of schools catering for the poorest quintile of learners ('quintile 1'), and schools catering for the second-poorest quintile of learners ('quintile 2').</i></p> <p><i>(c) An indicator of current and future projected physical space available for Grade R. This space should be expressed in terms of the number of Grade R learners who can be accommodated, and should take into account seating, workspace and recreational space. The capital investment plans of the PED should be taken into account, as well as any private building plans of the school itself. The PED must allow the school itself to report on its readiness for Grade R in terms of physical space, and this can take into account plans on the part of the school to rearrange classes so that space is created for Grade R. The PED must then assess the school's report, and can accept, reject or modify it, in the light of</i></p>	<p>Motivation: We cannot say that all primary schools should be targeted, as we do not want to introduce publicly funded Grade R into schools with, say, Grades 5 to 7.</p> <p>Motivation: All schools must have school funds, according to SASA. The way the school fund is managed, as manifested for instance in financial budgets and statements, would be one way of assessing management readiness.</p> <p>Discussion: The White Paper does not say much on the topic of physical facilities for the introduction of Grade R. It says physical space should be considered, but does not attach the same importance to this criterion as it does to management readiness. The White Paper does not rule out the possibility of using physical space near but not in the school, for instance a rented garage or the facilities of an existing private ECD centre. However, concerns around quality has meant there has not been a critical mass of support for this option (although several PEDs have expressed a general interest in it). It is assumed here that we do not pursue this option, an option that would make the determination of</p>

Par.	Policy	Comments
	<p><i>the PEDs knowledge about what extent and type of physical space is necessary for the offering of Grade R. Initially, it would be sufficient to assess the physical space readiness of quintiles 1 and 2 schools.</i></p> <p><i>(d) A rank number indicating the sequence by which Grade R would be introduced in schools. Initially, only schools which currently possessed management readiness and enough physical space for at least some Grade R learners would be sequenced, and sequencing would occur according to the poverty ranking of the resource targeting list, with poorer schools enjoying earlier targeting.</i></p>	<p>readiness a lot more complex. Moreover, it is assumed that physical space is so obviously important, that it can be put on a par with management readiness. The issue of physical space as a possible obstacle to the roll-out of schools-based Grade R should not be under-estimated. Whilst enrolment in the primary level has been declining, in the baseline scenario there was considerable over-crowding. There was a net classroom shortage in 2000 of about 14,000 classrooms, made up of a surplus of 29,000 and a shortfall of 43,000 rooms.</p>
	<p>Formulation of MTEF budgets for public school Grade R</p>	
167	<p><i>PEDs must budget for Grade R in public schools within the medium term expenditure framework (MTEF) and, given the long-range nature of the implementation process, must formulate long-range plans for increasing the Grade R in public schools budget, with a view to making Grade R universal and compulsory in the province by 2010.</i></p>	
168	<p><i>PEDs must use sub-programme 7.1, 'Grade R in public schools', to indicate budgets for this expenditure category. In budgets and financial reports, PEDs must clearly separate expenditure on Grade R in public ordinary schools from other expenditure in public ordinary schools. Whilst a merging of the two may be optimal in the long term, in the interim, whilst Grade R is being rolled out in some but not other schools, it is optimal to keep the two separate in order to avoid confusing financial statistics.</i></p>	<p>Motivation: This sub-programme has already been created.</p>
169	<p><i>PEDs must ensure that careful expenditure analysis is undertaken with a view to reallocating budgets towards publicly funded Grade R. The DoE and PEDs must seriously consider the option of hiring the full-time services of one or more financial analysts dedicated to the financial planning of publicly funded Grade R.</i></p>	<p>Motivation: WP5 has been accused of being too optimistic about the fiscal space created by the so-called dividends. This may be true, but it is also true that enrolment in Grades 1 to 12 is set to decrease in most, though possibly not all provinces, to the extent that funds can be diverted towards Grade R, <i>even with</i></p>

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	<p><i>The DoE must engage with PEDs in this planning and reprioritisation process, and must develop planning tools and models for this purpose. The DoE must, in collaboration with PEDs, explore alternative arrangements for funding Grade R in provinces where budget reprioritisation does not provide the space for a sufficiently speedy roll-out of publicly funded Grade R.</i></p>	<p><i>real increases to per learner expenditure in Grades 1 to 12. In most, if not all provinces, the WP5 fiscal space argument can be said to hold.</i></p> <p>Discussion: Apart from the trade-off between Grade R and the other school grades, there is an important trade-off between education and other social services. The education share of social expenditure has been declining, and the roll-out of publicly funded Grade R can be expected to be an important element in the debates around the continuation, arresting or reversal of this trend.</p> <p>Implication to note: The DoE requirement here can be seen as part of the current drive, arising out of e.g. the recent schools resourcing report and the budget reform process of the National Treasury, to vastly improve financial analysis in departments. Much of the success in the roll-out of Grade R depends on this improvement. At the national level there is a pressing need, and this may be the case in each province too, for a full-time financial analyst focussing only on the Grade R roll-out process.</p>
	<p><i>Determination of per learner cost</i></p>	
170	<p><i>PEDs must determine a per learner cost for Grade R, which allows for the roll-out of a quality service to as many learners, in particular poor learners, as possible within the prevailing budgetary constraints.</i></p>	<p>Motivation: Some national alignment of per learner expenditure levels, though not a single national resourcing norm, has received strong support from PEDs.</p>
171	<p><i>PEDs must express total per learner cost for Grade R in rand terms, where the recommendation is a level equal to 70% of the total per learner cost for Grade 1. Should this level be less than 70%, the determination referred to in paragraph 170 must occur after consultation with the DoE.</i></p>	<p>Motivation: The route chosen here is between two extremes, one where we simply focus on outputs and do not prescribe any expenditure benchmark, and one where the national level prescribes the precise per learner expenditure level, in rand terms. This median route is probably optimal. It would probably be unpopular and bad for education if we threw the doors open entirely, and made it possible for PEDs to spend as little on each Grade R learner as the private sector currently does (according to the 2000 ECD Audit). On the other hand, the disadvantage with prescribing a rand amount per learner from a national level is that optimal practice varies from province to province.</p>
172	<p><i>The per learner cost determined by the PED must cover the full cost of a basic package of inputs. This basic package of inputs must include the cost of an educator working as an ECD practitioner, teaching a class of a size deemed</i></p>	<p>Implication to note: The amount in 2001 rands to cover a basic package has been estimated at around R2,000. This is if we consider a basic package to be an ECD practitioner earning R3,200 per month (90% of them currently earn less</p>

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	<p><i>reasonable by the PED, as well as non-personnel recurrent inputs required by the Grade R learners such as learner support materials, minor building repairs, utilities such as electricity and water, administrative support, copying of materials and media collections.</i></p>	<p>than this), teaching a class of 30 learners (average L:E in Grade 1 is about 35) and a non-personnel recurrent package of R500 per learner (currently Gauteng and Northern Cape pay this to the <i>poorest learner</i>). An amount of R2,000 for the <i>average learner</i> (it would be more for the poorest learner) is more or less what is proposed in WP5. R2,000 is below 70% of the Grade 1 expenditure of even the poor provinces, so the 70% recommendation is relatively generous, and strengthens the argument for pursuing a faster, less expensive route in the interim, as allowed for in paragraph 173. (The 70% and R2,000 levels, both supported by WP5, are contradictory. This seems to have come about due to a miscalculation of the Grade 1 expenditure level.)</p> <p>Implication to note: The implication of the policy as it is proposed here, is that the state should provide <i>free</i> Grade R, at least for quintiles 1, 2 and 3. Any fees charged would be top-ups to what would be an adequate amount provided by the state. This approach is in keeping with recent statements by DoE, including the recommendations for improving the resourcing of schools.</p> <p>Implication to note: Because we are not promoting the rental of space outside the school for use by Grade R learners (see earlier comments in this regard), adequate funding per learner takes no account of any costs associated with renting physical space. Physical backlogs are thus dealt with by PEDs as part of the building programme, and not through any interim rental arrangement.</p>
173	<p><i>In order to cover a larger number of schools in the early years of the roll-out process, PEDs may determine a per learner expenditure level down to a minimum of 50% of the Grade 1 per learner expenditure figure. However, this must be an interim arrangement only, and should not compromise quality to the extent that national standards in this regard, referred to in paragraph 221, are not met.</i></p>	<p>Motivation: A lower limit, but not an upper limit, is set. The question is whether it would be necessary to set an upper limit, e.g. at 100% of the cost of a Grade 1 learner. It is probably very unlikely that any PED would go as high as the Grade 1 expenditure level, and even if any did, one could probably assume that this would be for good reason. Hence there is no upper limit. Avoidance of unacceptably high inter-provincial disparities is something that can be dealt with through negotiation in the various intergovernmental fora. It is probably not something we want to create a national policy on.</p>
	<p><i>Determination of coverage per school</i></p>	
174	<p><i>The PED must determine how many Grade R places could receive funding in each school eligible for public Grade R funding across each roll-out year, on the</i></p>	<p>Discussion: The point has been made that this paragraph and the following ones carry too much prescription, and that PEDs should have a greater degree of</p>

