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Performance Audit Report

FUNCTIONING, LICENSING AND OVERSIGHT OF PRESCHOOL INSTITUTIONS

Prishtina, July 2025

The Auditor General of the Republic of Kosovo is the highest institution of economic and financial control, which the Constitution and the Law¹ is provided with functional, financial and operational independence.

The National Audit Office is an independent institution, which assists the Auditor General in carrying out his/her duties. Our mission is to contribute effectively to public sector accountability through quality audits, by promoting public transparency and good governance, and fostering economy, effectiveness and efficiency of government programs to the benefit of all. We are thus building confidence in the spending of public funds and play an active role in securing the taxpayers' and other stakeholders' interest in increasing public accountability. The Auditor General is accountable before the Assembly for the exercise of the duties and powers set forth in the Constitution, the Law, by-laws and international public sector auditing standards.

This audit was conducted in accordance with International Standards of Supreme Audit Institutions (ISSAI 3000²) as well as with good European practices.

Performance audits undertaken by the National Audit Office are objective and reliable examinations that assess whether government actions, systems, operations, programs, activities or organizations operate in accordance with the principles of economy³, efficiency⁴ and effectiveness⁵ and whether there is room for improvement.

The Auditor General has decided on the content of the performance audit report "Functioning, Licensing and Oversight of Preschool Institutions", in consultation with the Assistant Auditor General, Myrvete Gashi-Morina, who supervised the audit.

The audit team consisted of:

Ariana Gjonbalaj Shala, Director of the Audit Department

Ylfete Osmani, Team Leader

Ardiana Miftari, Team Member

¹Law 05_L_055 on the Auditor General and the National Audit Office of the Republic of Kosovo

²Standards and guidelines for performance auditing based on ONISA Auditing Standards and practical experience

³Economy - The principle of economy means minimizing the cost of resources. The resources used must be available at the right time, in the right quantity and quality, and at the best possible price.

⁴Efficiency - The principle of efficiency means maximising the output from available resources. It is about the relationship between the resources employed and the results given in terms of quantity, quality and time.

⁵Effectiveness - The principle of effectiveness implies meeting the predetermined objectives and achieving expected results.

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List of abbreviations

ECE - Early Childhood Education

PE - Preschool Education

PI - Preschool Institutions

UNICEF - United Nations, International Children's Emergency Fund

UNESCO - United Nations Educational, Scientific and Cultural Organization

PIE - Preschool Education Institutions

MESTI - Ministry of Education, Science, Technology and Innovation (the Ministry)

DECE - Division for Early Childhood Education

DPPUE - Division for Private Pre-University Education

DPUE - Department of Pre-University Education

MED - Municipal Education Directorate

EI - Education Inspectorate

EIS - Education Inspectorate Sector

Executive Summary

Education during childhood is a basic condition and fundamental right of every child, protected by international conventions. In this context, Early Childhood Education plays an important role in human life and provides a strong foundation for later development in emotional, educational and social aspects.

The National Audit Office has conducted a performance audit, "Functioning, Licensing and Oversight of preschool Institutions", with the objective of assessing the organization of the early childhood education process, the use and development of capacities, as well as assessing the functioning of preschool institutions. At the same time, the supervision and monitoring of preschool institutions by all responsible parties was assessed.

The audit focused on analyzing the legal infrastructure and functioning of the governance system at the central and local levels, such as: the Ministry of Education, Science, Technology and Innovation, as well as the Municipal Education Directorates in the Municipalities of Gjakova, Pristina and Prizren. The audit scope includes the time period 2022/2024 and is based on the analysis of official documents, interviews with stakeholders and the assessment of the results achieved in comparison with the objectives and criteria set.

The audit results show that despite legal initiatives and efforts by the Ministry of Education, Science, Technology and Innovation to advance early childhood education, the existing system faces significant structural, managerial and implementation challenges. The lack of secondary legal infrastructure, as well as functional mechanisms for monitoring, licensing and inspection of preschool institutions, prevents the effective implementation of educational policies in this sector. At the local level, although some progress has been noted in the construction of new preschool facilities and in the implementation of partial monitoring, the lack of long-term development plans, internal operating regulations and insufficient inclusion of all age groups significantly hinder the provision of a sustainable and quality preschool education system. On the other hand, the growing demand from the community and the sector for the establishment and licensing of new preschool institutions, as well as the need to expand existing capacities, remain high and unmet.

The lack of administrative instructions has made the new law on early childhood education unenforceable. The Ministry of Education, Science, Technology and Innovation has not drafted the administrative guidelines stemming from the Law on Early Childhood Education, adopted in 2023. The process of building the necessary legal structure has not even passed the initial drafting stage. By the time of the audit, none of the envisaged administrative guidelines had been finalized or approved, although almost two years have passed since the law entered into force. The failure to approve these bylaws has made the practical implementation of the new law impossible. As a result, preschool institutions continue to operate according to previous regulations and guidelines, which are not in line with the provisions and requirements of the current law, creating uncertainty and inconsistency in its implementation.

The lack of effective supervision by the Education Inspectorate has created uncertainty in the functioning of preschool institutions. The Regional Inspection Sector in Prishtina and Prizren has covered 30 to 31% of inspections for preschool institutions. Meanwhile, the Regional Inspection Sector in Gjakova does not have responsible officials engaged in inspections and supervision of education institutions. Additionally, the Education Inspectorate does not have regulations, by-laws or other internal documents in place that would support the organization of the work of inspection officials. A significant gap in staff organization issues is left by the lack of a Regulation on the Systematization of Job Positions. Inspectors are engaged according to the general description of the Law on the Education Inspectorate.

The lack of efficient licensing and monitoring mechanisms by the Division of Early Childhood Education has contributed to delays, irregularities, and uncontrolled functioning of preschool institutions. The Division for Early Childhood Education has not established efficient mechanisms for the licensing process, review of applications and monitoring of licensed preschool institutions. Licensing procedures for private, community-based and public-private preschool institutions are carried out without clear deadlines. As a result, significant delays have been identified in the processing of received applications, with some being reviewed within a week, while others remaining pending for 2-3 months to two years. Furthermore, the lack of a functional monitoring system by this division has contributed to emerging irregularities in the functioning of preschool institutions, including: exceeding the number of children in relation to the license decision, the closure of preschool institutions without notifying the responsible officials and authorities, and the functioning of some institutions in conditions unsuitable for the development and safety of children.

The lack of development plans and administrative difficulties at the local level have hindered the achievement of objectives for expanding capacities and greater inclusion of children in preschool education. At the local level, the objectives for expanding capacities and increasing the inclusion of children in early childhood education have not been achieved. The Municipal Directorate of Education in Prishtina has not drafted an education development plan for the years 2022-2024, which has resulted in a lack of strategic direction for the development of the preschool sector. In the Municipality of Prizren, the Municipal Directorate of Education has encountered obstacles in the implementation of all administrative procedures related to the appointment and functioning of new public preschool institutions. Furthermore, this directorate has not included in public institutions the most vulnerable category of children, those aged 0-3. This action has limited the access of younger children to Public Preschool Institutions even though the scope of the law on ECE covers all ages from birth to six years old. The situation is different in the other municipality, more specifically the Municipal Directorate of Gjakova which has shown better performance, managing to meet to a greater extent the needs for expanding the technical capacities of preschool institutions and accommodating all age groups of children, from 9 months to 6 years old.

The lack of a monitoring system or staffing and regulations for ECE has resulted in disorganized management and lack of regular supervision of public preschool institutions in Prishtina and Prizren. Furthermore, the Municipal Directorate of Education in Prishtina lacks a functional and documented system for the evaluation and monitoring of preschool institutions. There is no clear data on how many times a year and in what period of time they are monitored, what are the identified shortcomings and the measures that should be taken to improve them. Meanwhile, the MED of Prizren has not appointed

an official responsible for this level of education. These systemic and operational bottlenecks make it difficult for preschool institutions to function effectively and sustainably.

A total of eight recommendations for necessary improvements were given. Five recommendations were given to the Ministry of Education, Science, Technology and Innovation and three recommendations to the Municipal Education Directorates.

Response of the auditees

The Municipality of Gjakova has agreed with the audit findings in this report and has submitted the Letter of Confirmation. On the other hand, the Municipalities of Pristina and Prizren did not submit the Letters of Confirmation. The Ministry of Education, Science, Culture, and Innovation also submitted its Letter of Confirmation and partially agreed with the audit findings and conclusions. The Ministry's comments are presented under Annex 6, Letters of Confirmation and Comments from the Auditee.

1 Introduction

Education during childhood is a basic condition and a fundamental right of every child, protected by international conventions. In this context, Early Childhood Education (hereinafter, ECE) plays an important role in human life and provides a strong foundation for later development in emotional, educational and social aspects.⁶ Early childhood is considered a critical period of life that has an impact on a person's mental and physical health. At this age, the human brain deeply absorbs and assimilates all basic knowledge, develops communication and motor skills, and adapts behavior to existing social norms.⁷ Based on this, it can be concluded that this age is the period when the human being undergoes a complete transformation in both personality development and identity formation.⁸ Therefore, it is important to take all measures to ensure the appropriate conditions for the development of children's proper education during this period of time.

Given the importance of this level of education in a global perspective, the international convention on the rights of the child stipulates that every state must take all legislative and organizational measures to ensure the well-being of children of this age group.⁹ According to data from the Kosovo Agency of Statistics (hereinafter, KAS), the number of children aged 0-6 in our country is 154,471, while 32,818 children are included in the preschool education cycle in both the public and private sectors.¹⁰

In Kosovo legislation terms, inclusion of children in early education, namely at the pre-primary level, was not mandatory until 2023. A change in this regard was the approval of the new law on Early Childhood Education, which mandates the level of pre-primary education for all children aged 5-6.

In Kosovo, continuous efforts have been made to achieve education quality for the younger generations, within the framework of Preschool Institutions (hereinafter referred to as PI), where this level of education is developed. Based on our governance system, PIs are organized accordingly into several categories; public, private, combined (public-private), and community-based.

Referring to the European Commission's Reform Agenda for the Western Balkans, it is imperative for Kosovo to invest in ECE and increase attention to infrastructural enhancements at this level of education. This document, among other things, states that efforts should be made to provide a better basis for increasing the potential of children. The ECE level is especially important considering the

⁶American Public University, <https://www.apu.apus.edu/area-of-study/education/resources/why-is-early-childhood-education-important-for-children/>

⁷Very well mind, Critical period in brain development; definition & importance, July 25, 2023 <https://www.verywellmind.com/critical-period-in-brain-development-definition-importance-7556041#:~:text=The%20early%20years%20of%20a%20child's%20life%2C%20from%20birth%20to,being%20learned%20and%20processed%20extensively.>

⁸The role of early childhood education, Bissoli, MDF (2014). Development of Children's Personality: The role of early childhood education. Psicologia em Estudo, 19(4), <https://www.scielo.br/j/pe/a/Q39MGD7HSyJ4XsSQdLLJgw/?lang=en>

⁹Law on Early Childhood Education 2006

¹⁰Kosovo Agency of Statistics by age group 0-6, 2024 census

obstacles that young women face in entering the labor market.¹¹ It is worth noting that according to recent statistics, the number of children enrolled in early childhood education, aged 0-6, is only 21%.¹²

The Ministry of Education, Science, Technology and Innovation (hereinafter referred to as MESTI) is responsible for drafting primary and secondary legislation for all levels of ECE. MESTI establishes all Public PIs and periodically licenses Private PIs, community-based PIs and PIs with public-private partnerships. This responsibility is also comprehensive in terms of supervising all preschool institutions for children aged 0-5.

According to data from MESTI, the number of PIs that are currently functional is 245, of which 65 have public status, 170 are licensed private PIs, while another 10 belong to the category of community-based PIs and public-private partnerships.¹³

The National Audit Office (NAO) has undertaken this audit to assess the functioning, licensing and supervision of PIs. Through this assessment, the NAO aims to provide information and recommendations to help all stakeholders make necessary improvements to the process and increase the quality of early childhood education and care.

2 Audit Objectives and Questions

The objective of this audit is to assess the organization of the early childhood education process, the capacities and functioning of preschool institutions. The audit also aims to examine the supervision and monitoring of these institutions by the responsible parties.

Our main goal is to provide useful recommendations for improving the performance of responsible entities, with the aim of ensuring the well-being, sustainable development and quality inclusion of children in early childhood education.

Audit Questions

The audit questions are focused on reviewing the drafting of institutional policies for early education, verifying licensing procedures and assessing the supervision and monitoring of Preschool Institutions. Based on this system, the audit questions are as follows:

- 1. Has the Ministry of Education managed to establish an effective process for the functioning and oversight of preschool Institutions?**
- 2. Has the Ministry of Education managed to ensure regular IP licensing processes?**
- 3. Has the monitoring of Preschool Institutions for the services provided been carried out effectively?**

¹¹European Commission Report on Reforms in the Western Balkans, Kosovo Report 2024, p. 16

¹²Kosovo Agency of Statistics, 2024 census

¹³Data provided by MEST 2024, DAPU, database of preschool institutions at the national level

The audit questions are phrased in accordance with the audit scope, including MESTI as the body responsible for policy development, supervision, functionalization and licensing of preschool institutions. At the local level, the audit includes municipalities with the largest number of preschool institutions such as Gjakova, Prishtina and Prizren, with a focus on management and monitoring by local government. The scope of this audit covered the period from 2022-2024. To assess the effect of the services, a number of public, private, community-based, and public-private preschool institutions selected based on the audit sample were reviewed.

The audit methodology and scope are elaborated in Annex 1.

3 Audit findings

The Early Childhood Education level represents a complex process of inter-institutional activities that belong to the central and local levels of government.

The management, supervision and monitoring of preschool institutions is carried out according to the category and status of PIs:

- Private preschool institutions, community-based PIs¹⁴ and PIs with public private partnership¹⁵ are licensed, monitored and supervised directly by MESTI, respectively the Division for ECE and the Education Inspectorate. MESTI, in cooperation with municipalities, also has the right to engage in new public IP investments.
- Public preschool institutions are established through cooperation between MESTI and Municipalities. MESTI is responsible for their direct supervision through the Education Inspectorate. However, planning for capacity expansion, management and continuous monitoring of public PIs falls under the responsibility of the municipalities, respectively the Municipal Education Directorates.

More specifically, the total number of PIs throughout Kosovo, for the years 2022-2024, is 245. Of these, 170 are private, 65 are public, 9 are community-based, and 1 is a public-private partnership.

