

Decentralizing Education Functions in Cambodia: Lessons from Battambang 2019-2022

Chum Chandarin*

University of Technology and Entrepreneurship, Cambodia.

ABSTRACT

This article presents a detailed examination of the decentralization of education functions in Cambodia, focusing on the pilot initiative implemented in Battambang province between 2019 and 2022. It begins by outlining the legal and institutional frameworks—most notably Sub-Decrees No. 182 and 184—that enabled the transfer of selected education responsibilities from central authorities to District and Municipal Administrations (DMAs). The analysis also explores the roles of key provincial and national institutions in supporting the implementation process, as well as the dual modalities of assignment and delegation. Drawing on qualitative field research, including semi-structured interviews with education officials and local stakeholders, policy document reviews, and participant observations, the article highlights both the achievements and persistent challenges in operationalizing decentralization. It identifies issues such as capacity gaps, inconsistent regulatory interpretations, unclear mandates, and communication bottlenecks across administrative levels. The findings underscore the need for clearer procedural guidelines, sustained capacity-building efforts, and the establishment of structured provincial support mechanisms. By capturing the nuanced experiences from Battambang, this article provides critical insights and practical recommendations for strengthening the decentralization process. It argues that, if effectively addressed, the lessons from this pilot can inform a more coherent, inclusive, and scalable strategy for transferring education functions across Cambodia's provinces—ultimately contributing to more responsive, accountable, and community-centered education service delivery.

Keywords: Decentralization, Cambodia, Piloting, Transferring functions.

Journal of Data Analysis and Critical Management (2025); DOI: XXXX.XXXX

INTRODUCTION

Background and Purpose

On 2 December 2019, the Royal Government of Cambodia issued Sub-Decrees No. 182 and No. 184, which outlined the functions and organizational structures of municipal and district administrations, respectively. These Sub-Decrees were intended to strengthen administrative efficiency, improve public service delivery, and promote local development by clearly defining the roles, responsibilities, structures, and accountability mechanisms of sub-national administrations. Importantly, the Sub-Decrees marked a significant step forward in the Sub-National Democratic Development (SNDD) reform agenda by transferring certain functions—such as education—from central to local levels.

The transfer of responsibilities occurred through two mechanisms: assignment (or devolution) and delegation. Under the assignment model, sub-national administrations are granted substantial authority to

Corresponding Author: Chum Chandarin, University of Technology and Entrepreneurship, Cambodia, e-mail: cchandin@ute.ac

How to cite this article: Chandarin, C. (2025). Decentralizing Education Functions in Cambodia: Lessons from Battambang 2019-2022. *Journal of Data Analysis and Critical Management*, 01(2):34-40.

Source of support: Nil

Conflict of interest: None

manage and implement the assigned functions and are directly accountable to the local population, as stipulated in Article 225 of the 2008 Organic Law. In contrast, delegated functions must be carried out according to the directives of the central ministry or institution, with accountability primarily flowing back to that authority. (Organic Law, 2008).

While education functions were generally transferred in delegated form across Cambodia's provinces and capital, Battambang was an exception. There, three key areas of education—Early Childhood Education (ECE),

Primary Education (PE), and Non-Formal Education (NFE)—were transferred under the assignment model, granting the local administration greater autonomy in managing these services.

Battambang has served as a pilot site for implementing the 2016 Policy on Decentralization and Deconcentration (D&D) Reform in the education sector, developed by the Ministry of Education, Youth and Sport (MoEYS, 2016). The policy aims to enhance the autonomy and accountability of sub-national administrations—particularly at the district and municipal levels—and public educational institutions, enabling them to provide quality, transparent, and equitable education services. The transfer of responsibilities and resources in education, youth, and sport has been carried out gradually and with caution. The implementation experience in Battambang is expected to offer important lessons and insights that can inform broader efforts to assign education functions to district-level administrations across other provinces in Cambodia.

