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Working Paper

Process evaluation of the universal access to quality tertiary education act (RA 10931): Status and prospects for improved implementation

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Ma. Kristina P. Ortiz, Kris Ann M. Melad, Nina Victoria V. Araos, Aniceto C. Orbeta Jr., and Celia M. Reyes



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Process Evaluation of the Universal Access to Quality Tertiary
Education Act (RA 10931): Status and Prospects
for Improved Implementation

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Abstract

On August 13, 2017, the Philippine government enacted into law the Universal Access to Quality Tertiary Education Act (UAQTE) or Republic Act No. 10931, also known as Free Tuition Law, which mandates all public higher education institutions (HEIs) and government-run technical-vocational institutions (TVIs) to provide free quality tertiary education among eligible Filipino students. This long-awaited policy aims to increase access to tertiary education, particularly for students from poorer households. These goals are intended to be achieved through the implementation of four component programs under the law, namely, (a) free tuition and other school fees in public higher education institutions, (b) free tuition in TESDA technical-vocational training institutes (TVIs), (c) tertiary education subsidy (TES), and (d) student loan program.

The study is an early assessment of the RA 10931 during its first year of implementation. Given the limited time and resources, the study concentrated on the implementation of the higher education component and was not able to cover the implementation component on TESDA TVIs.

The study investigated the program design and objectives, as specified by the law and its implementing rules and regulations as well as how these are perceived and understood by key implementing actors. The study also collected initial accounts from key stakeholders and implementers on their experiences in the implementation of the law and the delivery of the policy benefits to intended recipients. The study also examined the organizational and resource requirements for the implementation of the law during this transition period. Finally, the study did an online information gathering and processed available administrative data of pertinent agencies to provide support to information generated from qualitative methods mentioned earlier.

Examining the first year enrollment data, one noteworthy observation is that public HEIs were able to recover from declines in enrollment due to the introduction of grades 11 and 12 better than private HEIs in AY 2018-2019. This is true at least among the universities included in the sample of the study. There are also indications of a widening gap in the share of public and private HEI enrollment, also among first year students.

Duly recognizing that the law is still in the transition period of implementation, the study raises concerns that emerged from the interviews and quantitative information and presents recommendations to strengthen the law's implementation and enhance the chances of achieving its desired outcomes.

Keywords: tertiary education, free tuition, education subsidy, RA 10931, process evaluation

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List of Acronyms

4Ps	-	Pantawid Pamilyang Pilipino Program
AACUP	-	Accrediting Agency of Chartered Colleges and Universities of the Philippines
AI	-	artificial intelligence
ALCU	-	Association of Local Colleges and Universities
ALCUCOA	-	Association of Local Colleges and Universities Commission on Accreditation
APIS	-	Annual Poverty Indicators Survey
ASEAN	-	Association of Southeast Asian Nations
AY	-	academic year
BAföG	-	Federal Training Assistance Act
BESF	-	Budget of Expenditures and Sources of Financing
BIR	-	Bureau of Internal Revenue
BSP	-	Bangko Sentral ng Pilipinas
CASEN	-	Information on the National Socio-Economic Characterization Survey
CE	-	Civil Engineering
CEAP	-	Catholic Educational Association of the Philippines
CHED	-	Commission on Higher Education
CHEDRO	-	CHED Regional Offices
CMO	-	CHED Memorandum Orders
COA	-	Commission on Audit
COCOPEA	-	Coordinating Council for Private Educational Associations
COPC	-	Certificate of Program Compliance
CSO	-	civil society organization
DA	-	Department of Agriculture
DBM	-	Department of Budget and Management
DepEd	-	Department of Education
DOLE	-	Department of Labor and Employment
DOST	-	Department of Science and Technology
DSWD	-	Department of Social Welfare and Development
ES	-	elementary school
ESC	-	Education Service Contract
ESGP-PA	-	Expanded Students Grants-in-Aid Program for Poverty Alleviation
FHE	-	Free Higher Education
FIRe	-	Fourth Industrial Revolution
FU	-	Flagship Universities
GAA	-	General Appropriations Act
GASTPE	-	Government Assistance to Students and Teachers in Private Education
GDP	-	gross domestic product
GIA	-	grants-in-aid
GII	-	Global Innovation Index
GSIS	-	Government Social Insurance System
HE	-	higher education

HECs	- Higher Education Contribution Scheme
HEIs	- higher education institutions
HESF	- Higher Education Support Fund
HK	- human capital
HS	- high school
ICETEX	- Colombian Institute of Educational Credit and Training Abroad
ICT	- information and communications technology
IRR	- implementing rules and regulations
ITR	- income tax return
JHS	- junior high school
JMC	- Joint Memorandum Circular
K–12	- Kindergarten to Grade Twelve
KII	- key informant interview
LFS	- Labor Force Survey
LGU	- local government unit
LUCs	- local universities and colleges
MOOC	- massive open online course
MOOE	- maintenance and other operating expenses
NAF	- National Assessment Framework
NAT	- National Assessment Tests
NBI	- National Bureau of Investigation
NCIP	- National Commission on Indigenous Peoples
NCR	- National Capital Region
NEDA	- National Economic and Development Authority
NEP	- National Expenditure Program
NFU	- National Flagship University
NGA	- national government agency
NGO	- Non-government organization
NNQAA	- National Network of Quality Accrediting Agencies
NPV	- net present value of the benefits
NTA	- National Transfer Account
NYC	- National Youth Commission
OECD	- Organization for Economic Cooperation and Development
OLS	- ordinary least squares
OPAPP	- Office of the Presidential Adviser on the Peace Process
PACU	- Philippine Association of Colleges and Universities
PBE	- professional board examination
PE	- Process Evaluation
PEAC	- Private Education Assistance Committee
PISA	- Program for International Student Assessment
POEA	- Philippine Overseas Employment Administration
PPP	- Purchasing Power Parity
PRC	- Professional Regulatory Commission
PSA	- Philippine Statistics Authority

PVB	- present value of the benefits
PVC	- present value of the costs
QS	- Quacquarelli Symonds
R&D	- research and development
RA	- Republic Act
RSS	- Return Service System
SDG	- Sustainable Development Goals
SEC	- Securities and Exchange Commission
SES	- socio-economic status
SGP-PA	- Students Grants-in-Aid Program
SHS	- senior high school
SLP	- Student Loan Program
SNPL	- study-now-pay-later
SNPLP	- Study Now Pay Later Program
SOEs	- state-owned enterprises
SSP	- state scholarship program
SSS	- Social Security System
STEM	- science, technology, engineering and mathematics
StuFAP	- student financial assistance program
STVI	- State Technical Vocational Institute
SUCs	- State universities and colleges
TES	- Tertiary Education Subsidy
TESDA	- Technical Education and Skills Development Authority
TVET	- Technical and Vocational Education and Training
TVI	- technical-vocational institution
TVL	- technical-vocational-livelihood track
UAQTE	- Universal Access to Quality Tertiary Education
UNESCO	- United Nations Educational, Scientific and Cultural Organization
UniFAST	- Unified Student Financial Assistance System for Tertiary Education
UP	- University of the Philippines

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1. Introduction

1.1. Background

Ensuring equitable and inclusive access to quality higher education remains as one of the primary agendas of many governments worldwide due to its crucial role in economic development and poverty reduction. Providing access to individuals, especially those who come from disadvantaged backgrounds, does not only help raise these individuals' potential income, but it can also benefit the society in the long run (Baum and Payea 2004). The United Nations (UN) recognizes this so that under Goal No. 4 of the UN's Sustainable Development Goals (SDG), by 2020, the number of scholarships available to developing countries for enrollment in higher education, as well as in vocational training and information and communications technology, technical, engineering and scientific programs, should have increased significantly in developed countries and in other developing countries. Indeed, the drive towards an inclusive quality higher education system to attain an innovative and competitive workforce in the future is becoming increasingly important especially on the cusp of the Fourth Industrial Revolution (FIRe).

Realizing this, the Philippine government, on August 13, 2017, enacted into law the Universal Access to Quality Tertiary Education Act (UAQTE) or Republic Act No. 10931, which mandates all public higher education institutions (HEIs) and government-run technical-vocational institutions (TVIs) to provide free quality tertiary education among eligible Filipino students. This ambitious effort, which has been constant advocacy of certain youth groups in the country, is expected to significantly increase enrollment among students regardless of their socio-economic status.

Guided by the State's constitutional mandate² to make quality education accessible to all, Section 2 of Republic Act No. 10931 ("Free Tuition Law"³) declares the following objectives:

- 1) provide adequate funding and such other mechanisms to increase the participation rate among all socioeconomic classes in tertiary education;
- 2) provide all Filipinos with equal opportunity to quality tertiary education in both the private and public educational institutions;
- 3) give priority to students who are academically able and who come from poor families;
- 4) ensure the optimized utilization of government resources in education;
- 5) provide adequate guidance and incentives in channeling young Filipinos in their career choices and towards the proper development and utilization of human resources, and;
- 6) recognize the complementary roles of public and private institutions in tertiary educational system (Republic Act No. 10931 2017, 1).

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² See Article XIV, Section 1 of the 1987 Philippine Constitution.

³ For the purposes of this paper, RA No. 10931 shall be referred to as "Free Tuition Law".

Prior to the enactment of this law, the current administration had already implemented a free tuition policy during Academic Year (AY) 2017-2018 in all 112 state universities and colleges (SUCs) nationwide through the so-called “Free Tuition 2017” program. The funding, which amounted to PHP 8 billion, was lodged under the Higher Education Support Fund (HESF) line item of the Commission on Higher Education (CHED) budget through a special provision in the 2017 General Appropriations Act (GAA). While the special provision declared no tuition fee collections of all SUCs from undergraduate students in SY 2017-2018, the President’s Veto Message (GAA 2017) introduced the need for a prioritization scheme for a more prudent spending of the HESF. In the President’s directive, students who are “financially-disadvantaged but academically-able”, particularly the beneficiaries of the nationally-funded Student Financial Assistance Programs (StuFAPs), are to be given top priority in HESF. The remaining slots were given to the continuing students in the SUCs, and then followed by new enrollees, subject to the availability of funds (CHED-DBM Joint Memorandum Circular No. 2017-1: Guidelines on the Grant of Free Tuition in SUCs for Fiscal Year 2017).

The national government embarked on the full implementation of the Free Tuition Law across all tertiary education institutions starting AY 2018-2019 with a budget allocation of PHP40 billion. Unlike the preceding version of the free tuition policy, the law now covers both students of SUCs and LUCs enrolled in courses leading to a bachelor’s degree, as well as students enrolled in Technical-Vocational Education and Training (TVET) programs provided by State-run Technical-Vocational Institutions (STVIs). But aside from the provision of tuition-free higher education in public HEIs and STVIs, the law also provides for other assistance mechanisms that aim to give additional support to eligible financially-disadvantaged students. The first one is the Tertiary Education Subsidy (TES) which aims to provide additional funding to cover education-related costs of students, who shall be identified through a prioritization scheme. The second mechanism is the Student Loan Program (SLP) which offers short-term and long-term loans for the tertiary education needs of eligible students. Both mechanisms under the Law are administered by the Unified Financial Assistant System for Tertiary Education (UniFAST) Board⁴ with annual budget appropriations lodged in CHED and the Technical Education and Skills Development Authority (TESDA). While these components already have identified budgets for their implementation, the specific guidelines for some components are yet to be finalized and released by the UniFAST Board. The implementing rules and regulations (IRR) was released six months after the signing of the law but some design details are yet to be formulated to allow full implementation of TES and SLP.

Despite having established the law and its IRR, this policy is potentially faced with issues and concerns that may affect the prescribed implementation process, and consequently, the intended outcomes of the law. Several economic managers have expressed their concerns regarding the effectiveness and sustainability of the policy even prior to its legislation (Uy, 2017). Besides the general sentiment that the benefits would mostly accrue to the better-off students, Orbeta and Paqueo (2017) pointed out that the free tuition policy would cause sudden influx of students toward public HEIs, to the detriment of the private HEIs. In the occasion that this happens, public HEIs (i.e. SUCs) may not have enough carrying capacity to increase the admission slots and accommodate the additional volume of students. And as competition among students becomes tighter, the question on who among these students are more equipped to enter these public HEIs becomes a critical concern as this may potentially result to the

⁴ The UniFAST Board is a creation of another law, i.e. RA No. 10687 or the UniFAST Act. It is composed of the Chair of the CHED as the UniFAST Chair; the Director-General of the TESDA and the Secretary of the Department of Science and Technology (DOST) as Co-Chairs; the Secretary of the Department of Education (DepEd), representatives from the Department of Labor and Employment (DOLE), National Economic and Development Authority (NEDA), and the National Youth Commission (NYC) as members.

worsening of income inequalities (Orbeta & Paqueo, 2017). The policy's fiscal sustainability, as well as the its seeming overlapping role with that of the UniFAST Law or RA No. 10687, are also major issues that need to be looked at in the continued implementation of the law.

1.2. Objectives of the study

The study intends to examine the implementation design and features of RA No. 10931, assess how the law was implemented in its pilot year, and identify areas that can be refined to advance achievement of the law's intended outcomes. In assessing the implementation of the law, the study looks at the policy's logic and plausibility, its delivery to and uptake of intended beneficiaries, and the overall program organization required for its implementation. Specifically, the study aims to: 1) collect insights on the objectives of the policy and its intended outcomes based on program documents and perception of implementers and beneficiaries; (2) document the actual implementation of the policy, including variations in delivery, facilitating factors and challenges; (3) investigate the beneficiary targeting and coverage of the policy using available administrative data; (4) examine the resource inputs, and procedural and organizational adjustments for the implementation of the policy; and 5) generate recommendations to improve the policy's implementation. Additionally, the study also attempts to present initial observations on the possible effects of the policy on tertiary education enrollment.

The study is presented as follows: Section 1 presents the background, objectives, and limitations of the study; Section 2 looks at the related literature relevant to the study, including the experiences of other countries in implementing free tuition policy; Section 3 discusses the policy provisions of the Free Tuition law and relevant legislations, and present the current status of the Philippine tertiary education system; Section 4 presents the methodology and design of the study; Section 5 presents the results; and Section 6 provides the conclusions and recommendations.

1.3. Limitations of the Study

The study is an early attempt to assess the implementation of the Free Tuition Law during its pilot year of implementation. At the time of data collection and analysis, only the Free Higher Education and TES components of the law were being implemented, and some of the implementation guidelines were still being developed and refined. Likewise, administrative data on the implementation of the policy were still limited. The study – being a rapid assessment – also focused on a limited sample of respondents that may not capture the experiences of the other excluded respondents and/or the majority. As such, the observations presented in this study may not provide the complete representation of the implementation of the policy. Nevertheless, these observations remain a valid depiction of the status of implementation of the policy, at the time of data collection and among the select respondents and areas covered.

2. Review of Related Literature

2.1. Motivations for Adopting Free Higher Education

Various factors may influence a government's decision to adopt free higher education policy. According to Marcucci and Johnstone (2007), the common arguments behind free higher education are as follows: 1) educated population induces great benefits to the society in the long run; 2) access to education is perceived as a basic right; 3) tuition costs may discourage the enrollment of students, especially those who come from low-income households and other minority groups, which could lead to worsened inequality, and 4) costs of staying in school, in addition to the forgone student earnings, may be very high and burdensome for many households.

In some cases, such radical reform is triggered by constant pressures from the society, particularly university students and other civil society organizations (CSOs), who call for equal opportunities to college education, as with the case of Chile (Delisle and Bernasconi, 2018), Argentina (Schugurensky, 2002), and Germany (Oltermann, 2019). For instance, in Chile apart from the abolition of tuition fee, demands also included more equitable opportunities in entering distinguished universities, enhanced accreditation processes to improve the quality of higher education institutions (HEIs), and greater support for public universities (Arango, Evans, & Quadri, 2016). But for some economies that have had this policy in place for quite some time, reverting to a cost-sharing scheme has proven to be very challenging. Aside from Egypt and Argentina, Morocco is also experiencing this predicament as the government is currently trying to introduce registration fees on students depending on the family's income. This is part of a larger bill that is believed to end the tuition-free education in the country (Sawahel, 2018; Lahsini, 2018).

To date, there are only a few countries that have a tuition-free public higher educational system. Most of these countries are high-income societies (e.g. Europe) which have greater financial capacity to subsidize its student body. Table 1 shows the list of countries that do not charge tuition fees in its state-subsidized or public HEIs.

Table 1. List of Countries with Free-Tuition Public Higher Education System

Country	Free Tuition (Citizens)	Free Tuition (International Students)	Continent	Income Grouping ^{i/}
1 Argentina	Yes	No	South America	High income
2 Austria	Yes	No ^{a/}	Europe	High income
3 Brazil	Yes	Yes ^{b/}	South America	Upper middle income
4 Czech Republic ^{b/}	Yes	Yes	Europe	High income
5 Denmark	Yes	No ^{a/}	Europe	High income
6 Egypt	Yes	No	Africa/Asia	Lower middle income
7 Finland	Yes	Yes	Europe	High income
8 France	Yes	No ^{d/}	Europe	High income
9 Germany	Yes	No	Europe	High income
10 Greece	Yes	Yes	Europe	High income
11 Iceland	Yes ^{b/}	Yes	Europe	High income
12 Ireland ^{e/}	Yes	No	Europe	High income
13 Iran	Yes	No	Asia	Upper middle income
14 Kenya	Yes	No	Africa	Lower middle income
15 Luxembourg	Yes	Yes	Europe	High income
16 Malta	Yes	No ^{a/}	Europe	High income
17 Mauritius	Yes	No	Africa	Upper middle income
18 Morocco	Yes	No	Africa	Lower middle income
19 Nigeria	Yes	No	Africa	Lower middle income
20 Norway	Yes	Yes	Europe	High income
21 Panama	Yes	Yes	North America	High income
22 Philippines	Yes	No	Asia	Lower middle income
23 Poland	Yes	Yes ^{f/}	Europe	High income
24 Scotland	Yes	No ^{h/}	Europe	High income
25 Slovenia	Yes	No ^{g/}	Europe	High income
26 Sri Lanka	Yes	No	Asia	Lower middle income
27 Sweden	Yes	No ^{h/}	Europe	High income
28 Trinidad and Tobago	Yes	No	South America	High income
29 Uruguay	Yes ^{i/}	No	South America	High income

Notes:

- a) Free for EU or European Economic Area (EEA) nationals only
- b) Registration fees need to be paid
- c) Fees for administration of admission proceedings, extending the duration of study beyond a set limit, and foreign language studies are requested from the students
- d) Free for EU/EAA nationals only, including those of Switzerland
- e) Needs to pay a student contribution charge of about 3,000 Euros per year; Ireland follows a set of criteria for eligibility
- f) Applicable to foreigners who started their college studies in Poland with terms applicable to Polish citizens
- g) Can apply to qualify for free tuition; limited slots
- h) Free for EU Citizens only
- i) There is only one public university in Uruguay and four private universities which charge fees
- j) Source of this information is the World Bank Open Data.

Sources: Various references

2.2. The Case of Germany and other High-Income Countries

In Germany, financing the tertiary education system has been a back-and-forth case between a fee-imposing scheme to cost-sharing or tuition-free schemes. As early as 1971, tuition fees had been abolished and financial aid for all German students had been introduced (Kehm, 2014; Kauder & Potrafke, 2013). This needs-based financial aid called the “BAFöG” program aims to assist students coming from low and middle-income families by providing a 50 percent interest-free repayable loan and 50 percent half-grant⁵. The amount of income and savings of the parents, the number and age of the students’ siblings, and whether the students still reside with their parents or not are the considerations for eligibility as well as the amount of aid that will be provided through the said program (Ankroth, 2015).

Repayment of the loan begins after graduation and typically covers three and a half years of undergraduate program, and two and a half years for a Master’s degree program. Apart from the BAFöG, students are also provided with other support mechanisms such as more accessible health insurance terms, discounts for public transportation and other services, and other merit-based financing programs. Another government-subsidized loan program through the KfW bank was established but was not as widely-availed as the BAFöG program (Ankroth, 2015).

Lowering education costs should naturally increase the prospect of students’ enrollment in schools. A study conducted by Lauer (2002) confirmed this noting that the chance of being entitled to BAFöG benefits has a strong positive correlation to the likelihood of enrolling in college, as well as increasing the grant amount, albeit at a lesser degree. Also, the lower the loan share in the BAFöG package, the higher the likelihood of pursuing education which may reflect the students’ perceived lower returns to education as they would have to repay after graduation.