Table 1: Number of Preschool Institutions in Kosovo Municipalities

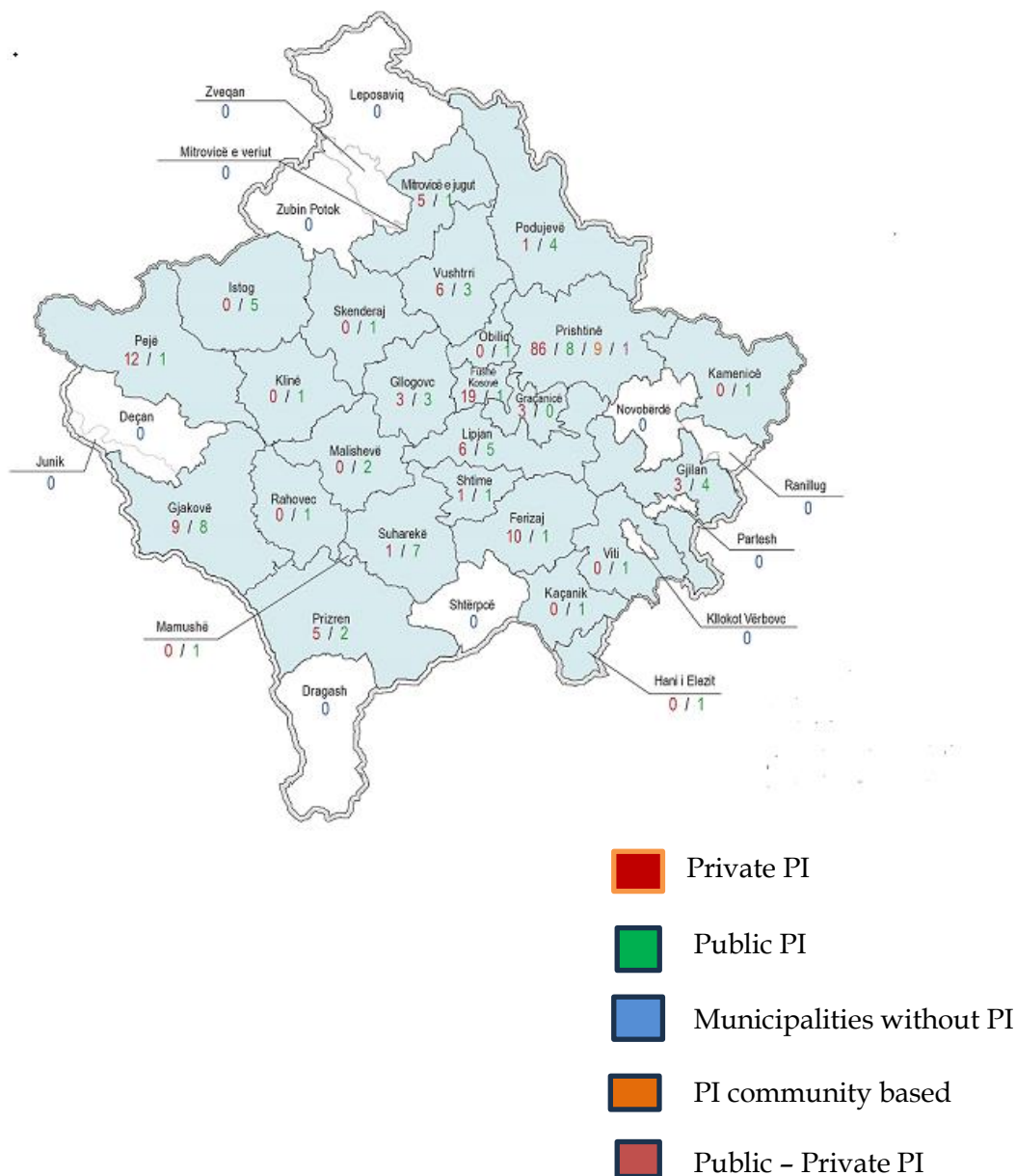
Overview of preschool institutions by municipality, period 2022-2024								
Municipality	Preschool institutions		Municipality	Preschool institutions		Municipality	Preschool institutions	
	Public PIs	Other PI		Public PIs	Other PIs		Public PIs	Other PIs
Prishtinë	8	96	Podujeva	4	1	Deçan	/	/
Pejë	1	12	Kamenicë	1	/	Dragash	/	/
Prizren	2	5	Gjilan	4	3	Leposaviq	/	/
Gjakovë	8	9	Skënderaj	1	/	Shtërpc	/	/
Ferizaj	1	10	Glllogoc	3	3	Zubin Potok	/	/
Fushë Kosovë	1	19	Viti	1	/	Zveçan	/	/
Obiliq	1	/	Klinë	1	/	Novo Bërdë	/	/
Vushtrri	3	6	Istog	5	/	North Mitrovica	/	/
Lipjan	5	6	Malisheva	2	/	Junik	/	/
Shtime	1	1	Rahovec	1	/	Ranillug	/	/
Suhareka	7	1	Kaçanik	1	/	Partesh	/	/
Graçanica	/	3	Mamushë	1	/	Klllokot	/	/
Mitrovicë	1	5	Hani i Elezit	1	/			

¹⁴Community-based PI is used as a term for PIs that have organizational structures based on a board of directors, parents, and founding partners.

¹⁵PI with public private partnership - used as a term for PIs that are established with mixed capital determined by agreement between the public authority and the legal entity

The distribution of PIs throughout the territory of Kosovo is also presented in the chart below, which shows a considerable number of functional PIs in municipalities, 13 of which do not have any PIs. It is worth noting that this includes municipalities that do not appear in the ministry's registers as having functionalized any public or private PI so far and this mainly concerns the territory of the northern part of the Republic of Kosovo. The register of all educational institutions is maintained and regularly updated by the MESTI authorities.¹⁶

Chart 1. Map of Kosovo according to the geographical distribution of Preschool Institutions.



¹⁶AI no. 104/2020 Criteria and procedures for the establishment and closure of pre-university education institutions, Article 6

According to the data, the municipalities with the largest number of public preschools are Gjakova and Prishtina, while Prizren has the lowest number of functional public preschools. The audit focused on these three municipalities, as they provide opportunities for comparative analysis and the use of analytical methods for all categories of preschools. The audit samples were selected based on the category of preschools, the capacity and technical condition of the facilities, as well as the comparative number of children. During the audit process, the documentation of 26 preschools selected as audit samples was reviewed. The number of samples selected and those that passed the observations is presented in the following table.

Table 2: Number of audit samples by PI categories and number of PIs in the process of audit observations

Public PI	Private PI	PI with public private partnership	Community-based PI	Total
Number of samples by category				
6	17	1	2	26
Number of samples observed				
6	7	1	2	16

According to the statistics, in the three municipalities that are in focus of the audit – Gjakova, Prishtina and Prizren, the total number of children enrolled in early childhood education is 11,404. Based on the selected samples, this audit included PIs where 2,796 children were enrolled.

A detailed description of the system for the operation, licensing and supervision of PIs is provided in Annex 2 of this report.

We have further disclosed all audit findings, based on the activities, tasks and objectives set out by this level of education.

3.1 Development of Activities to Date within the Framework of the Ministry of Education, Science, Technology and Innovation

According to MESTI's analysis of the strategic planning for the period 2022-2026, the ECE sector is covered by 11% of the total education budget. The financial resources that should cover the estimated cost of EUR 35.6 million are those of the state budget (50-60%) and donations (10%). However, the budget coverage of 30% is supposed to be covered by additional funds through the state budget and from foreign financing.¹⁷

During the three-year audit period, MESTI initiated capital investments to expand existing PI capacities in over 30 municipalities in Kosovo. According to the documentation and explanations

¹⁷ Education Strategy 2022-2026; Strategic Objective 1 “Increasing inclusion and equal access to early childhood education by providing safe, supportive and stimulating environments as well as integrated and quality services”, Table 3, SA Budget, 2022-2026 in years.

provided, these investments amount to EUR 7.6 million for completed projects and over 17 million for projects that are still under development.¹⁸

During this period, five new facilities were put to operation in the municipalities of Prizren, Suhareka, and Rahovec, in accordance with the procedures of the founding committee operating within the ministry.¹⁹

MESTI also had some new developments in terms of ECE activities. In addition to the new law, new agreements with donors and international partners have been initiated. In order to meet the objectives, set out in the law and the new agreements, the ministerial authorities have activated certain working groups. More specifically, during 2023, a working group was established for the design of the World Bank “Partnership for Early Learning - Multi-Donor Trust Fund” project.²⁰ During 2023, research was also conducted on the costs of early childhood care and a feasibility report on building new capacities was produced. These are the reports on the “Costs of providing public, private and public-private partnerships for preschool education in the Republic of Kosovo” and “Feasibility Study for Modular Early Childhood Education Centre 2023”, carried out in cooperation with international partners such as the United Nations Children's Fund Office in Kosovo (UNICEF) and the World Bank.²¹ The implementation of projects with the World Bank has continued in 2024-2025, which includes the implementation of the distribution of a donation of two million euros to support the participation of children from vulnerable groups.²²

Some steps have also been taken in terms of drafting new pedagogical programs for early childhood education. According to the responsible officials of the ministry, the draft program for early childhood education is a document that enhances this level of education by affirming the implementation of new pedagogical methods and gradually eliminating the methods that have served as references since the post-war period. The first draft of this pedagogical program for early childhood education is already in the pilot phase in public and private PEs.

In the following sub-chapters, the findings regarding the ministry's activities in terms of the functioning, supervision and licensing of Preschool Institutions have been outlined.

- **Obstacles in the drafting and approval of administrative instructions**

Ministry authorities are obliged to engage in drafting legal documents six months after the approval of the law.²³ Authorities shall engage in developing programmed policies and creating new inclusive opportunities in ECE.²⁴

¹⁸Annex of investments made by the ministry in cooperation with donors

¹⁹According to the decisions of the MEST Foundation Commission, Infrastructure Division, Construction of PIs in the Municipalities of Prizren, Suhareka and Rahovec (Villages of Xërxë, Ratkoc and Krushë e madhe).

²⁰Decision issued by MEST, Design of the ECE project in cooperation with the World Bank, date 27.01.2023

²¹Kosovo ECEC Report

²²Decision issued by MESTI, date 30.09.2024

²³Law on Early Childhood Education 2023, Article 38

²⁴Education Strategy 2022-27

One of MESTI's responsibilities is to determine the legal, primary and secondary infrastructure for early childhood education.

After drafting the new law on ECE, MESTI established two working groups to draft administrative instructions, one in January and the other in December 2023. During 2023, three workshops were also held, and another 11 workshops in 2024. According to the officials, the working group's commitments were related to issuing 15 new normative acts, reviewing old instructions and integrating them into new and more appropriate components with the new law. We have found that three administrative instructions have been developed and submitted for approval to the ministry authorities.

During the period from the adoption of the law in 2023 until early 2025, a lack of commitment to the implementation of this law has been identified. During this period, despite the fact that three administrative were designed and are awaiting final procedures in the government cabinet, none of them was approved by the time of the audit. According to the responsible officials, the main reason for the delays is the high workload in the ministry, which has exceeded the current staff capacities to handle issues related to this segment of education.

Delays in drafting and approving administrative instructions have prevented the new law on ECEC from being implemented in practice. As a result, preschool institutions are continuing to operate under old rules that are not in line with the law adopted in 2023. This has created uncertainty about the licensing and assessment of these institutions. Furthermore, the fact that the licensing criteria have not been changed since 2016 indicates that without the adoption of new administrative instructions, the reform envisaged by the new law for this education sector is also being delayed.

- **Organization of Supervision and Irregularities Identified during the Inspection of Preschool Institutions**

MEST shall exercise supervision of PIs through the Education Inspectorate. The inspection officers of the Education Inspectorate Sectors (EIS) are competent to evaluate, control, advise, inform and report on the status of PIs. The supervision of PIs aims to ensure that these institutions meet the required standards with the established criteria of MESTI, respectively drafted by the Division for Early Childhood Education (DECE).²⁵

The Education Inspectorate within MESTI operates through seven Education Inspectorate Sectors (hereinafter, EIS) in the main regions such as Pristina, Mitrovica, Peja, Prizren, Ferizaj, Gjilan and Gjakova.

In these seven EISs, 20 education inspectors are engaged to supervise and monitor educational institutions at all levels of education, both public and private. These inspectors are distributed in each of the EISs, where a manager and two to four inspection officers are engaged.

According to the law in force, the education inspectorate (hereinafter EI) must supervise all PIs and the type of inspections undertaken are:

²⁵Law on Education Inspectorate, 2018 & Law on ECE, 2023

- General inspections - administrative and pedagogical;
- Thematic inspections - as planned, on request and unannounced, as well as
- Emergency inspections - judged on a case-by-case basis.

The Education Inspectorate drafts annual general plans and reports, which provide for the supervision of PIs. However, the annual reports only contain statistical data on the number of inspections carried out within the calendar year, without including detailed analyses on the implementation and results of the supervision of PIs, which limits transparency and the assessment of the effectiveness of the inspection activity.

In addition, the education inspectorate does not have internal regulations, bylaws or operational documents that would enable a clearer structuring of the functions and responsibilities of the inspection officers. The most pronounced shortcoming is identified in terms of staff organization, namely in the absence of the Regulation on the Systematization of Jobs. Currently, the engagements of inspectors are based on the general descriptions set out in the Law on the Education Inspectorate (See Annex 3; Engagement of inspectors in the EIS), without any functional division according to education levels.

This situation has resulted in an unbalanced distribution of work, leading to low inspection activities in certain regions. In addition, the lack of division of inspection officer profiles in accordance with education levels may affect the quality of supervision.

More details on the number of IP inspections and other characteristics of the Regional Sectors of Gjakova, Prishtina and Prizren are provided below.

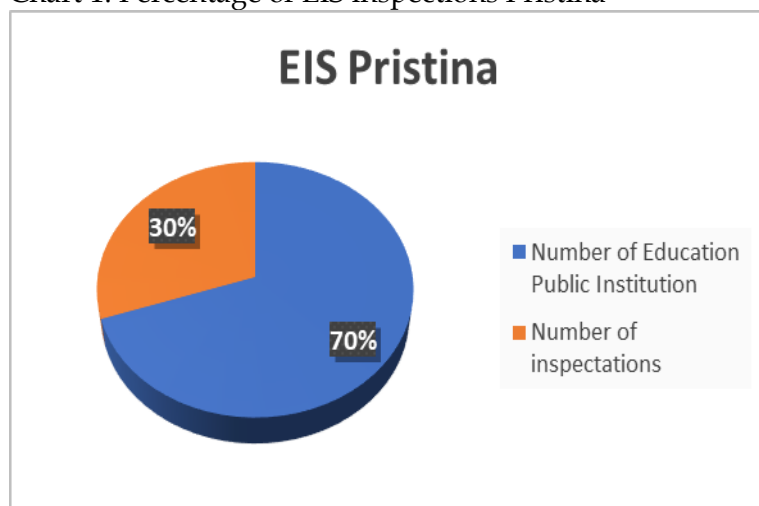
EIS Gjakova does not have inspection reports for the period 2022/2024. The main reason for this is the fact that this regional office does not have any responsible official engaged as an education inspector. As a result of the lack of sufficient staff at the central level, supervision in this region has been carried out occasionally through the temporary engagement of inspectors from EIS Prizren.