This article presents the key lessons learned and practical experiences associated with the decentralization of education functions to the District/Municipal Administrations (DMAs) in Battambang. It critically examines the effectiveness of the implementation, identifying areas of success, challenges encountered, and aspects requiring further improvement. The study also considers implications for the potential replication and scaling-up of the Battambang model in other provinces.

Research Methods

This study employed a qualitative methodology, drawing on semi-structured interviews with key stakeholders and a comprehensive review of relevant legal frameworks and documentation related to the decentralization process in Battambang. Field observations of policy implementation at the District and Municipal Administrations (DMAs) were conducted between June 2020 and December 2021. In addition, stakeholders were periodically invited to reflect on the implementation process. Two national reflection workshops were organized to gather further insights: the first was held virtually on 29–30 July 2021, and a follow-up session was conducted on 24 March 2022.

It is important to interpret the findings within the constraints posed by the COVID-19 pandemic. Following the issuance of Sub-Decrees No. 182 and 184 in late 2019, significant administrative capacity at both national and sub-national levels was redirected toward pandemic response efforts. Most schools in Battambang were

closed and repurposed as quarantine or treatment facilities, which hindered the full exercise of the newly assigned educational responsibilities. Consequently, the rollout of assigned functions occurred under exceptional circumstances, limiting the degree of implementation that could reasonably be expected.

This article emphasizes the practical experiences, observations, and reflections of education sector officials at the provincial and DMA levels, based in part on the author's own role as an advisor on education decentralization in Battambang. As the three education functions—Early Childhood Education, Primary Education, and Non-Formal Education—were transferred, local officials encountered numerous legal, administrative, and financial challenges, many of which lacked clear procedural guidance. This report documents those challenges and the ways in which they were addressed—or, in some cases, left unresolved. However, it does not attempt to assess the broader outcomes or impacts of the devolution process, such as changes in the quality or accessibility of educational services. Nor does it compare the results across different decentralization modalities.

Regulatory Framework

The education decentralization process in Battambang was shaped by several key policies and legal instruments:

Policy on Decentralization and Deconcentration (D&D) Reform

Adopted in 2016, this policy aimed to grant greater autonomy to local administrations in managing education services. The policy laid the foundation for transferring education functions and resources to sub-national levels.

Sub-Decrees 182-184 (2019)

These decrees established the governance structure for municipal and district administrations, officially transferring ECE, PE, and NFE responsibilities to DMAs in Battambang. Unlike other provinces where education functions were delegated, Battambang was selected to test the assignment approach, allowing DMAs to have more control over education management.

Although Sub-Decrees No. 182 and 184 (2019) established the legal framework for the transfer of education functions to District and Municipal Administrations (DMAs), both under assigned and delegated modalities, these provisions alone have proven insufficient to effectively guide implementation at the sub-national level. In response to emerging

challenges and ambiguities encountered during the rollout, additional directives and technical guidelines have been developed to provide further clarification. It is anticipated that more detailed and context-specific guidance will continue to be issued, informed by ongoing feedback and lessons learned from the implementation process.

Administrative Regulations

To guide the transition, several ministerial regulations were issued such as:

- Instruction No. 055 SNN (2019) ensured service continuity during the transition.
- Notice No. 1622 SCN (2020) clarified administrative coordination between DMAs and provincial departments.
- Inter-Ministerial Prakas No. 521 SHV.BK (2020) outlined financial and technical conditions for funding transfers to DMAs.

Supporting Institutions

Multiple institutions have played a pivotal role in advancing the decentralization process. Given Cambodia's complex institutional landscape, this section highlights the key actors involved in facilitating and reinforcing the implementation of decentralization across both the provincial and district/municipal administrative levels. Their coordination and support are essential for ensuring effective governance and smooth execution of the reform agenda.