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	<p><i>basis of the enrolment in grades other than Grade R, the physical space available, and the proximity of community-based sites and plans to upscale or downscale particular schools. The need for this PED determination is particularly important in the years before Grade R becomes universal, as demand for publicly funded Grade R places is likely to exceed demand for these places.</i></p>	<p>freedom in determining the coverage per school. As a concrete example, it has been argued that where a school is very well managed, its coverage should be expanded, so that it feeds the Grade 1 classes not only of the school in question, but even other surrounding schools. These paragraphs should perhaps be regarded more as a checklist of factors to consider, rather than a prescription for determining coverage. In support of such an approach, the prescriptive-looking paragraphs have been retained, but with an 'escape clause' in paragraph 176b.</p>
175	<p><i>Full coverage for Grade R in any school in any year is defined as a number of learners equal to the average of the enrolment in Grades 1, 2 and 3 during the previous year. There are three exceptions to this rule:</i></p> <p><i>(a) If a PED is upscaling or downscaling a school as part of a spatial development process, or if the PED is establishing grade sizes that optimise the utilisation of staff and school spaces, then fewer or more Grade R learners may constitute full coverage.</i></p> <p><i>(b) If there is a community-based ECD site near a school, or a public school offering only Grade R, and the PED considers the proximity of this other institution to have a significant impact on demand for Grade R places at the school, then fewer Grade R learners may constitute full coverage.</i></p> <p><i>(c) If not all the three grades exist in a school, then the average for whichever grades do exist must be used. In the case of a school which offers only Grade R, historical trends, or special PED criteria, if applicable, should be used to determine the full coverage for Grade R.</i></p>	<p>Motivation: The post provisioning norms and the SFN both work on the basis that the previous year's enrolment is used to resource the school for the current year.</p> <p>Discussion: This paragraph could be important for PEDs pursuing a post distribution approach to staffing the Grade R service. Specifically, if PEDs want standardised posts to be used, then more standardised class sizes become desirable. For example, a PED may wish to rationalise a situation where full coverage for two schools is 45 learners each, and three posts are available, to a situation in which one school has full coverage of 60 learners, and the other school has full coverage of 30 learners. The two schools would then receive two posts and one post respectively.</p>
176a	<p><i>Full coverage of Grade R may not be possible, or desirable, during an interim period. It may be necessary for the PED to determine incomplete coverage of Grade R for some years. There are three reasons why incomplete coverage may be determined:</i></p>	

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	<p>(a) If physical space does not permit full coverage for some years, then incomplete coverage, determined by the space that is available, is the only practical option whilst adequate space is being provided.</p> <p>(b) A PED may choose to adopt a partial approach in rolling out Grade R in public schools, and implement incomplete coverage in all schools during an interim period. Such an approach may involve introducing one Grade R class in all quintile 1 and 2 schools, before returning to those schools in order to attain full coverage across all schools. This approach, if pursued, must be designed through consultation between the PED and DoE.</p> <p>(c) A PED may temporarily reduce the number of learner places in a school if learner performance at the end of the Grade R year is not satisfactory. This can only occur within a framework of evaluation that is transparent, fair, and gives schools a reasonable window period during which to improve learner performance. If this option is pursued, PEDs must ensure that learners are accommodated in other public schools whilst the problem in the first school is resolved.</p>	
176b	<p>Paragraphs 175 to 176a are intended to create a framework for best practice in the determination of how many learners should be funded in each school. PEDs may, after consultation with the DoE, formulate and pursue more appropriate methodologies for determining coverage per school.</p>	
	<p>Determination of a pro-poor funding gradient</p>	
177	<p>Level of Grade R funding must be higher in schools servicing poorer communities. However, as the public funding of Grade R includes the funding of personnel, and is consequently high relative to the purely non-personnel funding referred to in paragraph 102A to 102I of these norms, it is not appropriate for the same pro-poor funding gradient to be applicable to non-personnel recurrent expenditure in Grades 1 to 12, and total expenditure in Grade R. Instead, it is recommended that if expenditure on learners in the middle quintile ('quintile 3') is indexed to 100, then learners in quintile 1 should be funded at a level of 120,</p>	<p>Implication to note: The levels recommended here translate into a 28-26-23-19-5 gradient. The new gradient for Grades 1 to 12 being proposed is 30-28-23-15-5. What is recommended here is in other words very close to what will probably become the funding gradient for Grades 1 to 12.</p> <p>Discussion: There are conceivably strong reasons for flattening the distribution curve even further, especially at the quintile 1, 2 and 3 end. If we take the quintile 3 amount to be 'adequate' (this is indeed the assumption we make in paragraph</p>

Par.	Policy	Comments
	<p>learners in quintile 2 should be funded at a level of 110, learners in the fourth-poorest quintile ('quintile 2') should be funded at a level of 80, and that learners in the least poor quintile ('quintile 1') should be funded at a level of 20. The expenditure index of 100 corresponds to the per learner cost referred to in paragraph 170.</p>	<p>172 above), then assuming an adequate amount of R2,000 per learner, the current recommendation is that each quintile 1 learner get R2,400, or an extra R400 to deal with poverty alleviation. This poverty alleviation would be manifested most likely in either smaller classes, or more educational media. The R400 per learner could buy a reduction in the L:E ratio from 25 to 20, or a total investment of R8,000 in additional educational media for one class of 20 learners. We need to keep these kinds of parameters in mind when considering the slope we want. One option is to have a flat curve for quintiles 1, 2 and 3 in the interim, i.e. to fund each learner with only an adequate amount, with no poverty alleviation top-up. A rough simulation reveals that using the route of adequate funding for all, as opposed to poverty alleviation for quintiles 1 and 2, shortens the time taken to cover quintiles 1, 2 and 3 by 8%.</p>
178	<p>The relationship between the levels of funding in the five quintiles recommended in paragraph 177 is a benchmark only. If PEDs discover strong reasons for deviating from this benchmark, in particular reasons of the kind explained in paragraph 102C of these norms, then alternative approaches may be followed after consultation with the DoE.</p>	
179	<p>PEDs may pursue an approach in the interim whereby learners in quintiles 1, 2 and 3 are all funded at the benchmark level determined according to paragraph 171 above, in order to accelerate the roll-out of the service to all schools in these three quintiles. However, the poverty alleviation top-up referred to in paragraph 177 above should be implemented across quintiles 1 and 2 before publicly funded Grade R is rolled out in quintiles 4 and 5.</p>	
180	<p>PEDs must use a continuous gradient of Grade R funding, which avoids sudden differences between one funded school on the resource targeting list and the next funded school on the list caused by the location of the two schools in different quintiles. The levels of funding referred to in paragraph 177 above apply to the average level of funding within a quintile, and not the level of funding in each individual school in each quintile.</p>	<p>Motivation: Although this was not a requirement in the SFN before, this is in fact what all provinces do, and it is an approach that minimises contestations.</p>
181	<p>Funding over and above a basic level, which would be available for schools in the two poorest quintiles, is intended for the purchase of inputs that at least</p>	