During the audit period 2022-2024, only one thematic inspection was carried out in the Gjakova region, undertaken by EIS Prizren at the request of the MED of Gjakova. This situation indicates an insufficient level of oversight of preschool institutions in this region, creating uncertainty and ambiguity regarding the functioning, management and implementation of standards in these institutions.

EIS Pristina- According to data from annual inspection reports, EIS Pristina conducted 24 inspections during 2022, 21 inspections in 2023 and 14 inspections in 2024.

However, there has been a declining trend in the number of inspections over the past three years, which may signal ongoing challenges in the organizational and operational capacities of this inspection office. This declining trend in the number of inspections can affect the level of supervision of educational institutions in the region, limiting the ability to identify and address issues related to quality and legality in education in a timely manner.

Chart 1: Percentage of EIS inspections Pristina

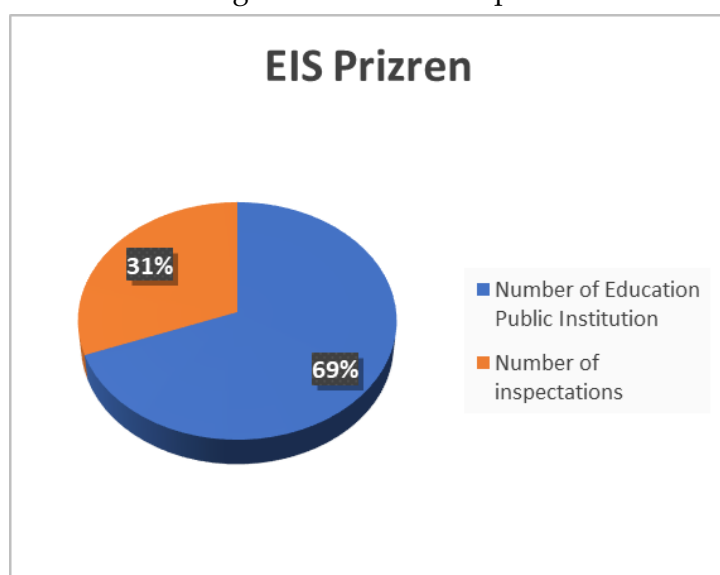


Overall data suggests that during the 2022-2024 period, the Regional Inspection Sector in Pristina has managed to cover 30% of Preschool Institutions.

A characteristic of this sector is that in 2024, a joint inspection was undertaken with the sanitary and labor inspectorate in four preschool institutions.

EIS Prizren- According to the annual inspection reports, EIS Prizren conducted 31 inspections in 2022, 9 inspections in 2023 and 21 inspections in 2024. The data shows a significant decrease in inspection activity in 2023, followed by a partial increase in the following year. Fluctuations in the number of inspections indicate a lack of consistency in the implementation of inspection activities over the years.

Chart 2: Percentage of EIS Prizren inspections



The overall data suggests that during the 2022-2024 period, the Regional Inspection Sector in Prizren managed to cover 31% of Preschool Institutions.

It is worth noting that these inspections have in some cases been repeated in the same PIs, while there are PIs that were never inspected.

While analyzing these inspection reports, we noticed that the regional EISs have encountered private PEs operating without a valid license. These

institutions, according to MESTI legislation and responsibilities, are obliged to be licensed and re-licensed periodically by the Division of ECE. The operation of PIs without a license not only contradicts legal requirements, but also jeopardizes the provision of established standards for quality and safety in preschool education.

In cases where regional inspectorates identify preschool institutions operating without a license, one of the first steps taken is the imposition of a fine of €1,000-2,000, in accordance with the relevant legal provisions. In cases of repeated violations, the education inspectorate initiates minor offence proceedings and issues decisions to close institutions that continue to operate illegally. These

measures aim to strengthen law enforcement and prevent the operation of institutions that undermine the quality and safety of educational services for preschool children.

Below are the results of the inspections conducted, which present the situation observed by the educational inspectors during their field work.

Table 3: Data collected during field inspection activities

INSPECTION RESULTS FOR THE YEARS 2022-2024						
	Number of inspections	Inspections in licensed PIs	Cases of unlicensed private PIs	Cases of closed private PIs	Number of imposed fines	Number of minor offence decisions
EIS GJAKOVA	1	1	/	/	/	/
EIS PRISHTINA	45	10	35	/	2	11
EIS PRIZREN	46	15	31	2	/	13

Data from the 2022/24 annual inspection reports

As the audit findings show, the lack of inspectors has resulted in an unclear situation in the municipality of Gjakova, without regular supervision, which makes it impossible to accurately assess the functioning of preschool institutions in this municipality. Meanwhile, in the two main municipalities, Pristina and Prizren, a considerable number of preschool institutions operating without a valid license were identified during the period 2022–2024. In the Municipality of Pristina, the inspectorate imposed 2 administrative fines and 11 minor offense decisions, while in the Municipality of Prizren, 13 minor offense decisions were imposed. However, despite the identification of a large number of private PIs operating without a license and in violation of the legislation in force, in some cases, no punitive action was taken by the inspectors. The lack of institutional response in such cases not only undermines the integrity of the licensing system, but also encourages illegal practices that may violate the safety, quality of education, and rights of preschool children.

According to the inspectors' statements, some preschool institutions have submitted a request for licensing and are awaiting the ministry's decision. Specifically, in the municipality of Prishtina, according to the table, out of 35 preschool institutions identified without a license, 22 cases are awaiting the ministry's decision but have not received a response yet from the MESTI Early Childhood Education Division. While in the municipality of Prizren, out of 31 cases identified without a license, 16 cases are awaiting the ministry's decision. Due to uncertainty around the ministry's final decision, no concrete punitive measures are taken against these institutions. Imposing fines or closing these institutions, which are awaiting a license, creates an unfavorable situation for all parties involved, especially for children and their inclusion in education. The inspectors emphasize that, in absence of a license, it cannot be accurately assessed whether the

premises of these institutions are suitable for educational activity. For this reason, the operation of unlicensed preschool institutions is considered a consequence of systemic shortcomings in the licensing process. Delays in the review and approval of licensing applications have led to the operation of a significant number of preschool institutions without a valid license. This situation not only affects the services provided, but also creates a risk of unregistered activity and reduces the effectiveness of supervisory mechanisms.

3.2 Licensing and Monitoring procedures by the Division of Early Childhood Education

- Inefficient licensing procedures

The official authorities of the Ministry of Education shall appoint a special commission for the licensing of PIs. Officials of the Licensing Commission issue decisions on licensing/re-licensing or rejection of applications submitted no later than one month before the start of the school year.²⁶

In 2024, MESTI re-systematized its job positions, which resulted in the creation of a specific division for Early Childhood Education (hereinafter, ECE). Previously, ECE had only one representative within the Division for Early and Preschool Education.

There is a Licensing Commission within the DECE, responsible for reviewing applications for the licensing of various categories of PIs, such as private, public private, and community-based PIs.

The Licensing Commission consists of five professional members, representatives of different MEST divisions, where an important role is played by the infrastructure officer as responsible for assessing the infrastructure conditions of the facilities. The Commission is activated and functions as needed and according to licensing requirements. After the licensing application, the commission assesses the situation and approves or rejects the licensing application.

The duration of the license for preschool institutions varies according to the stage of activity. Initially, it is issued for one year, while re-licensing is done for up to three more years depending on the assessment of the commission. More specifically, the duration of licenses is one to three years.

It is worth noting that there are two types of licenses that are approved: licenses for the age group of children 9 months to 6 years and licenses only for the age group 3 to 6 years.

According to the law, the types of institutions that apply for licensing or re-licensing are as follows:

Private institutions, financed and managed by legal or natural persons outside the state budget;

Community-based institutions providing early childhood education services organized and managed by the community in agreement with the municipality;

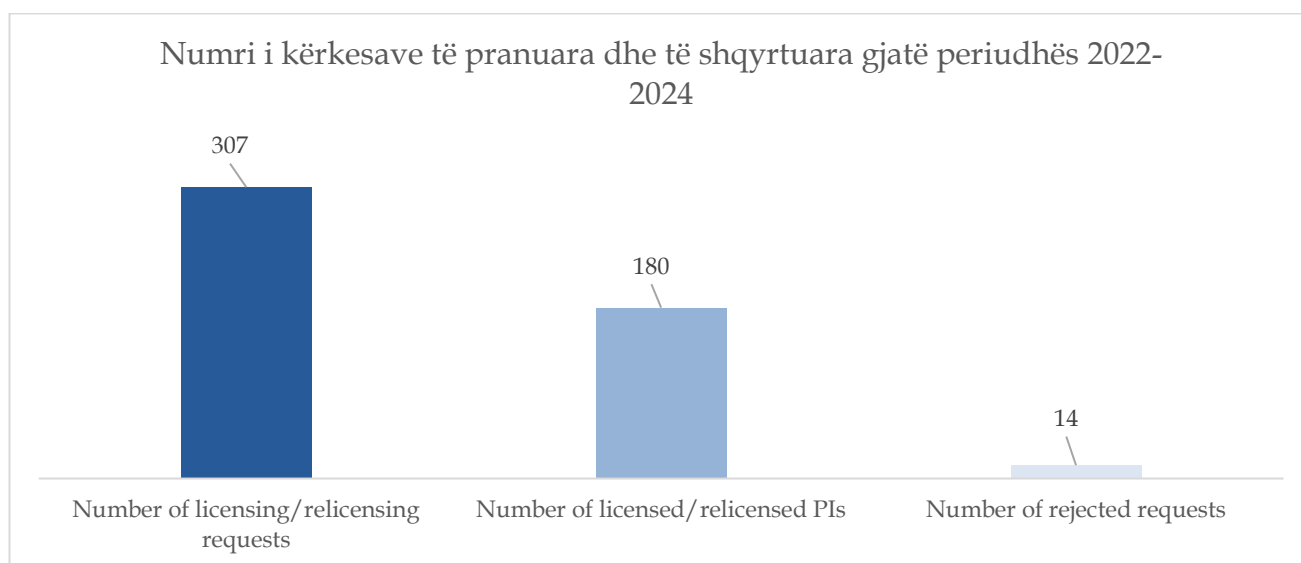
²⁶AI (MEST) No. 15/2016 Licensing and registration of private preschool educational institutions, Article 17, Granting of license

Public-private partnership institutions, established with mixed capital determined by agreement between the public authority and the legal entity.

We have noticed that preschool institutions that need to be licensed to operate their activities submit applications to the Early Childhood Education Division throughout the year without any specific deadline, and this method of licensing results in irregular applications, a large number of applications, and makes the process of reviewing applications for licensing more difficult. According to administrative instructions, licensing should be done at least one month before the start of the school year.

The chart below shows the number of licensing requests compared to the number of licensed PIs for the period 2022-2024.

Chart 2: Number of licensing applications compared to the number of PIs licensed during the 2022-2024 time period, across Kosovo



Data from the Ministry of Education, February 2025

During the period 2022–2024, over 300 licensing applications were submitted, of which only 180 PIs were licensed. Many of the applications were carried over from year to year and the situation regarding their review is unclear. The number of licensing applications registered in the DECE database is not consistent with the number of preschool institutions that have been licensed. This database does not provide data on the number of applications that have not been reviewed and carried over the years.

The audit found that the licensing process does not set deadlines for reviewing and approving licenses according to the administrative instruction²⁷ and does not guarantee equal treatment of applications from private stakeholders to exercise the activity of early childhood education development. In the sample analyses, cases were identified where some requests were processed

²⁷AI no. 15/2016 Licensing and registration of private preschool educational institutions article 17, point 2

within a week, while others remained pending for 2-3 months to two years. This is due to the lack of an efficient system that processes all received applications in a timely manner.

Furthermore, in cases where PI licensing applications are rejected, applicants have the legal right to appeal by following a defined appeals procedure. Appeals are reviewed by a special commission within 30 days from the date of their receipt. Data analysis for the period 2022-2024 shows that the number of appeals filed for the refusal of licensing has been low. During this period, only 2 to 5 cases of appeals were identified. The review of the documentation also shows that none of the decisions to refuse licensing were changed or cancelled by the review commission. For details regarding the results of the appeals procedures, see the table below:

Table 4. Number of appeals and their review during the period 2022-2024

	No. of appeals	No. of appeals reviewed	No. of approved appeals	No. of rejected appeals
2022	5	5	0	5
2023	2	2	0	2
2024	3	3	0	3

Source: Data from the Complaints Commission, MEST

As the table shows, the number of complaints during the audit period was low and the complaints process did not have any significant impact. However, the small number of complaints does not represent any indication of the progress of the process, because due to delays in reviewing requests, interested parties did not have the opportunity to file a complaint regarding the decisions of the licensing commission.

The lack of deadlines for submitting and reviewing licensing applications has resulted in the licensing process being inefficient. According to the audit findings and analysis, we conclude that this has led to significant delays in reviewing applications, unequal treatment of applicants, and uncertainty for institutions awaiting ministerial decisions on their functioning.

- **Lack of monitoring mechanisms**

The officials of the Division of Early Childhood Education (DECE) are responsible for conducting regular and continuous monitoring of all licensed preschool institutions and assessing their capacities and services. DECE shall produce monitoring reports on the work of preschool institutions after the end of the school year.²⁸

One of the objectives of DECE is the continuous monitoring of licensed PIs. This monitoring aims to assess whether licensed PIs are operating according to the established criteria and whether they have ensured the provision of appropriate conditions and environment for the specified age groups.

However, we have noticed that DECE has failed to produce monitoring reports on the work of licensed PIs at the end of each school year to assess the implementation of licensing criteria.

²⁸AI (MEST) No.15/2016 Licensing and registration of private preschool educational institutions, Article 17, Granting of license & Article 28, Point 6

An overview of the situation of sample PIs selected for observation, for the categories of PIs that are licensed by the ministry, is presented below.