Provincial Department of Education Youth and Sport (PDoEYS)

The Provincial Department of Education, Youth and Sport (PDoEYS) was envisioned to serve as a key intermediary between the Ministry of Education, Youth and Sport (MoEYS) and the District/Municipal Administrations (DMAs), providing both technical support and oversight. However, its role has remained ambiguous, largely due to outdated mandates and resource constraints. Based on a review of relevant documents and consultations with key informants from the PDoEYS, the study identifies several pressing challenges.

Firstly, the current operations of the PDoEYS are not yet aligned with the 2016 Policy on Decentralization and Deconcentration (D&D) in the education sector. The department continues to function under the framework established by a 1999 MoEYS decision, which does not reflect the changes introduced by the 2016 policy or the provisions outlined in Sub-Decrees No. 182 and

184 regarding the transfer of educational functions. It is noted that MoEYS is in the process of revising this framework and preparing a new Prakas that will define the roles and responsibilities of the PDoEYS in accordance with the current decentralization reforms and to better support the implementation of assigned education functions in Battambang.

Secondly, while there have been initiatives to build the capacity of schoolteachers and principals, similar efforts have not been extended to the sector officials responsible for managing and supporting education at the PDoEYS level. Currently, no specific plans or budget allocations exist to strengthen the technical and managerial competencies of key support units such as administration, planning, personnel, training, or inspection offices. Nevertheless, field observations indicate that the PDoEYS in Battambang has taken some initiative. For example, the Office of Administration has established an informal Telegram group to facilitate communication and information-sharing among DMAs. Members of this group include district and municipal governors, deputy governors overseeing education, and directors of DMA administrations.

Lastly, the PDoEYS's three-year budget plan (2021–2023) reveals a projected financial shortfall of approximately 5%. This anticipated deficit may further constrain the department's ability to implement its operational plan, particularly in areas already under-resourced, such as capacity development and inspection functions.

Provincial Division of Human Resources Management (PDiHRM)

This department was responsible for personnel management at the provincial level but had limited direct engagement in training and support for DMA officials handling education functions.

Provincial Department of Civil Services (PDCS)

The Provincial Department of Civil Service (PDCS) is responsible for formalizing staff appointments and ensuring compliance with legal and regulatory procedures. However, bureaucratic inefficiencies have often resulted in significant delays in administrative processes. A case in point is the appointment of a preschool principal. According to existing regulations, such an appointment requires the preschool to be officially recognized through a *Prakas* issued by the Ministry of Education, Youth and Sport (MoEYS). In several instances, this prerequisite was unmet due to the absence of formal *Prakas* for certain preschools.



As a result, individuals who had served in an acting capacity for years remained ineligible for official appointments. These issues have been acknowledged by the PDoEYS, which reportedly submitted requests for school recognition to MoEYS as early as 2018, but these requests had yet to receive a response.

District/Municipal Administrations (DMAs)

DMAs were at the center of education service delivery but faced multiple challenges, including inadequate staffing, a lack of technical expertise, and budgetary constraints. During the piloting period, there were some notable challenges as noted below.

Administrative and Procedural Ambiguities

The lack of clear administrative guidelines led to inconsistent practices across DMAs. Issues such as stamp usage, leave approval, and financial procedures created confusion and inefficiencies.

Human Resource Constraints

Many DMAs struggled with a lack of experienced education personnel. Officials new to the role faced difficulties managing teachers, approving leave requests, and handling school budgets.

Financial challenges

Delays in fund transfers, coupled with unclear budgeting procedures, hampered school operations. Schools reported difficulties in securing necessary funding for infrastructure and supplies.

Institutional coordination issues

Limited communication between DMAs, PDoEYS, and other provincial bodies led to confusion over roles and responsibilities. The absence of a structured support mechanism exacerbated these challenges.

Lessons Learned

Drawing from the experience in Battambang, the author presents a set of key lessons and recommendations intended to enhance the current implementation process and inform the planning and preparation for the future expansion of the initiative to other provinces.