Par.	Policy	Comments
	<p><i>partly compensate learners for their relative disadvantage resulting from the poverty of the community. This means that the additional funding should be used above all for inputs such as media collections and more individualised attention through a reduction of the L:E ratio, inputs which clearly compensate for a lack of inputs in the home. PEDs must communicate this intention to targeted schools, and parents of learners, in order to promote an expenditure practice that furthers effective poverty alleviation.</i></p>	
182	<p><i>In the two least poor quintiles, where public funding is not intended to cover the entire basic minimum package, it is anticipated that private contributions, in particular school fees, will top up the public allocation so that a reasonable level of expenditure can be attained. In their communications strategies, PEDs must communicate to stakeholders that school fees in less poor schools are a necessity if sufficient funds are to be allocated to poorer schools to alleviate poverty.</i></p>	<p>Implication to note: The pro-poor gradient proposed implies that quintile 4 parents would pay about R400 per year and quintile 5 parents R1,600 per year in school fees (2001 rands), assuming that parents aim for an ‘adequate package’ of R2,000. This is in keeping with what quintile 5 parents currently pay on average, but the quintile 4 implied school fee is relatively high. Currently, parents in quintile 4 are paying less than R200. However, that is a fee where there is almost no expectation that personnel costs would be covered. The matter probably requires more discussion.</p>
	<p><i>Use of establishment posts for Grade R</i></p>	
182a	<p><i>PEDs may establish posts to support publicly funded Grade R in public schools. The establishment of such posts, and their distribution to schools, must occur within the overall framework of the funding and roll-out of the Grade R service laid down in these funding norms, and in terms of the Employment of Educators Act.</i></p>	
182b	<p><i>PEDs may decide to convert a portion of a school’s total allocation for Grade R, referred to in paragraph 184, to a post or posts. Such conversion must take into account the total cost to the state of the post or posts. A portion of the allocation may only be converted to posts if the value of the allocation exceeds the value of the posts, and if the PED has determined that the portion of the allocation not converted to posts is adequate for the purposes of non-personnel expenditure.</i></p>	
182c	<p><i>The conversion of a portion of the allocation to posts occurs on an annual basis, meaning that the criteria referred to in paragraph 182b above must be applied annually. A change from one year to the next in the value of the allocation or a</i></p>	

Par.	Policy	Comments
	<i>change in the value of the posts may alter the feasibility of the conversion.</i>	
182d	<i>PEDs must assess carefully the advantages and disadvantages of establishing posts for the Grade R service. Issues of efficiency, cost, educator supply, the pace at which Grade R is made universal, and labour relations stability need to be taken into account. PEDs must consult with the various school stakeholders on the matter, including employee organisations, school management structures and SGB representatives.</i>	
182e	<i>The DoE and PEDs must collaborate closely to ensure that national and provincial conditions of service planning and bargaining processes are aligned with respect to any post categories utilised in the delivery of Grade R.</i>	
	<i>Formulation of a roll-out plan for public school Grade R</i>	
183	<i>Each PED must formulate a roll-out plan for public school Grade R, using the information on Grade R eligibility, budgets, per learner cost, learner coverage per school, and the pro-poor funding gradient referred to in paragraphs 164 to 182 above. The target of the roll-out plan should be universal Grade R by 2010, and possibly before 2010. The plan must be dynamic, and must be updated on a regular basis with new data on, for instance, actual targets met and changing cost drivers. This is a complex task, and must involve the use of planning tools to be developed jointly by the DoE and PEDs.</i>	
184	<i>The roll-out plan must, on a school by school basis, indicate what number of learners constitute full Grade R coverage, the year in which publicly funded Grade R is introduced, whether there is a period of incomplete learner coverage, and if so, for how long, what the total and per learner Grade R allocation is, what portion of the allocation is converted to posts, and what the net allocation after employee post deductions is. As a summary, the roll-out plan must indicate for each year and quintile, how many publicly funded Grade R places there are in the province, how many schools are subject to incomplete coverage, and how many enjoy complete coverage. When applicable, the learner numbers for future years in the roll-out plan must be adjusted in accordance with adjusted</i>	

<i>Par.</i>	<i>Policy</i>	<i>Comments</i>
	<i>population projections distributed by the DoE to PEDs.</i>	
185	<i>Although the general principle is that PEDs must progress from the poorest to the less poor quintiles in rolling out Grade R in public schools, for reasons of practicality, PEDs may target two adjacent quintiles simultaneously. This means that PEDs may begin to introduce publicly funded Grade R in quintile 2 schools before all quintile 1 schools have this service. However, a PED may not begin to introduce Grade R into quintile 3 schools before all quintile 1 schools enjoy full coverage. Similarly, a PED may not begin to introduce Grade R into quintile 4 schools before all quintile 2 schools enjoy full coverage. This same principle applies to the entire roll-out process across the five quintiles.</i>	<p>Motivation: Considering that the poorer schools will often display low readiness for the introduction of Grade R, and that it takes time to develop management capacity and build more physical space, it would be important to allow PEDs to implement simultaneously across a broader band of schools. Above all, we want to avoid bottlenecks where there are enough funds to expand Grade R, but not enough schools that are ready to introduce the service.</p> <p>Discussion: The suggestion has been made that PEDs should be permitted to target three adjacent quintiles at one time. This is probably too broad a parameter, and the pro-poor targeting criteria could be undermined. Two quintiles means 50% of schools in EC, and 18% of schools in GP. This is probably a sufficiently broad range for both provinces – whilst the GP range seems relatively narrow, GP has greater access to the resources required to bring financial management in poor schools up to speed.</p>
186	<i>The roll-out plan must also include plans on how management readiness and physical space needed for Grade R will be achieved in public schools.</i>	
187	<i>The roll-out plan is needed by households, other Government Departments and non-government organisations (NGOs) in their own planning processes. PEDs must therefore ensure that a highly readable version of the plan is available for general consumption.</i>	
	School budgets for Grade R	
188	<i>The introduction of publicly funded Grade R involves some new planning and reporting procedures for schools. These should be integrated into the general planning cycles of the school as far as possible. However, funds for Grade R should be accounted for separately, although they will be kept in the general school fund.</i>	
189	<i>By September of each year, PEDs must provide each targeted school with an indicative amount of what its public allocation will be for the provisioning of</i>	

Par.	Policy	Comments
	<p><i>Grade R in the following year, and how the amount was determined. The information provided to each school should be the information contained in the roll-out plan referred to in paragraphs 183 to 187. This information is needed by schools for proper planning of the next school year to take place, and for employment contracts to be drawn up or salary increases for employees teaching Grade R to be indicated.</i></p>	
190	<p><i>Schools must earmark a proportion of their Grade R allocation towards personnel costs, and a proportion towards non-personnel costs. Where schools have had a portion of the allocation converted to posts, it is likely that this personnel proportion would be zero. In the case of schools in quintiles 1, 2 and 3, the proportion for personnel costs must be between 65% to 85% of the total Grade R allocation. During the roll-out years, schools are encouraged not to select the maximum of 85%, so that, firstly, a stock of non-personnel items needed for Grade R can be built up and, secondly, the school is left with room to increase the percentage in future years, when possible reductions in the Grade R class size, and hence the total Grade R allocation, may require a reprioritisation within the Grade R budget in the school. These parameters do not apply to schools that are subject to the conversion of the allocation into posts, though the PED may utilise these parameters in determining what conversions to effect for which schools.</i></p>	<p>Motivation: It only makes sense to specify proportions for personnel funding for quintiles 1, 2 and 3, because it is only these schools that will receive public funding that is adequate to cover the full Grade R cost. Rough calculations indicate that a reasonable salary of an ECD practitioner comes to about 75% of the adequate amount, so the 65% to 85% band provided here represents a 10% area of mobility on either side.</p> <p>Implication to note: If the planned strategy to improve non-personnel funding in Grades 1 to 12 lags behind the roll-out of Grade R, the possibility exists in some provinces that schools will use the relatively generous non-personnel funding in Grade R to purchase goods for the school as a whole, because Grade 1 to 12 non-personnel funding is inadequate. This is not necessarily something we should or could stop. We should just be aware of how the two strategies complement each other.</p> <p>Implication to note: Because the Grade R allocation is high relative to the Grade 1 to Grade 12 allocation, it is possible that the monetary value of the total Grade R allocation for a school even net of any conversions to posts would be considerable. For this reason we can probably anticipate that some schools receiving a post would in addition wish to employ more staff, e.g. a classroom assistant, with the additional Grade R funds. The possibility of this would depend on the criteria used by the PED to determine full coverage and the distribution of posts, and the school's emphasis on non-personnel resources.</p>
	<p><i>Transfer of non-personnel funds to schools</i></p>	<p>Motivation: Non-personnel funds and personnel funds are dealt with separately here, as the two-model approach of section 21 schools and non-section 21 schools is being pursued for Grade R (see discussion in 2.2.3 above). Because the state cannot procure personnel and non-personnel items on behalf of schools according</p>