The free tuition policy, together with the BAFöG assistance program, has led to the continual increase in enrollment rates however, to the detriment of the quality of education. According to Wolter (2004), the German educational system was beleaguered with issues such as overcrowding of students, under-staffing, and lack of enough funding. Since 1975, the rising enrollment rate was not met with the corresponding necessary investment in the higher education infrastructure.

With such issues at hand, a court decision in 2005 finally allowed the 16 German states to charge tuition fees, although some still opted to maintain status quo (Marcucci & Johnstone, 2007). A study by Kroth (2015) explored the possibility of imposing a modest⁶ amount of tuition and found no significant effect in college enrollment in Germany, although it must be noted that this varies depending on the educational backgrounds of the families. Students who come from families with low educational attainment are less likely to enter college than those who come from college-educated families. Nonetheless, faced with massive protests, this policy was gradually abolished among states after only a few years of reinstatement. Recently, the OECD (2016) reported that from 2008 to 2013, tertiary enrollment in Germany had increased by 28 percent, which is one of the highest growths seen among OECD countries from 2008 to 2013. Unfortunately, as with experience, the expected corresponding increase in public funding failed to keep up with the upsurge of students.

⁵ At first, this was provided as 100 percent loans, but transitioned to half-repayable and half-grant scheme in 1990 (Baumgartner and Steiner 2004).

⁶ Defined as 10% of students’ annual living costs which is about 1,000 Euros.

2.3. Does Free Tuition Policy Promote or Worsen Equality and Accessibility?

As earlier mentioned, one of the major arguments for free higher education is not just to merely increase the enrollment rate, but also to provide an equal access to all students irrespective of their socioeconomic status. In many cases, eligibility to avail of the free tuition education is dependent on one's ability to pass certain exams (e.g. university admission exam, national entrance exam). In Ireland, for instance, the Department for Education and Skills (2003) noted that while the Free Fees Initiative in 1995 resulted in higher enrollment of students from all socio-economic groups, the report showed that the policy had "little or no impact" on enhancing equity, as well as expanding access to tertiary education. It further noted that the students from lower socio-economic households had an even lower percentage share in 2001 than in 1995.

A study conducted by Usher and Cervenán (2005) observed the interrelationship between affordability and accessibility of tertiary education in 16 economies⁷. They found that there is no straightforward relationship between the two indicators, noting that Germany and Austria, which do not charge tuition in its public HEIs, were ranked at the bottom of the list in terms of accessibility. In addition, the socio-economic composition of the student body in these countries were found to be dominated by well-off students. Among the countries which have a free tuition policy, only Finland scored high both in terms of accessibility and affordability.

Looking at the case of Finland, aside from free tuition, other education-related assistance is made available to eligible college students. These include study grants, loans, and housing allowances. One of its distinct features is that it is largely means-tested which means that the amount provided to the students depends on their personal circumstances, e.g., living with parents or not, civil status, have children who are minors (InfoFinland 2019). The housing stipend is given to the student monthly and it varies depending on the actual cost of the student's rent. The third component is the loans, although the government only guarantees the actual loans that are provided by banks. Loan amount depends on the student's age and the location of the school where they are studying. Aside from this, each university also has its own grant schemes that have varying eligibility requirements (European Commission 2014). The support mainly targets the unemployed or those who lack capacity to finance other education-related expenses, and aged 25-64 years old. It is also time-limited with up to 55 months for living costs (OECD, 2005).

In Argentina, the no-tuition tertiary education was one of the major features of the 1918 Cordoba Reform, which allowed all academically able students to enter public universities. Similar with the experience of another Latin American country, i.e. Mexico, this policy has resulted to massive increases in the number of students over the years, particularly in the 1950s. The government's response was an expansion of the slots in public universities, creation of new public HEIs, as well as the introduction of institutions dedicated for vocational and technical programs. Despite the changes in administration, this ideal (i.e. no-tuition education) had prevailed in the Argentinian community. But, as with the experience of Germany, the policy has eventually resulted to the deterioration of quality of tertiary education in Argentina.

From 1966 to 1972, the Argentinian government had decentralized the educational system to address the national government's growing budgetary constraints. During that time, admission

⁷ This includes the following: 1) Australia; 2) Austria; 3) Belgium (French Community); 4) Belgium (Flemish Community); 5) Canada; 6) Finland; 7) France; 8) Germany; 9) Ireland; 10) Italy; 11) Japan; 12) The Netherlands; 13) New Zealand; 14) Sweden; 15) United Kingdom; and the 16) United States.

exams were also abolished to provide equal opportunities to students from all socio-economic classes. In 1995, the free tuition policy was halted as the new higher education act paved way for the charging of tuition fees and finding of other revenue sources (Fernandez Lamarra, 2002; Garcia de Fanelli, 2005). Rozada and Menendez (2002) reported that majority of college students (i.e. 83% of more than a million student body) remained enrolled in public institutions despite the rise of private HEIs, which at that time, represented half of tertiary education providers in Argentina.

2.4. Relationship between College Attendance and Socioeconomic Background of Families

Using the May 1998 Permanent Household Survey data and probit models, Rozada and Menendez (2002) found that the socioeconomic background of the students' families matter in college attendance in Argentina. Students in both public and private HEIs are found to belong in families from higher income groups and highly educated ones. Notably, almost half of the students attending public universities came from private secondary schools, where tuition is self-financed. This is an indication that the policy may have actually exacerbated inequality in access to tertiary education.

One of the plausible reasons for such an imbalance in the socioeconomic mix of college attendance is the greater tendency for students from lower income groups to drop out at the earliest levels of education system, as there are only 2 for every 10 students who get to finish secondary education in Argentina (Mollis, 2002).

In the literature, the correlation between the family's socio-economic status and the student's school achievement or performance is widely established. In a study conducted by Caro (2009) using both panel data and hierarchical linear models, he found that differences in the academic achievement of students belonging to varying socio-economic classes are more or less unchanging for students aged 7-11 years (Grades 2-6), but broadens at an increasing rate for those aged 11 to 15 years (i.e. elementary to middle school). It has been shown that as children from low-income households, grow older, their school performance worsens, which tends to increase their likelihood of leaving school as posited by several studies (Alexander, Entwisle, & Kabbani, 2001; Lan & Lanthier, 2003).

The case of Brazil, South America's largest country, paints a similar picture of worsening inequality as the benefits of the free tuition policy accrues to the more affluent students, who are better equipped to get through highly competitive admission exams in the top public universities of Brazil. With the doubling of the enrollment figures from 2002 to 2012 (Horch, 2014), financially disadvantaged students were left to enroll in universities that are of lower quality or barely meet the minimum quality standards (Jackson, 2015; Gayardon and Bernasconi, 2016). The OECD (2015) noted that only about 15% of 25-34 year olds in Brazil had finished college (i.e. attainment rate), which is below the OECD average of about 41%.

2.5. Case of Chile and other Lower Middle-Income Countries

In Chile, a lower middle-income country, the "Short Tuition Free Act" of 2015 served as the government's first step towards achieving free higher education with the full free tuition plan to be achieved by 2020. This covers all enrolled students in either public universities or eligible private universities, and who come from families belonging to the poorest 50 percent of the

higher education population (Gayardon & Bernasconi, 2016). However, improving equality of access remains questionable since according to Chile's major household socioeconomic survey, CASEN, the main reason that the poorest Chilean students do not pursue college is not just because of financial reasons, but is largely due to their failure to pass the admission exams in universities and high tendencies to drop out. This is why Gayardon and Bernasconi (2016) point out the importance of improving the quality of secondary schools in Chile or in changing the university admissions criteria. Bucarey (2018) also shows evidence that under a free-tuition scheme, about 20 percent of the currently enrolled low-income Chilean students are likely to lose out to higher-income students should the university capacities (i.e. number of students the university is willing to admit) remain fixed.

The cases of Argentina, Brazil, and Chile, or the so-called Southern Cone of the Americas, are still plagued with issues particularly those concerning quality. Balan (2014) noted that these countries suffer from poor quality of primary and secondary education, with the admission policy in tertiary education being less selective. Nonetheless, the move towards the achievement of greater quality is now being pursued, as institutions in Chile and Argentina are obliged to have their first-degree programs accredited, especially those in the regulated professions.

Morocco, which is also a lower middle-income country, implemented an “Open Access” policy to address its low enrollment rate in higher education. However, over time, higher education has expanded so much that it has become too burdensome for the national government to finance. The quality of tertiary education was compromised and has worsened due to higher student-teacher ratio and fewer research studies produced (Buckner, 2013). Currently, the program shoulders the tuition expenses of all enrolled students in each institution, in addition to an allowance provided to each student amounting to USD4,000 per student per year. But according to Sawahel (2018), the Moroccan government is now pushing for reforms in the higher education system with the introduction of registration fees in public HEIs with amounts depending on students’ family income and the provision of financial assistance to those who are in need.

Similar to the case of Morocco, Egypt’s so-called “mass education” or “education for all”, which was instituted in 1962, led to massive increases in enrollment (i.e. threefold increase), as well as in the number of HEIs, but equal access was barely achieved since richer households, who have more resources, had better chances of passing national entrance exams (Habibi & El-Hamidi, 2016). Throughout the years, the Egyptian government implemented various interventions to address the sudden upsurge in university enrollment. It attempted to curb enrollment by linking the salaries of the faculties to teaching hours, which only resulted in the decline in the share of students in Science majors; raising the minimum score needed to pass admission to universities, which was short-lived because of the external pressures to improve access in higher education; and implementing privatization reforms by allowing public institutions to impose tuition fees to students who failed to pass the national entrance exam and entry of for-profit private universities. Despite the reforms made, student enrollment continued to grow thus leading to higher student-to-teacher ratios from 1990 (i.e. 21.3) to 2002 (i.e. 29.7).

This section is divided in two parts. The first part presents the background information on three key legislations relevant to the study. These include RA10687 or the UniFAST Law of 2015, the Free Tuition Program in 2017 through the GAA special provision, and RA10931 or the Free Tuition Law. The second part presents the current profile of the higher education system in the country in terms of distributions of institutions, overall trends in enrollment, and access

to StuFAPs. These subsections provide essential information that contextualize the study's research questions and findings.

3. Policy Background and Profile of the Higher Education System

3.1. Overview of Key Legislations

3.1.1. RA No. 10687 UniFAST 2015

Prior to RA No. 10931, the Philippine government has initiated other programs geared towards increasing the participation of Filipino students in quality tertiary education. These include various scholarships, grants-in-aid (GIA), and student loans, among others. To make the provision of student financial aid programs (StuFAPs) more harmonized, effective, efficient and free of political patronage, the UniFAST Act or RA No. 10687 was formally adopted on October 15, 2015. This policy was envisioned to promote equitable and rationalized access to quality tertiary education primarily to the benefit of the financially disadvantaged but academically-able and highly-motivated students. Section 3 of RA No. 10687 lays out the following objectives:

- 1) Allocate and utilize properly all government resources intended for students through effective beneficiary-targeting;
- 2) Ensure consistency, continuity, and efficient coordination of student financial assistance policies and programs;
- 3) Ensure regional equity in the distribution of student financial assistance slots;
- 4) Produce a pool of highly qualified graduates and technical experts who will contribute to the country's high-level labor force through merit and talent-based Scholarships;
- 5) Facilitate access to quality education through Grants-in-Aid for students belonging to marginalized sectors; and
- 6) Assist students with liquidity issues through Student Loans (Republic Act No. 10687 2015).

This law also created the UniFAST Board to serve as the main implementing body of the law. This is chaired by the CHED Commissioner with members coming from different agencies such as the TESDA, Department of Science and Technology (DOST), Department of Education (DepEd), Department of Labor and Employment (DOLE), National Economic and Development Authority (NEDA), and the National Youth Commission (NYC). They are tasked to formulate and execute policies relevant to achieving the objectives of the law.

The intention of UniFAST Act is essentially the same with that of the Free Tuition Law, which is to expand the access of all Filipinos to quality⁸ tertiary education while also ensuring that government resources in education are optimally utilized. It is just that the former caters to a more limited and targeted group of beneficiaries by imposing eligibility requirements and provides variable levels of benefits. The latter, on the other hand, is a blanket provision of free tuition among enrolled students in public HEIs. Table 2 presents the programs under the UniFAST Act categorized as either a state scholarship program or grants-in-aid (GIA).

⁸ The UniFAST Act or RA No. 10687 requires that the beneficiary student be enrolled in an HEI and program that are included in the Registry of Programs and Institutions (RPI), as certified through the quality standards set by the CHED. This is also specified in RA No. 10981.

Table 2. Programs under StuFAPs

Program	Financial Assistance (per Academic Year)	Intended Beneficiaries	Grade Requirement	Type of HEI
State Scholarship Program (SSP)				
Full Scholarship (FS)	PHP 30,000	High school/ Senior High School Graduates Graduating Senior High School students	At least 90% or its equivalent At least 90% or its equivalent in the first three semesters of the senior high	Public and Private
Partial Scholarship	PHP 15,000	High school/ Senior High School Graduates Graduating Senior High School students	At least 85% or its equivalent At least 85% or its equivalent in the first three semesters of the senior high	Public
Private Education Student Financial Assistance (PESFA) Scholarship	PHP 15,000	High school/ Senior High School Graduates Graduating Senior High School students	At least 85% or its equivalent At least 85% or its equivalent in the first three semesters of the senior high	Private
Grants-in-Aid (GIA)				
Tulong Dunong	PHP 6,000; PHP 9,000; or PHP 12,000 <i>Per academic year based on tuition and other fees of HEIs</i>	High school/ Senior High School Graduates Graduating Senior High School students Students with earned units in college Students who passed the Alternative Learning System (ALS) and Philippine Educational Placement Test (PEPT)	At least passing grade At least passing grade in the first three semesters of the senior high At least passing grade for the last two (2) semesters	Public and Private
Study Now Pay Later Plan	PHP 15,000	Deserving students who are enrolled or to enroll in any curriculum year level	None	Public and Private

Source: CHED

The granting of the StuFAPs above are mostly merit-based, providing an assurance that students will get equal opportunity in accessing their needed financial assistance so long as their performance meet the requirements. Moreover, similar to the voucher system in the K-to-12 program, these schemes give students the liberty to enroll in their preferred schools - whether this should be a private or public HEI, or a technical-vocational institution. In this way, the complementary roles of public and private HEIs in providing higher education is also

supported. However, the policy faced challenges as it had no separate budget for its programs and it lacked the needed organizational support to be implemented smoothly. Asuncion and Tullao, Jr. (2018), in their evaluation study of the UniFAST Act, pointed out that the national Student Loan Program (SLP) provided for in the Act is a promising mechanism to address existing capital market imperfections in financing tertiary education. But to do this, it needed to have a more comprehensive IRR that would provide necessary guidance to students interested in availing of the program.

For 2019, the Department of Budget and Management (DBM) decreased its funding for the StuFAPs from PHP4.73 billion in 2018 to PHP1.7 billion, to provide additional funding for the TES component of the Free Tuition Law. The then DBM Secretary Benjamin Diokno emphasized that the decrease in the StuFAP budget was necessitated since it is already redundant with the programs embedded in RA No. 10931 (Tomicruz 2018). From a PHP16 billion-budget in 2018, the proposed TES allocation has increased to PHP27 billion for 2019 (DBM 2018). In lieu of the programs inscribed in the UniFAST Act, the TES now serves as the national grants-in-aid (GIA) program of the government. Further, the Student Loan Program of the Free Tuition law overtakes the SLP provision in the UniFAST Act. These components of the Free Tuition Law will be further discussed later in the succeeding subsections.

3.1.2. Free Tuition 2017 Program

Two years after the enactment of the UniFAST Act, the Free Tuition 2017 program was implemented to pave way for the government's first attempt in providing free quality tertiary education in the country. This program, as stipulated in the special provisions of the 2017 GAA⁹, covers all Filipino students enrolled in undergraduate programs in SUCs during AY 2017-2018. The total budget, amounting to PHP8 billion, was based on each SUC's estimated income from tuition fee collections as reported in the DBM's 2017 Budget of Expenditures and Sources of Financing (BESF).

Joint Memorandum Circular (JMC) No. 2017-1 of the DBM and CHED lays out the specific guidelines and requirements for the implementation of the Free Tuition 2017 program. It states that priority should be given to existing StuFAP beneficiaries, followed by non-StuFAP beneficiaries but subject to the availability of funds and certain prioritization scheme based on their year level and economic status. The tuition expense of StuFAP beneficiaries who receive more than PHP15,000 in total annual benefits shall be charged against their original StuFAP allocations, while those whose total annual benefits are PHP15,000 or less, fees shall be charged against the SUC's Free Tuition 2017 budget. Among the non-StuFAP beneficiaries, priority was given to continuing students that are: (1) graduating within a semester or academic year; (2) non-graduating students that are beneficiaries of the Pantawid Pamilyang Pilipino Program (4Ps) and/or classified as poor in the national household poverty targeting system (Listahanan); and (3) non-graduating students ranked based on household income. The applicants may submit any of the following documentary requirements as proof of income: (a) Income Tax Return (ITR); (b) BIR Form 2316; (c) BIR Certificate of Exemption from Filing of ITR; (d) Barangay Certificate of Indigency; (e) Certification from the DSWD; (f) Overseas Filipino Worker (OFW) Certificate of Employment Contract; (g) Other government-issued documents that indicate the income earnings of member(s) of the household who would be

⁹ The specific statements in the 2017 GAA are as follows: 1.1 Special Provision No. 2 under Other Executive Officers (OEO)-CHED, Volume I-B, page 272; 1.2 Special Provision No. 1 under SUCs, Special Provision(s) Applicable to the SUCs, Volume 1-A, page 963; and 1.3 Conditional Implementation ordered by the President (Source: CHED).

responsible for the financing of the student's cost of education. Subject to availability of funds in the HESF of the school, new enrollees and returning students can also avail of the free tuition benefit following the same prioritization scheme for continuing students.

In the same Circular, SUCs are instructed to assess their respective students' eligibility to avail of the Free Tuition 2017 program as early as four weeks before the enrollment period. However, since the Circular was issued only in April 2017, the remaining time leading up to the enrollment period, especially for schools opening in June, may be a little short. Students whose main consideration is their financial capacity to enter college may have decided not to continue with their enrollment given no prior information that tertiary education will be free in AY 2017-2018.

In 2018, the Commission on Audit (COA) highlighted the program's low disbursement rate for CY 2017 which reached only about 18.1 percent (equivalent to PHP1.45 billion). The CHED however clarified that the COA report only includes the first semester payments to the schools. In their statement, CHED reported having already paid majority of the SUCs' second semester reimbursement claims, as well as the entire first semester claims (CHED, 2018). According to them, the main bottleneck in the disbursement process is the delay in submission of billing claims because the SUCs had been required to follow the guidelines prescribed in the 2017 GAA, which states the need to prioritize "poor but deserving students".

The CHED-UniFAST also encountered an issue in reconciling the amount of billing of the SUCs vis-à-vis their allocated budget. Section 6.1.1. of the JMC notes that the basis of the grant per SUC is its estimated tuition fee income that was declared in Table G of the DBM's 2017 Budget of Expenditures and Sources of Financing (BESF). However, according to the UniFAST, there were mismatches in the referenced tuition income in the BESF and the actual tuition income reimbursements billed by the schools. There were SUCs which required more funding to cover the actual cost of implementation of the Free Tuition 2017 program; and then there were those which had more allocation than their actual reimbursements. The part of the excess budget from the latter, which amounted to PHP1.25 billion, was reallocated¹⁰ to those which needed additional funding (e.g. University of the Philippines). As of January 2019, about PHP 6.93 billion had been disbursed to SUCs for the first and second semester of AY 2017-2018. Of the remaining, PHP1.07 billion, two more SUCs with billings submitted beyond the deadline are to be reimbursed with PHP 0.013 billion.

Section 8 of the JMC stipulates the reporting requirements that must be submitted by the stakeholders, namely, the SUCs, CHED Regional Offices (CHEDROs), and the CHED. It specifies the timeline and the specific document needed from each stakeholder. However, despite this provision in the Circular, the implementation was still beset with delays because of several factors, as mentioned earlier. One of the frequently mentioned reasons was the sudden changes in the documentary requirements and templates as reported by some interview respondents.

In terms of program organization, an administrative support of 0.5% of the HESF was allotted to CHED to finance the implementation of the program. This includes payments to expenses incurred in advocacy campaigns and promotions, technical assistance, and monitoring and evaluation, among others.