Table 5: Preschool institutions and their functioning according to licensing criteria

Preschool Institutions	Status	Location	Children's capacity (C) according to the license or area of the facility	Current number of children (C) according to observations	Data about the facility
PI1	Community-based	Pristina	1435m ² (1435m ² /100c = 14.5m ² for each child)	100 C	Municipal building
PI2	Community-based	Pristina	2307m ² (2307m ² /196c=11.77m ² for each child)	196 C	Facility financed by IPA funds
PI3	Public Private Partnership	Pristina	140 C	160 C	Private property
PI4	Private	Gjakova	60 C	60 C	Rented property
PI5	Private	Gjakova	70 C	54 C	Church building
PI6	Private	Pristina	160 C	140 C	Private property
PI7	Private	Pristina	110 C	70 C	Private property
PI8	Private	Pristina	25 C	Not operational	Private property
PI9	Private	Prizren	35 C	40 C	Rented property
PI10	Private	Prizren	120 C	120 C	Church building

Data from MEST and audit observations

As presented in the table, there are three categories of PIs that are licensed by DECE: Community-based IPs, IPs with public private partnership, and private IPs. The infrastructure of these facilities in relation to children is determined according to measurable standards with the available surface area of the facility, or in other cases is determined by the license decision issued by the ministry.

Community-based PIs admit children based on their infrastructure capacity and the area of the facilities. According to the instruction on the norms and standards of preschool facilities, the area for each child is around 3-6m² depending on the age group. According to MEST instructions, the number of 100-200 children currently registered in these two PIs is permissible for the spaces they

have available since the area of the facilities is around 1400-2300m² and this space is sufficient to accommodate the children that these PIs have admitted.

According to the data presented in the table above, we have observed an excess of the number of children in relation to the license decision at the PI with public-private partnership (PI3) in Pristina, where an overload of the number of children currently registered was observed, which indicates 20 children more than the allowed capacity.

At Private PI (IP8) in Pristina, we noticed that this institution was closed without notifying the responsible officials and authorities, although it had a working license for another year.

A Private PI in Prizren (Kindergarten 9) exceeded the number of registered children, admitting five more children than the capacity allowed by the licensing decision. In the same kindergarten, we noticed that the yard area is small and concreted, but it is equipped with toys for children.

During the observation process in Gjakova, (IP5) it was found that there was not enough yard space. The entire yard was concreted and without any play equipment for children. The yard was used as a parking lot for staff vehicles, instead of being a safe and attractive area for children's development. See the following photo.

Photo 1: Field observations at one of the private PIs in Gjakova



All these irregularities that we encountered during the observation and comparison with the standards and criteria required by DECE, were not monitored nor recorded by the responsible division that has an obligation to monitor all licensed private PIs at the end of each school year.

The audit has shown that the monitoring of licensed private institutions is not carried out in a regular and structured manner by DECE. According to the statements of the responsible officials, the lack of sufficient human capacity and internal work organization appear as the main factors that have influenced the failure to carry out continuous monitoring. However, even though monitoring standards exist, DECE has not carried out and documented monitoring on a regular basis. During the audit, no annual monitoring plan was presented, there are no standard procedures nor any

formal reporting system that would enable the systematic monitoring of the fulfilment of the criteria by the licensed PIs.

The lack of these mechanisms makes it difficult to identify shortcomings in the functioning of PIs in a timely manner and undermines the efficiency of institutional oversight in the relevant sector.

More details regarding the results of our observations for the three categories of licensed PIs are provided in the following subchapters.

- [Results of observations in community-based and public-private partnership preschool institutions](#)

Community-based IPs are registered as non-governmental organizations and operate under an agreement with the MED. They have a system of organization based on community support, and are managed by members of the Steering Council. This council consists of the head of the PI, representatives from the municipality and parents.²⁹

IP with Public-Private Partnership are institutions that are established with mixed capital determined by agreement between the public authority and the legal entity.³⁰

It is worth noting that these two categories of preschool institutions are functional only in the Municipality of Prishtina, which means that there are nine community-based preschools and one public-private partnership preschool operating throughout Kosovo. We observed the functioning of two community-based preschools and one public-private partnership preschool.

The results of the observations in these two categories of PIs are presented below:

Community-based PI “Botanika” operates in the premises of the Municipality of Prishtina. The systematization, organization and structure of the facility are adapted to the standards and age group of children. 100 children and 10 educators are registered in this preschool institution. This preschool institution has a license according to the surface area of the facility and is in accordance with the licensing criteria. Food is supplied by the central kitchen of the Municipality. The institution implements the “Montessori” and “Regio Emilio” curriculum. This preschool institution has an organization system supported by a parents’ council. The systematization, organization and structure of the facility are according to the standards and age group of children. According to officials, the demand for the registration of children is very high. For details, see Annex 5, Results of Observations of Preschool Institutions.

²⁹Agreement between MED and PI Civërimat, 20.04.2022 **20**

³⁰Law on Early Childhood Education 2023

Photo 2: Community-based PI “Botanika” Pristina

*Playground in the green space outside the facility*

Community-based IP “Cicërimat” is a new construction realized with IPA funds.³¹ There are 196 children and 23 to 26 educators in this PI. The systematization, organization and structure of the facility are adapted to the standards and age group of children. Food supply is done by the central kitchen of the Municipality. In the pedagogical aspect, the curriculum from MESTI, the "Montessori" teaching method is implemented³² and the ministry's new draft program is being piloted.

Photo 3: Community-based PI “Cicërimat” Pristina

*Kitchen during lunch time*

³¹Pre-Accession Instrument, European Commission Funds²¹

³²Montessori Method: Montessori education is a child-centered teaching method based on the belief that children can learn through their own experience and at their own pace. This teaching model considers the child as the determining force in their education, encouraging independence and hands-on learning.

<https://www.wgu.edu/blog/montessori-learning2207.html>

Public-private partnership PI “Fillesa” operates in a private facility, with a GF+1 organization system, ground floor and first floor. The preschool is licensed for 140 children, while 160 children are currently registered, with 18 educators. This excess number has caused overload. The facility needs to expand its internal capacities, while the external area of the yard is sufficient and equipped with toys. According to the responsible staff, there are 150 more requests for admission on the waiting list since the location of the preschool is located in the most populated neighborhood of the city. In terms of pedagogical aspects, the “Montessori” curriculum is implemented and they are piloting the new draft curriculum of MEST. For details, see Annex number 5: *Observation results of preschool institutions*.

Photo 4: PI with public-private partnership “Fillesa”, Pristina



Preschool Institution Entrance

- **Observation results in private preschool institutions**

In general, Private PIs operate in rented or self-financed buildings. According to managers, the prices for registering children in these PIs are calculated based on the costs of the facility and other expenses incurred in opening a preschool institution. The directors of these PIs claim that the services provided are subject to quite high competition, therefore efforts must be made to achieve the appropriate standards. The requirements for registering children are also quite high.

It is worth noting that from this category of preschool institutions, 170 private preschools are functional for the municipalities of Kosovo, and the Municipality of Pristina leads in terms of the largest number of them. We have observed the functioning of seven private preschools, in three municipalities within the scope of this audit: Gjakova, Pristina and Prizren.

Some general information about the functioning of these institutions is provided below.

Photo 5: Private PI (PI4), Gjakova

*Day room where recreational activities take place*

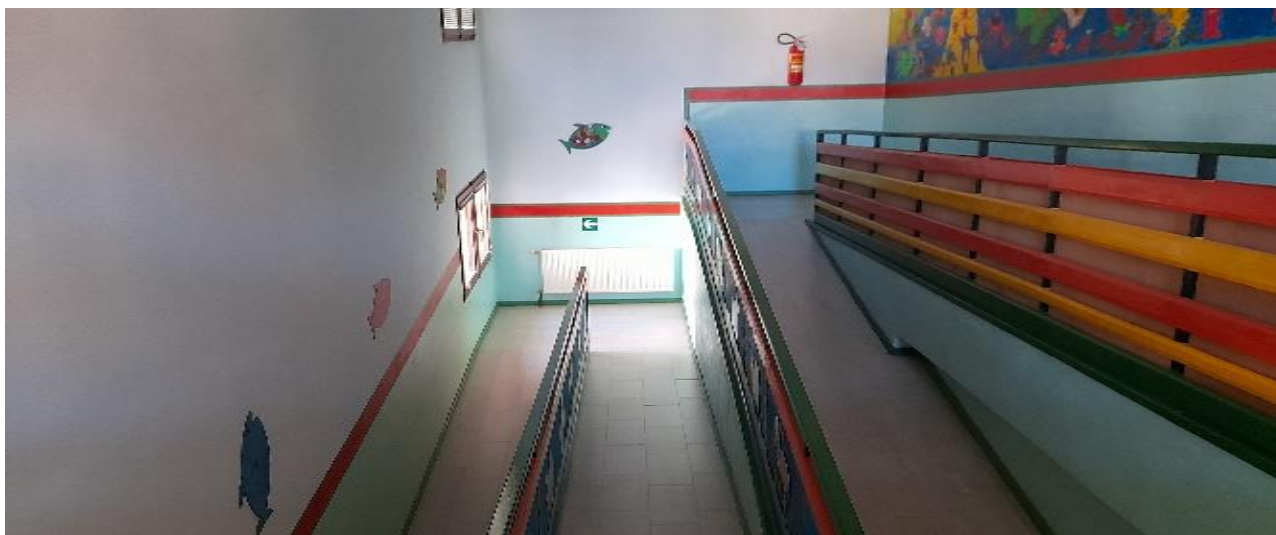
This Preschool Institution operates in a rented building. The number of registered children is in accordance with the licensing decision, currently 60 children and 10 educators are registered. The building is built according to the GF+1 system, which means a ground floor and an additional floor. The building is in good condition and has sufficient yard space, equipped with toys. Children are arranged according to age groups and implements the MEST curriculum. For details, see Annex number 5: *Results of observations of preschool institutions*.

Photo 6: Private PI (PI6), Pristina

*Recreational activities area*

This Preschool Institution operates in a self-financed building. The organizational system is ground floor and one floor; it has an adequate yard area equipped with toys. The number of registered children is smaller than the licensing decision which is 160 children, while currently 140 children and 29 educators are registered. In general, compared to other private PIs under observation, it has the highest level of standards. This PI implements the “Reggio Emilia” curriculum³³ as well as the MEST core program. For details, see Annex number 5: *Results of observations of preschool institutions*.

Photo 7; Private PI (PI10), Prizren



Organized system with easy access for children with disabilities

This preschool institution operates according to the GF+1 system, has a laboratory and studio and a well-organized system for recreational activities, and is the only private PI that has an appropriate organizational structure within the facility for children with special needs. The number of registered children is 120 and is in accordance with the capacities, according to the licensing decision. There is a total of 8 educators in this PI. The facility has a yard and playground area outside the facility. The PI works with the MEST curriculum, “Montessori” and “Reggio Emilia”. For details, see annex number 5: *Observation results of preschool institutions*.

³³The Reggio Emilia approach is an educational philosophy based on the image of a child with strong developmental potential and a subject with rights, who learns through the hundreds of languages that belong to all human beings and grows in relationships with others; <https://www.reggiochildren.it/en/reggio-emilia-approach/>

3.3 Capacity development in municipalities and the functioning of Public Preschool Institutions

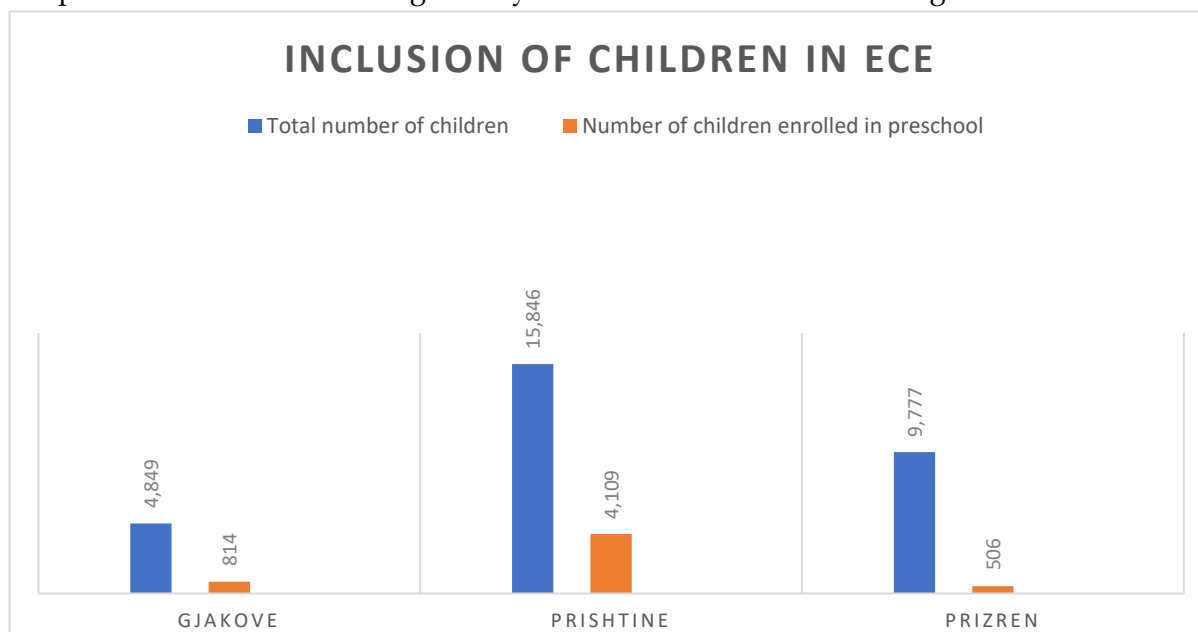
- Infrastructural capacities and low level of involvement in the public sector

Municipal Education Directorates are responsible for ensuring an inclusive environment for preschoolers within their territory.³⁴ Official authorities from Municipal Education Directorates are responsible for providing comprehensive services to all preschool children aged 0.9 months-6 years.³⁵

Admission of children to preschool education is done through announcements of competitions by MEDs. The competition for registration in all public PIs (preschool institutions) is usually announced in June of each calendar year, while the registration procedure begins in September, as in the regular school year.

The inclusion of children at this level of education in relation to the statistics of children of this age, in the three municipalities, is presented in the graph below.

Graph 3: Number of children aged 0-5 years and number of children registered in PI



Information from the Agency of Statistics 2022-2024

According to the graph, the inclusion in ECE is at a level of two times lower than the total number of children. In Gjakova, the participation of children in PI is about 17%, in Prishtina about 26% and in Prizren only 5%. Although education for children aged 0-5 is not mandatory by law, the inclusion of these age groups reflects on social issues, on the possibility of increasing the chances of women's employment and early education as the main basis for the advancement of society. We have

³⁴ Law on Education in the Municipalities of Kosovo, L03/L-068, Article 11

³⁵ Law on Education in the Municipalities of Kosovo, L03/L-068, Article 11

concluded that the high demands for the registration of children in public PIs indicate the necessity for expanding capacities.