The Importance of Clear Communication

Effective implementation of any new policy depends on broad-based understanding and stakeholder buy-in. Although field observations and interviews indicate that staff within the District/Municipal

Offices of Education, Youth and Sport (DoEYS) have expressed reservations about the shift in authority to District/Municipal Administrations (DMAs), there is general recognition that such a transition is both necessary and beneficial for improving the delivery of education services at the community level. To ensure a balanced approach—combining both support and accountability—it is essential that all actors directly impacted by the transfer are well-informed about the intended benefits, as well as the revised administrative procedures. Achieving this requires robust awareness-raising and information dissemination strategies that extend beyond government officials to include local stakeholders such as school support committees, commune chiefs, commune, and district/municipal councilors.

The Role of Personal Relationships

The effectiveness of the transition process was significantly shaped by the quality of collaboration between District/Municipal Administration (DMA) officials and education sector administrators. In areas where strong working relationships had been established, challenges were addressed more efficiently. Despite the lack of clear operational guidelines and formal support mechanisms, many DMA and DoEYS staff demonstrated a capacity for cooperation based on mutual trust and interpersonal rapport. Some DoEYS chiefs expressed satisfaction with the collaborative environment fostered through regular interactions with DMA leadership. Shared understanding of roles and responsibilities contributed to smoother administrative processes, including the issuance of *Deika*, budget approvals, and official documentation.

However, instances of misalignment and tension were also reported. In a few cases, misunderstandings or resentment arose between DMA and DoEYS staff. Examples include strict oversight of attendance—requiring DoEYS personnel to sign in and out four times a day—and inconsistent access to office equipment. While some DMAs responded flexibly to DoEYS requests, others enforced rigid procurement procedures. These issues, however, appear to reflect the typical initial frictions associated with new institutional arrangements. It is anticipated that such challenges will diminish over time as stakeholders become more familiar with evolving roles, processes, and collaborative practices.

The Need for Clearer Policies

Inconsistencies in regulatory interpretation have led to varied understandings and applications of

administrative procedures, highlighting the need for clear, consistent, and uniformly enforced policies in future decentralization efforts. Instances of *ultra vires*—when authorities act beyond their legal mandate—can occur. Conversely, reluctance to act within one's legal responsibility (*intra vires*) is often justified by the perceived lack of clarity in legal instructions and procedural guidance.

While it is acknowledged that further development of technical and administrative guidelines is necessary, Sub-Decrees No. 182 and 184 do provide a foundational legal framework for the implementation of education functions by DMAs. For example, Article 30 of both Sub-Decrees explicitly authorizes DMAs to establish sector-specific working groups. Despite the clarity of this provision, some DMAs have hesitated to act, opting instead to await further instructions due to concerns about overstepping their legal authority.

This ambiguity has allowed for divergent interpretations and inconsistent implementation practices. A case in point is the use of official stamps by the DoEYS. The Ministry of Interior's Instruction No. 1622 has been interpreted in multiple ways, particularly concerning its applicability to delegated versus assigned education functions. As a result, practices vary across districts: some DoEYS offices have ceased using the stamp entirely, others use it only for internal communications, while some continue its use both internally and externally on a selective basis.

National and provincial institutions, including sectoral ministries, have been slow to provide clarification or updated guidance. Although the 2016 MoEYS Policy on Decentralization and Deconcentration Reform in the Education Sector recognized the need to revise legal instruments and mechanisms in line with the reform, concrete progress remains limited. For instance, the roles and responsibilities of the PDoEYS have not yet been officially updated, and the technical guidelines to support the implementation of transferred education functions are still pending, despite the formation of a working group in July 2020.

Establishing Provincial Support Mechanisms

Establishing a structured support mechanism at the provincial level could significantly alleviate administrative challenges and provide timely, coordinated guidance to District/Municipal Administrations (DMAs). The institutional analysis above highlights several key actors that could contribute meaningfully to strengthening sub-national administrative functions. To ensure

responsive and effective support, dedicated backup mechanisms should be operational and readily accessible, enabling prompt clarification and assistance when needed.