¹⁰ This was done through the DBM's "Change of Creditor" scheme (DBM Circular No. 407, series of 1989) wherein a total of 30 SUCs have benefitted including the University of the Philippines System (PHP988 million)

3.1.3. Republic Act No. 10931 or Free Tuition Law

Following the implementation of the Free Tuition Program in 2017, RA No. 10931 or the “Universal Access to Quality Tertiary Education Act” was enacted the succeeding year to cover not only the SUCs, but all the tertiary education providers in the country. It has four components: first, is the free higher education (FHE), which refers to the provision of free tuition and miscellaneous fees to students enrolled in SUCs and LUCs; second is the free technical-vocational education and training (TVET) which covers all state-run post-secondary TVIs; third is the Tertiary Education Subsidy (TES), which serves as additional financial assistance to all deserving students who are selected based on certain prioritization parameters; and, fourth is the national Student Loan Program (SLP), which offers short- and long-term loans to all deserving Filipino students. For the purposes of this study, only the FHE, TES, and SLP shall be covered in the discussion henceforth.

In general, the law applies to all Filipino students who are currently enrolled or will enroll at any time after the effectivity of the Act, in any SUC, STVI, CHED-recognized LUC, or private HEI listed in the UniFAST Registry. The UniFAST Registry is the list of government recognized HEIs that are qualified to avail of the applicable benefits under RA No. 10931. Section 3 of the IRR, which is also linked to the UniFAST Law, specifically defines it as the list of “quality-assured academic and research programs and tertiary institutions that have been certified by the CHED and/or TESDA”. Box 1 presents the different quality assurance schemes implemented by CHED for each type of HEI.

Box 1. Government-recognized HEIs and quality assurance

Pursuant to RA No. 7722, or the Higher Education Act of 1994, the CHED is mandated to promote quality tertiary education, among others. To do this, the CHED issues two types of accreditation – one is institutional and the other is programs-based. Technically, all HEIs are required to ensure that they provide quality education by being accredited, not just institutionally, but all of its programs need to be 100 percent compliant. However, in practice, this is not easily done especially in the case of LUCs.

The CHED, through CHED Memorandum Orders (CMO), executes various policies, standards and guidelines (PSGs) that are meant to ensure that HEIs in the country abide by the same quality standards. For private HEIs, standards are anchored on CMO No. 40, series of 2008, or the “Manual of Regulations for Private Higher Education of 2008”. In establishing private HEIs, concerned parties first need to acquire a government permit-to-operate, which is of temporary nature. They are given about 1-2 years to comply with the requirements. After this period, the HEI needs to re-apply for government recognition for permanent status; but, if there are still areas of non-compliance, it will be given a permit valid for one year. Should they still fail to comply after the one-year grace period, it will be phased out and will be ordered for gradual or outright shutdown.

In the case of SUCs, since they are creations of law (i.e., 100 percent program compliance), CHED-accreditation is done only through the issuance of Certificate of Program Compliance (COPC). Nonetheless, similar with the private HEIs, the CHED has the regulatory power to closely monitor the performance of these HEIs as the CHED Commissioner sits as the Chair of their respective Governing Boards.

Accreditation of LUCs is less straightforward. Despite the provisions set forth in the Higher Education Act of 1994, CHED does not seem to have clear mandatory powers to regulate the

operations of LUCs. They are independent in the sense that they are creations of local government ordinances set by their respective municipal or city councils. In an attempt to increase the number of government-recognized LUCs, the CHED released CMO No. 32, series of 2006, or the so-called “Policies, Standards and Guidelines on the Establishment and Operation of Local Colleges and Universities” to set the minimum standards and guidelines that LGUs must comply with should it propose to establish and/or operate local HEI. In the said CMO, the CHED asserts its mandated power and function, as stipulated in Section 8(m) of RA No. 7722 (“Higher Education Act of 1994), to ensure that all higher education institutions (i.e. both public and private) in the country provide quality tertiary education. CMO No. 4, s. of 2007 provides for the IRR of the CMO No. 32, s. 2006. This requires LGUs who intend to establish and operate a local HEI to consult with the CHED Regional Office for assistance in complying with CHED standards and requirements, as stipulated in Sections 2 to 4, Article V of CMO No. 32.

An important provision in the IRR of CMO No. 32 is in Rule XII, which requires existing local HEIs with the title “University” or “Pamantasan” in its name to undergo the assessment set by CHED. Should the local HEI, which carries the university status, fail to comply in required standards, it shall be given eight (8) years to comply with the same. However, should it still fail to comply after the eight-year incubation period, the CHED must recommend to the LGU for a change of status from University (i.e. University/Pamantasan/Universidad in the name) to College through an amendment in its Ordinance. Based on the interview conducted with the UniFAST, the 8-year period has already lapsed, however, these local HEIs which failed to comply still operate as is. As of early 2019, the CHED was able to identify 78 accredited LUCs, 24 of which are institutionally recognized, and the remaining 54 have 100% program compliance (i.e. holds COPC). In cases where an institutionally recognized LUC does not have 100% program compliance, it is given two years to facilitate program compliance or else the CHED recognition will be revoked.

The CHED Office of Programs and Standards Development (OPSD) noted that they are currently implementing Voluntary Accreditation to LUCs. With the implementation of the Free Tuition Law, the UniFAST during the interview, mentioned that some LUCs are now more eager to get accredited. There are external bodies which help them get accredited, such as the umbrella accrediting organization, National Network of Quality Accrediting Agencies (NNQAA), which includes the Accrediting Agency of Chartered Colleges and Universities of the Philippines (AACCUP) and the Association of Local Colleges and Universities Commission on Accreditation (ALCU COA).

Based on the interview with Association of Local Colleges and Universities (ALCU), the official organization of LUCs, the member LUCs are familiar with the accreditation process but the challenge lies in meeting the requirements, particularly the costs and the processes involved. As of March 2019, there are only about 78 accredited LUCs (out of 111 LUCs), where not all are 100% program compliant.

Nonetheless, as highlighted by Conchada and Tiongco (2015), even with the compliance with CHED, there are HEIs that still have bad performances as shown in their board passing rate and employment absorption in their respective fields. Having said this, the government may need not just to simply incentivize or encourage HEIs to be government-recognized institutions, but more importantly it may need to revisit the accreditation standards and the entire process, including the costs involved, in ensuring that HEIs indeed perform with quality.

3.1.3.1. Free Public Higher Education

The free higher education (FHE) component involves the provision of free tuition and other school fees in all SUCs and CHED-recognized LUCs nationwide. The “other school fees” covers at least 13 types of expenses, namely, “library fees, computer fees, laboratory fees, school ID fees, athletic fees, admission fees, development fees, guidance fees, handbook fees, entrance fees, registration fees, medical and dental fees, cultural fees” and other related fees.

Students enrolled in eligible HEIs are entitled to receive these benefits so long as they qualify under the admission and retention requirements of their respective schools. Based on the IRR, a Return Service System (RSS)¹¹ should be established by SUCs and LUCs for student beneficiaries of the law. The students must also finish the degree up to a maximum of one-year extension in addition to the original timeline of the degree they are currently enrolled in. The IRR also requires eligible public HEIs to establish affirmative action programs to increase participation of students coming from disadvantaged groups such as the Lumads, Muslims, and other indigenous peoples; persons with disabilities, students from public schools; and students from depressed areas.

Moreover, the law and its IRR provide mechanisms for students to opt-out of the free tuition subsidy or provide voluntary contribution to the school. This is intended for financially able students who would not wish to be covered by the free tuition subsidy. These mechanisms should be done during the enrollment period of each semester or term and should allow students the option to change their decision in succeeding terms. Under the opt-out mechanism, students can choose to opt-out of the free tuition subsidy and pay the full amount of tuition under regular university fees. As for the voluntary contribution mechanism, students may give a discretionary amount, which may be lower than actual tuition fees, as a contribution to the school. Schools are compelled to report all earnings through these mechanisms to CHED.

In terms of budget projection, the governing board of each SUC and LUC holds the responsibility of providing information on the projected number of enrollees for each academic year, which will serve as the primary basis in computing the proposed budget of SUCs, as well as LUCs. The enrollment projections provided by public HEIs, as stated in the law, shall be the DBM’s basis in its preparation of the annual National Expenditure Program (NEP). During the early years of implementation, the budget for the FHE will be lodged in CHED and reimbursed to the public HEIs. After the transitory period, the budget for the FHE will eventually be allocated to the benefitting public HEI through the annual General Appropriations Act (GAA).

Finally, the IRR also specifies the reportorial requirements of the participating SUCs and LUCs. These HEIs are required to submit to CHED within five working days after the last day of registration for each semester the report on names of applicants who took the entrance exam (and if possible, whether they pass or not), names of students who availed of the free tuition and other school fee benefits including relevant details of availment, and all payments collected from students who opted out and made voluntary contributions to the school.

Similar policies apply to the free TVET component provided in all state-run TVIs. However, the law exempts the following: (1) students who already have a bachelor’s degree, or a certificate or diploma for a technical vocational course that is equivalent to at least National

¹¹ While this was not explicitly identified in the law, this provision in the IRR cites Article II, Section 13 of the 1987 Constitution and Article II, Section 15(f) of RA No. 10687 as basis for the formulation and implementation of the RSS for students who shall benefit from this component of the law.

Certificate III and above; or (2) students who should fail in any course in the duration of the program. As earlier mentioned, it is the TESDA which will govern any-TVET related component in the law.

3.1.3.2. Tertiary Education Subsidy

The second component is the TES which is intended for students enrolled in post-secondary undergraduate programs in all eligible HEIs including SUCs, LUCs, and private HEIs, as well as in post-secondary technical-vocational programs registered under the TESDA. The benefit coverage depends on the type of institution and program where students are enrolled in. Selection of beneficiaries are subject to prioritization and the availability of funds.

There are three categories of benefits under the TES. These are: (1) TES 1, which includes tuition and other school fees for those enrolled in private HEIs; (2) TES 2, which includes allowance for other educational expenses such as books, transportation, and miscellaneous personal expenses, and allowance for room and board expenses; and, (3) TES 3, which includes allowance for disability-related expenses for students with disability and a one-time cost of obtaining first professional credential or qualifications for students requiring professional license or certification.

Students who are enrolled in eligible SUCs and LUCs may be entitled to TES 2 and TES 3, while those enrolled in eligible private HEIs may be entitled to TES 1, 2, and 3. Section 24 (c) of the IRR notes that beneficiaries enrolled in public and private HEIs are to receive a full-year grant, subject to yearly renewal based on their continued studies. For beneficiaries enrolled in public and private TVIs, either a full-year amount of grant or the amount equivalent to the required duration of the TVET program will be provided, whichever of the two amounts is lower.

The provision of TES follows a prioritization scheme for students based on household income. Based on the guidelines issued by the UniFAST, first priority is to be given to students from households classified as poor or near-poor in the most recent round of the National Household Targeting System for Poverty Reduction (NHTS-PR) or Listahanan, ranked according to the estimated per capita income of the household. If there are unfilled slots for TES, other students excluded in the first criteria will be ranked according to the per capita income of their household based on documents submitted (e.g., BIR certification). For the transition period – during which the study's data was collected - the UniFAST implemented a slightly different prioritization scheme in allocating the TES slots. Students prioritized for TES are: (1) continuing beneficiaries of the Expanded Students' Grants-in-Aid Program for Poverty Alleviation (ESGP-PA)¹²; (2) students enrolled in private HEIs in cities or municipalities with no state or local university and colleges; and (3) Students included in the Listahanan 2.0 of the Department of Social Welfare and Development (DSWD).

As illustrated above, the prioritization scheme heavily relies on the Listahanan data of the DSWD. Related to this, Section 25 of the IRR notes that certain government bodies (e.g. National Commission on Indigenous Peoples, Office of the Presidential Adviser on the Peace Process, Department of Agriculture) that offer need-based scholarships are to work with the

¹² ESGP-PA students belonging to 4Ps families enrolled in selected SUCs taking up CHED priority programs; More than 30,000 ESGP-PA beneficiaries in AY 2018-2019; They are currently enrolled in selected State Universities and Colleges (SUCs) taking up CHED priority programs and other courses offerings within the government key growth areas.

DSWD to expand the Listahanan to include these disadvantaged groups. The “Expanded Listahanan”, as per the IRR, shall be used for the TES targeting starting AY 2019-2020.

As for the subsidies, the annual subsidy allotted for the TES-1 and TES-2 of each student amounts to a maximum of PHP 40,000 for those enrolled in public HEIs or TVIs and PHP 60,000 for those enrolled in private institutions.

3.1.3.3. Student Loan Program for Tertiary Education

The third component of the law is the student loan program (SLP) for tertiary education which aims to give further support to all Filipino students enrolled in any tertiary educational institution. It provides for short-term and long-term student loans for students enrolling in post-secondary undergraduate or TVET programs. Unlike the TES, which was already being implemented, the SLP is still slated to begin implementation in 2019. The guidelines for implementation are also set to be released in the same year.

Section 31 of the IRR gives the UniFAST the power to administer the SLP through partner banks and similar entities. The UniFAST is also tasked to create the guidelines, criteria and processes both for the short- and long-term loans. While the National Student Loan Program (NSLP) is supposed to begin implementation soon, clear guidelines that reflect lessons learned from previous iterations of the program are still pending. Aligned with the law’s intent to strengthen the complementarity of public and private HEIs, the vision for the program as stipulated in Section 60 of the IRR, is to become a self-sustaining National Student Loan Program.

The following students are allowed to avail of the SLP services: (1) those who qualify under the existing admission and retention standards of the HEIs; 2) those who already availed during their undergraduate who still wishes to avail another cycle of loan for the pursuit of graduate studies; 3) those who have not availed of the loan during their undergraduate studies but wish to avail for their graduate studies; 4) those who have not availed of the loan during their undergraduate studies but wish to avail for review expenses for professional licensure examinations. The student availing of the SLP should have also secured a Tax Identification Number from the Bureau of Internal Revenue and a Social Security System (SSS) Number from the SSS, have participated in the required financial counseling programs to be administered by the SLP partner, and has a guarantor (i.e. parent or guardian) for short-term loans.

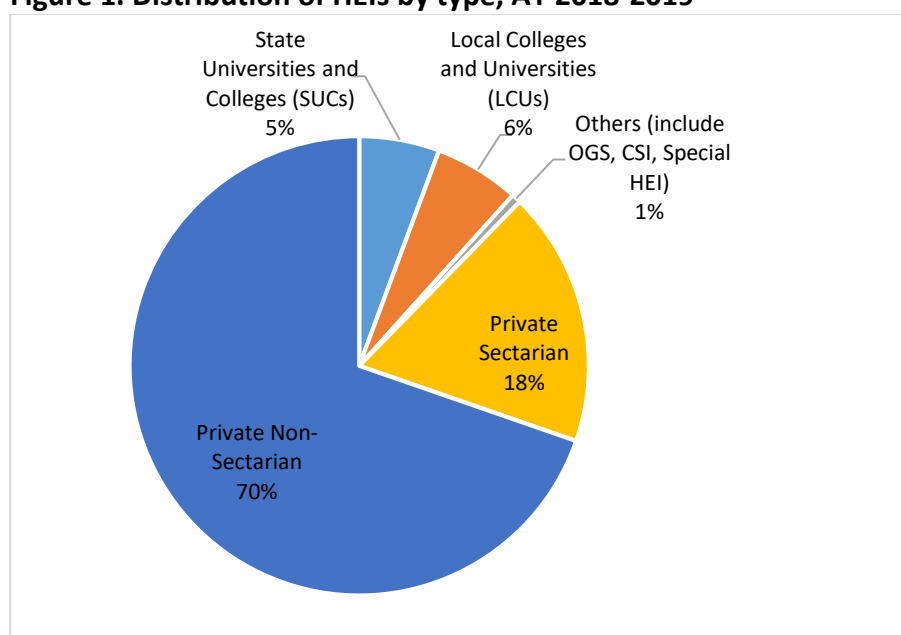
Loan proceeds that will be used for the purpose of paying tuition, other school services or other services provided by the HEI shall be directly paid to these institutions. Section 35 of the IRR also provides that the UniFAST will pilot-test several designs of both the short- and long-term SLP in order to determine the practical and appropriate designs given the context of the country. As for the repayment of long-term loans, this is expected to take effect when the beneficiary gets employment with compensation that reach the Compulsory Repayment Threshold (CRT), which is yet to be determined by the UniFAST. The SSS and the GSIS shall serve as one of the conduits through which the students who have secured gainful employment, may repay. The UniFAST is yet to determine the mechanism through which other beneficiaries (e.g., overseas Filipino workers, emigrants, professional and the self-employed persons) can repay.

One of the most important provisions in the IRR, which is also pursuant to Section 15(r) of RA No. 10687, is the need to establish an efficient tracking system of Student-Borrowers of long-term loans. There will be a tracking system of disbursement and collection of payments. Coordination with pertinent government agencies such as the BIR, GSIS, SSS, NBI, BSP, POEA, among others shall take place to ensure the smooth implementation of this law, including the possible investigation and checking of the “whereabouts of delinquent student-borrowers, and setting up mechanisms for blacklisting of defaulting student-borrowers in application for loans, credit cards, and other credit facilities.”

3.2. Profile of the Higher Education System

As of AY 2018-2019, the CHED reports that there are 1,963 HEIs in the country excluding SUCs satellite campuses, and 2,393 HEIs if SUC satellite campuses are to be counted. The distribution of the HEIs excluding satellite campuses by type is shown in Figure 2. By a significant margin, private sectarian and non-sectarian HEIs compose majority (88%) of the higher education institutions in the country. Around 10 percent are public HEIs with SUCs and LUCs having almost equal shares at 5 percent and 6 percent of total institutions, respectively.

Figure 1. Distribution of HEIs by type, AY 2018-2019



Note: Excluding SUC satellite campuses

Source: CHED’s Higher Education Indicators

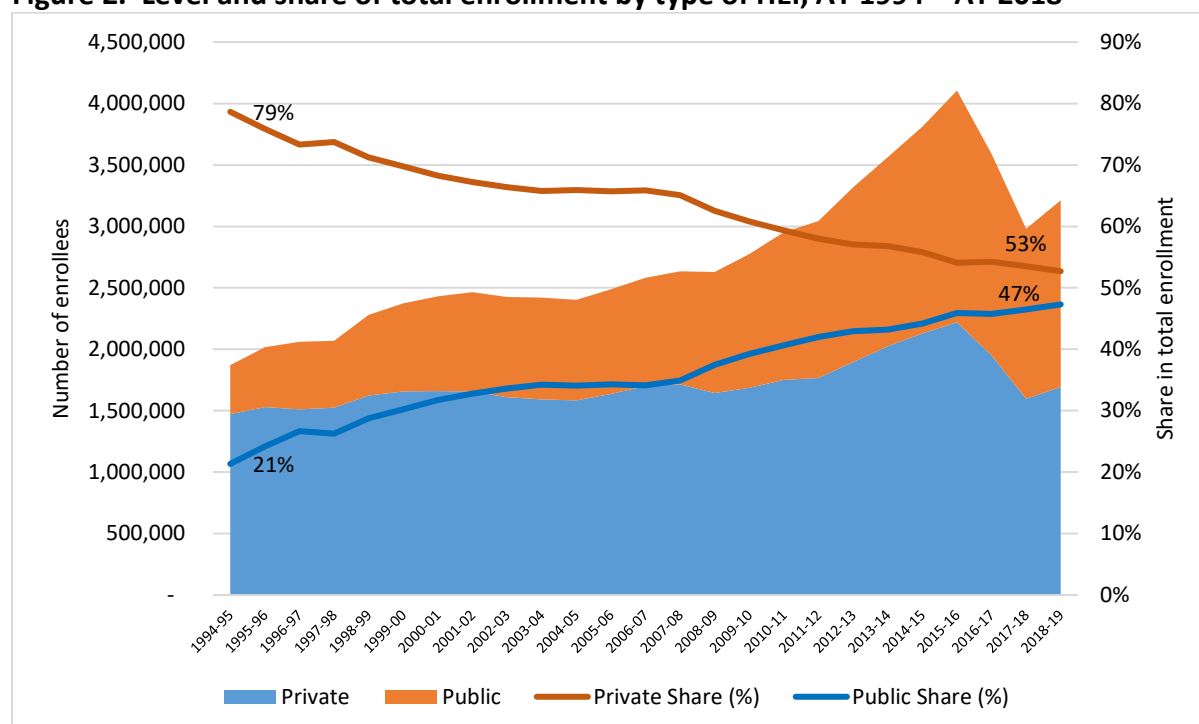
In terms of the enrollment share by type of institution, most recent report of the CHED report slightly higher private HEI enrollment than public HEIs, at 53 percent and 47 percent respectively. Trend in the enrollment share over the years since 1994 is shown in Figure 4. From the data, the enrollment shares of private and public HEIs have slowly converged towards the middle despite the higher number of institutions from the private sector.