The interest of parents in registering children aged 0-5 years in public PIs is high and a large number of requests for these age groups remain pending. The public capacities for these age groups, namely the number of public PIs compared to PIs of other categories, remain as shown in the table;

Table 6; Number of PIs, according to their form of organization in the three municipalities

Municipalities	PI - Public	PI - Private	PI - Community-based	PI - Public-Private Partnership
Gjakovë	8	9	/	/
Prishtinë	8	86	9	1
Prizren	2	5	/	/

Data from MEDs

Data show that the number of public PIs is always lower than private PIs, and this reflects the low level of inclusion of children aged 0.9-5 years in ECE and is especially pronounced in the capital city, where the population density is higher.

We should also emphasize that the inclusion of children starting from the age of 0.9 months is a legal obligation for all public PIs.³⁶ It is worth noting that, according to labor law, maternity leave lasts 12 months, and the lack of institutional support in childcare after the maternity leave period represents an obstacle to the continuation of work or the integration of women into the labor market.³⁷

The audit has identified that, although the municipalities of Gjakova and Prishtina have ensured the inclusion of all age groups designated for early education in public preschools, the Municipality of Prizren has not included children aged 0.9m-3 years in public preschools at all.

According to MED officials and PI managers, the inclusion of these age groups requires specific infrastructure investments, qualified professional staff and a considerable budget to create adequate conditions. Despite the justifications emphasized by MED, this level of education has been implemented in other municipalities. Moreover, the numerous requests from parents and the long waiting lists of children testify to the real and immediate need to expand capacities and services at this level of education in the Municipality of Prizren as well. The lack of inclusion of this age group

³⁶ Administrative Instruction (MESTI) No. 03/2022 on the ²⁶inclusion of children in preschool institutions in Kosova, Article 2, Point 2.1 & LAW NO. 08/L-153, 2023 Article 4 point 1.11

³⁷ Labor Law, No.03/212, 2010, Article 49, Maternity Leave,

creates inequality in access to early education and violates the right of children to equal public educational services.

On the other hand, prices in public PIs are fixed and range from €40-50 per month, while prices for registering children in private preschools are significantly higher, starting from €70 and going up to €300 per month (See Annex 5 for details of the audit samples). This large difference in costs, combined with the limited capacities of public PIs, has significantly limited families' equal access to public early education services. As a result, a significant proportion of parents are forced to rely on informal care from relatives. Furthermore, in cases where there is a lack of financial means to cover the fees of private PIs and when there is no family support, childcare is mainly a burden on women. This situation directly affects the limitation of their opportunities for employment and participation in economic life, deepening gender inequalities and negatively affecting the socio-economic well-being of families.

- **Municipal activities to expand public sector capacities**

Municipal competencies include identifying needs, determining administrative-technical issues, and maximizing the involvement of children in this level of education.³⁸ Municipal officials must cooperate with managers, assess needs, and fulfil requirements for the smooth running of PIs.³⁹ Municipal government activities to expand the capacities of the ECE can be developed autonomously and independently in each municipality.⁴⁰

Municipal competencies in the construction of educational facilities include identifying the needs for the construction of educational facilities, determining administrative-technical issues, and carrying out monitoring activities. Although municipalities are obliged to commit to the greatest possible inclusion of children aged 0-5 years in this level of education,⁴¹ there is a huge gap between the capacities currently available and the number of children in this age group in Kosovo. According to statistics, the total number of children 0-5 years compared to the number of children enrolled in Public PIs in the three sample municipalities is as follows; the percentage of children enrolled in the Municipality of Prishtina is only 8%, in the Municipality of Gjakova it is 12%, while in Prizren it is only 1.7%. It is worth noting that according to audit evidence, the requests for enrolment are very high.

In the private sector for the three municipalities, the inclusion of children is as follows: In the Municipality of Prishtina 17%, in Gjakova 4.7% and in Prizren 3.4%. For this sector, according to those responsible, there is a high interest for enrolment. The development of this level of education depends on the specifics of the municipality, the situation inherited earlier, budgetary constraints, decisions taken and priorities set.

³⁸ LAW NO. 03/L-068, on Municipal Education in the Republic of Kosovo, Article 8; Competencies of the Municipalities;

³⁹ Law on Early Education and Municipal Competences **27**

⁴⁰ Law on Early Education and Municipal Competences

⁴¹ LAW NO. 03/L-068, on Municipal Education in the Republic of Kosovo, Article 8; Competences of the Municipality; Interview conducted with civil society activists "NGO Ed Guards", 18.12.2024

The expansion of capacities in the three municipalities is presented in the table below. For clarification, since we are talking about capital investments that are realized in the longer term, we have taken into consideration the years 2021-2025.

Table 7: Expansion of technical capacities for ECE in the municipalities of Gjakova, Prishtina and Prizren

Capacity planning and expansion in three municipalities								
Number of PIs	Location	Funding source	Stage of construction	Year of functionalization/requests by MED for constructions				
				<2021	2022	2023	2024	2025>
Auditing period								
MED Gjakova								
1	Korenica village	MESTI	Completed renovations	?				
2	Shishmon village	MESTI	Completed renovations	?				
3	"Sadik Pozhegu" village	MESTI	Adopted facility			?		
4	Cërmjan village	MESTI	Adopted facility			?		
5	"Dardania" neighborhood	MESTI	Construction completed					?
MED Prishtina								
1	"Dardania" neighborhood	MED-Donation	Construction completed					?
3	"Shpëtim Robaj" nationhood	MED-Donation	Construction expected to begin					?
4	"Kolovica e vjetër" neighborhood	MED-Donation	Construction expected to begin					?
5	"Pejton" neighborhood	MED	Completed renovations				?	
6	"Kodra e diellit" neighborhood	MED	Completed renovations				?	
7	"Fehmi Agani" neighbourhood	MED	Completed renovations				?	
8	"Kodra e diellit" neighborhood	MED	Completed renovations				?	
9	"Ulpiana" neighborhood	MED	Completed renovations				?	
10	"George Bush" neighborhood	MED	Completed renovations				?	
MED Prizren								
1	"11 Maji" neighborhood	MED	Functional	?				
2	"Bajram Curri" neighborhood	MED-MLGA	Functional				?	
3	"Dardania" neighborhood	MESTI	Functional					?
4	"Tusus" neighborhood	MED	Construction ongoing					?

Data from MEDs Gjakova, Prishtina, Prizren

As can be seen, during this period of time, there have been efforts in the three municipalities to develop capacities for ECE, which have been done through new construction, adoption or renovation of existing facilities. However, the level of child inclusion remains quite low. During the current year 2025, it is expected that in the Municipality of Prishtina and Gjakova, one public more PI in each city will be functional, while in the Municipality of Prizren two are still under construction.

Below are details about the achievements, weaknesses and challenges of MEDs in this regard.

- [The Municipal Directorate of Education in Gjakova has made progress in terms of expanding the capacities of Preschool Institutions](#)

The Municipality of Gjakova has made investments and renovated or adopted two public facilities, where it has accommodated around 600 children aged 0-5.

According to the municipal authorities, it is expected that the children accommodated in the old facility "Ganimete Tërbeshi - Komon" where there is overcrowding and more unfavourable conditions than in other facilities of this PI will soon be transferred to the new facility. It is worth noting that according to the analyses presented above, even though there has been an expansion of capacities, the demand for public preschool institutions continues to remain high and it is important that the municipality continues its commitments to meet new needs.

- [The Municipal Directorate of Education in Prishtina has not made sufficient progress in expanding its capacities as needed](#)

The Municipality of Prishtina has made several new investments and renovations of old buildings as shown in Table 5. It is worth noting that during 2024, the works of a new facility were completed and it is expected to be put into operation in the current year 2025. The MED of Prishtina has also completed all procedures for the commencement of construction of two new projects. For these projects, the MED, in addition to securing the location, has also managed to ensure the identification of the plot and urban planning consent, and the commitment of the MEST for the necessary investments has been secured.

In 2024, the renovations of six buildings in different locations in Prishtina were completed. However, although the MED Prishtina had an education development plan for the years 2018-2022, it did not continue to prepare the education development plan for the following years 2022-2025. The new constructions were undertaken based on momentary decisions and not on a needs-based analysis or strategic planning.

Statements by central and local level officials that construction is not being carried out because locations have not been identified, in the absence of a concrete analysis by the MED, cannot be verified, therefore the cause of this stagnation in the capital city may also be the lack of a specific plan on where new construction can begin. Overcrowding in public PIs continues to hinder the functioning and development of this level of education and this poses the urgent need for the municipality to draft a development plan for the coming years, just as it has drafted a development

plan for the years 2018-2022. This would help clearly confirm the possibilities of locations or consider other possibilities on how to increase the necessary capacities in the capital.

The lack of strategic planning for capacity expansion increases the risk of unsustainable investments, increased expenses, and leads to failure to achieve long-term development objectives for this level of education in the capital.

- **The Municipal Directorate of Education in Prizren has not made sufficient progress in inclusion and expansion of capacities as needed**

The MED must submit proposals for the establishment of public preschool institutions to the Ministry of Education, at least three months before the start of work of the respective institution.⁴² Each Public PI must have its own budget code and unique identification number for managing financial matters.⁴³

Until 2010, the Municipality of Prizren had a functional public PI named "Yllkat", which was granted through a concession, which is permitted for municipalities under the law on public-private partnerships and infrastructure concessions.⁴⁴ This PI has subsequently come under the control of the contracting authority and continues to function as an educational institution, but not for preschool education.

The complete lack of this level of education in the public sector has been filled with the opening of a new preschool institution in 2021/2022 in the "11 Maj" neighborhood, named "Zambaku" PI. A trend of new construction development in Prizren has continued in 2023 with the opening of another Public PI in the "Bajram Curri" neighborhood, and this MED is expected to soon establish two new buildings, in the "Dardania" and "Tusus" neighborhoods of Prizren.

The PI opened in the Bajram Curri neighborhood was functionalized in September 2024, but it has been confirmed that the MED of Prizren has not managed to complete the full procedures for the appointment of the public PI established this year. This procedure has been forwarded by the MED to the ministry authorities, but the naming of this institution has not yet been completed. According to officials, the failure to complete the procedures for the naming of the public PI may have occurred due to technical issues led by the ministry.

Delays in completing all administrative procedures for the operationalization of preschool institutions are reflected in the management of the daily activities of the PI. This issue not only poses the risk of the PI not being recorded in all instances, but as a result there may also be complications and uncertainties in the management of budgetary funds.

⁴² Law on Education in Municipalities of the Republic of Kosovo, Article 5, Reporting by Local Government to MEST

⁴³ Administrative Instruction No. 104 on the criteria and procedures for the establishment and termination of Educational Institutions, p. 3, Article 2 Definitions,

⁴⁴ Law No. 03/L-090, on public-private partnerships and concessions in infrastructure and the procedures for their award

3.4 Management of Public Preschool Institutions by Municipal Education Directorates

- Shortcomings in the continuous monitoring of the activities and functioning of Public Institutions

Municipal Education Directorates are responsible for periodically monitoring Public PIs in order to ensure an adequate environment.⁴⁵ The municipality's competencies include management, drafting regulations for the development of the educational process, the supply of PIs and the implementation of all activities required for the regular functioning of Public PIs.⁴⁶

In order for the IPs to continue to have a suitable educational environment, it is important that the MEDs continuously monitor them. Monitoring is carried out with the aim of following up on the implementation of the daily activities of the Preschool Institutions. The manner in which the MED-PI monitoring process was carried out in the three municipalities is presented below:

In the MED Gjakova, public preschool institutions are monitored at least once a year. At the beginning of the school year, responsible officials of the MED notify the directors of educational institutions of all levels that they will be monitored by the municipal education directorate. After each monitoring visit, MED officials draft a report describing the situation and recommendations for improvement. In addition to the monitoring carried out by the responsible education officials, the general director of the PI prepares monthly work reports and sends them to the MED.

It is worth noting that this municipality has a centralized system for the functioning of PIs, which means that all PIs are organized by the PI center Ganimete Tërbeshi. The Director of "Ganimete Tërbeshi" PI conducts continuous monitoring and submits reports periodically, more specifically every month, upon the request of the MED.

In 2017, the MED Gjakova drafted a regulation for the organization of training and education in all educational institutions, including the preschool education level, and appointed the official responsible for drafting policies for this level of education.

MED in Prizren has engaged external experts to conduct a detailed assessment of all two educational institutions for the school year 2024-2025, including PI-Zambaku. This assessment has been summarized in a progressive report and has presented the current state of the PI, also foreseeing the improvements that need to be made during the following year 2025. Also, the monitoring process of PIs is evidenced by a report on the visit they made to "Zambaku" PI in November 2024. According to the responsible officials, the monitoring process mainly takes place during the registration of children and the resolution of parents' complaints about this process.

⁴⁵ Law on Education in Municipalities of Kosovo, L03/L-068 Article 11

⁴⁶ Law No. 03/L-068, 2008 on Education in Municipalities of the Republic of Kosovo Article 5; Competences of Municipalities at Educational Levels

However, the lack of inclusion of the age group 0-3 years has not been identified in any of the monitoring and evaluation reports compiled by MED.

Furthermore, we noticed that MED Prizren does not employ an officer responsible for PI and has not included preschool education in the regulation on the functioning of educational institutions.⁴⁷

According to officials, the reason why no official has been appointed for this category is because there is not enough staff and that this level is treated within the framework of other levels of training and education. The lack of a competent official for this level of education affects the management of this sector in accordance with needs, and may also affect the commitments to complete or draft regulations for the functioning of PIs.

In *MED Prishtina*, there is a lack of a clear and efficient system for evaluating and monitoring PIs. According to the responsible officials, the lack of monitoring of public preschool institutions has occurred because they are in constant contact with these institutions and have not implemented the documentation of this process in practice. This situation may cause that problems and difficulties in the functioning of PIs will not be identified and addressed in a timely manner.

MED Prishtina has also not included the level of preschool education in the education regulation where the rules for lower and higher secondary levels are defined. The reason for this appears to be that MED is still in the process of reviewing the general education regulation.⁴⁸

The lack of a structured and documented system for the regular monitoring of public PIs limits the ability of MEDs to identify, address and prevent deficiencies in the provision of educational services in a timely manner. Furthermore, the lack of regulations negatively reflects on the coordination of work between MEDs and PIs. All of these affect the quality of early childhood education, the well-being of children and the provision of an appropriate and equitable educational environment in all institutions.

- [Details from observations of Public Preschool Institutions](#)

This sub-chapter discloses details of the Public PI observations in the three municipalities subject to this audit.

Public PI "Ganimete Tërbeshi" in Gjakova, has a hierarchical organizational structure in eight facilities. The organization is done through the PI center that functions as the parent PI and seven other dependent facilities that are managed by a common director. However, in each facility/branch of public preschool institution, one person responsible for their management is appointed. Also, the food supply is prepared in the parent nursery and then distributed to the other facilities.