Par.	Policy	Comments
		<p>to the same procedures, and because the state will be controlling the public funds of schools, on behalf of schools, for an initial period, non-personnel funding must be dealt with separately.</p> <p>Discussion: It should be noted that having this separation in the policy between personnel and non-personnel inputs is perhaps not optimal. It may cause complications, as discussed in 2.2.3. It may be preferable to regard the Grade R funds from the state more holistically in the policy, though this would require relinquishing many of the state controls that are built into the current draft.</p>
191	<p><i>Schools targeted for publicly funded Grade R must report to PEDs what proportion of their Grade R allocation after employee post deductions they plan to spend on non-personnel items. In the case of schools receiving posts, this proportion is likely to be 100%. This communication should occur through existing reporting procedures, or new procedures set up for this purpose. The information should reach the PED before the end of the year prior to the year in which the funds will be spent.</i></p>	<p>Motivation: The separation of the non-personnel funding for Grade R from the non-personnel funding for the other grades proposed in this paragraph and elsewhere (the per learner amount can be different, and the procedures different) is a key point. There are advantages to integrating the two, i.e. just extending the current non-personnel allocation for Grades 1 to 12 to Grade R – i.e. have same amount, same procedures. Above all, the advantage is administrative simplicity. However, there are also some very good reasons for delinking the non-personnel funding for Grade R, from the non-personnel funding for the rest of the school. Firstly, the approach promoted here allows the school to determine what proportion of funds should go towards personnel, and what proportion to non-personnel. This increases the possibility that the resource mix will be optimal. Not all schools are the same. Different schools benefit from different resource mixes. Secondly, if the non-personnel portion follows the same approach across all grades, then this turns the Grade R per learner cost determination exercise of the PED into an exercise in determining personnel cost.</p>
192	<p><i>PEDs must make non-personnel funds for Grade R available to schools from the beginning of the school year, in accordance with the non-personnel proportion determined by the school. This can be done in one of two ways:</i></p> <p><i>(a) The PED may transfer funds into the bank account of the school fund.</i></p> <p><i>(b) The PED may retain the funds and procure items for the school according to school plans and school requests, in the same way as non-personnel items are procured for schools without section 21 SASA status. This option may not be followed if the school has already been granted section 21(a), (c) or (d) SASA</i></p>	<p>Motivation: This option (b) is not reflected in WP5, partly because the assumption was made that the introduction of Grade R would go hand in hand with full section 21 status. However, it is probably necessary to put this paragraph in. It would be strange for Grade R non-personnel funds to be</p>

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	<i>status.</i>	<p>transferred directly to schools, when non-personnel funds for other grades were not. (The counter would perhaps be that one uses the Grade R non-personnel allocation as a test of the ability of the school to handle public funds for Grades 1 to 12.)</p> <p>Discussion: The approach whereby the PED procures goods on behalf of the school, and on the basis of an allocation granted to the school, has on the whole not worked well. If we followed this approach in Grade R, projects to improve the methodology in Grades 1 to 12, would have to be applicable to Grade R as well.</p>
	<i>Transfer of personnel funds to schools</i>	<p>Discussion: The earlier version of this document made reference to provincial and national guidelines for the employment of SGB employees. It was felt that this falls outside the ambit of the SFN. However, a framework for the employer-employee relationship will nevertheless have to be fine-tuned for Grade R, on the basis of the current legislation governing employment of staff by SGBs. The recognition of ECD practitioners as educators is another key issue falling outside the school funding ambit, yet it is of great relevance for the school funding system.</p>
195	<i>In order to maintain proper financial controls over funds intended for publicly funded Grade R, PEDs may, during the initial years of roll-out, transfer funds for the remuneration of SGB-employed educators working as ECD practitioners straight to the school governing body employees concerned. This will occur on behalf of the school governing body. As financial management capacity in schools improves, schools themselves will control the public funds intended for the remuneration of school governing body employees delivering Grade R.</i>	<p>Discussion: There are various systems options for transferring funds straight to the SGB employees. Cheques could be issued in the name of the employees, and given to schools. Transfers into the bank accounts of employees could occur.</p>
196	<i>Where PEDs control funds intended for the remuneration of school governing body employees teaching Grade R, schools must provide PEDs with adequate information about school governing body employees, for instance names, ID numbers and bank account details, in order for the effective transfer of funds to take place. The information that must be provided by schools, and when the information must be provided, should be specified in procedures determined by the PED.</i>	

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197	<i>On the basis of the information received by the PED from schools, PEDs must formally communicate to schools their commitment to paying school governing body employees. Monetary amounts, names of employees receiving funds, and frequency of disbursement must be specified in the formal communication. These provisions apply only where the PED controls personnel funds relating to SGB-employed staff.</i>	
198	<i>Given the importance of ensuring that payment of educators working as ECD practitioners occurs correctly and according to the required timeframes, PEDs must ensure that the required systems are put in place, and may explore the use of an agency approach for this purpose.</i>	Discussion: KN has valuable experience implementing effective salary payment systems for Grade R educators. It is not clear if there is a report on these experiences, and the approaches taken.
199	<i>The procedures mentioned in paragraph 196 above must specify what information schools can expect to receive from the PED relating to payments made by the PED to SGB-employed personnel. In particular, schools will require tax information from the PED in order to comply with the requirements of the South African Revenue Services (SARS).</i>	
	School-level utilisation of public funds and publicly funded resources for Grade R	
200	<i>Utilisation of public funds for the provisioning of Grade R at the level of the school is subject to all relevant financial management rules and regulations, in particular those embodied in the SASA.</i>	
201	<i>In admitting learners into publicly funded Grade R places, schools must prioritise learners living in the vicinity of the school.</i>	Motivation: Especially during the early years of implementation, when there will be only a few funded Grade R places, there will be widespread demand for places that cannot be met by the existing places. It is important that schools should not take advantage of this situation through the enrolment of learners that are not living close to the school, either to capture 'better' learners, or in response to political or other pressure.
202	<i>A targeted school in quintiles 1, 2 or 3 that receives public funds for Grade R may enrol learners in excess of the number of funded places, but in the absence of privately paid fees, enrolled learners may not exceed funded places by more</i>	Motivation: If schools decide to stretch their Grade R state allocation to cover more learners than there are funded places (this may seem possible given the fact that demand is expected to outstrip supply of places in the initial years), then per