A noticeable dip in the enrollment can be observed in 2016 in total enrollment due to the introduction of the Senior High School (SHS) program in the K-12 curriculum. This reform in the basic education resulted in a two-year gap in the first-year enrollment in higher education,

as shown in the enrollment data for SY 2016-17 and SY 2017-18. The missing chunk in enrollment were only able to “return” to the HEIs in SY 2018-2019 with the first batch of SHS graduates. This coincides with the first year of implementation of the Free Tuition Law.

Using data from the Annual Poverty Indicators Survey (APIS)¹³ of the Philippine Statistics Authority (PSA), the total enrollment of first year college students is estimated for years 2011, 2013, 2014, 2016, and 2017. Figure 3 below shows the steep reduction in freshman enrollment in 2016 from the 2014¹⁴ estimate by around 70 percent.

Figure 2. Level and share of total enrollment by type of HEI, AY 1994 – AY 2018

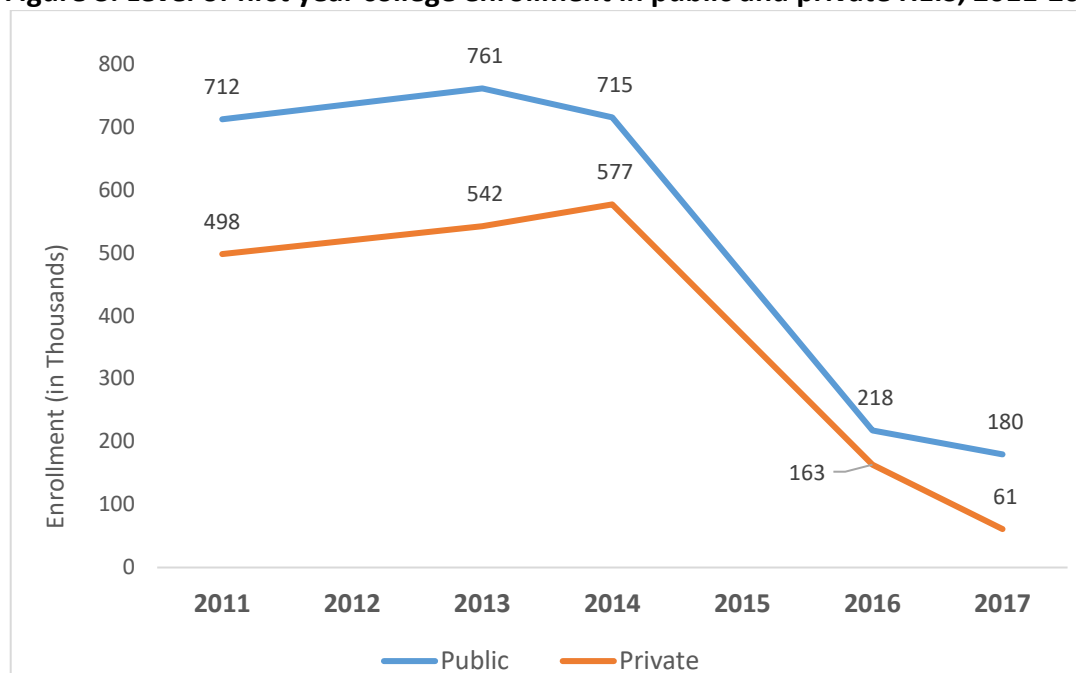


Source: CHED Higher Education Indicators 2019

¹³ With the use of the two data sources – CHED and APIS, it is important to note that the shares in the total public and private enrollment differ. While CHED reports higher share of private enrollment, the APIS estimates show higher share of enrollment for public HEIs (not shown).

¹⁴ APIS data is not available for 2012, 2015, and 2018 since the Family Income and Expenditures Survey is conducted instead in those years.

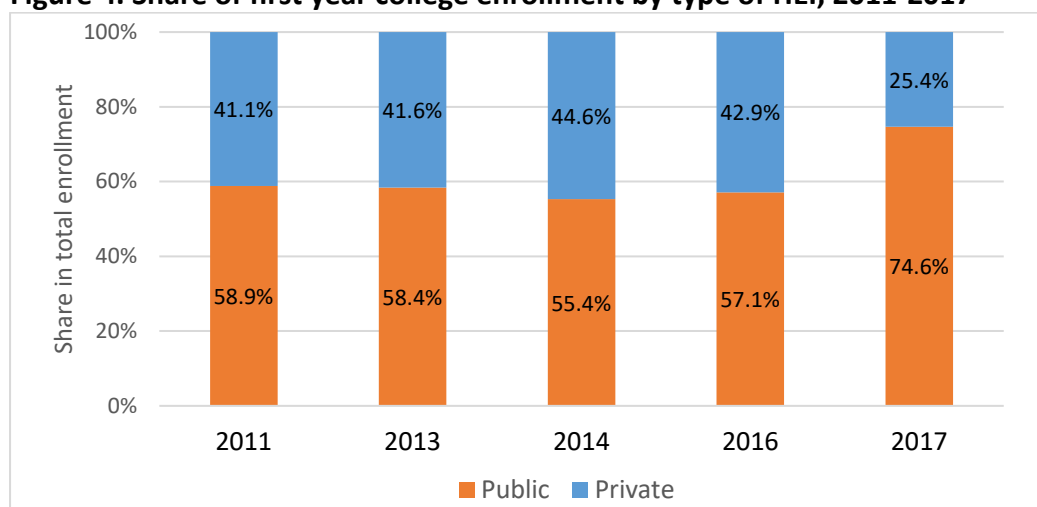
Figure 3. Level of first year college enrollment in public and private HEIS, 2011-2017



Source: Authors' calculation using APIS data (PSA, various years)

Looking into the share in first year college enrollment by type of institution, estimates using the APIS data show an increase in the share of public HEIs in 2017. The shares of freshman enrollment in public HEIs are comparable at around 57 to 59 percent from 2011 to 2016, until its sudden increase to 75 percent in 2017. This increase in public enrollment share coincides with the introduction of the Free Tuition Program implementation in SUCs in the same year. However, given that the base enrollment level for 2016 and 2017 are unnaturally low due to the SHS gap years, it is difficult to surmise whether this increase in public HEI enrollment is due to the free tuition policy. A more rigorous examination of the data is required; however, it is not probed further in this study.

Figure 4. Share of first year college enrollment by type of HEI, 2011-2017



Source: Authors' calculation using APIS data (PSA, various years)

In terms of access to student financial assistance programs, Table 2 shows that prior to the enactment of the free tuition law, only a very low proportion of higher education students benefit from StuFAPs. Except for SY 2014-2015, only around 3 percent of total enrollees, on the average, are beneficiaries of these programs. With the implementation of the Free Tuition law, the student financing subsidy is provided on a far larger scale.

Table 3. Number of StuFAP grantees and share to total HE enrollment, AY 2007 to AY 2016

Academic Year	Total Enrollment	No. of StuFAP Beneficiaries	Percentage of total enrollment
2007-08	2,632,935	71,542	3%
2008-09	2,627,798	144,735	6%
2009-10	2,774,368	57,566	2%
2010-11	2,951,195	58,449	2%
2011-12	3,044,218	63,346	2%
2012-13	3,317,265	53,792	2%
2013-14	3,563,396	58,155	2%
2014-15	3,811,726	391,817	10%
2015-16	4,104,841	164,475	4%
2016-17	3,589,484	166,204	5%

Source: CHED Higher Education Indicators 2019

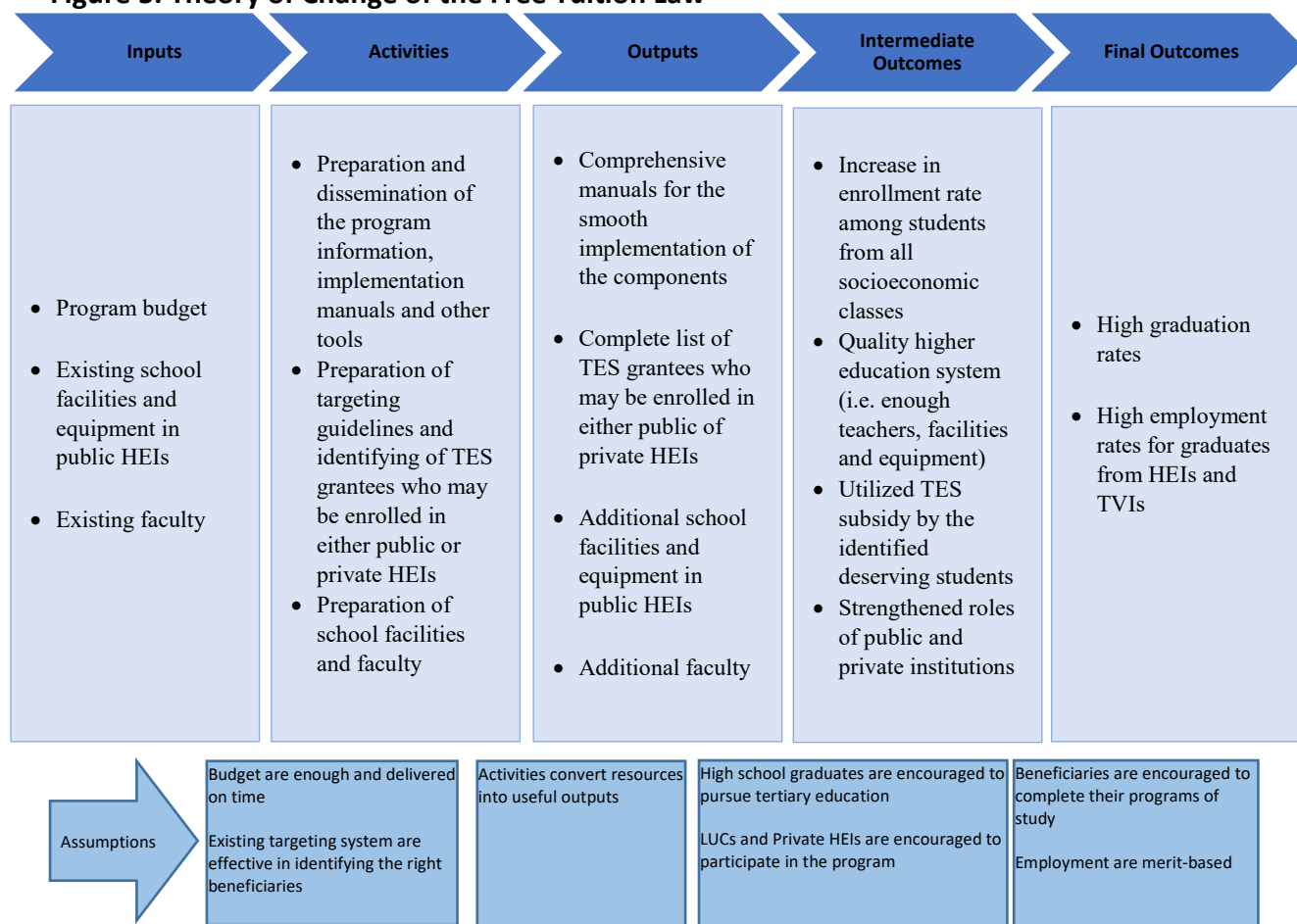
4. Methodology

The study is a Process Evaluation (PE) of the Free Tuition Law. In process evaluation, the actual implementation of the program is scrutinized and assessed if aligned with the original design of program as indicated in relevant documents and guidelines. In essence, it provides an evidence as to the “level of quality or success of the processes of a program” (Gertler et al., 2011). To do this, the study examined three aspects of the law or program namely, its 1) program theory; 2) service delivery and utilization, and 3) program organization. The method of assessment is particularly helpful given that the program or policy of interest is at its early stages of implementation.

4.1. Theory of Change

This process evaluation is anchored on the Theory of Change (TOC) of the policy examined. The TOC lays out the process through which the program is supposed to accomplish its intended objectives. TOCs present logical causal pathways toward the desired results, with the corresponding assumptions and conditions (Gertler, et al. 2011). A typical TOC framework is composed of the following elements in order: inputs, activities, outputs, intermediate outcomes and final outcomes. Adopting this, a basic framework for the Free Tuition Law is presented in Figure 5.

Figure 5. Theory of Change of the Free Tuition Law



Source: Authors' interpretation

As shown in the TOC, the goal of the law is to increase graduation rate of the Filipino youth from HEIs and TVIs and increase the employment rates for these graduates. This is done through increased higher education participation and the corresponding provision of quality higher education. The increase in enrollment rates are achieved through the main components of the program: (1) the provision of free higher education and TVET; and (2) the provision of student financing assistance through the TES and NSLP to deserving students who are at risk of discontinuing tertiary education due to financial constraints. The aspect of quality is achieved through multiple possible ways as indicated in the law. Firstly, the upholding of quality standards is consistently mentioned in the law. Income generated by HEIs from the provisions of the law can be used to improve the quality of education in the institution. Moreover, limiting the eligibility to CHED-recognized HEIs provides an incentive to institutions to pursue CHED recognition. For instance, LUCs – who, in the past have operated even without complying with CHED quality standards – now need to abide to these standards to be entitled to the Free Tuition Law benefits.

The achievement of the policy's outcomes and outputs rely on key assumptions. First, it is vital that the resources for the full implementation of the law are available and sufficient. The budget for the policy should be adequately and timely provided. Facilities, tools and technical know-how of the key actors should also be adequate. Further, benefits of the Free Tuition Law should be enough to encourage students to participate in higher education studies and HEIs should be

incentivized to participate. More specific for TES, existing targeting systems should be effective in targeting of the deserving beneficiaries of the subsidy. If these assumptions are not realized, the possibility of achieving the pathways and outcomes in the TOC will be diminished.

4.2. Data Collection Method

In gathering the necessary data and information for this study, the research team conducted the following activities:

- 1) Desk review to check on studies and literature on the implementation of the Free Tuition policy, among others;
- 2) Online information-gathering activity among different HEIs across the country;
- 3) Key-informant interviews with relevant stakeholders from HEIs, associations, and regulators within Metro Manila, and;
- 4) Collection of administrative data from pertinent agencies to complement the findings of the study.

Key-informant interviews (KIIs) with key implementers and stakeholders were conducted to collect insights on the status of implementation of the law as well as the successes and challenges facing the program. The selection criteria for the respondents are discussed in more detail in the succeeding section. The questionnaires for the KII are presented in Appendix Items D to F. Key informant interviews were conducted starting the 4th quarter of 2018 up to March 2019.

Aside from the KIIs, enrollment data were also collected using a form that was distributed via email to several HEIs across the country. The objective was to observe any changes in enrollment between public and private HEIs after the introduction of the law. Unfortunately, since the data collection was an online effort, the availability of data for a school depended on their response to the online request. Moreover, due to the unavailability of a complete and comprehensive directory of schools to the research team, the form was only distributed to some HEIs with available contact information online and other sources available to the authors. The results of this data collection effort should be viewed with this limitation in mind.

4.3. Sampling: Selection of respondents

The study team conducted interviews with identified key informants to gather their experiences in the implementation of the law. The key stakeholders identified as respondents include representatives of public and private higher education institutions, university associations, and the CHED-UniFAST, as the implementing body of the program.

Table 4. List of KII Respondents

Type of organization	Number of respondents
HEIs	13
University association	4
Other key stakeholders	1
TOTAL	18

For the selection of HEIs, given the limited timeline of the study, convenience sampling was implemented for the collection of university-level enrollment data and survey data. Specifically, selection of schools was based on existing directories available to PIDS, as well as through the selection of major schools in NCR, Luzon, Visayas, and Mindanao.

Respondents for key informant interviews were selected from universities that were able to submit enrollment data to the study team. Schools were identified based on noteworthy changes in university enrollment in AY 2018-2019 relative to pre-SHS program years (i.e. AY 2015-2016, or earlier). Both public and private HEIs that experienced a significant decrease in enrollment, as well as public HEIs that experienced an increase in enrollment, were targeted in order to probe reasons behind the changes in enrollment, and their initial experiences with the programs under RA 10931.

From the schools identified, 13 out of 22 universities were interviewed either in person or through video conference for universities located outside NCR. The study team was not able to interview all of the identified universities due to time limitations, as well as non-response from some of the targeted HEIs.

Table 5. Number of KII Respondents from HEIs, by type of HEI and island group

Type of School	Luzon	Visayas	Mindanao	Respondents by type
Private HEI	4	2	1	7
SUC	3	-	1	4
LUC	2	-	-	2
TOTAL	9	2	2	13

Besides key informant interviews with schools, the study team also conducted interviews with multiple university associations, and with CHED-UniFAST, as the implementing body of the program

4.4. Key research questions

As mentioned earlier, this study examines the implementation of the Free Tuition Law under three general topics of program theory, delivery, and organizational structures. Within those topics, the study aimed to answer specific research questions. These are listed below:

(1) Program Logic and Plausibility

- a. What are the objectives of law? What are the stakeholders' understanding of the objectives of the law?
- b. Are the objectives realistic and achievable (according to stakeholders)?
- c. Are there better approaches to achieve the same objectives?

(2) Service Delivery and Utilization

- a. Do the implementing guidelines and issuances address the intentions of the law adequately and appropriately?
- b. How are the components of the law being implemented?
 - i. How do implementers identify beneficiaries of the policy? Are these beneficiaries being reached by the program?

- ii. How are benefits (i.e., TES) delivered to rightful recipients?
- iii. How satisfied are stakeholders of the implementation of the law?
- c. How is information on the implementation communicated across stakeholders?

(3) Program Organization

- a. Are budget appropriations enough and timely delivered?
- b. What adjustments in existing procedures and organizational resources were needed in the implementation of the law?
- c. How are activities, outputs, and outcomes monitored and evaluated by implementers?
- d. Are there opportunities for consultation and feedback among stakeholders regarding the implementation of the law?

In addition to the above, initial analysis was performed to see if there are shifts in the enrollment in public and private HEIs as a potential result of the introduction of the policy.

5. Results

This section presents the results of the data collection activities conducted. Majority of the results come from the key-informant interviews (KIIs) conducted with stakeholders including officials from public and private HEIs, pertinent associations, and the regulators. It particularly focuses on the status and implementation process of RA No. 10931 both at the lens of the implementer and beneficiaries (i.e. schools). In addition to the KII responses, supplementary data are also presented to enrich the discussion as well as validate the responses provided. The results are presented according to the components of the process evaluation (i.e., program logic, delivery, organization) and provide answers to the research questions identified in the previous section.

In reading the results discussed below, it is important to note that since the Free Tuition Law is still implemented within the transition period at the time of interview, changes and optimizations in the procedural guidelines and issuances of the law are likely. This means that there is a real probability that the information and insights collected at the time of data collection and while this report is being written may not be applicable in the current time. Nevertheless, the observations made during this study can provide a reference for the experiences during this transition period and present useful inputs in strengthening the implementation of the law.

5.1. Program Logic and Plausibility

This subsection looks at how the stakeholders understand the objectives of the law, feasibility of achieving the objectives of the law given the design, and the possible ways through which these objectives may be better attained.

5.1.1. Objectives of the Free Tuition Law

Section 2 of RA 10931 lays out the objectives of the free tuition policy. As stated, the law aims to: a) provide adequate funding and such other mechanisms to increase the participation rate among all socioeconomic classes in tertiary education; b) provide all Filipinos with equal opportunity to quality tertiary education in both the private and public educational institutions; c) give priority to students who are academically able and who come from poor families; d) ensure the optimized utilization of government resources in education; e) provide adequate guidance and incentives in channeling young Filipinos in their career choices and towards the proper development and utilization of human resources; and f) recognize the complementary roles of public and private institutions in tertiary educational system.

Generally, the KII respondents appear to have a clear understanding of the overall objective of the law, which is to provide greater access to free quality tertiary education. However, there seems to be a mixed notion on what the term “access” really implies. One respondent pointed out that universal access should entail the absence of any hindrance in entering college, at least from the supply side. This means that everything should be ready and adequately provided – from the facilities to teachers, to the number of admission slots available to students who may want to enter any public HEI. Many perceive “access” as increasing opportunities available to students to enter college, especially for those who come from low-income families. Essentially, these responses constitute the two components of the law’s overarching objective, i.e., equitable access and quality education.

Most of the respondents from the private HEIs highlighted the promise of the law to ensure that quality tertiary education is provided in its implementation. They also noted the law’s recognition of the complementarity between public and private higher education institutions, as well as the technical-vocational schools in the educational system. This complementarity, according to the respondents, is preserved under the TES which they think intends to protect the contribution of private HEIs to the educational system. They also note the promotion of inclusivity as the law includes specific provisions to facilitate the access of those coming from the minority groups including the Lumads, Muslims, and other indigenous peoples, among others.