However, stakeholder responses reveal inconsistent understandings of institutional responsibilities. While DMA personnel tend to seek guidance from the Provincial Departments of Internal Human Resource Management (PDiHRM) and Civil Service (PDCS), staff from the District/Municipal Offices of Education, Youth and Sport (DoEYS) continue to look to the Provincial Department of Education, Youth and Sport (PDoEYS) for support. The PDoEYS, in turn, typically advises DoEYS staff to defer to DMAs, citing the official transfer of functions. Conversely, PDiHRM and PDCS direct DMAs to coordinate with PDoEYS and DoEYS to resolve emerging issues.

An illustrative case from one DMA underscores the confusion. Interpreting the transfer of education functions as complete, the DMA asserted full administrative authority—taking over responsibilities such as approving teacher leave and appointing school principals—effectively sidelining the DoEYS. Complaints regarding this situation have been raised across various institutions, including PDoEYS and NCDD-S, yet no formal clarification or resolution has been provided.

This situation reflects a broader set of issues—including unclear legal frameworks and inconsistent inter-institutional communication. A more coordinated response could be achieved by forming a dedicated provincial-level support group composed of experts in education (from PDoEYS), human resource management (from PDiHRM), and legal affairs (from PDCS). While some DMAs have initiated internal committees to manage the education function transfer, a parallel working group at the provincial level is essential—at least during the initial phase of implementation—to guide and support local administrations effectively.

Prioritizing Capacity Building

To effectively manage their newly assigned responsibilities, officials within the District/Municipal Administrations (DMAs) require both technical and managerial capacity development. The timely completion and dissemination of a training manual specific to the transferred education functions is critical. Capacity building must be seen as a central pillar of the empowerment process, particularly in the context of newly devolved functions. Strengthening both institutional capacities and individual competencies is essential for successful implementation.



To this end, a Training Needs Assessment (TNA) was conducted by the PDoEYS, with support from the DAR/GIZ program, between February and March 2021. The assessment engaged 286 participants from both DoEYS and DMAs and revealed a number of priority areas requiring attention. The three most pressing needs identified were in staff management, planning, and financial and asset management. Additionally, there was a strong demand for foundational technical skills—particularly in computer literacy, including typing, and the use of Microsoft Word, Excel, and PowerPoint. The assessment also highlighted key personal development areas, specifically leadership, time management, and communication, as essential skills to be strengthened.

RECOMMENDATIONS

Strengthening Awareness and Engagement

Local stakeholders, including community leaders and council members, require enhanced awareness and understanding of the decentralization process. One-off dissemination workshops held at the national or provincial level are insufficient to ensure comprehensive outreach to District/Municipal Administrations (DMAs). The transfer of education functions to the sub-national level entails new roles and responsibilities, making it imperative that key actors at the district and commune levels are adequately informed. To address this, regular and targeted workshops should be organized not only at the provincial level but also at the district and commune levels to effectively communicate policy changes and the provisions outlined in Sub-Decrees 182–184.

Developing Comprehensive Administrative Guidelines

To ensure effective implementation at the District/Municipal Administration (DMA) level, comprehensive and clear procedural guidelines must be developed to regulate human resource management, financial operations, and administrative procedures. The use of Battambang as a pilot province for the assignment of education functions has highlighted several operational challenges that should be addressed early in the decentralization process to prevent confusion and lack of direction at the local level. Specific issues observed include ambiguity over the use of the DoEYS stamp in official communications, unclear authority regarding the approval of leave for school principals and teachers, uncertainty about the support role of PDoEYS to both DoEYS and DMAs, and questions about how DoEYS can

access funding for activities beyond district boundaries when DMA budgets cannot accommodate such needs.

Although these concerns may seem minor, they have nonetheless disrupted the smooth implementation of education function transfers. In addition to the absence of formal guidance on these matters, inconsistencies within existing regulations and directives must also be resolved to provide coherent and unified instructions across all administrative levels.