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	than 10%.	learner expenditure drops. If per learner expenditure across all grades drops, then there can be serious inter-provincial migration consequences, but if expenditure drops in only one grade, in this case Grade R, the migration risks are probably not high. However, there is a problem if schools use Grade R for 'empire-building'. We presumably do not want schools to swell Grade R by stretching enrolment beyond the number of allocated places (which is linked to the physical capacity of the school anyway), so that there is pressure for the Grade 1 and following grades to swell during subsequent years. This is a complex matter, and there has probably not been enough discussion in this regard.
203	Targeted schools may enrol Grade R learners who are financed fully from private fees only if private fees are equal to or greater than the total per learner allocation provided by the state, including the value of posts, where applicable. This is to ensure that the per learner expenditure figure does not drop below a reasonable level, and that public funds for Grade R are not spread across a greater number of learners than intended.	Motivation: We do not want to stop schools completely from offering Grade R privately. However, this should not compromise publicly funded Grade R.
204	A school that enrolls a number of Grade R learners that is less than 90% of the number of funded places must return to the PED funds corresponding to the non-personnel part of the unoccupied learner places below the 90% level. For example, a school that fills only 70% of funded places will have to return funds corresponding to the non-personnel portion of 20% of funded places. In the case of schools that hold these funds in the school fund, the amount to be returned to the PED will be subtracted from the following year's non-personnel allocation for Grade R. Where the PED manages the school's Grade R non-personnel fund on behalf of the school, the amount corresponding to unoccupied learner places should be retained by the PED or, failing that, subtracted from the following year's Grade R allocation.	Implication to note: It is probably very unlikely that schools will not fill all their funded places, especially in the initial roll-out years. The demand for places will be huge, much greater than availability. Thus this is not a paragraph that will often be invoked. It should be noted that nothing in this paragraph prevents schools retaining unspent funds, if planned and actual enrolment is equal. In other words, saving of funds is a definite possibility. Motivation: If it won't be used a lot, why have this paragraph? Arguably, in the absence of this provision, a risk arises whereby unscrupulous principals deliberately under-enrol in order to raise funds for the school. If the non-personnel portion for Grade R is larger than that for the other grades (this possibility exists), then the temptation is especially real. Moreover, because Grade R is a new phenomenon working a bit differently to the other grades, it may be possible for a principal to mislead communities into accepting an under-enrolment situation. It is in view of this, probably marginal, risk, that this paragraph has been included.
205	The personnel part of the Grade R allocation not used to pay personnel teaching or caring for Grade R learners, in accordance with the budget of the school, must	Motivation: This may sound complicated, but the logic is fairly simple. In a sense, the state is 'buying' the schooling of X number of Grade R learners from

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	<p><i>be returned to the PED. The method whereby funds are returned are the same as that applicable to non-personnel funds and referred to in paragraph 204 above.</i></p>	<p>each school. If schools do not offer the state the full service, then clearly funds must flow back to the state. However, because personnel funding is not highly fungible, i.e. it is tied into contracts, we cannot expect schools to return personnel funds to PEDs, and break a contract with an employee, simply because there were not enough Grade R learners enrolled in that year. But what the state can and should do, is insist that personnel funds get spent on personnel, according to the budget that the school itself has drawn up, and nothing else. Personnel funding is so large, relative to non-personnel funding, that we cannot let schools spend unused personnel budgets (as determined by the school within a band) on non-personnel items, at least not yet.</p> <p>Implication to note: Unlike the previous paragraph, this paragraph may be invoked frequently. Schools are likely to under-spend due to for instance one educator leaving and there being a lag before the employment of the following educator – even if a temporary educator is employed, it is very possible that there would be an uneven level of expenditure.</p>
206	<p><i>The financial statements of each targeted school that controls its own funds must indicate that personnel and non-personnel expenditure on Grade R was at least as high as the allocation granted to the school for Grade R, minus possible returns of funds referred to in paragraphs 204 and 205 and minus saving of non-personnel funds for purchase of large non-personnel items in future years.</i></p>	<p>Motivation: This paragraph aims at ensuring that the spending of public Grade R funds is more or less restricted to Grade R service delivery. This is in line with the idea, argued earlier, of having Grade R as a service delivery component that is somewhat separate, at least in terms of the resourcing system, from other grades in the school. Clearly, this paragraph makes it possible for private income, e.g. from fees, to displace some of the public funding in Grade R, so some cross-subsidisation of other grades could still take place, but it would be limited.</p>
207	<p><i>The non-personnel part of the Grade R allocation must be spent on non-personnel inputs that directly enhance service delivery for Grade R learners. Inputs that can also be used by learners in other grades, for example media collections that are usable by learners of several ages, may be purchased with the non-personnel part of the Grade R allocation, as long as the inputs assist in enhancing the quality of Grade R learning.</i></p>	
208	<p><i>Educators working as ECD practitioners and funded from the school's Grade R budget must work teaching Grade R learners, and not any other grade, except where multi-grade teaching that covers Grade R takes place. The personnel portion of the public Grade R funding may be used to employ support staff who</i></p>	<p>Motivation: Because of the logistical difficulties inherent in finding optimal combinations of physical space, number of learners and the personnel budget, it is important to give schools a flexible framework in which to offer Grade R. Educator assistants are an important way of optimising service delivery within a</p>

<i>Par.</i>	<i>Policy</i>	<i>Comments</i>
	<i>assist educators working as ECD practitioners.</i>	particular budget, where both over- and under-expenditure are undesirable.
209	<i>Regulations governing which inputs may be purchased with the non-personnel allocations for Grades 1 to 12, referred to in paragraphs 100A to 100F of these norms, also apply to the non-personnel allocation for Grade R. Regulations promulgated in the future in this regard will also apply to Grade R, unless such regulations explicitly exclude Grade R.</i>	Motivation: The matter of which inputs are covered by the recurrent non-personnel allocations is a complex matter, which is being resolved for Grades 1 to 12 currently. Here it makes sense for the Grade R system to simply piggy-back on Grades 1 to 12.
210	<i>Small schools are expected to have small Grade R classes. PEDs may, after consultation with the DoE, build a funding advantage for small schools into the funding policy laid down in paragraphs 183 to 187. The design of any such proviso must take into account its overall effect on the funding of learners in non-small schools. Moreover, the DoE and PEDs must work together on finding alternative solutions to the special problems experienced by small schools.</i>	Motivation: See 2.2.3 above.
	Public schools offering only Grade R	
211	<i>The DoE and PEDs must work towards the normalisation of what were historically referred to as public pre-primary schools. Where such schools continue to exist, they should offer a service within the schooling system established by SASA, and within the funding system established by paragraphs 164 to 210 of this policy. In particular, the normal pro-poor funding provisions must apply to learners in these schools.</i>	Implication to note: Because the schools referred to are generally in advantaged areas, it would be logical to withdraw public funding during the initial roll-out period, and to reinstate the funding, according to the new rules, when the 'turn' of the school arrived on the resource targeting list.
212	<i>In view of the fact that public schools offering only Grade R have historically serviced primarily advantaged communities, and are therefore often located in relatively well off areas, PEDs must carefully consider the appropriateness of the continued existence of these schools, and take steps to rationalise them where required.</i>	
213	<i>The only exception to paragraph 211 above is that PEDs must provision public schools that offer only Grade R with a school principal, even if the school does not qualify for educator posts according to the Regulations for the Creation of Educator Posts in a Provincial Department of Education and the Distribution of</i>	Motivation: This is what WP5 says we must do. The logic is that it would be bureaucratically difficult to have managers of public schools that are not public employees.

<i>Par.</i>	<i>Policy</i>	<i>Comments</i>
	<i>Such Posts to the Educational Institutions of Such a Department (Notice R1676 of 1998), as subsequently amended.</i>	
	<i>Pre-Grade R orphans in public schools</i>	Discussion: WP5 requires the state to fund pre-Grade R orphans in public schools. The assumption is made here that this proposal of WP5 is pursued. There have been some objections to this proposal on the basis of logistical and practical consideration. For instance, there are concerns around mixing different ages in the same class, and the definition of orphans. However, the flexible funding approach put forward by WP5 should make it easier for schools to deal with orphans in creative ways that are sensitive to local need. If we do accept that this service delivery occurs, then we would need to add more detail to the following paragraphs.
214	<i>PEDs must make use of StatsSA demographic data, and other relevant data, to establish the distribution of young orphans across districts and localities. PEDs must then ensure that learner places for orphans younger than the Grade R age are funded in schools with the most pressing demand.</i>	
215	<i>In the interests of administrative efficiency, the funding of learner places for orphans referred to in paragraph 214 should occur only in schools which are already offering publicly funded Grade R.</i>	
216	<i>PEDs must work with the provincial Departments of Social Development to determine specifications regarding which orphans are eligible for the service to pre-Grade R orphans, to publicise the availability of the service, and to monitor its effectiveness.</i>	
	<i>National alignment and the role of the Department of Education</i>	
217	<i>For all public service delivery in education, it is important for certain processes to be aligned nationally. This assists inter-provincial comparison, and reduces the risk of major inter-provincial differences that can lead to inter-provincial migration as people move towards better services. Moreover, it is important for certain tasks with high costs, e.g. certain research and systems development tasks, to be undertaken nationally, in order to reduce total cost to the country.</i>	