The respondents also enumerated the means through which these objectives are intended to be achieved. These are the Free Higher Education (FHE), TES, and the NSLP. The TES is expected to target the poorest of the poor and serve as financial aid to deserving students. The NSLP intends the same although this is more open to students from all socio-economic classes and students are expected to fully pay their loans once they gain employment in the future.

5.1.2. Are the objectives realistic and achievable?

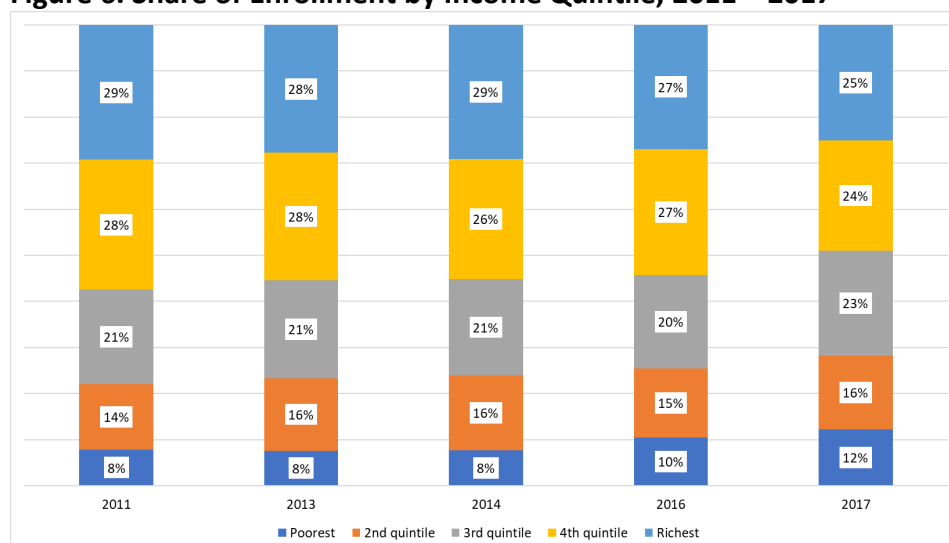
While all the Free Tuition Law objectives appear to be addressed in the law’s components in theory, most respondents are nonetheless doubtful whether these are all attainable given the current implementation design of the law, as well as the resources available to sustain it. Looking into the essence of the components, several respondents noted that they all seem to hit the objectives on increasing access to tertiary education, giving priority to academically-able and financially-challenged students (Sec. 2c), and covering not just the tuition expense, but also other education-related costs. They noted that the designs of the two components (i.e. TES, SLP) also allow for the complementation between public and private HEIs in the tertiary educational system (Sec. 2f), while FHE addresses the goal to provide equal opportunity to all

Filipinos (Sec. 2b). Moreover, the law touches on the need for HEIs to meet and maintain standards that would ensure that government resources are utilized effectively by allocating it to the good-performing schools (Sec. 2d). However, as mentioned, some respondents remain skeptical as to whether these can be achieved primarily because of the current implementation of the components (mainly the TES), and second, the design of the law, itself.

Some of the respondents raise the point of how this policy would provide “equal” opportunities to all Filipino students when the primary prerequisite for availing of the benefits is to be enrolled in government recognized HEI. Their argument, which is also based on their observations in the respective HEIs, is that economically better-off students really have the advantage in terms of passing the admission policy of the schools, although there are other private HEIs which target certain income classes, i.e., students from lower-income to middle-income households. Students who come from higher income households are typically more equipped, and therefore have a higher chance of transitioning from senior high school to college. Using data from APIS, the composition of college students by income class, for total enrollment and in public and private HEIs, are presented in Figures 6, 7, and 8.

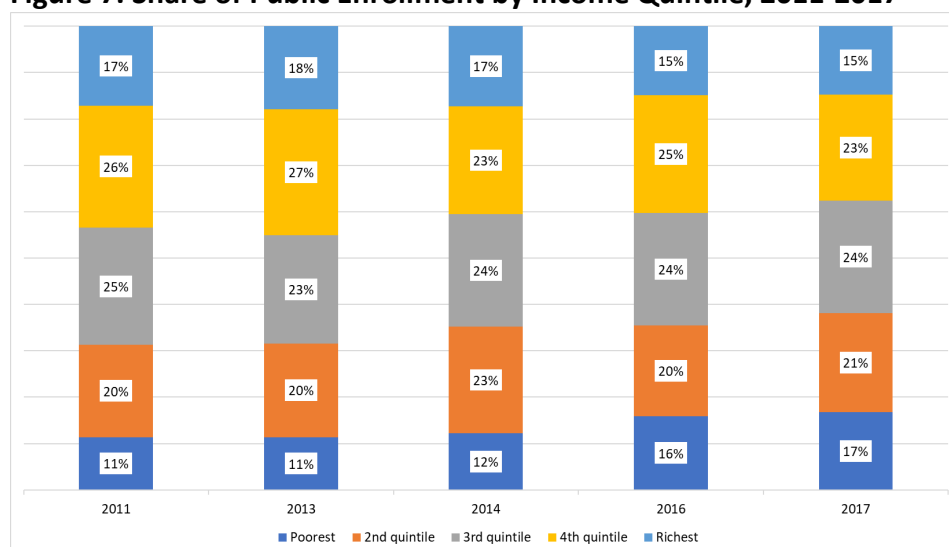
As shown in Figure 6, the percentage share of the poor (i.e., poorest and 2nd quintile) students in total higher education enrollment remain significantly smaller (i.e., 22% in 2011, 28% in 2017) than the share of the middle-income class up to the richest households. The same is observed in the public HEIs enrollment (Figure 7), albeit higher shares for the poor (i.e., 31% in 2011, 38% in 2017). The data shows that in the past six years, there has been a meager change in the socio-economic mix of students enrolled in HEIs, even in public HEIs. As expected, in the case of enrollment in private HEIs, the percentage share of these households is as low as 11% in 2011, and 13% in 2017 (Figure 8). So, as highlighted earlier, it is difficult to assert if “equal” opportunities may be achieved given the design of the law. In addition, some of the respondents noted that the DSWD’s Listahanan 2.0, used to identify students from the poorest households for TES, is not updated. Reviewing and updating of the list is done every four years (Sec. 2 of Executive Order 867, series of 2010), hence, households who have slipped into poverty in the previous year, for instance, will not get a chance to be prioritized under the Listahanan category of the TES prioritization scheme.

Figure 6. Share of Enrollment by Income Quintile, 2011 – 2017



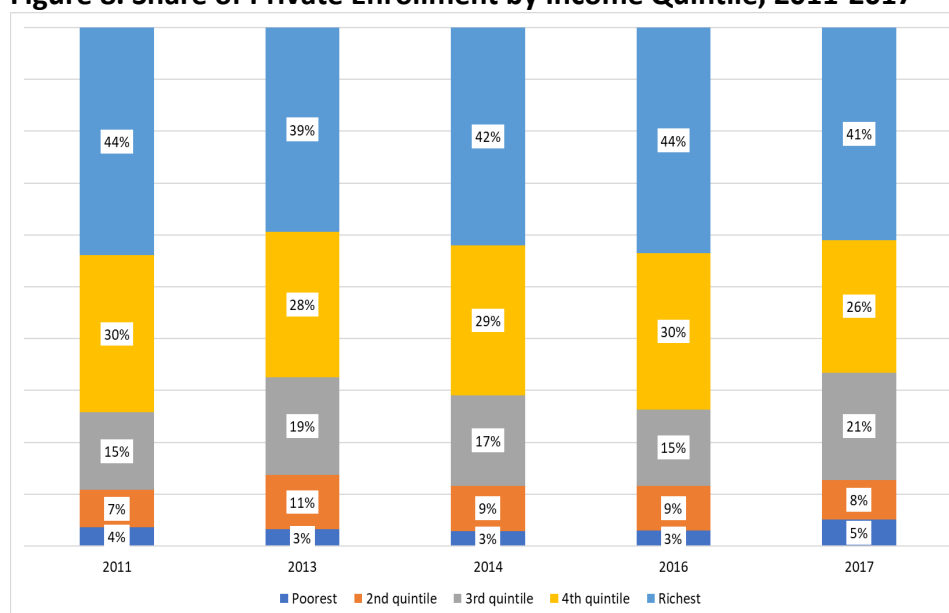
Source: Authors’ calculations using APIS data (PSA, various years)

Figure 7. Share of Public Enrollment by Income Quintile, 2011-2017



Source: Authors' calculations using APIS data (PSA, various years)

Figure 8. Share of Private Enrollment by Income Quintile, 2011-2017



Source: Authors' calculations using APIS data (PSA, various years)

Another issue is on the amount of budget needed to operationalize the four components of the law. This remains a big concern because, as some stakeholders have pointed out, this is essential to the success of the law in terms of achieving its intended outcomes. A good balance on the budget allotted for each component (i.e. FHE, TES, SLP) is important. One of the respondents highlighted that the available slots under the TES are dependent on the budget, and not on the actual demand for it. With this, it is possible that some deserving students in need of financial assistance are excluded in the entitlement if the budget is not sufficient.

On the objective to provide quality tertiary education, some respondents also question the government's capacity to ensure that the public HEIs conform with CHED's standards, especially with the expected influx of students to these institutions. According to CHED, they

are now more committed in making sure that HEIs acquire Certificate of Program Compliance (COPC). However, in the case of public HEIs, improving quality would surely entail significant amount of public resources. Unfortunately, drastic increases in its budget allocation can prove to be challenging as the national government is currently financing other equally important social programs (e.g. Universal Health Care Law). Even if the law states (under Section 15) that the GAA should provide all the necessary funding to achieve the intents of the law, the reality shows that this is not possible without taking away funds from other agency's share of the budgetary pie. In an interview with the UniFAST, it was confirmed that in 2018, funds were carved out from other agencies' budget including that of the Department of Education, to finance the Free Tuition Law. Aside from the budgetary concern, some of the private HEIs believe that even if the law recognizes the important of the complementary roles of the private and public HEIs in providing quality tertiary education, it seems to be more biased towards the implementation of the FHE in public HEIs as shown in its funding allocation (Figure 9).

A point was also raised regarding the seeming lack of other types of support such as guidance counseling, prioritization for dormitories, and other important ad hoc programs. In the IRR, this is indicated in Section 43, which mandates the UniFAST to coordinate with relevant NGAs, e.g. DOLE, DepEd, DOST, CHED, TESDA, among others, in crafting guidelines for nationwide guidance, counseling, and career development programs to students. This is connected to objective (e) in Section 2, which is to i.e. "provide adequate guidance and incentives in channeling youth Filipinos in their career choices."

Regarding the voluntary opt-out mechanism and the voluntary contribution, the respondents are doubtful about the effectiveness of these provisions since as rational economic agents, i.e., students and their respective families, would naturally want to be covered by the free tuition.

5.1.3. Alternative approaches to achieve the objectives

The responses of stakeholders regarding the possible approaches that may better achieve the objectives specified in the law circle around the following themes: 1) improving and investing in public basic education (including early childhood education¹⁵) to increase the chance of the low-income students of getting into college, or at the very least get to finish high school; 2) encouraging those who can pay for their tuition and fees in SUCs and LUCs to voluntarily opt out of the program, or consider amending the law to exclude those who are economically qualified to pay for their tuition and fees; 4) decentralize the assessment of potential beneficiaries of the TES to schools; 5) realign some funds from FHE to other components such as the TES and SLP, and 6) earmark substantial funds for the development of research in the universities.

Meanwhile, to ensure the complementarity in the roles of the public and private HEIs, as well as to promote quality education, several respondents advocated the use of a voucher system for the TES implementation, similar to what is implemented in Senior High School. This could be a more efficient system since the students would know where to enroll best given their preferences (e.g. perceived quality of education, proximity of school from home).

There was one respondent who noted that the current components of the law are more than enough in terms of achieving the objectives, noting that the participants are already "pampered" given all the available support. To augment the budgetary needs, the beneficiaries therefore

¹⁵ One respondent suggested the need to provide funding to the provision of early childhood education (ECE) because this is where bias towards richer students begins as students without pre-school education are more likely to drop out prior to college.

should also contribute or pay some “premium” as they will benefit from returns of education in the future.

As for the prioritization for TES slots, one private HEI suggested it should be offered first to SHS students, thereby giving these students a better chance of going to college.

5.2. Service Delivery and Utilization

This section talks about the actual implementation of the law which covers the reach of the policy, satisfaction of the beneficiaries (in this case, the HEIs), availability of resources, and the status of guidelines and the processes involved in implementing the components.

5.2.1. Adequacy of the guidelines

Majority of the respondents, both from public and private HEIs, noted that most of the guidelines were released on a tight schedule where deadlines for the documentary compliances need to be met right away. Some of the guidelines were found to be vague, or incomplete, thus making the implementation process confusing. For instance, in the initial call for TES application, HEIs were asked to submit the data for students from “poorest of the poor, poor, near poor” households¹⁶. Respondents noted that it was not clear how they were supposed to classify a student as “poor”, “near-poor”, or “poorest of the poor”. Subsequently, according to one respondent, there was a second call for submission which required all the names of the school enrollees and not just the pre-identified poor students. For this HEI, they submitted two lists of potential beneficiaries – the first one is the list of applicants from 4Ps households¹⁷, with the accompanying proof of income, while the second list contained the entire roster of the HEI’s enrolled students (i.e. not just the pre-identified poor). According to this HEI, the reason that was given by CHED for the second call was that all the names of their students will now be matched in the Listahanan. There was no confirmation if all schools were asked to submit the same for the second round¹⁸.

In addition, some HEIs also experienced difficulties in the billing and reimbursement process because of changes in the documentary requirements. Others also noted that requirements were voluminous and sometimes redundant. On the one hand, a respondent admitted that the Law’s guidelines were difficult to understand at first, but questions they had were addressed by information dissemination campaigns conducted by the UniFAST. On the other hand, one respondent noted the unavailability of resource persons for clarification and instruction, adding that the implementers (i.e. CHED regional coordinators, UniFAST Secretariat) themselves did not appear to be entirely knowledgeable about the processes and requirements.

Despite these lapses in the guidelines, almost all the respondents noted that these issues and challenges in implementation are all part of the birthing pains of the policy as it is only in its first year of implementation.

The UniFAST Secretariat confirmed that there really was a lack of technical capacity and manpower when the program started. They had to start from scratch as they did not have the

¹⁶ UniFAST Memorandum to all eligible (i.e., those in registry) HEIs dated 10 September 2018

¹⁷ The respondent specifically used the term 4Ps households in their response. They may be referring to the “poorest of the poor, poor, and near poor” criteria provided by CHED. This was not verified, however.

¹⁸ It should be noted however, that despite some challenges in the actual implementation of the guidelines, the CHED-UniFAST was able to convene in December 2018 about a thousand private HEI heads to sign the Memorandum of Agreement (MOA) for the implementation of the TES component.

guideline (e.g. templates for sorting out school billings) and other necessary requirements to implement the program smoothly. They were able to gain help from the regional staff of CHED since their budget is currently lodged under CHED. The UniFAST is currently in the process of requesting for plantilla posts so that they may operate independently from CHED. The Secretariat noted that they were able to run the program despite these challenges and were able to gather resources and to form technical working groups to aid in the management and administration of the program.

The HEI respondents were also asked if they noted any deviation from the law in the guidelines and issuances. First deviation they mentioned is the inclusion of the Return Service System requirement for students of SUCs and LUCs. This requirement is not listed in the law but was indicated in the IRR (Rule II, Sec. 4). According to the UniFAST, they understand that this was not included in the law but the CHED strongly believes that this should be institutionalized in the IRR. Since this was not included in the law, the resolution was that the UniFAST will discuss with the universities and define areas where they can do their respective RSS. Another deviation is the expansion of the reportorial requirements of HEIs. In the law only SUCs are required to submit to the CHED and the Joint Congressional Oversight Committee a detailed SUC development plan which is to be updated every 10 years, while the IRR expands this requirement to LUCs.

5.2.2. Timeliness of the issuance of the guidelines

One of the major issues that the key respondents pointed out is the delay in the release of program guidelines. Although the IRR of RA No. 10931 was released within the prescribed period, the detailed guidelines for the TES were released only in October 2018, which was later than expected. By this time, first semester enrollment in most HEIs had already ended. This is a missed opportunity for students who, given the chance to receive the subsidy, may have chosen to pursue enrolling in tertiary education.

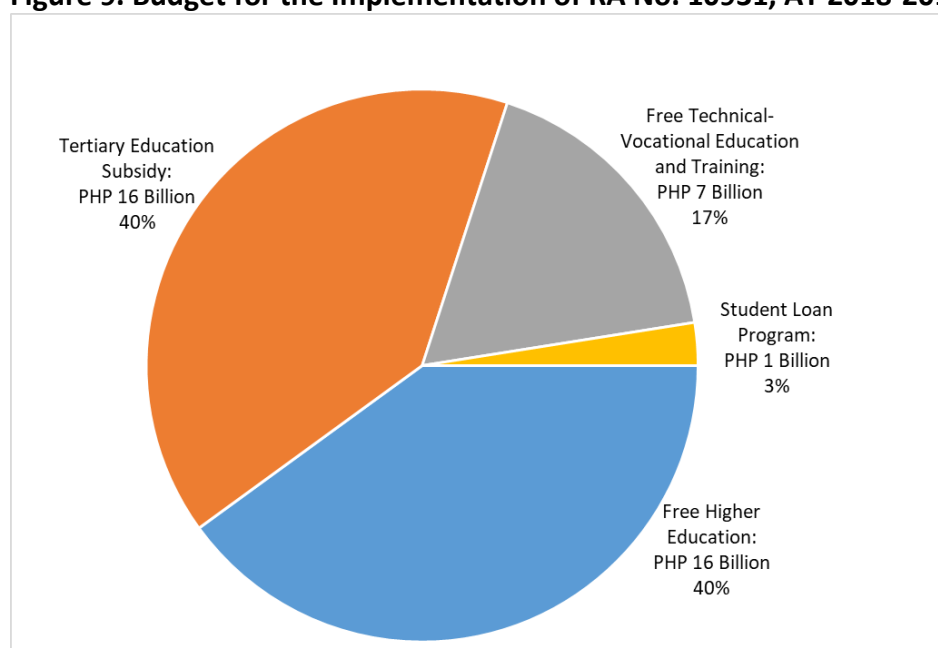
The delay in release of the TES guidelines also contributed to the confusion of some HEIs in terms of how it should really be implemented and what can be expected so that necessary preparations would be made by beneficiaries (whether it be the school, or the student-applicants themselves). From the responses, the HEIs claimed they did not have ample opportunity to ask about the contents of the guidelines and its potential implications given the constrained timelines. The frequent changes in the documentary requirements (e.g. billing forms), also added in the confusion of the HEIs. They noted that some forms/templates that were supposedly meant to expedite the claims of the schools had only added to the volume and duplication of documents.

According to the UniFAST, there was full information campaign through various modes including regional caravans. Some HEI associations also conducted association-wide information dissemination campaigns for their member schools through their regional leaders on the crafting of the law, especially on how the TES, as well as the SLP would benefit qualified students. However, some HEIs stated that these widespread dissemination campaigns also conditioned the disappointment when AY 2018-2019 began without students benefitting from the TES and SLP.

5.2.3. Implementation of the FHE component

The Free Higher Education component aims to provide all Filipino students the opportunity to have access to quality tertiary education regardless of socio-economic class. As such, this component received a major budgetary share worth PHP16 billion with a PHP8-billion cap for each semester of AY 2018-2019 (Figure 9). For the implementation in first semester, the billings of the 59 SUCs (out of the 113) and 50 LUCs (out of the 76) had already been processed and paid by the UniFAST and CHED, as of January 2019. The total amount of billing for the first semester had exceeded the PHP8 billion cap since about PHP3.63 billion (PHP3.17 billion for SUCs and PHP0.457 billion for LUCs) had already been disbursed to schools; about PHP 3.9 billion are awaiting to be released; and PHP0.577 billion are still for processing. Upon the final checking of the UniFAST, the total excess FHE billings for the first semester reached about PHP0.111 billion. According to the them, at the time, there were still many schools whose billings need to be subject to scrutiny especially those with compliance issues. Nonetheless, the excess can still be charged against the second semester budget.