⁴⁷ Regulation on the functioning of educational institutions of the Municipality of Prizren 2023

⁴⁸ Regulations on the organization of work in primary, lower secondary and upper secondary schools, explanatory email, dated 13.03.2025

It is worth noting that since 2022, the municipality has enabled the inclusion of the 3-5 year old age group (with a duration of 180 minutes), in rural settlements wherever there were free classes in schools but no functional PI.

The information and images from the audit observations are focused on two facilities of the PI "Ganimete Tërbeshi"; "Orize" and "Komon".

PI "Ganimete Tërbeshi - Orize" serves as a central base for seven other PIs within the municipality of Gjakova; the PI has 160 children and 17 educators registered. Food supply is done on a daily basis by eight companies that have been selected through procurement procedures. 206 children are registered in this PI.

Photo 8: Public PI "Ganimete Tërbeshi - Orize", under the management of MED Gjakova



The area of the yard in the "Orize" facility, the center of PI Ganimete Tërbeshi"

PI "Ganimete Tërbeshi-Komon" is the oldest facility of this institution and therefore operates in the most difficult conditions. This PI is expected to be transferred to a new facility soon. Currently, 64 children are registered and 10 educators are engaged.

Photo 9: Public PI “Ganimete Tërbeshi-Komon” under the management of MED Gjakova



Yard area and toy corner

Below is some information and images from audit observations focused on two PI facilities in Prishtina: “Gëzimi Ynë” and “Xixëllonjat”.

PI “Gëzimi ynë” in Prishtina - The complex includes four buildings. Only one of the four buildings has been renovated, the other three are operating in poor conditions. The PI has a capacity for 400 children, but currently 360 children are registered, while the number of educators is 42. The PI does not have any green spaces and the playgrounds are not maintained.

Photo 10&11: Public PI “Gëzimi ynë” under the management of MED Prishtina



View of one of the four facilities and the playground areas

PI “Xixëllonjat” in Prishtina is a renovated and expanded facility in 2024. The number of children in 2024 has increased from 130 to 230 children and 32 educators are engaged. The PI is equipped with completely new inventory, and has high standards of kitchen and toilets. A characteristic of this PI is that during our observation, it was noted that there was no control and security system because entry and exit were free, without monitoring by staff.

Photo 12: Public PI “Xixëllonjat” under the management of MED Prishtina



Bedroom for ages 0-3

Below are some information and images from audit observations focused on two Public PI facilities in Prizren: “Zambaku” and the PI in the “Bajram Curri” neighborhood.

PI “Zambaku” in Prizren started operating in May 2021. The children registered in this PI belong to the age group of 3-6 years. There are 185 children registered in this PI and the number of educators is 20. According to the manager, there is high demand for registration, specifically 150 children are on the waiting list.

The PI's interior spaces and yard area are well-maintained and equipped not only with toys but also with domestic birds.

Photo 13: Public PI “Zambaku” under the management of MED Prizren



Recreation room where educational activities take place

PI “Bajram Curri” in Prizren, started operating in September 2024. 190 children are registered in this PI and 20 educators are employed. The children involved in this PI are in the age group of 3-6 years. The interior spaces are at a very good level, while the yard has sufficient surface area but needs to be equipped with toys.

Photo 14: PI in the “Bajram Curri” neighborhood under the management of MED Prizren



The kitchen where food is served

4 Conclusions

The audit results show that despite legal initiatives and efforts by the Ministry of Education, Science, Technology and Innovation to advance early childhood education, the current system faces structural, managerial and implementation challenges. There is a lack of secondary legal infrastructure, functional mechanisms for monitoring and licensing. At the local level, despite some progress in building facilities and partial monitoring, the lack of development plans, operating regulations and full inclusion of age groups hinders the sustainable and quality functioning of preschool institutions.

The Ministry of Education has failed to establish an effective process for the functioning and oversight of preschool institutions. Although the Law on Early Childhood Education was adopted in 2023, its implementation has lagged behind due to the lack of secondary legislation. The Ministry has also failed to ensure a regular, fair and equitable licensing process for preschool institutions. There is a lack of administrative mechanisms for the timely handling of licensing requests and clear deadlines for decision-making. This has caused delays, institutional uncertainty and the operation of some preschool institutions without a license. Documented cases show that even after the issuance of a license, some institutions have not met the legal requirements.

The Education Inspectorate, as the body responsible for supervising preschool institutions, still does not have a systematization of jobs. The sectors of the Education Inspectorate lack profiles according to education levels and the level of supervision is constantly declining. As a result, there is no clear overview of the situation of licensed preschool institutions, the number of those operating without a license, and other irregularities that may appear in all categories of preschool institutions are not identified.

The Early Childhood Education Division, responsible for licensing preschool institutions, has not provided mechanisms for an efficient and equitable administration of requests. The lack of regular and detailed monitoring of licensed preschool institutions has made it impossible to identify problems and provide opportunities for their improvement. We have confirmed that some licensed preschool institutions have not respected the decisions of the licensing commission, developing the education process in unfavorable conditions.

The unspecified deadline for submitting and reviewing applications for licensing has created delays and challenges in managing the process, affecting the functioning of private preschool institutions without a license, as well as causing risks and uncertainty for the ministry, for preschool institutions in operation, as well as other stakeholders. Licensing applications have not been processed in a timely manner and in the order of application. Operating without a license due to a delay in reviewing applications or even the termination of the activity of licensed preschool institutions without notifying the relevant authority, causes uncertainty and difficulties in institutional management and control for the benefit of the public interest.

Although increasing the level of inclusion of all age groups in education is foreseen as a legal obligation and strategic objective, its implementation has encountered obstacles from the local government. More specifically, the Municipal Directorate of Education in Prizren has not included children aged 0-3 in public preschool institutions.

In terms of development of construction capacities, the Municipal Education Directorate in Gjakova has managed to expand capacities in five new buildings. In the Municipal Education Directorate in Prishtina, there have been new constructions and renovations in several buildings, however, this Directorate has not drafted an education development plan that would guide new and necessary investments. The Municipal Education Directorate in Prizren has opened two new preschool institutions during the period 2022-2024, but there have been obstacles in completing the administrative procedures for appointment and their full and timely functionalization.

The Municipal Education Directorate in Gjakova has established a regular annual monitoring practice, supported by documented reports and concrete recommendations, as well as periodic reporting by the heads of preschool institutions. The Municipal Education Directorate in Prizren has taken steps towards assessing the current situation through the engagement of external experts and has carried out periodic monitoring. Meanwhile, the Municipal Directorate in Prishtina has not established a clear and documented system for monitoring preschool institutions, which limits the ability to identify and address existing shortcomings in a timely manner.

5 Recommendations

The following recommendations are intended to improve the process of operation, licensing and oversight of preschool Institutions. They have been presented and addressed based on the review of the process in the responsible entities.

We recommend the Ministry of Education, Science, Technology and Innovation to:

- Accelerate the process of drafting administrative instructions and to undertake the necessary activities to begin the implementation of the reforms envisaged for Early Childhood Education as soon as possible.
- Strengthen mechanisms for increasing the level of supervision and reporting on identified cases of unlicensed PIs or other irregularities in all categories. In view of this goal, the education inspectorate should engage in the systematization of jobs and the most efficient use of existing available capacities.
- Strengthen coordination and cooperation between the ministry and municipalities for the timely completion of the procedures for the establishment, appointment and registration of PIs in all necessary instances.
- Improve the management of the licensing process, establish specific time periods for receiving and reviewing applications, and ensure that all applications are reviewed objectively to increase the efficiency and reliability of the process.
- Establish a system for regular control of licensed PIs, to verify compliance with legal criteria and quality standards, and to take punitive measures against violators.

We recommend the Municipal Directorates of Education:

- To engage in the effective monitoring and management of PIs based on the standards set by regulations for the organization of the educational process of Early Childhood Education.
- The Municipal Directorate of Education in Prishtina should draft a development plan and identify locations where new investments can be made based on needs and create regular mechanisms for monitoring public PIs.
- The Municipal Directorate of Education of Prizren should make efforts to accelerate the procedures for the establishment and appointment of new preschool institutions, as well as to include the 0-3 age group in accordance with the relevant capacities and standards.

6 Annex 1. Scope, methodology and system description

Audit scope

The scope and focus of this audit is the Ministry of Education, Science, Technology and Innovation (MESTI), as the main institution responsible for the functioning of the PIs. Within this ministry, the Division for Early Childhood Education and the Education Inspectorate, including the seven regional inspection units, are responsible for this level of education. The organization of the supervision of PIs was tested through the review of the activities of the Education Inspectorate in three municipalities with the largest number of Public PIs, such as the Municipality of Gjakova, Prishtina and Prizren.

Furthermore, the scope includes the Municipal Education Directorates that are responsible for the management of Public PIs. In this regard, the three aforementioned municipalities were taken into account and tested regarding their commitment to the coordination, organization and direct monitoring of PIs.

The review of the effect of operation, licensing and supervision is focused on all categories of PIs, such as; Public PIs, Private PIs, Public-Private Partnership PIs and Community-Based PIs.

The time period of the scope of this audit report includes the years 2022 - 2024.

Audit methodology

In this audit, a range of techniques and methods were used to provide relevant, reliable and sufficient evidence, which leads us to identify deficiencies in processes or activities.

The methodology used in this audit is as follows:

- Analysis of the legal and regulatory framework regarding the licensing process of preschool institutions and their supervision;
- Analyzing the Education Strategy 2022-2026; to review the strategic objectives and problems confirmed by strategic research;
- Analyzing the Action Plan for the Education Strategy 2022-2026, to review the planning, results and achievements in the field of ECE;
- Analyzing the UN Convention on the Rights of the Child; to review the rights arising from international conventions and to compare the progress of ECE in Kosovo;
- Analysis of Development and Learning Standards in Early Childhood 0-6 years (MESTI);
- Application of audit tests in municipal MEDs, collection of statistical data, or even analysis for addressing other specific issues.
- Analyzing the Kosovo Progress Report
- Analyzing the European Commission's Reform Agenda in the Western Balkans countries,
- Analysis of the Ministry of Education's national and international agreements for ECE
- Analyzing the MESTI pedagogical programs

- Analyzing various reports and research related to the functioning, licensing and oversight of preschool institutions;
- Analyzing data/statistics on the number of licensed preschool institutions;
- Analysis of minutes/reports of inspections carried out at preschool institutions;
- Analyzing selected files according to analytical, comparative and empirical methods⁴⁹ for the period 2022-2024;
- Conducting interviews with officials of responsible institutions to collect information and clarify the process
- Conducting interviews with directors and responsible staff of Private, Public Preschool Institutions, or with combined status.
- Physical observation of preschool institutions;
- Other documentation relevant to our audit work.

⁴⁹ Empirical evidence is information collected directly or indirectly through observation and testing, or experimentation, that can be used to confirm theories, or to help justify a proposal, in this case the audit recommendation.

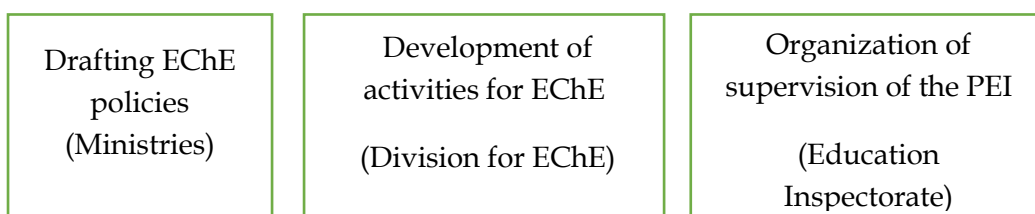
7 Annex 2. System description, audit questions and criteria

Licensing of preschool institutions and their supervision is carried out by various institutions at both the central and local levels.

In the diagram we have presented the role of the responsible parties of this spectrum of education and their ongoing activities by entity.

Diagram 3: Operation, licensing and oversight of Preschool Institutions

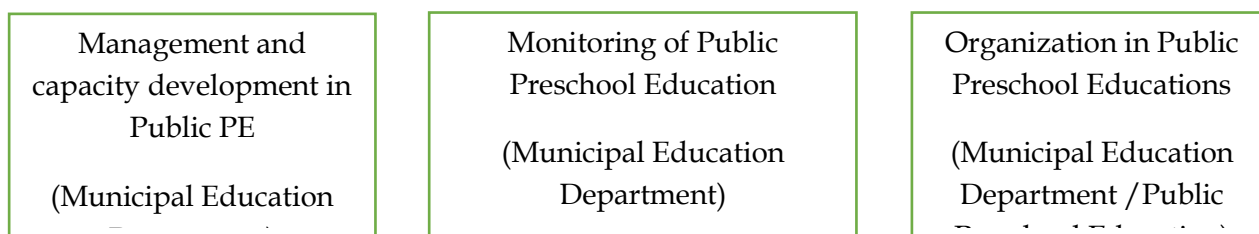
- Drafting policies for Early Childhood Education



- Procedures for the establishment and licensing of Privat Preschool Education



- Capacity development in Public Preschool Education



The Public Preschool Education (PPIs) supervision and operationalization system is managed by:

Ministry of Education, Science and Information Technology, (MESTI); determines the policies for operation, licensing and supervision through the Division for Early Childhood Education (DECE); The role of the division is to monitor and report on the part of the substantive documents or standards of early childhood development. In case of a change in the working conditions of the PPEI, the relevant institution must request the MEST to change the license conditions. Within this division, the ministry established a special commission that will review the requests for licensing of IEAPPs and must make a decision on granting or not granting the license. According to the ministry's policies, in case of rejection of the request for granting a license, the party whose request has been rejected has the right to appeal. This division is obliged to maintain a data register that includes all licensed PPEIs with their data. The PPEI license is approved for a period of one to three years.

Education Inspectorate (IA); develops procedures for the supervision of all preschool institutions. Within the Education Inspectorate there are the Office of the General Director and seven (7) Education Inspectorate Sectors (EISs) operate, which cover the field of inspection in all educational and training institutions of the Republic of Kosovo. The sectors are located in the regions of: Prishtina, Mitrovica, Ferizaj, Peja, Prizren, Gjilan and Gjakova.

Municipal Education Directorates (MEDs), are responsible for monitoring Public Preschool Institutions in order to ensure their smooth running. They are responsible for the establishment and construction of public preschool educational facilities, issuing final permits for the use of the facility and creating normal conditions for the preschool education process. MEDs are also responsible for monitoring Public Preschool Institutions for the smooth running of the preschool education process.