Improving Institutional Coordination

To strengthen coordination and address implementation challenges, formalized communication channels between DMAs, PDoEYS, and national-level institutions should be established. A transitional support mechanism at the provincial level is recommended to assist DMAs as they gradually assume full responsibility for the newly devolved education functions. This mechanism should bring together representatives from key provincial departments, including PDoEYS, the Provincial Department of Internal Human Resource Management (PDIHRM), the Provincial Department of Civil Service (PDCS), and the Provincial Department of Economy and Finance (PDEF).

Functioning as a responsive platform, this support structure would enable provincial stakeholders to address concerns and provide technical guidance during the initial implementation phase. Additionally, it would help facilitate communication and engagement with relevant national institutions, such as the National Committee for Sub-National Democratic Development (NCDD), the Ministry of Civil Service, and sector-specific ministries. Both DMAs and DoEYS offices could utilize this mechanism as a point of reference when uncertainties arise in the course of implementing transferred functions.

Expediting Training and Capacity Building

Prioritizing the development of a standardized training manual on education functions, alongside ongoing capacity development initiatives, is essential for effective decentralization. Successful reform efforts require sufficient capacity at both the provincial and district/municipal levels. Technical personnel within PDoEYS must be adequately trained in both the knowledge and skills necessary to support DMAs and DoEYS in carrying out the transferred education functions. Similarly, DMA staff require not only technical expertise in education administration but also interpersonal and leadership skills to effectively manage their new responsibilities. Competence in both content knowledge and team

leadership is critical for fostering positive engagement with the reform process and for enhancing service delivery to the public.

In addition to individual skill development, institutional capacity must also be strengthened to ensure long-term sustainability. Both PDoEYS and DMAs should incorporate comprehensive capacity-building strategies into their annual operational plans. Strong institutions are better positioned to support knowledge retention, facilitate peer learning, and promote effective knowledge-sharing within and across administrative levels.

CONCLUSION

The pilot initiative in Battambang provides valuable lessons on the challenges and opportunities of decentralizing education functions. While the assignment approach has not significantly disrupted education services, it has revealed critical gaps in administrative processes and institutional coordination. By strengthening regulatory frameworks, capacity-building efforts, and support mechanisms, Cambodia can refine and expand this model to improve education service delivery nationwide.

Moreover, the findings underscore the importance of clear procedural guidelines, consistent policy interpretation, and inclusive stakeholder engagement at all levels. The implementation process has shown that both institutional and individual capacities must be simultaneously developed to support sustained reform. Provincial and district/municipal administrations require not only technical training but also the authority, resources, and structured support networks to function

effectively. The establishment of coordinated provincial support teams and formal communication channels between sub-national and national institutions will be critical for ensuring a smooth transition.

Equally important is the need to foster a culture of collaboration and shared responsibility among DMA officials, education administrators, and local leaders. As Cambodia prepares to scale the reform to other provinces, sustained investment in capacity building, ongoing policy refinement, and adaptive management will be essential. The Battambang experience demonstrates that while decentralization is inherently complex, it also holds the potential to bring education governance closer to communities, making it more responsive, transparent, and equitable in the long run.

REFERENCES

- MoEYS. (2016). *Policy on decentralization and deconcentration in education*. Ministry of Education, Youth and Sport. <https://moeys.gov.kh/en/undefined/document-5239>
- Organic law on the administrative management of capital, provinces, municipalities, districts, and khans*. (2008). <https://faolex.fao.org/docs/pdf/cam200757.pdf>
- Sub decree No. 184 on functions and structure of district administration - OD Mekong Datahub*. (2019). https://data.opendevdevelopmentcambodia.net/laws_record/sub-decree-no-184-on-functions-and-structure-of-district-administration
- Sub-decree No. 182 on functions and structure of municipal administrations - OD Mekong Datahub*. (2019). https://data.opendevdevelopmentcambodia.net/laws_record/sub-decree-no-182-on-functions-and-structures-of-town-administration