Figure 9. Budget for the Implementation of RA No. 10931, AY 2018-2019



Source: UniFAST

For the second semester, the UniFAST required the eligible public HEIs to submit their second semester billings by February 15, 2019 to give them enough time to reconcile the 1st and 2nd semester sums for reimbursement. The UniFAST identified possible ways to do this – first is to get the excess from the second semester budget; second is to process the billings but subject to scrutiny to avoid exceeding the PHP8 billion budget cap, and third is to delay the processing of the excess reimbursement claims from the 14 HEIs (9 SUCs and 5 LUCs) until all the other second 2nd semester billings have already been processed.

Apart from the issues on budget reconciliation, one of the recurring issues among SUCs is the billing of the other school-related fees. The IRR specifies the types of fees that may be billed to CHED but there are other existing school fees¹⁹ that were not named in both the law and its IRR. Since these fees form portion of the SUC's income and are used in the SUC's operations prior to the FHE, failure to reimburse these fees would either result in schools absorbing this deficiency or the cost being passed on to students. Some schools reported engaging with talks

¹⁹ Examples are Related Learning Experiences (RLE) fee, Accreditation, Affiliation fees

with the UNiFAST to request for the reimbursement of some of the fees that were not included in the law and the IRR. Reimbursement for some of these fees were approved, but some were not allowed by the UniFAST to be reimbursed, judged based on the nature of the fees (e.g. student insurance). With this, some schools were reportedly considering lodging further appeals regarding these miscellaneous fees to UniFAST, and even elevating these concerns to the Senate or Congress.

On the other hand, there is also contention in subsidizing some of the miscellaneous fees identified in the law. For instance, the entrance exam fee. One respondent argued that since there is a natural tendency for the applicants to apply to as many schools as they want to increase their chances, as well as options, for their tertiary education, the IRR allows subsidizing multiple instances of the same fee for one student. Apart from the entrance exam fee, medical and dental fees are also waived in the IRR; however, it is unclear whether this refers to medical and dental examinations that are conducted as part of the admission process (e.g. in addition to entrance examination) or after the student already passed admission requirements. While waiving of these fees would lift substantial financial burden on the side of the students, there may be a need to revisit the rules which fees should be subsidized so as to ensure that government resources are optimally utilized.

As of December 3, 2019, the total payments for the FHE component of the Free Tuition Law amounted to PHP 14.9 billion, benefiting 1.2 million students of SUCs and LUCs (Table 6). The excess budget of PHP1.2 million will be allotted to mid-year or “Summer” semester billings of the public HEIs.

Table 6. Disbursements for the FHE for AY2018-2019, as of December 3, 2019

HEI Type	No. of Beneficiaries	Tuition and other school fees (in PHP)
State Universities and Colleges	1,075,024	13,487,155,033.09
Local Universities and Colleges	109,833	1,397,401,409.27
TOTAL	1,184,857	14,884,556,442.36

Source: UniFAST, 2019²⁰

5.2.4. Implementation of the TES component

The TES component holds the same budget share as with that of the FHE under the Free Tuition Law (Figure 9). Given such importance, the respondents have high hopes that this would reinforce the role of private HEIs in providing tertiary education in the country. However, in its first year of implementation, the respondents, especially those coming from the private HEIs, felt that the execution was beleaguered with ambiguity and unpredictability. They noted various issues including those that concern the actual guidelines, documentary requirements, processes on the selection of beneficiaries, and communication with the HEIs regarding the implementation of this component. Nonetheless, the HEIs seem to be optimistic that should these issues be addressed, the implementation can be made better, and deliver the promise that it makes.

²⁰ From the presentation of Atty Yadao-Sison “Updates on the Implementation of the Universal Access to Quality Tertiary Education Act (R.A. No. 10931)” presented in the PhilED Conference on December 4, 2019

5.2.4.1. Selection of Beneficiaries

Based on the interview with the UniFAST, the prioritization scheme for the first year of implementation of the TES component is as follows: 1) all continuing student-beneficiaries²¹ of the Expanded Students' Grants-in-Aid Program for Poverty Alleviation (ESGP-PA)²²; 2) all students who enroll in private HEIs and reside²³ in areas with no CHED-recognized SUC/LUC²⁴; 3) students that match in the most recently updated Listahanan; 4) those who are not part of the Listahanan and ranked according to their per capita income based on the proof of income submitted. The identification of beneficiaries for the first and second prioritization layers (i.e., ESGPPA and private HEIs without adjacent SUCs/LUCs) were straightforward, hence most of the targeting done by UniFAST focused on the matching of the student names with the Listahanan data and the sorting according to proof of income.

The CHED issued a memorandum to call for eligible HEIs to submit their list of the “poorest of the poor, poor and near poor” students to be matched with the Listahanan 2.0 list of poor households. Schools were asked to submit through the TES portal, which the UniFAST administers. However, during the interviews, it was noticeable that instructions reported by respondents on the submission of names of potential beneficiaries vary. One university uploaded the names of all its students enrolled in the 1st semester of AY 2018-2019 since according to them, UniFAST did not provide standards of poverty that should qualify students as beneficiaries of the program.

According to the UniFAST, the HEIs conduct the initial vetting; hence, the lists that goes to the TES portal have already been subjected to the “selection” process conducted by the schools. There are schools that identify their students separately, depending if they are 4Ps beneficiaries, and there are those who included all students who wish to avail of the TES provided that they can prove that they are 4Ps beneficiary or they can provide the necessary documentary attachments. One HEI noted that the first requirement is the Listahanan reference number. If none, the student applicants are required to submit other documents such as BIR, barangay, and others.

The HEIs used various mechanisms to disseminate information regarding the TES subsidy. There was one HEI which had an open letter to the students, inviting them to apply because they did not know who were in the Listahanan. Another HEI disseminated using social media, e-mail, public information systems, and face-to-face interactions.

Some of the private HEIs were also concerned of their school being criticized for the results of the targeting should the highly qualified (e.g. poorest of the poor) students fail to get into the program. Some private HEIs raised this concern as there were cases where less than 10 or 5 beneficiaries were selected despite having submitted thousands of potentially qualified names in the TES portal. The UniFAST explained this as the result of the lack of budget to

21 This is equivalent to about 13,804 students based on the KII conducted with UniFAST.

22 These are poor but deserving students who belong to families identified in the DSWD's 4Ps. These are students who are still enrolled in select SUCs and taking up CHED priority programs and other course offerings identified as one of the government's key growth areas. These grantees are expected to receive the following benefits: a) “allowance for books, supplies, transportation, and miscellaneous personal expenses, including a reasonable allowance for the documented rental or purchase of personal computer or laptop, and other education-related expenses”; b) “allowance for room and board costs incurred by the student”; and c) “if applicable, additional subsidy for PWDs, or a one-time cost of a first licensure examination for graduates of a Board course or program.”

23 Those who were not able to meet the residency criteria were not eligible.

24 According to the UniFAST, there are about 431 private HEIs that are situated in areas that have no LUC or SUC within the area.

accommodate all qualified students, and that the budget for the TES is lower than the ideal funding that can cover all eligible beneficiaries. For AY 2018-2019, TES has received PHP16 billion which can accommodate about 300,000 students, of the 1,000,000 applicants. The UniFAST also recounted getting negative feedback from the stakeholders/beneficiaries when the list of beneficiaries was initially released. At the time, they recalled a surge of complaints from the 4Ps families asking why they were not eligible to the TES benefits.

5.2.4.2. The TES Portal and the Matching of Names

The platform through which the schools submit the names of their students to UniFAST is the TES portal. This was a convenient way to submit the names given that all they must do is upload the list of names on the portal. However, some respondents encountered issues in utilizing this platform. One of the respondents noted that there were glitches in the uploading of the Excel file. For instance, there were students who failed to be considered since there was one student whose indicated postal code is different from the ones that were reported in the same address. This glitch, unfortunately, was not discovered immediately. Another issue encountered was the file size capacity of the portal. In one case, the university had to divide the file into smaller-sized files to be able to upload it in the portal.

Names of students uploaded by the HEIs are then matched by UniFAST in the Listahanan 2.0 list of poor households. The UniFAST shared having encountered difficulties in acquiring the needed Listahanan data from the DSWD. Despite the Listahanan being identified in the IRR, the DSWD did not provide the data immediately to UniFAST due to the latter's lack of needed infrastructure or facility (e.g. server, decrypting) to accommodate the data and protect the private information included therein. Fortunately, they were able to resolve these through the assistance of CHED which loaned some IT facilities to the UniFAST. The whole data transfer process took one month.

According to the UniFAST, the matching of student names in the list submitted by schools with that of poor households in Listahanan 2.0 are based on the last name, first name, and birth date of the student. However, not everyone in the Listahanan list, were matched because of minor errors in the encoding of personal information, e.g. misspelled names. As of the interview, the UniFAST maintained a strict "exact match" criteria in the matching with the Listahanan poor data, which resulted in these cases being ineligible to the entitlement.

Another issue, which was discovered by UniFAST only after the results of the initial matching of beneficiaries and surge of complaints by 4Ps beneficiaries, is that the list of 4Ps households is not a perfect subset of the poor households in the Listahanan 2.0 data. This means that not all current beneficiaries of the 4Ps were matched with the Listahanan 2.0 and found eligible to the TES. The source of this discrepancy in the data is the fact that the 4Ps beneficiaries were based on the first round of Listahanan poor households which was collected in 2010-2011.

Due to the above issues and circumstances, the UniFAST, at the time of interview, was not able to exhaust the 300,000 slots allotted for the TES 1 and 2. This is reflected in the status of TES implementation as of January 2019 shown in Table 7 below where around 70,000 TES slots were yet to be filled.

As of February 2019, the UniFAST Board was still finalizing the mechanism through which the remaining slots will be distributed. In the law, the next and fourth category of beneficiaries under the TES are the students that are not part of the Listahanan 2.0 and are ranked according

to the estimated per capita household income based on the valid proof of income submitted by the student. There are several options that are being put forward at the time including use of alternative data sources to validate income levels of students.

Table 7. Implementation status of the TES as of January and December 2019

TES Beneficiaries	Update as of January 2019		Update as of December 2019	
	Number of Beneficiaries	Amount in PHP million	Number of Beneficiaries	Amount in PHP million
ESGPPA Grantees	13,804	552.2	13,809	568.9
Studying in Private HEIs without SUCs and LUCs	70,819	4,249.1	70,864	4,379.4
Listahanan 2.0	148,296	8,897.8	147,611	7,075.0
Additional Grantees from the Listahanan 2.0*			49,071	2,300.5
UNFILLED SLOTS DSWD 4Ps Beneficiaries not in Listahanan 2.0			22,711	1,169.6
SUB TOTAL	232,919	13,699.1	304,066	15,493.4
TES 3A (PWD)	43	1.2	183	5.5
TES 3B (Graduating in Board Courses)	13,734	137.3	50,104	501.0
TOTAL		13,837.7		15,999.9

Source: Yadao-Sison (2019). "UniFAST Updates: Free Tuition 2017 and RA 10931 Implementation", 28 January 2019 and 4 December 2019

As of December 3, 2019, the number of TES (1&2) beneficiaries increased to around 282 thousand. The additional students came from the following:

- 1) Students from 33 SUCs that failed to import the applications of their students in the TES Online Portal during the First Call for Applications (UniFAST Board Resolution No. 2019-053).
- 2) Under the Listahanan 2.0 category as verified by the DSWD NHTO utilizing the matching option of last name, first 2 letters of first name and birthday of student (UniFAST Board Resolution No. 2019-046)
- 3) Students with misspelled names from SUCs that failed to import the applications of their students to the TES Online Portal during the First Call for Applications (UniFAST Board Resolution No. 2019 045A)

Nevertheless, there are still 22 thousand slots remaining lots that have yet to be filled. According to the presentation of UniFAST, they are currently considering targeting current 4Ps beneficiaries not in the Listahanan 2.0 list. To sort through these students, the UniFAST will adopt the Social Welfare Development Indicators of the DSWD as basis for ranking.

5.2.4.3. Student Loan Program

The student loan program is not being implemented yet at the time of the study. As of October 2018, only the guidelines for the short-term loans have been approved and released by

UniFAST. As of December 3, 2019, the UniFAST reports around 1,054 pre-screened short-term loan applications received at CHED Regional Offices. The maximum loanable amount is PHP60,000.

5.2.5. Budget Appropriations and Disbursement

Among the important provisions is on the appropriation of budget, which will eventually be allocated to the public HEI through the annual General Appropriations Act (GAA); however, during the transitory period - whose length is yet to be determined by the UniFAST - the budget funds will be lodged in CHED. During this period, the funds shall be disbursed to the public HEIs as the respective income of the institutions. Currently, there is a mix of insights regarding this. Some of the respondents are in favor of receiving the funds as income since they can exercise more flexibility as to where and how they can spend it; as opposed to the case where it will be lodged directly in the SUCs. Those in favor of lodging it directly in SUC budget believe that this would be easier since the billing process with UniFAST takes effort and may experience delays.

5.2.6. Satisfaction of the Stakeholders

According to one LUC, their students were thankful of the law because they will be able to finish their schooling.

Based on the interviews with SUCs, it seems that the implementation of the TES was easier than the Free Higher Education because the subsidy is “already there” (i.e., more accessible in terms of billing procedures). One major state university, however, noted that it was not very satisfied and suggested that the UniFAST should provide flowcharts to guide the schools and harmonize programs to come up with more comprehensive support for students. Among the private HEIs, the consensus is that the first year of implementation of the TES did not live up to their expectations, especially in terms of the promised complementation of the law. However, some of the respondents also acknowledged that the implementation was generally acceptable given that it is just the first year.

5.2.7. Effects on Enrollment

To get an initial insight on the effects of the program on the student enrollment in public and private HEI, the study collected enrollment data from 59 public and private HEIs all over the country. The profile of the respondents and the results are shown in Appendix B and C, respectively. All in all, there were 26 SUC main campuses and 13 HEIs. The data presentation focused on the enrollment of first year students being the relevant population faced with the choice between public and private HEI enrollment. The data is from AY 2010-11 to AY 2018-19 to establish a multi-year reference of the average enrollment of the school prior to the Free Tuition law. As shown in Figure 12, there is a sharp but expected drop in enrollment in 2016 due to the introduction for the SHS curriculum. Academic year 2018-19 is the first chance of higher education institutions to recover the loss in enrollment in 2016 and 2017. However, notice that on the average, the enrollment levels of both SUCs and Private HEIs have not yet reached the 2015 levels of enrollment that they had. Comparing the two sectors, SUCs seem to have recovered more of this drop in enrollment than private HEIs. Although inconclusive, this may potentially confirm the suspicion of the surge of public HEI enrollment due to FHE. In terms of share in first year enrollment between public and private HEIs, the gap has been widening since 2017.

From the interviews, one LUC respondent observed a significant increase in the number of applicants for AY 2019-2020 on the information that FHE can now be availed of, without prejudice to the school's admission and retention policies. The university continues to enforce strict compliance with its admission and retention policies. Reconsiderations are purely out of benevolence by the administration upon due consultation with the city government.

On the other hand, one private HEI reported that some of their degree programs were "badly hit" by the supposed surge of enrollment to the public HEIs due to the FHE. From more than 100 students, enrollment has declined to 29 students in some programs. They had to accommodate students even if they failed to pass the exam and just introduced a bridging program for students to be able to cope with the academic requirements. However, the school is concerned that they have become a catch basin for students who did not make it to LUCs/SUCs. The respondent also noted that some of their teachers are now thinking of transferring to SUCs/LUCs. Another private HEI also reported having experienced a drop in freshman enrollment of about 28% relative to its pre-K-to-12 years (i.e. AY 2015-2016).

One SUC confirmed the significant increase in its enrollment, noting that there was a significant increase (39.9%) in its enrollment rate, possibly due to the Free Tuition Law. It accommodated as much students as it could since the essence of the law is to provide access. Hence, the enrollment exceeded the school's carrying capacity and class size reached 60. There was no CHED pronouncement on carrying capacity. There are also no specific guidelines yet on how the quality of the public HEIs will be assured and maintained so that government resources will be maximized. Certainly, this would require additional budget to increase the quality of the public HEIs while maintaining the needed capacity. The UniFAST/CHED is also keeping an eye on public HEIs that may suddenly start creating additional extension or satellite campuses just to accommodate the additional students and benefit from the law.

There were some respondents who were skeptical of the possible shift in enrollment because they find it a bit doubtful that students would suddenly change their school preference just because of free tuition policy. Meanwhile, many were a little more pensive in concluding anything from the changes in enrollment as they are only just recovering from the 2-year gap of the SHS implementation

5.3. Program Organization

5.3.1. Adjustments in the HEI systems

Most of the respondents noted that they have not set up any additional organizational support yet in relation to the implementation of the Free Tuition Law. Currently, there are schools that tap student assistants to work on the administrative tasks, while some utilized its regular staff, who sometimes had to work overtime. In one HEI, their staff who used to monitor collection of promissory notes was assigned to work on the billing since there are no tuition fee collections anymore. One of the biggest SUCs in the country had to reconfigure its enrollment system in order to integrate its processes to comply with the law. It also held trainings in order to harmonize this with its other financial assistance programs. Given this, they recognize that soon, they would have to set up a system, including hiring additional staff, to accommodate the additional tasks brought about by the law. As indicated in the law, the UniFAST is to give 3% of the TES and SLP costs to the school to cover these expenses. There was one SUC however

which reported that it did not receive the said compensation as they were told that it is only for CHED.

The private HEIs were also asked about how they would adjust given the expectation that enrollment would shift eventually to public HEIs. According to them, they are now observing the shift in enrollment, but most of them emphasized that they would not compromise the quality of education that they provide. This means that they will not relax their admission policies in order to attract students. A respondent from the private HEI noted that the school intends to distribute the load among teachers and let go of part-time teachers. In terms of enticing students, they would need to improve the messaging of the education that they provide and intensify social media interactions. It also intends to commission a research to develop a marketing plan that addresses low enrollment.

In the case of the public HEIs, the next step is how to maintain quality education if there will be higher demand for public sector tertiary education. One SUC noted that to adjust for possible increase in enrollment, the school will adjust its registration scheduling. They might also have to put up additional buildings in main campus.

The UniFAST, on its part, is watchful of the possible sprouting of additional satellite campuses of public HEIs. In a previous statement²⁵, the then DBM Secretary Diokno encouraged SUCs to invest in other resources, such as the faculty, and not in constructing additional buildings.

5.3.2. Stakeholder consultations and orientations

According to the respondents, HEI associations such as the Philippine Association of Colleges and Universities (PACU) and Coordinating Council for Private Educational Associations (COCOPEA) were heavily consulted during the crafting of the law. Although involvement was more of defensive action since initially the law was only to provide free tuition to LUCs and SUCs. Through their advocacy, the TES and SLP components were added to the law to introduce the public and private complementation. The Catholic Educational Association of the Philippines (CEAP) was also an active participant in the crafting of the law through the COCOPEA. After the passage of the law, the crafting of the IRRs was entrusted to the UniFAST Board. The Association of Local Colleges and Universities (ALCU) has set up a communication mechanism to be able to easily relay information to the 78 LUCs that were enlisted in the Registry.

One SUC conducted workshops and training programs in order to prepare for implementation in 2017. However, they needed to redo preparations because they implemented the free tuition policy immediately upon signing, even if there was no IRR yet.

5.3.3. Monitoring of outcomes

In the case of UniFAST, for free education, monitoring is limited to budget utilization reports but there is no monitoring of outcomes. For the TES, they conduct periodic random checks of students. There is no monitoring system for SLP yet. As for one major SUC, they said that they conduct usual monitoring of graduates and reporting requirements for accreditation.

²⁵ <https://www.dbm.gov.ph/index.php/secretary-s-corner/press-releases/list-of-press-releases/1151-2019-ched-budget-rationalized-not-gutted>

6. Summary and Recommendations

6.1. Summary

The main objective of the study is to assess the program design and objectives, as well as gather and assess initial insights from key stakeholders and implementers on their understanding of the law and its objectives, and their experiences with its implementation. Given that implementation is still in its early stages at the time of writing, the study does not posit to assess program impact on any outcomes, however, the experiences of HEIs regarding student enrollment in the years surrounding implementation of the law are analyzed and discussed briefly.

Regarding program theory, respondents generally displayed a good understanding of the objectives of the law. Among the objectives stated in the law and IRR, oft-cited was, as stated in the title of the law, the objective of providing universal access to quality tertiary education. Also highlighted among the responses was the prioritization of underprivileged students. Among respondents from private schools, the study also noted positive response regarding the law's recognition of the complementarity of public and private education.

Although the program objectives are well-understood, there is a mixed view of whether these objectives are realistic and achievable. Some respondents raise concerns regarding the design of the law and IRR, the implementation of the program components under the law, and the adequacy of resources to maintain these programs.