Preschool Institutions of Early Childhood Education: are educational facilities that offer a wide range of services for the development of children from zero to six years of age. They are divided into the following categories according to the law:

- Private institutions of ECE are institutions that are financed and managed by legal or natural persons outside the state budget.
- Community-based ECE institutions are institutions that provide early childhood education services organized and managed by the community in agreement with the municipality and in accordance with standards approved by competent institutions.
- Public-private partnership ECE institutions are institutions that are established with combined capital determined by agreement between the public authority and the legal entity according to the legislation in force;
- Public institutions of ECE are institutions that are financed by the budget of the Republic of Kosovo and managed by municipal education directorates (MDEs).

Audit questions

To respond to the audit objective, we have posed the following audit questions and sub-questions:

1. Has the ministry managed to establish an effective process for the functioning and oversight of preschool Institutions?

- 1.1 Have appropriate procedural policies been developed for the functioning of PIs?
- 1.2 Has the supervision of all categories of PIs been properly carried out by the Education Inspectorate?

2. Has the ministry managed to ensure regular PI licensing processes?

- 2.1 Are the appropriate mechanisms in place for licensing Private PIs?
- 2.2 Are deadlines set for receiving applications for licensing and has their implementation been ensured by the relevant divisions?
- 2.3 Have the requests of the entities been reviewed and approved according to the criteria and predetermined conditions?

3. Has the monitoring of Preschool Institutions for the services provided been carried out effectively?

- 3.1 Have the existing capacities of the Public PIs been used efficiently?
- 3.2 Has the management and monitoring of public preschools institutions been carried out properly by the relevant Municipal Departments?

Audit criteria

The audit criteria are formulated based on laws, regulations and defined objectives, as well as focusing on principles and good practices. The development of the questions of this audit is based on the following criteria:

Criterion 1: The authorities of the Ministry of Education, Science, Technology and Innovation are obliged to engage in the drafting of legal documents six months after the approval of the law.⁵⁰ Authorities should engage in developing program policies and creating new inclusive opportunities in ECE.⁵¹

Criterion 2: The Ministry of Education, Science, Technology and Innovation exercises supervision of PIs through the Education Inspectorate. The inspection officers of the Education Inspectorate Sectors (EIS) are competent to assess, control, advise, inform and report on the status of PIs. The

⁵⁰ Law on Early Childhood Education 2023, Article 38

⁵¹ Education Strategy 2022-27

supervision of PIs aims to ensure that these institutions meet the required standards with the criteria set by MESTI, respectively drafted by the Division for Early Childhood Education (DECE).⁵²

Criterion 3. The official authorities of the Ministry of Education, Science, Technology and Information must appoint a special commission for licensing PIs. Officials of the Licensing Commission issue decisions on licensing/re-licensing or rejection of applications submitted no later than one month before the beginning of the school year.⁵³

Criterion 4: The officials of the Division for Early Childhood Education (DECE) are responsible for conducting regular and continuous monitoring of all licensed preschool institutions and assessing their capacities and services. DECE must prepare monitoring reports on the work of preschool institutions after the end of the school year.⁵⁴

Criterion 5: Municipal Education Directorates must submit proposals for the establishment of public preschool institutions to the ministry, at least three months before the start of work of the respective institution.⁵⁵ Each Public PI must have its own budget code and unique identification number for managing financial matters.⁵⁶ Members of the licensing committee must ensure that PIs meet the necessary conditions according to the norms and standards for preschool facilities, to provide a safe and quality environment for children, always including social and pedagogical aspects.⁵⁷

Criterion 6: Municipal Education Directorates are tasked with providing an inclusive environment for preschoolers within their territory.⁵⁸ Official authorities from Municipal Education Directorates are in charge of providing comprehensive services to all preschool children aged 0.9 months-6 years.⁵⁹

Criterion 7: Municipal competencies include identifying needs, determining administrative-technical issues, and maximizing the involvement of children in this level of education.⁶⁰ Municipal officials must cooperate with managers, assess needs, and fulfil requirements for the smooth running of PIs.⁶¹ Municipal government activities to expand the capacities of the ECE can be developed autonomously and independently in each municipality.⁶² Municipal Education Directorates are responsible to periodically monitor Public Primary Schools in order to ensure an

⁵² Law on Education Inspectorate, 2018 & Law on ECE, 2023

⁵³ AI (MEST) No. 15/2016 Licensing and registration of private preschool educational institutions, Article 17, Granting of licenses

⁵⁴ AI (MEST) no.15/2016 on Licensing and registration of private preschool educational institutions, Article 17, Granting of licenses & Article 28, Point 6

⁵⁵ Law on Education in Municipalities of the Republic of Kosovo, Article 5, Reporting by Local Government to MEST

⁵⁶ Administrative Guideline N 104 On the criteria and procedures for the establishment and closure of Educational Institutions, p. 3, Article 2 Definitions,

⁵⁷ Guidelines for norms and standards of preschool facilities, MEST 2022, p.6

⁵⁸ Law on Education in Municipalities of Kosovo, L03/L-068, Article 11

⁵⁹ Law on Education in Municipalities of Kosovo, L03/L-068, Article 11

⁶⁰ LAW NO. 03/L-068, on Municipal Education in the Republic of Kosovo, Article 8; Competences of the Municipality;

⁶¹ Law on Early Childhood Education and Municipal Competences

⁶² Law on Early Childhood Education and Municipal Competences

adequate environment. 63 The municipality's competencies include management, drafting regulations for the development of the educational process, the supply of PIs, and the implementation of all activities required for the regular functioning of Public PIs.⁶⁴

8 Annex 3. Investments for public capacity development

Table 8: New and ongoing constructions for the period 2022-2024

New constructions 2022-2024			Ongoing constructions 2022-24		
No	Location	Amount of investment	No	Location	Amount of investment
1	Vrellë-Istog	264,010.00 €	11	Istog	669,639.26 €
2	Suhareke	742,382.05 €	12	Klina	560,330.50 €
3	Prizren	563,758.40 €	13	Komoran-Gllogoc	504,330.40 €
4	Prizren	799,272.72 €	14	Ferizaj	739,999.99 €
5	Dobërqan – Gjilan	297,705.35 €	15	Pejë	947,619.66 €
6	Millosevë-Obiliq	569,569.56€	16	Mitrovica	488,000.00 €
7	Prishtinë	5,000,000.00 €	17	Prishtina	743,347.74 €
8	Obiliq		18	Koretin-Kamenica	741,013.95 €
9	Skenderaj		19	Gjakova	758,892.49 €
10	Gjilan		20	Gjilan	710,995.62 €
			21	Podujeva	687,407.93 €
			22	Deçan	708,902.53 €
			23	F.Kosova	1,282,282.28 €
			24	Batllavë-Podujeva	448,209.88 €
			25	F.Kosova	415,659.59 €
			26	Prizren	743,246.84 €
			27	Godanc-Shtime	414,643.49 €
			28	Rahovec	540,364.80 €
			29	Gurakoc, Istog	713,437.39 €
			30	Viti	718,646.30 €
			31	Brodosanë, Dragash	1,082,569.56 €
			32	Kaçanik	1,096,043.96 €
			33	Malisheva	689,349.60 €
			34	Gjilan	895,429.07 €
	Total	7,667,128.52 €		Total	17,300,362.83 €

Data from the Ministry of Education, Science, Technology and Innovation

⁶³Law on Education in Municipalities of Kosovo, L03/L-068, Article 11

⁶⁴LAW NO. 03/L-068, 2008 On Education in Municipalities of the Republic of Kosovo Article 5; Competences of Municipalities at Educational Levels

9 Annex 4: Data on the Education Inspectorate

Table 9: Composition of the Education Inspectorate staff

Central Office of the Education Inspectorate	Profile	Number of staff	Job title	Number of staff in EI - regional sectors
	Lawyer - Master	1	Education Inspector	
	Pedagogue	1	Education Inspector	
	Language and Literature-Master	2	Education Inspector	
Number of staff at the Central Office of the Education Inspectorate				4
Education Inspectorate Sector - Prishtina	Profile	Number of staff	Job title	Number of staff in the Prishtina region
	Pedagogue - Master	1	Head of EIS	
	Pedagogue	1	Education Inspector	
	Pedagogue - Master	2	Education Inspector	
	Language and Literature-Master	1	Education Inspector	
	Biologist	1	Education Inspector	
	Sports sciences	1	Education Inspector	
Number of staff at EIS Pristina				7
Education Inspectorate Sector - Mitrovica	Profile	Number of staff	Job title	Number of staff in the Mitrovica region
	Engineer - Master	1	Head of EIS	
	Engineer - Geology	1	Education Inspector	
	Chemist - Master	1	Education Inspector	
Number of staff at EIS Mitrovica				3
Education Inspectorate Sector - Peja	Profile	Number of staff	Job title	Number of staff in the Peja region
	lawyer	1	Head of EIS	
	Pedagogue - Master	2		
Number of staff at EIS Peja				3
Education Inspectorate Sector - Prizren	Profile	Number of staff	Job title	Number of staff in the Prizren region
	Engineer - Master	1	Head of EIS	
	Pedagogue - Master	2		
	Sociologist	1		
Number of staff at EIS Prizren				4
Education Inspectorate Sector - Ferizaj	Profile	Number of staff	Job title	Number of staff in the Ferizaj region
	Engineer - Master	1	Head of EIS	
Number of staff at EIS Ferizaj				1

Education Inspectorate Sector - Gjilan	Profile	Number of staff	Job title	Number of staff in the Gjilan region
	Pedagogue - Doctor of Historical Sciences		Head of EIS	
	Pedagogue - Master of Psychology		Education Inspector	
	Language and literature / Lawyer		Education Inspector	
Number of staff at EIS Gjilan				3
Education Inspectorate Sector - Gjakova	Profile	Number of staff	Job title	Number of staff in the Gjakova region
Number of staff at EIS Gjakova				0

Table 10: Audit Samples / Number of Inspections 2022-2024

Number of inspections by samples					
No.	No.	No.	No.		No.
			yes	not	
1	Public PI	Pristina		x	
2	Public PI	Pristina		x	
3	PI 1 (Community-based)	Pristina		x	
4	IP2 (Public-private partnership)	Pristina		x	
5	IP3 (Private PI)	Pristina		x	
6	IP4 (Private PI)	Pristina		x	
7	IP5 (Private PI)	Pristina		x	
8	IP6 (Private PI)	Pristina		x	
9	IP7 (Private PI)	Pristina		x	
10	IP8 (Community-based PI)	Pristina		x	
11	IP9 (Private PI)	Pristina		x	
12	PI 10 (Private PI)	Pristina		x	
13	PI 11 (Private PI)	Pristina		x	
14	PI 12 (Private PI)	Pristina		x	
15	Public PI	Prizren	x		Verification
16	Public PI	Prizren		x	
17	PI 13 (Private PI)	Prizren	x		New licensing verification
18	PI 14 (Private PI)	Prizren		x	
19	PI 15 (Private PI)	Prizren		x	
20	PI 16 (Private PI)	Prizren		x	

21	PI 17 (Private PI)	Prizren		x	
22	Public PI	Gjakova	x		On request
23	Public PI	Gjakova		x	
24	PI 18 (Private PI)	Gjakova		x	
25	PI 19 (Private PI)	Gjakova		x	
26	PI 20 (Private PI)	Gjakova		x	

10 Annex 5. Observation results presented in tabular form

Table 11: Results of analysis from audit observations

State of the Public PIs according to observations during the execution phase									
Public PIs	Location	Capacity for children by license	Current number of children	Payment fee in €	No of educators	Teaching programme	Facility data	Children with disabilities	Comments on ascertained situation
1	"Ganimete Terbeshi, Orize" - Gjakovë	162	160	45	17	MASTI curriculum, 10 educators are included in training for the new curriculum.	It is a municipal facility.	2 children with special needs	The PI functions as a main centre and as a base for seven other PIs. The food supply is done by a private operator. The food is prepared in the base facility and then distributed to other branches. 22 minority children are included in this PI.
2	"Ganimete Terbeshi, Komon" - Gjakovë	/	71	45	10	MESTI's curriculum	It is a municipal facility.	There are no children with special needs.	The building is very old, dating from the 1960s, in poor condition. There are disputes regarding the ownership and status of the property, so the accommodation issue is expected to be resolved with the new building, which is currently in the process of being functionalized
3	Gëzimi Ynë - Prishtinë	400	360	50	42	MASHTI curriculum. The teacher and the psychologist are engaged twice	The garden has 4 buildings within the same yard. One building itself has been renovated, while the other 3 have not been renovated.	14 children with special needs without assistants for this category	The budget is administered by the MED, The MED pedagogical team treats children with special needs only in MED facilities and with the approval of the parent. According to the AI, children from social classes and with
4	Xixëllonjat - Prishtinë	230	230	50	32	13 groups, with 2 educators each.	The MED renovated the facility in 2024. The capacities have been increased, the inventory is completely new, the toilets and kitchen are of a high level.	3 children with special needs, without assistants	The current director has been in position since 2017. The entrance lacks a control and security system, this part is not monitored by staff.
5	Zambaku - Prizren	200	185	50	20	PP MEST, in piloting has had training for educators, 1 assistant for children with needs	New construction by MESTI and MED	2 children with special needs	IP has adequate space, and a separate area for raising birds. Supply is a challenge, and there are pending requests for renovations. Age group older than 3-6 years, has one multiethnic group.
6	PI in the Bajram Curri neighborhood -	220	190	50	20	MEST curriculum, coordinator, lecturer, special needs assistant	New construction by MESTI and MED	4 children with special needs	Still no designation, there are challenges in supplies and representation. They are waiting for the act of designation and representation at all levels. It started in 2024, the demands are high, age group 3-6 years.

	Prizren								
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Situation of public-private and community-based PIs according to audit observations							
Private and combined PIs	Capacity of children by licence	Current No. Of children	Payment fee in €	No. of educators	Teaching programme	Facility data	Comments on ascertained situation
PI1 (Community-based) Prishtina	1435m2 (1435m2/ 100f =14.5m2 Per each child)	100	150 €	10	Montessori and Reggio Emilia	Municipal facility	Community-based PI that operates in a municipal facility. It has an organizational system supported by a parents' council. Systematization, organization and structure of the facility according to standards and age group of children.
PI2 (Community-based) Prishtina	2307m2 (2307m2/ 196f=11.7 7m2 per each child)	196	130 €	23-26	Montessori and piloting the new curriculum.	The building was built with IPA funds. GF+1	PI built with IPA funds. The systematization, organization and structure of the facility is according to the standards and age group of the children. IPA has also supported them with several staff trainings abroad. Trainings are necessary.
PI3 (public private partnership) Prishtina	140	160	80 €	18	MEST and new pilot curriculum	Private building GF+1	Public-private partnership (PPP) supported by the Municipality, located in an overcrowded neighbourhood. There are 152 children on the waiting list for registration. Due to the overcrowding, the owners are interested in building another PI.