<i>Par.</i>	<i>Policy</i>	<i>Comments</i>
218	<i>The DoE and PEDs must collaborate with a view to harmonising the roll-out of publicly funded Grade R, and the level of per learner funding in Grade R, across the country.</i>	
219	<i>The DoE must, in collaboration with PEDs, develop the planning tools required for a successful roll-out of publicly funded Grade R in public schools. In particular, the DoE must ensure that a model for planning the roll-out process, guidelines for a basic minimum package of Grade R inputs and an instrument for monitoring school-level implementation of the service are made available to PEDs. In carrying out this mandate, the DoE must take cognisance of systems already developed by PEDs.</i>	
220	<i>The DoE must design appropriate national reporting systems to monitor the implementation of publicly funded Grade R and PEDs must comply with the requirements of these systems.</i>	
221	<i>PED systems to monitor the appropriate utilisation of public funds intended for Grade R in public schools must focus both on the input and output sides. The DoE must lead the process of developing appropriate monitoring instruments in this regard. On the input side, monitoring systems must track, for instance, that Grade R classes are of an appropriate size, that ECD practitioners possess adequate skills and that learners have access to appropriate learner support materials. On the output side, monitoring systems must track, above all, learner performance. The DoE must establish poverty-sensitive benchmarks for performance that can be used to gauge the success of public school Grade R in provinces. Monitoring on the side of expenditure must be in line with general PED systems that track financial management practice in schools.</i>	
222	<i>The DoE, in collaboration with PEDs, must develop manuals and training packages aimed at developing capacity at the school level to implement publicly funded Grade R. The materials must, in particular, provide useful advice, based on best practice, for the employment of ECD practitioners in schools.</i>	

<i>Par.</i>	<i>Policy</i>	<i>Comments</i>
223	<i>General DoE and PED responsibilities with regard to planning and monitoring referred to in paragraphs 197 and 198 are applicable to the roll-out of publicly funded Grade R in public schools, but also the funding of Grade R in independent schools as outlined in paragraphs 201 to 206 of these norms.</i>	
	8 PUBLIC FUNDING FOR GRADE R IN INDEPENDENT SCHOOLS	
	Introduction	
224	<i>In accordance with the proposals of Education White Paper 5, the state will fund Grade R in non-public institutions where there is a need for the piloting of new approaches or there is a need to reduce the distance travelled by poor Grade R learners between home and the institution.</i>	
	Registration of community-based sites as independent schools	Discussion: A complexity that may not have been considered adequately, is the joint responsibility of education and social development departments for community-based sites. Alignment between Government departments with regard to ECD is a matter that has arguably not been sufficiently thoroughly investigated up till now. It is possible that the optimum shape of policy, where there is joint responsibility, may only become clear at some later point, e.g. once the new Child Care Act is passed.
225	<i>PEDs must amend their current criteria for the registration of independent schools, to make it possible for publicly funded community based ECD sites to become independent schools. The DoE must provide a template for the amendments, based partly on analysis of existing provincial criteria for the registration of independent schools.</i>	Implication to note: The new criteria will obviously have to be wide enough to make sure that community based ECD sites that the province would want to fund, do qualify as independent schools.
226	<i>The amended criteria referred to in paragraph 225 must be formulated in such a way that qualification for registration as an independent school for classes lower than Grade 1 does not automatically qualify the school to offer Grade 1 or any higher grade. The introduction of Grade 1 or any higher grade should be subject to the controls applicable to all independent schools offering Grades 1 to 12.</i>	Motivation: An unintended consequence of registering community-based sites as independent schools is that they would be tempted to do the ‘school thing’ and expand into Grade 1 and beyond. This may not be a bad thing, if one believes that the expansion of the independent school sector is good for education. It is probably not feasible legally or politically to classify community-based sites as extraordinary independent schools that would not be allowed to expand upwards. What the state needs to do then is to ensure that the registration of community-

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		based sites as independent schools does not open a window for poor quality upward expansion. This can be done by making sure that the criteria for registration of independent schools require a re-assessment of the school by the state if a school expands from Grade R to Grades 1 to 12.
227	<i>PEDs must ensure that that all community-based sites funded by the state are registered as independent schools. Community-based sites that have not received public funding in the past, may apply for registration as independent schools in accordance with the amended criteria referred to in paragraph 225. However, approval for independent school status does not necessarily qualify a school for state funding.</i>	Motivation: If we allow the publicly funded community-based sites to register as independent schools, then it is difficult to stop the community-based sites we do not fund from applying for registration too. Registration would be associated with legitimacy, which sites could profit from, even if they did not receive public funding. It would have to be made very clear that registration as an independent school is no guarantee that the state would fund Grade R.
	Funding of pre-Grade 1 classes in independent schools	Discussion: This seems to be a difficult area in which to pronounce policy, partly because the funding of community based sites appears to have taken place in a policy vacuum, and partly because it is difficult to tell at this stage what the best practice is. This section requires some careful discussion.
228	<i>Every PED that funds learners in Grade R and below in independent schools must formally adopt a set of criteria for selecting independent schools that will receive such funding. The DoE will provide a template for this set of criteria. A key factor in determining these criteria will be the need for experimentation and piloting that can add value to ECD service delivery as a whole.</i>	Motivation: PEDs need to have a clear set of criteria for targeting independent schools in order to make the whole process accountable and to avoid allegations of irregularities. (The question is what the procedure has been till now to select community based sites for funding.)
229	<i>PEDs must maintain a register of which independent schools should receive public funding for learners in Grade R and below. This register must specify the reason why particular institutions receive funding, according to the criteria referred to in paragraph 228, and whether only Grade R learners, or Grade R learners and younger learners, will be funded.</i>	Discussion: If we regard experimentation and travelling distance as the two legitimate reasons for funding independent school pre-Grade 1 (as proposed by WP5), then it seems logical to only fund learners below Grade R where there is experimentation. If we also fund these learners in schools where travelling distance is the justification, then we would be unfairly and unreasonably advantaging independent school learners over public school learners.
230	<i>PEDs must fund Grade R learners in targeted independent schools according to transparent criteria that apply equally to all targeted schools. These criteria must be informed by the need to experiment with different approaches, and also by the need to advance equity and redress in the provisioning of public services.</i>	Discussion: When it comes to Grade R, it is not all independent schools that are eligible for state funding. The state chooses which schools to fund, according to relatively narrow criteria. The fact that the targeted schools would tend to be poor schools, and moreover often poor schools providing access that cannot be provided by a public institution, is an argument in favour of funding that is more or less equivalent to the public funding, for these independent schools.
231	<i>No independent school has the right to receive public funding for Grade R or any</i>	

<i>Par.</i>	<i>Policy</i>	<i>Comments</i>
	<i>services below Grade R unless the school has been explicitly targeted by the state to be part of a publicly funded programme, for instance according to the criteria stated in paragraph 205.</i>	

6 Paragraphs from the National Norms and Standards

What follows are selected paragraphs from the *National Norms and Standards for School Funding*. The amended paragraphs, as proposed and released for public comment in September 2004, are reproduced here.

Key terms

98C The following terms have particular importance with regard to the school allocation.

National poverty distribution table (or the ‘poverty table’). A table, provided in this policy, that describes the distribution of national poverty across the country.

Provincial quintile One fifth of public ordinary school learners in a province, where the first provincial quintile is the poorest one-fifth, and second provincial quintile is the next poorest one-fifth, and so on. In practice, it is the level of poverty of the school that determines how poor each learner is, but a quintile is nevertheless one fifth of the province’s learners, not schools.