The main issue regarding service delivery and utilization which emerged from the interviews was lack of timely and clear guidelines. Stemming from this main issue were challenges in processing of billing requirements, which then resulted in delays in reimbursement.

However, despite these deficiencies, respondents generally described these challenges as “birthing pains” of the program and acknowledged the tremendous task that UniFAST had to face in the implementation of the law.

The study analyzes program organization at two levels – the level of UniFAST, as key implementer of the program, and at the level of universities, who are the frontline service providers to students. The UniFAST acknowledged that their biggest challenge about program organization in their first year of implementation was the lack of personnel to implement the program, both in number, and in technical capacity. However, the office was able to overcome this through support provided by CHED and technical working groups formed with key stakeholders and education specialists.

On the other hand, most HEIs reported that they did not require major adjustments to their enrollment and registration systems to process the documentary requirements required by the UniFAST. This, however, was not true for all schools, school size and information system capacities being identified as potential mediating factors. HEIs, particularly university associations, shared that UniFAST provided mechanisms for consultation as well as conducted information dissemination campaigns regarding the law. In addition to this, some university associations also have their own mechanisms to cascade information to their member schools.

The study analyzed enrollment data collected from HEIs to identify any potential shifts in enrollment patterns of students. It was noted that total HEI enrollment declined in the years

coinciding with the SHS implementation and recovered by AY 2018-19. One noteworthy observation is that public HEIs were able to recover better than private HEIs in AY 2018-2019 in terms of freshman enrollment, at least among the universities included in the sample. There are also indications of a widening gap in the share of public and private HEI enrollment, also among first year students. This can be seen in Figures 12 and 13, respectively, in the Appendix.

6.2. Recommendations

What follows are recommendations for improving the implementation of the Universal Access to Quality Tertiary Education Act (RA No. 10931) to improve the chances of achieving its stated objectives:

- **CHED should strengthen the monitoring of the quality of HEIs**, both public and private, as well as the quality standards it advocates. The importance of maintaining and improving the quality of education provided by HEIs is frequently stressed in the law and IRR. These documents also specify conditions HEIs must comply with to be allowed to receive program benefits under the law. The UniFAST should strictly implement these rules, and regularly review school quality and performance to ensure the optimal utilization of funds allocated to the programs under the law. There may also be a need to revisit the quality standards of CHED.
- **Look for ways to promote compliance with quality standards.** Specifically, this refers to institutional or program-based accreditation for LUCs and private HEIs, and application for COPCs for SUCs. CHED reported that one positive outcome with the implementation of the law is that LUCs have now been incentivized to pursue accreditation, which used to be a perennial problem for them. Through these incentives, the creation of LUCs by local governments may accelerate, thereby increasing the number of existing LUCs. Given this, measures should be taken to ensure quality at the outset. For instance, SB 1488 (2017) proposes setting mandatory guidelines on the establishment and operation of LUCs, this, as well as other initiatives, should be explored to ensure adherence to quality standards.
- **SUCs and LUCs should be monitored to ensure that they do not exceed their respective carrying capacities.** With the increasing number of applicants to public HEIs, one concern raised was that SUCs and LUCs may be incentivized to admit students in excess of the university's carrying capacity, thereby deteriorating school quality. Based on responses from public HEIs interviewed, however, this does not seem to be the case for most public HEIs. Most HEIs reported that their admission policies remain unchanged and they are still implementing quotas per program, however, UniFAST should continue to monitor this in the subsequent years as there are clear incentives in enrolling more students in SUCs and LUCs.
- **Leverage the subsidy to promote quality of HEIs.** Government stakeholders, including CHED-UniFAST should explore ways to incentivize, as well as support, investments in school quality. Some HEIs recommended that the government should explore providing subsidies directly to schools to invest in quality improvements and research programs and facilities of the schools.
- **The CHED-UniFAST needs to expand organizational support.** A program of this size needs the commensurate manpower that will allow for the effective implementation of the

policy. Besides a national secretariat, there should be additional staff delegated for each region that can cater to the needs and concerns of stakeholders in the different parts of the country. Alternative ways of delivering the tuition subsidies, the TES and student loans need to be explored and continuously evaluated for their effectiveness and efficiency.

- **Reassessment of program design with regards to the objective of the law to provide greater equity in access to tertiary education.** One key commitment stated in the law is the objective to give priority to academically able students from poor families. In the literature, free tuition schemes in multiple countries have been documented to have fallen short in their objectives, particularly those concerning equity. Disadvantages experienced by students from lower socioeconomic classes in primary and secondary education tend to remain barriers to their entrance to tertiary education, despite the provision of tuition subsidies. This issue was also raised by several respondents, who posited various alternative schemes, such as the socialization of tuition fees, as potentially more efficient ways to leverage limited government higher education funds. This view is bolstered by a paper by Orbeta and Paqueo (2017) which presents how untargeted tuition subsidies may worsen income inequalities, like the findings in the international literature. Given this, both implementers and legislators should remain open and flexible to facilitating redesign and improvements to the program to better democratize access to tertiary education, particularly, for the poor.
- **More efficient consultations/orientation utilizing exiting information technology.** The stakeholder consultations and/or orientations are usually done in the Central Office (in NCR). Some HEIs are hopeful that technology may be utilized and maximized so that online meetings may be used instead. It was also mentioned that consultations could be done in smaller groups (i.e. regional or zonal) while orientations could be conducted in larger groups.
- **Greater stability in implementing guidelines to avoid unnecessary delays in payments.** The UniFAST must craft clear and definite policies and release the corresponding guidelines to HEIs within a reasonable period. CHED-UniFAST has been diligent in conducting information campaigns across the country. However, respondents noted that guidelines provided on documentary requirements were constantly being changed and updated by the UniFAST. This resulted in difficulties in timely submission of administrative requirements, and, in turn, delays in payment.
- **Clarify the coverage of miscellaneous fees.** Public HEIs are concerned that their inability to collect miscellaneous fees – either from the UniFAST or their students – may affect school operations that are funded using this. There is a need to review the list of other school-related fees that can be reimbursed by qualified HEIs. This also should be well-established and disseminated to schools so that there will no longer be a need for the UniFAST to review requests of schools individually.
- **Strengthen the targeting mechanisms of the TES.** The UniFAST reported experiencing difficulties in the selection of first batch of grantees of the tertiary education subsidy. This was since the grantees identified in the first round, following the criteria specified by UniFAST, were not enough to fill all the slots allotted for the TES in 2018. In future calls

for applications for the TES, the UniFAST should establish a clear system of identification, based on the prioritization specified in the law.

- **Clarify the misconceptions surrounding Listahanan.** Based on the document review and responses to interviews, there seem to be some misconceptions regarding Listahanan that need to be cleared up. Some respondents equated being in the Listahanan to be a beneficiary of Pantawid Pamilya, or at least to being below poverty line²⁶, which is not the case. UniFAST needs to clear up these misconceptions to avoid confusion, both among its stakeholders and within the organization.
- **Calibrate the timing of calls for applications and deadlines for submission of requirements.** UniFAST should adjust the schedules for the various activities surrounding the implementation of the law in order to provide ample time for schools to accommodate these activities. Timing is also important for students, as the results of their application may influence their enrollment decisions, particularly for those who rely on the subsidies to continue their studies.

²⁶ Note that Listahanan is a survey and the full list of Listahanan households include those that are classified poor or non-poor based on the targeting model. The Listahanan *poor* households is a subset of the full list.

Bibliography

- Alexander, Karl L., Doris R. Entwisle, and Nader S. Kabbani. 2001. "The dropout process in life course perspective: Early risk factors at home and school." *Teacher College Record* 760-822. doi:10.1111/0161-4681.00134.
- Ankroth, Anna J. 2015. *The Effect of the Introduction of Tuition on College Enrollment in Germany: Results from a Natural Experiment with Special Reference to Students from Low Parental Education Backgrounds*. PhD Dissertation, Michigan: University of Michigan.
- Arango, Maria, Stuart Evans, and Zaitun Quadri. 2016. *Education Reform in Chile: Designing a Fairer, Better Higher Education System*. New Jersey, USA: Woodrow Wilson School of Public & International Affairs, Princeton University.
- Asuncion, Eric Jayson V., and Tereso S. Tullao, Jr. 2018. *Evaluation of Unified Student Financial Assistance System In Tertiary Education (UniFAST) in Addressing Capital Market Imperfection in the Philippines*. Working Paper Series 2018-02-049, Manila, Philippines: Angelo King Institute for Economic and Business Studies, De La Salle University.
- Balan, Jorge. 2014. *The Southern Cone of the Americas: Higher Education at a Crossroads*. Boston: The Boston College Center for International Higher Education.
- Baum, Sandy, and Kathleen Payea. 2004. *The Benefits of Higher Education for Individuals and Society*. New York: The College Board.
- Baumgartner, Hans J., and Viktor Steiner. 2004. *Student Aid, Repayment Obligations and Enrolment into Higher Education in Germany - Evidence from a 'Natural Experiment'*. Berlin, Germany: Free University of Berlin.
- Biglete, Amelia A. 2018. "CHED New Policies, Standards and Guidelines (PSGs)." *The 2018 AACUP Annual Accreditors' Conference*. Accrediting Agency of Chartered Colleges and Universities in the Philippines (AACUP), Inc. Accessed March 7, 2019. <http://www.aacupqa.org.ph/images/2018AccreditorsConference/Presentations/AACUPPresentationAsOfSept192018-DrAmyABiglete.pdf>.
- Bucarey, Alonso. 2018. *Who Pays for Free College? Crowding Out on Campus*. Cambridge, Massachusetts: Department of Economics, Massachusetts Institute of Technology.
- Buckner, Elizabeth. 2013. *Moroccan Universities Must Begin to Charge Tuition*. September 10. <https://www.al-fanarmedia.org/2013/09/moroccan-universities-must-begin-to-charge-tuition/>.
- Commission on Audit. 2018. *Consolidated Annual Audit Report on the Commission on Higher Education*. Quezon City, Philippines: Commission on Audit.
- Commission on Higher Education. 2018. *CHED on COA Report: Free Tuition 2017 reimbursements to SUCs almost complete*. Quezon City, NCR, August 21. Accessed November 25, 2018.

<https://ched.gov.ph/blog/2018/08/21/ched-on-coa-report-free-tuition-2017-reimbursements-to-sucs-almost-complete/>.

- Conchada, Mitzie Irene P., and Marites M. Tiongco. 2015. *A Review of the Accreditation System for Philippine Higher Education Institutions*. Discussion Paper Series No. 2015-30, Quezon City, Philippines: Philippine Institute for Development Studies.
- De Gayardon, Ariane. 2018. "Income Contingent Loans: Not a Miracle Solution." *International Higher Education* 18-19. doi:<http://dx.doi.org/10.6017/ihe.2018.93.10373>.
- Delisle, Jason, and Andres Bernasconi. 2018. *Lessons from Chile's Transition to Free College*. Evidence Speaks Reports, Vol. 2, #43, Washington, D.C.: Brookings Institution. Accessed December 14, 2018. <https://www.brookings.edu/wp-content/uploads/2018/03/delisle-and-bernasconi-report.pdf>.
- Delisle, Jason, and Andres Bernasconi. 2018. *Lessons from Chile's Transition to Free College*. Evidence Speaks Reports, Vol. 2, No. 43, Washington, DC, USA: Brookings Institution.
- Department for Education and Skills, Ireland. 2003. *The Future of Higher Education*. London: DfES.
- Department of Budget and Management, Philippines. 2018. *2019 CHED budget 'rationalized' not gutted*. Manila, Philippines, August 15.
- European Commission. 2014. *European Funding Guide*. August 27. <http://www.european-funding-guide.eu/articles/grants-and-loans/grants-and-loans-finland>.
- Fernandez Lamarra, Norberto. 2002. "La educació n superior en la Argentina [Higher education in Argentina]." Report prepared for IESALC. http://www.iesalc.unesco.org.ve/programas/nacionales/argentina/infnac_ar.pdf.
- Garcia de Fanelli, Ana Maria. 2005. *Universidad, organizacion e incentivos: Desafios de la politica de financiamiento frente a la complejidad institucional [University, organization, and incentives: Challenges to funding policy from institutional complexity]*. Buenos Aires: OSDE-Miño y Dávila.
- Gayardon, Ariane , and Andres Bernasconi. 2016. *Chilean Universities: Not So Tuition-free After All*. Massachusetts, USA: International Higher Education - The Boston College Center for International Higher Education, 23-25. doi:<https://doi.org/10.6017/ihe.2016.86.9372> .
- Gertler, Paul J. , Sebastian Martinez, Patrick Premand, Laura B. Rawlings, and Christel M.J. Vermeersch. 2011. *Impact Evaluation in Practice*. Washington, DC, USA: World Bank.
- Greenaway, David, and Michelle Haynes. 2003. "Funding Higher Education in the UK: The Role of Fees and Loans." *The Economic Journal* (Blackwell Publishing) CXIII (485): F150-F166.
- Habibi, Nader, and Fatma El-Hamidi. 2016. *Why are Egyptian Youth Burning Their University Diplomas? The Overeducation Crisis in Egypt*. Waltham, Massachusetts, USA: Crown Center for Middle East Studies - Brandeis University. Accessed April 2, 2019. <https://www.brandeis.edu/crown/publications/meb/MEB102.pdf>.

- Horch, Dan. 2014. "As Demand for Education Rises in Brazil, For-Profit Colleges Fill the Gap." *The New York Times*, June 19. <https://dealbook.nytimes.com/2014/06/19/as-demand-for-education-rises-in-brazil-for-profit-colleges-fill-the-gap/>.
- InfoFinland. 2019. *infoFinland.fi*. January 28. <https://www.infofinland.fi/en/living-in-finland/education/financing-studies>.
- Jackson, Abby. 2015. "Brazil has tuition-free college - but it comes with a catch." *Business Insider*, June 25. Accessed March 27, 2019. <https://www.businessinsider.com/brazil-has-tuition-free-college-but-it-only-serves-a-portion-of-its-citizens-2015-6>.
- Japan International Cooperation Agency. 2017. *Higher Education Sector Cooperation Planning Survey in Egypt*. Japan: Japan International Cooperation Agency; Asia SEED.
- Kamyab, Shahrzad. 2015. "Flying Brains: A Challenge Facing Iran Today." *International Higher Education* (The Boston College Center for International Higher Education). doi:<https://doi.org/10.6017/ihe.2007.47.7955>.
- Kauder, Björn, and Niklas Potrafke. 2013. *Government ideology and tuition fee policy: Evidence from German states*. Ifo Working Paper No. 159, Munich, Germany: Ifo Institute-Leibniz Institute for Economic Research, University of Munich. Accessed April 15, 2019. <https://www.cesifo-group.de/DocDL/IfoWorkingPaper-159.pdf>.
- Kehm, Barbara. 2014. "How Germany managed to abolish university tuition fees." *The Conversation*. October 13. <https://theconversation.com/how-germany-managed-to-abolish-university-tuition-fees-32529>.
- Kroth, Anna J. 2015. *The Effects of the Introduction of Tuition on College Enrollment in Germany: Results from a Natural Experiment with Special Reference to Students from Low Parental Education Backgrounds*. Ann Arbor: University of Michigan.
- Lahsini, Chaima. 2018. "Moroccan Government Wants to Put an End to Free Education." *Morocco World News*, January 3. <https://www.moroccoworldnews.com/2018/01/237595/moroccan-government-free-education/>.
- Lan, William, and Richard Lanthier. 2003. "Changes in Students' Academic Performance and Perceptions of School and Self Before Dropping Out of Schools." *Journal of Education for Students Placed at Risk* 309-332.
- Lauer, Charlotte. 2002. *Enrolments in higher education: do economic incentives matter?* New York City: MCB UP Ltd. doi:10.1108/00400910210432068.
- Lazrak, Mohammed, and Yahya Yechouti. 2017. "Issues in Moroccan Higher Education." *International Journal of English Language & Translation Studies* 86-93. Accessed April 2, 2019. <http://www.eltsjournal.org/archive/value5%20issue2/12-5-2-17.pdf>.
- Marcucci, Pamela N., and D. Bruce Johnstone. 2007. "Tuition fee policies in a comparative perspective: Theoretical and political rationales." *Journal of Higher Education Policy and Management* (Routledge) XXIX (1): 25-40. doi:10.1080/13600800600980015.

- Marcucci, Pamela N., and D. Bruce Johnstone. 2007. "Tuition fee policies in a comparative perspective: Theoretical and political rationales." *Journal of Higher Education Policy and Management* XXIX (1): 25-40. doi:10.1080/13600800600980015.
- Memo Middle East Monitor. 2017. *Millions lost as one fifth of educated Moroccans leave country*. September 17. <https://www.middleeastmonitor.com/20170912-millions-lost-as-one-fifth-of-educated-moroccans-leave-country/>.
- Ministry of Education, New Zealand. 2017. December 4. <https://www.education.govt.nz/news/details-of-fees-free-tertiary-education-and-training-for-2018-announced/>.
- Mohseni-Cheraghloou, Amin. 2017. "Update from Iran: Iran's Over-Education Crises." *The World Bank*. October 6. <http://blogs.worldbank.org/arabvoices/iran-education-crises>.
- Mollis, Marcela. 2002. *Higher Education Transition in Argentina*. Massachusetts, USA: Center for International Higher Education, Campion Hall, Boston College. doi:<https://doi.org/10.6017/ihe.2002.26.6960>.
- OECD. 2005. "Education Policy Analysis 2004." In *Education Policy Analysis 2004*, by OECD, 57-72. Paris: OECD.
- OECD. 2015. *Education Policy Outlook Brazil*. Paris: OECD.
- OECD. 2016. "Germany." In *Education at a Glance 2016: OECD Indicators*, by OECD. Paris: OECD Publishing. doi:<https://doi.org/10.1787/eag-2016-56-en>.
- Oltermann, Philip. 2019. "Germany axed tuition fees - but is it working out? Critics of Britain's education revolution cite the Berlin model." *The Observer Germany*, June 4. Accessed April 3, 2019. <https://www.theguardian.com/world/2016/jun/04/tuition-fees-germany-higher-education>.
- Orbeta, Jr. , Aniceto C., and Vicente B. Paqueo. 2017. *Who benefits and loses from an untargeted tuition subsidy for students in SUCs?* Policy Notes No. 2017-03, Quezon City : Philippine Institute for Development Studies. Accessed November 11, 2018. <https://dirp4.pids.gov.ph/websitcms/CDN/PUBLICATIONS/pidspn1703.pdf>.
- Pereira da Silva, Thomas. 2018. *High and Persistent Skilled Unemployment in Morocco: Explaining it by Skills Mismatch*. Rabat, Morocco: Policy Center for the New South - OCP Policy Center.
2016. "President's Veto Message: Fiscal Year 2017." *Official Gazette*. Republic of the Philippines, December 29.
- Rafterty, Adrian E., and Michael Hout. 1993. "Maximally Maintained Inequality: Expansion, Reform, and Opportunity in Irish Education." *Sociology of Education* LXVI (1): 41-62. <http://www.jstor.org/stable/2112784> .
- Republic Act No. 10687. 2015. "Unified Student Financial Assistance System for Tertiary Education (UniFAST) Act." Quezon City: Congress of the Philippines, October 15.

- Republic Act No. 10931. 2017. "Universal Access to Quality Tertiary Education Act." Metro Manila: Congress of the Philippines, August 3.
- Rozada, Martin Gonzalez, and Alicia Menendez. 2002. "Public university in Argentina: subsidizing the rich?" *Economics of Education Review* (Elsevier Science Ltd.) 341-351.
- Sawahel, Wagdy. 2018. *Mixed responses to university registration fee proposal*. January 19. <https://www.universityworldnews.com/post.php?story=20180119090249920>.
- . 2018. "Mixed responses to university registration fee proposal." *University World News*, January 19. <https://www.universityworldnews.com/post.php?story=20180119090249920>.
- Schugurensky, Daniel. 2002. *Students ignite democratic university reform in Cordoba, Argentina 1918*. August 14. <http://schugurensky.faculty.asu.edu/moments/1918cordoba.html>.
- Steiner, Viktor, and Katharina Wrohlich. 2008. *Financial Student Aid and Enrollment into Higher Education: New Evidence from Germany*. Discussion Paper 805, Berlin: DIW Berlin. https://www.diw.de/documents/publikationen/73/diw_01.c.87572.de/dp805.pdf.
- Tomacruz, Sofia. 2018. "DBM clarifies lower budget for student aid." *Rappler News*. August 16. <https://www.rappler.com/nation/209692-dbm-clarification-budget-financial-assistance-for-students>.
- Uy, Danica M. 2017. "Economic team rejects free tuition in state schools." *Business World Online*, February 10. Accessed November 11, 2019. <http://www.bworldonline.com/content.php?section=Economy&title=economic-team-rejects-free-tuition-in-state-schools&id=140425>.
- Wolter, Andrä. 2004. "From State Control to Competition: German Higher Education Transformed." *The Canadian Journal of Higher Education* XXXIV (3): 73-104.