Situation of private PIs according to audit observations

IP Private	New capac. of children by licence	Current No. of Children	Payment Fee in €	No of educators	Teaching programme	Facility data	Comments on ascertained situation
PI4 (Private PI) Gjakovë	60	60	120 €	10	MESTI programme	GF+1 facility	Private PI operates in a rented facility. Children are arranged in groups. They collaborate with international donors.
PI5 (Private PI) Gjakovë	70	54	80 €	4	MESTI programme Regio Emilio and Montessori	GF+1 facility	The PI operates in the premises of the Catholic church. Children are arranged according to age groups. There are currently 4 social cases, the price is negotiable from 20-80 euros. The surface of the yard is concreted and is currently unusable.
PI6 (Private PI) Prishtinë	160	140	300 €	29	Rexhio Emilio, MESTI core curriculum	Private GF+1. facility	The facility has sufficient indoor and outdoor areas and is equipped with toys. Advanced standard organization. Good cooperation with the Ministry and participants in training for educators.
PI7 (Private PI) Prishtinë	110	70	220 €	13	MESTI programme Piloting new curriculum	Private GF+1 facility	The facility has sufficient green space, equipped with toys.
PI8 (Private PI) Prishtina	25	/	90 €	/	/	Private GF+1 facility	It is currently closed, even though it has a valid license. The Ministry has not been notified of its closure.
PI9 (Private PI) Prizren	35	40	70 €	5	MESTI	Rented GF+2 facility	The building has a small courtyard area, concreted, but with suitable material and toys. It is not according to the P+1 standard and the license, the building has more floors.
PI10 (Private PI) Prizren	120	120	120 €	8	MESTI programme; Montessori, Regio Emilio. Employed psychologist, Regular part-time doctor.	Private GF+1 facility	Suitable facility and advanced system of organizing inventory, toys and the entire educational process. Infrastructure system for children with special needs.

11 Annex 6. Observation results presented in tabular form

Confirmation letter from audited parties - Municipality of Gjakova



LETËR E KONFIRMIMIT

Për pajtueshmërinë me të gjeturat e Auditorit të Përgjithshëm për raportin e auditimit të performancës **“Funksionimi, licencimi dhe mbikëqyrja e Institucioneve Parashkollore”**, dhe për zbatimin e rekomandimeve.

Për: Zyrën Kombëtare të Auditimit

Vendi dhe data: Gjakovë, 29.07.2025

I nderuar,

Përmes kësaj shkrese, konfirmoj se:

- kam pranuar draft raportin e Zyrës Kombëtare të Auditimit **“Funksionimi, licencimi dhe mbikëqyrja e Institucioneve Parashkollore”** (në tekstin e mëtejme “Raporti”);
- pajtohem me të gjeturat dhe rekomandimet dhe nuk kam ndonjë koment për përmbajtjen e Raportit; si dhe
- brenda 30 ditëve nga pranimi i Raportit final, do t’ju dorëzoj një plan të veprimit për implementimin e rekomandimeve, i cili do të përfshijë afatet kohore dhe stafin përgjegjës për implementimin e tyre.

Ardian Gjini

Kryetar i Komunës së Gjakovës



Letter of confirmation and comments of MESTI:



Republika e Kosovës
Republika Kosova-Republic of Kosovo
Qeveria –Vlada-Government

*Ministria e Arsimit, Shkencës, Teknologjisë dhe Inovacionit/Ministarstvo Obrazovanja, Nauke,
Tehnologije i Inovacija/Ministry of Education, Science, Technology and Innovation*

LETËR E KONFIRMIMIT

Për pajtueshmërinë me gjetjet e Auditorit të Përgjithshëm për zbatimin e rekomandimeve

Për: Zyrën e Kombëtare të Auditimit

Të nderuar,

Përmes kësaj shkrese, konfirmoj se:

- kam pranuar draft raportin e Zyrës Kombëtare të Auditimit për auditimin e performancës me temën: “Funksionimi, licencimi dhe mbikëqyrja e Institucioneve Parashkollore”,
- pajtohem pjesërisht me gjetjet dhe rekomandimet, ndërsa komentet dhe dëshmitë i gjeni të bashkangjitur;
- brenda 30 ditëve nga pranimi i Raportit final, do t’ju dorëzoj një plan të veprimit për zbatimin e rekomandimeve, i cili do të përfshijë afatet kohore dhe stafin përgjegjës për zbatimin e tyre.

Arbërie Nagaver, Ministre përgjegjëse

Data: 04.08.2025

Prishtinë



**MINISTRIA E ARSIMIT, SHKENCËS, TEKNOLOGJISË DHE INOVACIONIT
MINISTARSTVO OBRAZOVANJA, NAUKE, TEHNOLOGIJE I INOVACIJE
MINISTRY OF EDUCATION, SCIENCE, TECHNOLOGY AND INNOVATION**

Audit conducted: Functioning, licensing, and Oversight of Preschool Institutions

Document: MESTI Comments on the draft audit report

Findings	Agree yes/no	Auditee Comments when not agreed	View of the NAO
3.1. Development of activities to date within the Ministry of Education, Science, Technology, and Innovation		<p>Comment:</p> <p>The limited number of education inspectors has been a continuous challenge in effectively implementing institutional oversight in preschool education. This deficiency has had a direct impact on the conduction of regular and comprehensive inspections, resulting in insufficient oversight.</p>	<p>The performance audit assesses the efficient use of available resources. Regarding the lack of staff in the REI in Gjakova, the report clearly explains that: “As a result of the lack of sufficient staff at the central level, supervision in this region has been carried out occasionally through the temporary engagement of inspectors from EIS Prizren.” (page 12)</p> <p>This clarification was included to highlight the link between the lack of human resources and the insufficient level of oversight in this region. Meanwhile, details about inspections in REI Prishtina and Prizren were given only for the municipalities included in the audit’s focus and were based on information and reports</p>

			submitted by interviewed inspectors.
3.2. Procedures for licensing and monitoring		<p>Comment:</p> <p>The performance audit process covered the period 2022-2024, during which structural changes directly affected the capacity to address licensing and re-licensing applications.</p> <p>During 2022-2023, the division operated with only one official in the Quality Assurance, Standards, Evaluation, and Licensing Division.</p> <p>With the enforcement of Regulation (OPM) No. 09/2024 on the Internal Organization and Job Classification within MESTI, the Division for Private Pre-University Education was established, increasing the number of officials from one to three.</p> <p>The Division for Private Education is responsible for licensing private educational institutions at all levels: early childhood education, primary education, lower secondary, upper secondary, and vocational education, in accordance with Law No. 08/L-153 on Early Childhood Education and Law No. 04/L-032 on Pre-University Education.</p> <p>Meanwhile, monitoring is carried out by this Division, and</p>	<p>The audit report has thoroughly addressed the organizational structure of MASHTI during the audit period, reflecting both the previous and current organization based on official documentation submitted by MASHTI itself. On page 15 of the report, it is emphasized that: “In 2024, MESTI re-systematized its job positions, which resulted in the creation of a specific division for Early Childhood Education (hereinafter, ECE). Previously, ECE had only one representative within the Division for Early and Preschool Education. There is a Licensing Commission within the DECE, responsible for reviewing applications for the licensing of various categories of PIs, such as private, public private, and community-based PIs”</p> <p>The report also highlights that: “Officials of the Licensing Commission issue decisions on licensing/re-licensing or rejection of applications submitted no later than one month before the start of the school year”. (page 15, first paragraph)</p> <p>“We have noticed that preschool institutions that</p>

	<p>official oversight is done by the Education Inspectorate</p> <p>MESTI's Administrative Instruction No. 15/2016 does not set a specific deadline for license or re-license applications, but stipulates that the licensing/re-licensing decision must be given no later than one month before the start of the new school year.</p> <p>Article 20 of the same AI also allows the applications for changes to licensing condition to be submitted at any time.</p> <p>Within the Division, there is a commission reviewing these applications, composed of MESTI officials who have other primary responsibilities, which affects the time required to address the cases.</p> <p>During the period 2022-2024, over 300 applications for licensing or re-licensing were received, and decisions were made for almost all cases.</p> <p>The reported number of 180 institutions with valid licenses represents only those institutions that had active licenses at the time of the audit and does not reflect the total number of licenses issued during this period.</p> <p>This is because during the same period, some institutions submitted more than one application, as licenses are issued for 1 to 3 years under AI</p>	<p>need to be licensed to operate their activities submit applications to the Early Childhood Education Division throughout the year without any specific deadline, and this method of licensing results in irregular applications, a large number of applications, and makes the process of reviewing applications for licensing more difficult. According to administrative instructions, licensing should be done at least one month before the start of the school year". The relevant paragraph explains the cause and effect of this situation, not as a finding of violation of legal deadlines. Furthermore, even though Article 20 of the administrative instruction is mentioned as a basis for submitting requests at any time, there is no evidence that licensing criteria changed during 2022-2024 or that new rules were applied.</p> <p>The report treats the licensing and re-licensing process as a continuous cycle - as also described by MASHTI - noting that: "The duration of the license for preschool institutions varies according to the stage of activity. Initially, it is issued for one year, while re-licensing is done for up to three more years depending on the assessment of the commission. More</p>
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		<p>15/2016, with some initially receiving a one-year license and later being re-licensed for a longer term.</p> <p>Re-licensing is an administrative renewal of the licensing and does not constitute a new process.</p> <p>Site visits for assessment are organised in a coordinated manner according to territorial jurisdiction, not necessarily in chronological order of application. This helps use logistical and human resources more efficiently. In some cases, multiple visits are made to ensure institutions meet licensing conditions.</p> <p>Since the commission consists of officials with primary responsibilities in other divisions, some delays and carry-overs of cases from one year to another are inevitable.</p>	<p>specifically, the duration of licenses is one to three years.” Furthermore, explanations are given: “During the period 2022–2024, over 300 licensing applications were submitted, of which only 180 PIs were licensed. Many of the applications were carried over from year to year and the situation regarding their review is unclear. The number of licensing applications registered in the DECE database is not consistent with the number of preschool institutions that have been licensed. This database does not provide data on the number of applications that have not been reviewed and carried over the years.” The licensing and re-licensing process is presented as a continuation, as you have also emphasized. We clarify that the only reliable indicator available for assessment was the number of licensed IPs. You know we repeatedly requested an updated database and were informed about its defects. DEFH’s database does not clarify the number of requests carried over annually nor the number of IPs licensed/re-licensed within the year. Otherwise, as noted in the report, we discussed cases of requests</p>
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		<p>Law No. 04/L-046 on the Education Inspectorate defines two profiles of inspectors: administrative inspectors and pedagogical inspectors. This law does not foresee a division of inspectors according to levels of the International Standard Classification of Education (ISCED) or curriculum fields, which has affected the lack of specialization for specific levels, including preschool education</p> <p>Regarding the supervision of licensed preschool institutions, the Education Inspectorate has operated with limited capacity due to an insufficient number of appointed inspectors.</p> <p>Nevertheless, despite limitations, thematic inspections reflecting the real situation in private educational institutions in preschool education have been conducted.</p> <p>Pedagogical inspections for this level are expected to start only after MESTI/DECE approves the relevant administrative instruction and guidelines for performance evaluation, in accordance with Article 20 of AI No. 04/2017.</p>	<p>that had not been reviewed even after two years.</p> <p>The report states: “The Education Inspectorate drafts annual general plans and reports, which provide for the supervision of PIs. However, the annual reports only contain statistical data on the number of inspections carried out within the calendar year, without including detailed analyses on the implementation and results of the supervision of PIs, which limits transparency and the assessment of the effectiveness of the inspection activity.</p> <p>In addition, the education inspectorate does not have</p>
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		<p>Meanwhile, the Education Inspectorate has carried out and continues to carry out inspections to identify private educational institutions operating with or without a work license, maintaining regular records for such cases.</p> <p>For illustration, based on annual inspection reports, EIS Prishtina has conducted:</p> <p>24 inspections in 2022,</p> <p>21 inspections in 2023, and</p> <p>14 inspections in the first half of 2024.</p> <p>Regarding the low number of complaints:</p> <p>It is worth noting that parties have the legal right to file complaints within the specified deadlines. In all rejected cases, there is the possibility of</p>	<p>internal regulations, bylaws or operational documents that would enable a clearer structuring of the functions and responsibilities of the inspection officers. The most pronounced shortcoming is identified in terms of staff organization, namely in the absence of the Regulation on the Systematization of Jobs. Currently, the engagements of inspectors are based on the general descriptions set out in the Law on the Education Inspectorate (See Annex 3; Engagement of inspectors in the EIS), without any functional division according to education levels.”</p> <p>The issue of dividing profiles by levels is noted as a cause, not a finding. We clarify that the performance audit is based not only on laws and regulations but also on best practices. A division of the Education Inspectorate according to educational levels was observed in our research on education inspectorates in other countries.</p> <p>Activities of the Education Inspectorate are noted for each municipality and according to annual reports submitted by responsible</p>
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	<p>reapplying for licensing or re-licensing. This alternative procedure for reapplication practically reduces the number of complaints. Also, applicants can exercise their right to complain even while their cases are under review</p>	<p>officials. Specifically, the report states:</p> <p>“Overall data suggests that during the 2022-2024 period, the Regional Inspection Sector in Pristina has managed to cover 30% of Preschool Institutions. A characteristic of this sector is that in 2024, a joint inspection was undertaken with the sanitary and labour inspectorate in four preschool institutions. According to the annual inspection reports, EIS Prizren conducted 31 inspections in 2022, 9 inspections in 2023 and 21 inspections in 2024. The data shows a significant decrease in inspection activity in 2023, followed by a partial increase in the following year. Fluctuations in the number of inspections indicate a lack of consistency in the implementation of inspection activities over the years.”</p> <p>The report presented official data obtained from MESTI, showing that the number of complaints submitted for licensing refusal during 2022-2024 was very low (only 2 to 5 cases per year).</p> <p>The audit does not contest the existence of the legal right to file complaints or the related procedure described in the report. However, the analysis concluded that</p>
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			<p>delays in reviewing licensing applications and the absence of deadlines for submission and processing affected many parties' ability to effectively exercise this right because they did not receive decisions in time to appeal. Therefore, the complaint analysis was used as a supporting indicator in evaluating the overall efficiency of the licensing process and communication transparency with applicants, not as a separate finding.</p>
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A bright, sunlit room with wooden furniture, a potted plant, and a globe on a shelf. The scene is captured in a soft, warm light, likely from a window on the left. In the foreground, a wooden table and chairs are visible. On a shelf in the background, there is a potted plant in a light blue pot, a globe, and a small flag. The overall atmosphere is clean and modern.

National Audit Office of Kosovo
Arbëria District,
St. Ahmet Krasniqi, 210
10000 Pristina
Republic of Kosovo