National quintile. One fifth of public ordinary school learners in South Africa, where the first national quintile is the poorest one-fifth, and second national quintile is the next poorest one-fifth, and so on. In practice, it is the level of poverty of the school that determines how poor each learner is, but a national quintile is nevertheless one fifth of the country’s learners, not schools.

National table of targets for the school allocation (or the ‘targets table’). A table, provided in this policy, that lays down the per learner monetary targets for the school allocation in terms of national poverty quintiles.

Resource targeting list. A list of schools in a province with schools ranked according to poverty of the school community. Schools should be sorted from poorest to least poor on this list.

School allocation. An amount allocated by the state to each public ordinary school in the country on an annual basis in order to finance non-personnel recurrent expenditure items.

School allocation budget. A provincial budget used exclusively to finance the school allocations in the province.

School poverty score. A score attached to each school that reflects the degree of poverty of the surrounding community.

Inputs that may be covered by the school allocation

100A This sub-section describes which items may be covered by the school allocation. The description is not intended to be unnecessarily restrictive or prescriptive. Nor does the description exclude the use of state funds other than the school allocation for the items mentioned. Instead, this description should guide the state in determining the level and distribution of the school allocation, and schools in determining the utilisation of the allocation. This sub-section does not in any way place the state under the obligation of ensuring that the cost of all the items listed here should be fully covered by the school allocation.

100B In general, the school allocations are intended to cover non-personnel recurrent items and small capital items required by the school as well as normal repairs and maintenance to all the physical infrastructure of the school. Moreover, the school allocation is primarily and exclusively intended for the promotion of efficient and quality education in public ordinary schools.

100C The following list provides examples of items that the school allocation may cover, and a categorisation of these items. It should be noted that the items are mentioned serve as examples, and do not constitute all the possible items. The definition of a capital item is as per Treasury regulations (currently, any item exceeding a value of R5,000 per item is defined as a capital item).

(i) Learning support materials (LSMs), including textbooks, library books, charts, models, computer hardware and software, televisions, video recorders, video tapes, home economics equipment, science laboratory equipment, musical instruments, learner desks, chairs. (These items, and the ones under (ii) to (iv) below, would typically support the SASA section 21(c) function.) This category is subdivided into capital items and non-capital items.

(ii) Non-LSM equipment, including furniture other than learner desks and chairs, paper copier machines, telephone sets, fax machines, intercom systems, equipment for connectivity within the school and to the Internet, hardware tools, cleaning equipment, first aid kits, overalls for cleaners and ground staff, sporting equipment, electrical accessories. This category is subdivided into capital items and non-capital items.

(iii) Consumable items of an educational nature, including stationery for learners.

(iv) Consumable items of a non-educational nature, including stationery for office use, paper, cleaning materials, petrol, lubricants, food.

(v) Services relating to repairs and maintenance, including building repair work, equipment repairs and maintenance, light bulbs. (These items would typically support the SASA section 21(a) function.)

(vi) Other services, including workshop fees, TV licences, Internet service providers, school membership of educational associations, postage, telephone calls, electricity, water, rates and taxes, rental of equipment, audit fees, bank charges, legal services, advertising, security services, public or scholar transport, vehicle hire, insurance, copying services. (These items would typically support the SASA section 21(d) function.)

100D In view of the fact that schools are not equally subject to the legacy of apartheid inequities, population increases and unexpected calamities, the DoE and the PEDs must pursue resourcing mechanisms other than the school allocation in order to deal with the following shortages of the items referred to in paragraph 100C:

(a) Shortages of LSMs and equipment where the shortage is clearly and directly linked to historical expenditure inequities.

(b) Shortages of of LSMs and equipment, and in particular shortages of learner desks, learner chairs and textbooks, where the shortage is clearly and directly linked to a recent and significant increase in the enrolment of the school.

(c) Urgent building repair needs which are clearly and directly linked to historical expenditure inequities.

(d) Shortages resulting from calamities such as fire or floods.

(e) Start-up resource requirements linked to the approved introduction of new grades into existing schools, or the establishment of completely new schools.

100E Nothing in this policy prevents PEDs or SGBs from devoting funds derived from the school allocation towards needs described in paragraph 100D, if this is regarded as being in the interests of education in the school, and if this occurs in accordance with the general policy governing the school allocation. An SGB may, for instance, approve the use of the school allocation for urgent building repair needs arising out of a natural calamity. A PED may establish a system whereby schools are reimbursed at a future date for utilising funds from the school allocation for non-intended expenditure of a non-personnel nature. Such a system of

reimbursement must be transparent and treat all schools equally. Schools do not have an automatic right to this type of reimbursement outside of, or in the absence of, such a system in the province.

100F The school allocation may not be used to cover the cost of personnel and new buildings.

The resource targeting list

101A This sub-section describes the 'resource targeting lists' that PEDs must maintain as a basis for the pro-poor distribution of the school allocation budget. The resource targeting list is a list of all the public ordinary schools in the province, sorted from poorest to least poor. The principle is followed that, ideally, communities are best served by the schools closest to them. It is precisely for this reason that the preferential public funding of schools in poorer communities is regarded as a priority for Government. However, exceptions to this principle are also contemplated in this sub-section.

101B The PED must assign to each school a school poverty score that will allow the PED to sort all schools from poorest to least poor. The principles governing the determination of the school poverty score are the following:

(a) The score should be based on the relative poverty of the community around the school, which in turn should depend on individual or household advantage or disadvantage with regard to income, wealth and/or level of education.

(b) The score should be based on data from the national Census conducted by StatsSA, or any equivalent data set that could be used as a source. The beneficiaries of the school allocation, for example schools or districts, should never be the source of the data, in order to avoid undesirable incentives to distort information.

(c) The derivation and calculation of the score should be sufficiently comprehensive to provide a reasonable measure of the relative poverty of the school community. However, it should not be the intention to incorporate the complete range of poverty indicators in the score. The score should moreover be constructed to be as transparent and generally understandable as possible.

(d) The basic methodology behind the score should be national in order to promote a pro-poor funding framework that treats equally poor schools equally, regardless of the province they find themselves in. However, provincial variation should be pursued where this enhances the ability of a PED to distinguish between the poverty levels of different school communities, and where the variation has been agreed upon after consultation with the DoE.

101C The following steps should be followed in the determination of the school poverty score:

(a) Each school must be linked to a specific geographical area that can be considered the catchment area of the school. Where Census data is used, the geographical area would be the set of enumerator areas or place names closest to the particular school. Different levels of the schooling system, for example primary schools and secondary schools, would be dealt with separately. The DoE may determine precise rules for this step after consultation with PEDs.

(b) Variables from the data set relating to households or individuals must be selected to inform three different indicators of poverty: income; dependency ratio (or unemployment rate); and level of education of the community (or literacy rate). The DoE may change this set of indicators after consultation with the PEDs.

(c) Variables from the data set, and the indicators of poverty, must be weighted, for the purposes of arriving at a final poverty score for each specific geographical area, corresponding to each school. The DoE will determine the weightings that should be used.

101D The Provincial Department of Education must, as a first priority, aim to provide schooling to

communities in quality schools that are geographically accessible for learners. Linked to this priority, is the imperative to ensure that preferential school funding in poorer communities translates into effective interventions and optimal combinations of inputs that assist in combating historical disadvantage. However, PEDs may deviate from this principle, and may deviate from the school poverty score methodology described in paragraph 101C, in the following circumstances:

(a) There are inadequate places in local schools, and the PED has determined that the community should make use of schools at a distance from the local community.

(b) The PED has requested parents to make use of a school other than the local school, where the local school is suffering severe and temporary problems relating to, for instance, the quality of teaching and learning.

- 101E The exceptional circumstances referred to in paragraph 101D may permit the use of an approach other than the one described in paragraph 101C in order to determine a school's poverty score. In particular, the provision that it is the poverty of the community around the school that should be the determining factor, might be waived. Where a PED has determined that learners should attend a school other than the local school, the PED could, for instance, expand the community of the receiving school so that it included households from the community from which learners originated. Any deviation from the approach described in paragraph 101C must be effected transparently, and uniform criteria must apply to all similar deviations within the same province. PEDs must register deviations in a provincial register that provides details on each deviation, including the justification for the deviation. Such a register must be available for scrutiny by the public and monitoring authorities such as the DoE.
- 101F A school may apply to the PED for a deviation of the type described in paragraph 101D to be effected for that school, where the school believes that it warrants special consideration. PEDs must establish transparent and fair procedures for dealing with such applications from schools, in line with paragraph 101E.
- 101G A school may dispute the correctness of the poverty score assigned to it through representation to the Head of Department. PEDs must establish transparent and fair procedures to deal with such queries regarding technical accuracy.

The determination of nationally progressive school allocations

- 102A This sub-section describes how PEDs should use the resource targeting list, the table of targets for the school allocation (the 'targets table') and the national poverty distribution table (the 'poverty table') to determine the school allocation for each school.
- 102B The following 'table of targets for the school allocation' or 'targets table' establishes target per learner amounts for the school allocation. Column A provides the percentages that underlie the pro-poor funding approach. For example, the first national quintile (or one-fifth) of learners should receive 30% of funding, which is six times more than the 5% of funding which should go towards the least poor quintile. Column B specifies the target per learner school allocation amount in rands for each of the years 2006, 2007 and 2008. Column B furthermore specifies what the average per learner target value would be for the country as a whole. The 'adequacy benchmark' amount appearing in column B indicates the per learner amount that Government considers minimally adequate for each year. For 2006, the adequacy benchmark is set at R527, and for the following two years inflationary increments have been calculated to give R554 and R581. Column C indicates the maximum percentage of learners in each national quintile that could be funded to the adequacy level. Column C provides an indication of both the possibility of adequate resourcing without school fees, and the percentage of learners which could be exempted from the payment of school fees, given the existence of fees. For example, in 2007 in national quintile 5, if school fees were used to finance the needs of 78% of learners, then 22% of learners could be financed through the state's school allocation, in other words 22% of learners could be fully exempt from the payment of school fees.

THE TARGETS TABLE
National table of targets for the school allocation (2006-2008)

	A	2006		2007		2008	
		B	C	B	C	B	C
<i>NQ1</i>	30.0	R 703	100%	R 738	100%	R 775	100%
<i>NQ2</i>	27.5	R 645	100%	R 677	100%	R 711	100%
<i>NQ3</i>	22.5	R 527	100%	R 554	100%	R 581	100%
<i>NQ4</i>	15.0	R 352	67%	R 369	67%	R 388	67%
<i>NQ5</i>	5.0	R 117	22%	R 123	22%	R 129	22%
<i>Overall</i>	100.0	R 469	89%	R 492	89%	R 517	89%
<i>Adequacy benchmark</i>		R 527		R 554		R 581	

102C The table appearing in paragraph 102B covers the school allocation targets to the year 2008 only. The Minister, in consultation with the Minister of Finance and the Financial and Fiscal Commission (FFC), will release targets relating to years beyond 2008, and may change previously released targets, depending on circumstances. The Minister would publish in the Government Gazette, on an annual basis, the new column B targets for the new outer year. For instance, in 2006 the Minister would publish the column B targets applicable to 2009. This is to promote predictability and better medium term planning in the schooling system. Changes to previously released targets could be made to deal with factors such as unexpected changes in the inflation rate. The Minister may revise the distribution between national quintiles contained in column A. The Minister may revise the adequacy benchmark amounts. Revisions should occur on the basis of emerging research into the costs of schooling in different socio-economic contexts, changes in the socio-economic profile of the country and the overall budget of Government. The Department of Education must actively promote research that can inform optimal school allocation budgets, and an optimal distribution of this budget.

102D Considering that poverty is unevenly spread across South Africa, and that it is Government's intention to establish targets that treat equally poor learners equally, regardless of the province they find themselves in, province-specific poverty data should be taken into account. The following 'national poverty distribution table' or 'poverty table' should be used by PEDs in determining how the target table in paragraph 102B finds expression in each province. For example, Eastern Cape must consider the national quintile 1 target to be applicable to as many schools on the resource targeting list as it takes to cover 34% of learners, starting from the poorest school. The national quintile 2 target would be applicable to the following schools on the resource targeting list, up to the point at which the next 26% of learners would be covered. The national quintile 5 target would be applicable to only as many schools on the non-poor end of the resource targeting list as it takes to cover 11% of learners. The data in this table is based on household income data supplied by National Treasury.

THE POVERTY TABLE
National poverty distribution table

	National quintiles					Total
	1 (poorest)	2	3	4	5 (least poor)	
Eastern Cape	34%	26%	18%	10%	11%	100%
Free State	33%	20%	16%	14%	18%	100%
Gauteng	7%	11%	18%	28%	35%	100%
KwaZulu-Natal	19%	22%	22%	21%	16%	100%
Limpopo	27%	25%	22%	15%	10%	100%
Mpumalanga	14%	23%	25%	21%	17%	100%
Northern Cape	18%	17%	21%	20%	23%	100%
North West	20%	19%	23%	23%	15%	100%
Western Cape	4%	10%	16%	29%	40%	100%
South Africa	20%	20%	20%	20%	20%	100%

N.B. THE FIGURES IN THIS TABLE ARE STILL SUBJECT TO VERIFICATION

***THROUGH THE DEPARTMENT OF EDUCATION-NATIONAL TREASURY
CONSULTATIVE PROCESS.***

- 102E The Minister, in consultation with the Minister of Finance, will review the national poverty distribution table on an annual basis and, when necessary, will publish updated versions of this table in the Government Gazette.
- 102F In order to calculate the target school allocation for each individual school for the following year, the PED must multiply the relevant per learner target from the targets table by the enrolment of the school in the current year. For example, a school serving 100 national quintile 2 learners (defined as such according to the criteria laid out in paragraph 102D) in 2006, would have a target school allocation of 100 multiplied by R645, or R64,500, in 2007.
- 102G Each PED must, as part of its ongoing MTEF budgeting process, calculate the school allocation budget implied by the national targets, and compare this amount to the actual school allocation budget amount available in the MTEF budgets. If the target amount is not equal to the actual amount, one of the following sets of procedures should be followed:
- (a) If the actual amount exceeds the target amount, the PED must ensure that, as a minimum, each school receives the school allocation implied by the national targets. A PED may use the difference between the actual amount and the target amount to create a smoother distribution, or a continuous curve, so that less abrupt per learner funding shifts occur between one school on the resource targeting list and the next. However, such smoothing should not result in any school receiving less than the target per learner amount applicable to that school.
- (b) If the target amount exceeds the actual amount, the PED and the DoE, in collaboration with the National and Provincial Treasuries, must jointly devise a plan for attaining the targets in the earliest possible year. This plan must include details on how, in the interim, the actual budget will be distributed across the national quintiles. Such a plan must prioritise the attainment of targets in quintiles 1 and 2, and for learners in Grades 1 to 9.
- 102H Each PED must provide a recommended breakdown of the school allocation, for each school, according to the three section 21 functions of SASA that imply expenditure and according to the breakdown provided in paragraph 100C. This breakdown should be communicated in all official letters to schools indicating what their school allocations are. The three relevant section 21 functions are restated here, with some comments:
- Section 21(a) of SASA: To maintain and improve the school's property, and buildings and grounds occupied by the school.
- Section 21(c) of SASA: To purchase textbooks, educational materials or equipment for the school.
- Section 21(d) of SASA: To pay for services to the school.
- It should be noted that though school hostels are mentioned in section 21(a) of SASA, funding of school hostels is dealt with in the next section of this policy, titled 'Hostel costs'.
- 102I In addition to the breakdown referred to in the previous paragraph, and apart from the financial directions issued in terms of section 37 of SASA, PEDs may determine other conditions governing the use of the school allocation where this is deemed necessary for the promotion of better school management. Such other conditions may also be aimed at general socio-economic transformation. For instance, a PED may introduce procurement provisions or recommendations to empower small and black-owned businesses. The other conditions would apply to all schools, whether they have SASA section 21 functions or not. All these conditions must be communicated to schools in the official letters referred to in the previous paragraph.