Appendices

A. Comparative Table on the Components of the Free Tuition 2017 and RA 10931

Components	Free Tuition 2017	Universal Access to Quality Tertiary Education Act of 2017 (RA 10931)			
		Free Higher Education	Free TVET	Tertiary Education Subsidy	Student Loans Program
Start of implementation	AY June 2017 - March 2018 and AY August 2017 - May 2018 only	AY 2018-2019 onwards	Starting January 2018	AY 2018-2019 onwards	<ul style="list-style-type: none"> Short-term loans: AY 2018-2019 onwards Long-term loans: AY 2019 to 2020
Budget allocation	<ol style="list-style-type: none"> Php 8 billion; Special budget pursuant to Section 35, Chapter 5, Book VI of E.O. No. 292, S. 1987 Estimated tuition income of the SUC stated in Table G of the 2017 BESF; 	To be determined by respective SUC/LUC Governing Boards based on projected number of enrollees for each academic year	To be determined by the Governing Board of TESDA based on the projected number of enrollees per program	-	-
Budget disbursement	Billing of CHED by SUC, funds to be sourced from the Higher Education Support Fund (HESF) of CY 2017 CHED Budget	<ol style="list-style-type: none"> Release of 50% of appropriated funds as mobilization fund by CHED to SUCs/LUCs at the beginning of their academic years Semestral/trimestral billing of CHED by SUC/LUC 	<ol style="list-style-type: none"> Release of funds to TESDA by CHED Transitory period: STVIs shall bill TESDA the appropriate balance 2019 onwards: Funds for free TVET shall be included in the annual appropriation of the TESDA. 	Included in the budgets of the CHED and TESDA	<ol style="list-style-type: none"> Transition period: Included in the annual GAA appropriated under CHED and TESDA Starting 2019: Annual appropriation of UniFAST
Implementing Rules and Regulations	CHED-DBM Joint Memorandum Circular No. 2017-1, April 20, 2017;	Implementing Rules and Regulations of Republic Act No. 10931, known as the	Implementing Rules and Regulations of Republic Act No. 10931, known as	Implementing Rules and Regulations of Republic Act No. 10931, known as	Implementing Rules and Regulations of Republic Act No. 10931, known

	Guidelines on the Grant of Free Tuition in SUCs for Fiscal Year 2017	"Universal Access to Quality Tertiary Education Act of 2017" (approved Feb 2018)	the "Universal Access to Quality Tertiary Education Act of 2017" (approved Feb 2018)	the "Universal Access to Quality Tertiary Education Act of 2017" (approved Feb 2018)	as the "Universal Access to Quality Tertiary Education Act of 2017" (approved Feb 2018)
				Detailed guidelines to be developed by the UniFAST board	SLP Handbook (to be released by UNIFAST board)
Benefits	Free tuition only	Free Higher Education in SUCs and LUCs: 1. Free tuition for all courses/subjects/classes as part of the curriculum and are essential to obtaining a degree 2. Free miscellaneous, other school fees as defined by law	1. Free training and training-related expense 2. Living allowances 3. Starter toolkit 4. Cost of accreditation 5. Instructional materials allowance	TES 1: 1. Tuition and other fees for private HEIs TES 2: 2. Other educational expenses 3. Room and board TES 3: 4. Allowances for expenses related to disability 5. One-time cost of obtaining first professional credentials or qualifications	1. Short-term student loans 2. Long-term student loans
Coverage	Filipino undergraduates, subject to: 1. Admission/retention policies of institutions 2. Availability of funds 3. Prioritization for poor students and those with government StuFAPs Php 15k and below	Filipino undergraduates, subject to: 1. Admission/retention policies of institutions 2. Future qualification policies mandated by the UniFAST board	1. Learners enrolled in a TESDA-registered TVET program, subject to admission/retention policies of the institution and any future qualification policies mandated by the UniFAST board 2. Learners who are not holding a National	1. Students using TES benefits for first post-secondary higher education program 2. Students using TES benefits for post-secondary TVET programs registered under TESDA 3. For programs and institutions in the Registry	All Filipino students enrolling in post-secondary programs provided that the students: 1. Qualify under the existing admission and retention standards of the HEIs/screening of TVI

			Certification Level 3 or higher	<p>4. Students qualified under the admission/retention policies of institutions, and any future qualification policies mandated by the UniFAST board</p> <p>Note: This is subject to prioritization and availability of funds</p>	<p>2. Who previously availed of the loan have fully paid the previously availed loans</p> <p>3. Who have not previously availed of the loan may avail it to pursue continuing studies</p> <p>4. Who did not previously avail of the loan may avail of the loan program for review expenses for licensure examinations</p> <p>5. Other requirements: TIN, SSS number, financial counseling, designated guarantor</p>
Exceptions	None, but subject to prioritization and availability of funds	<p>1. Students who have already obtained a bachelor's degree</p> <p>2. Students who fail to comply with the admission and/or retention policies of the SUCs or LUCs</p> <p>3. Students who fail to complete their bachelor's degree within a year after the period prescribed in their program</p>	<p>1. Learners who have obtained a bachelor's degree</p> <p>2. Learners who are already holders of a certificate equivalent to a NC III or higher, unless enrolled in bundled courses in Level IV</p> <p>3. Learners who fail in any public TVET</p>	<p>Higher Education:</p> <p>1. Students who did not qualify under the admission and retention requirements of eligible HEIs</p> <p>2. Students who have exceeded the maximum residency rule of their programs</p>	None

		4. Students who voluntarily opt out of the free education	<p>course since effectivity of the Act</p> <p>4. Learners enrolled in TVET programs not registered under TESDA</p> <p>5. Learners who voluntarily opt out of the free TVET provision</p>	<p>3. Students enrolled in programs/HEIs not included in the registry</p> <p>TVET:</p> <p>1. Students who availed of other government-funded StuFAPS</p> <p>2. Students who did not undertake or qualify under TVIs' screening procedures</p> <p>3. Students enrolled in TVET programs not included in the Registry</p>	
Prioritization	<p>1. Beneficiaries of nationally-funded StuFAPS</p> <p>2. Continuing students:</p> <p>a. Graduating students with one semester,</p> <p>b. Graduating students with one academic year,</p> <p>c. Non-graduating 4Ps beneficiaries</p> <p>d. Non-graduating students listed in Listahanan ranked according to per capita household income</p> <p>e. Non-graduating students ranked according to their</p>	No prioritization, but financially-able students can opt-out or give voluntary contributions	No prioritization, but financially-able students can opt-out or give voluntary contributions	<p>1. Students included in the most recently updated Listahanan</p> <p>2. Students not included in Listahanan and ranked according to their per capita income</p> <p>Note: This prioritization system shall not apply to Filipino students in cities and municipalities with no existing SUCs or LUCs</p>	None

	per capita household income 3. New enrollees and returning – same order of prioritization as continuing students				
Providers	State Universities and Colleges	SUCs and CHED-recognized LUCs	TTIs, SUCs, LUCs, LGU-run TVET centers	SUCs, LUCs, private HEIs included in the Registry of Quality Assured Programs and Institutions	To be administered by the UniFAST together with its implementation partners
Opt-out mechanism?	No	Yes	Yes	No	No
Student voluntary contribution mechanism?	No	Yes	Yes	No	No

B. Respondent Profile

Figure 10. Number of universities by type

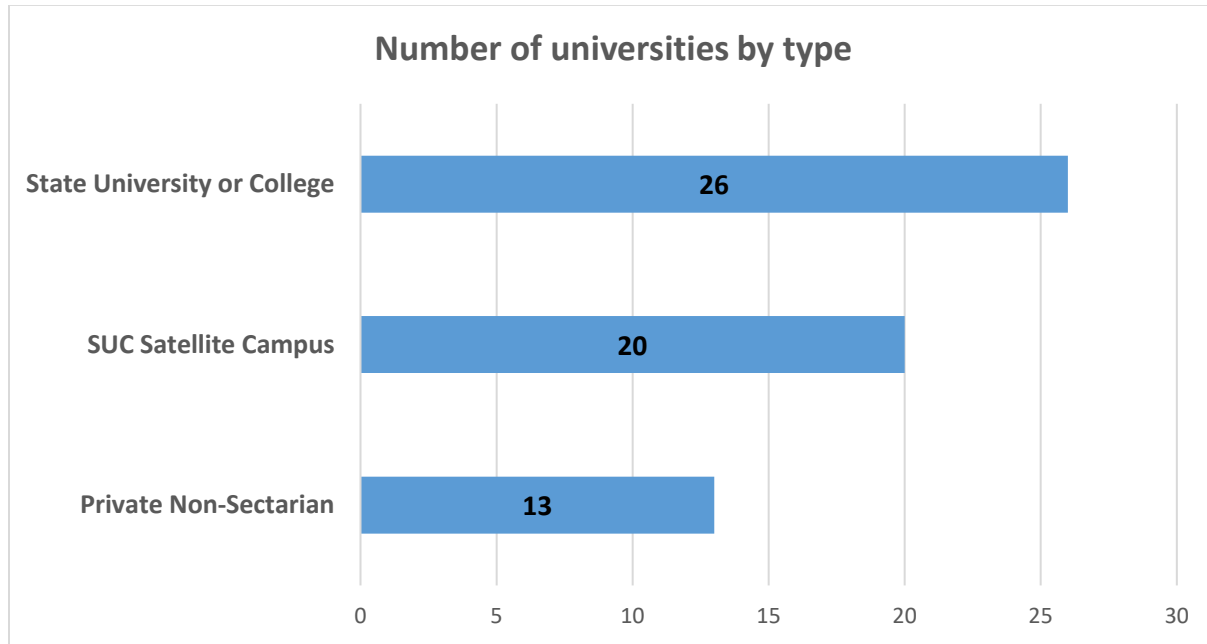
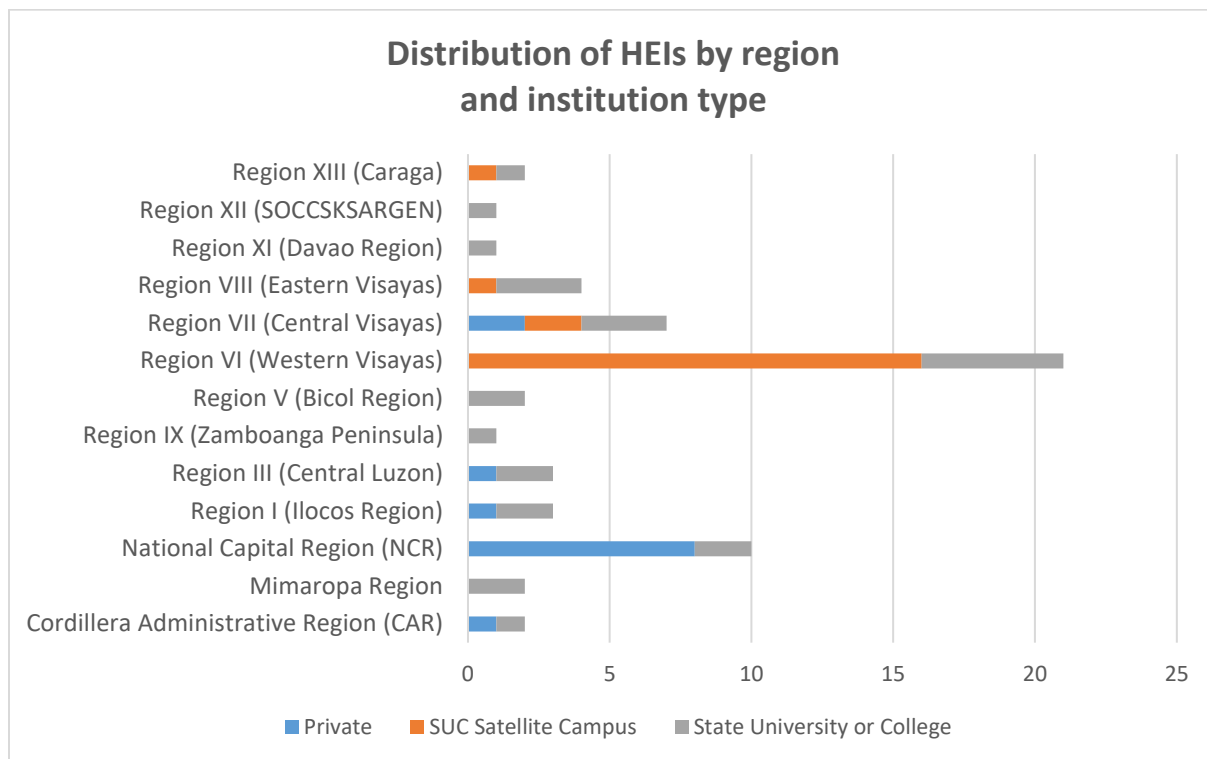
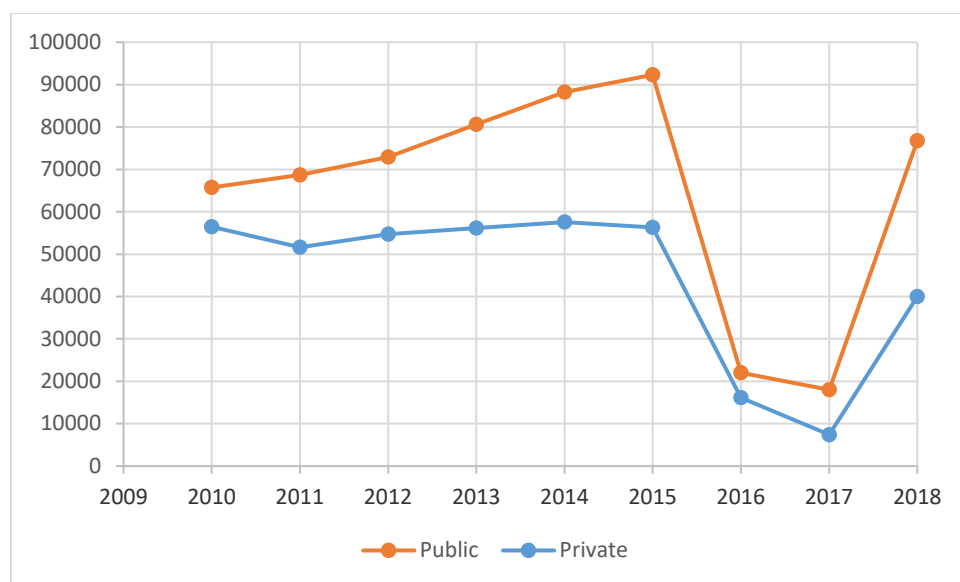


Figure 11. Distribution of HEIs by region and institution type



C. Enrollment of first year college students in public and private HEIs

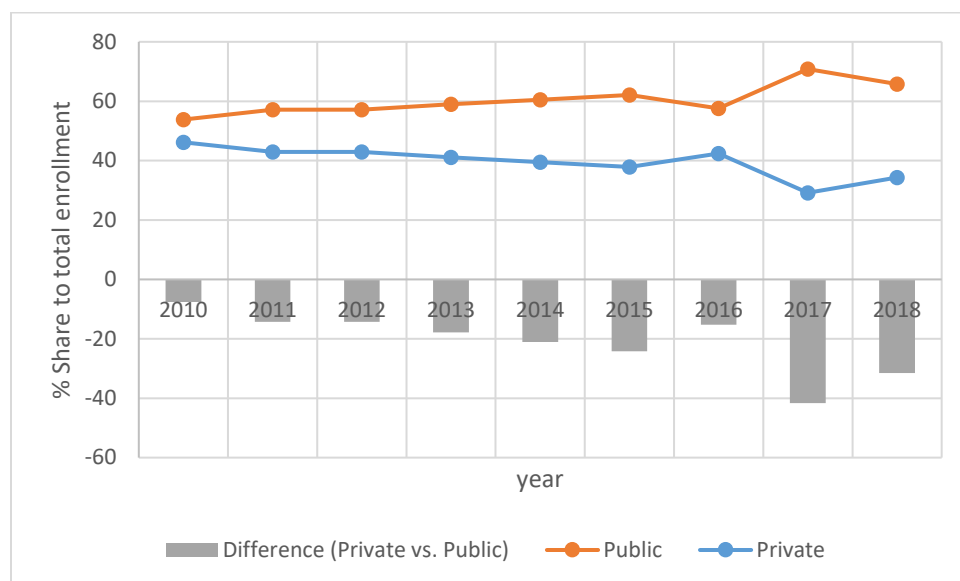
Figure 12. Public and private HEI enrollment of 1st year college students (AY 2010-11 to 2018-19)



Notes: n=59 schools; SHS implementation started in 2016

Source: Enrollment data submitted by schools

Figure 13. Share of public and private HEI enrollment among 1st year college students (AY 2010-11 to 2018-19)



Notes: n=59 schools; SHS implementation started in 2016

Source: Enrollment data submitted by schools

D. Questionnaire – KII with SUCs/LUCs

Respondent: _____

Designation/Affiliation: _____ **Date:** _____

Topic	Responses
1. Program Logic and Plausibility	
What are the objectives of the free tuition policy for SUCs and LUCs?	
Are these objectives realistic and achievable given the approach adopted by the policy?	
Is there a better approach of achieving the stated objectives? If yes, please describe.	
2. Service Delivery and Utilization	
Free tuition in 2017: Status of reimbursement (for <i>Public HEIs</i>)	
Free tuition Law in 2018 (RA 10931): Status of implementation of program components	
a. Free Tuition (for <i>Public HEIs</i>)	
b. Tertiary Education Subsidy	
c. Student Loan Program	
<i>Status of the development of the guidelines</i>	
a. Free Tuition (for <i>Public HEIs</i>)	
b. Tertiary Education Subsidy	
c. Student Loan Program	
What are your comments on the current guidelines? (e.g. in terms of completeness, practicality, clarity, etc.)	
a. Are these guidelines consistent across member schools? What is the cause of these inconsistencies, if any?	
b. Was there any deviation from the guidelines in terms of actual implementation? If yes, please elaborate.	
What are the effects of the law on the school's enrollment trend? Did the school observe an increase in the number of applicants for school year 2018/19 relative to pre-K12 and K12 school years?	
Were there students you had to refuse enrollment because of lack of slots in your school? If yes, how did you sort which students were admitted and which ones were denied admission?	
<i>Process of selection of beneficiaries</i>	
a. Free Higher Education / Admission policy: Who enrolls in the school and gets free tuition and miscellaneous fees? (for <i>Public HEIs</i>)	
b. Tertiary Education Subsidy (TES)	

Topic	Responses
c. Student Loan Program (SLP)	
Comparing those who received the benefits and the intended beneficiaries, is the program reaching the target beneficiaries? Why do you say so?	
What are the challenges and facilitating factors to its delivery and implementation?	
Is there a specific / limited number of slots allotted for students under the TES / SLP component? Are the slots enough?	
What is your perspective on the idea that the money goes through the CHED/UniFAST first and not directly allocated to the SUCs/LUCs? (for Public HEIs)	
Are you satisfied with how the program components have been implemented? What would you have wanted differently?	
3. Program Organization	
What kind of organizational support was developed to implement the free higher education law in your school?	
Who do you think are the stakeholders of the program? What is your relationship with them?	
Did you develop a monitoring and evaluation (M&E) system specifically for the program? If yes, please describe, particularly, how is it different from the M&E system of your other programs. Please describe in particular what information are being gathered, the sources of the information, and the reporting system.	
Was the university able to participate in any information dissemination activity on the implementation of RA No. 10931? If yes: <ul style="list-style-type: none"> • What were the topics included in the said activity? • Who conducted / organized the said activity? • What is your assessment on the information dissemination activity that was conducted? 	
Prior to the legislation of this policy, was the university invited to participate in any public consultation on the drafting of the Implementing Rules and Regulations? If yes, how would you assess the extent of your participation in the said public consultation meeting?	
4. For LUCs:	
<i>Process of Accreditation of LUCs</i>	
a. What are the steps and requirements involved in the accreditation of LUCs for the Free Tuition Law? Are these	

Topic	Responses
indicated in any regulatory document (e.g. Memorandum Order)? Kindly specify.	
b. What are your insights on the accreditation process?	
c. Are there any issues / challenges with the accreditation process? If yes, what are these?	

E. Discussion Points – KII with CHED-UniFAST

Topic	Responses
1. Program Logic and Plausibility	
Understanding on the objectives of the Free Tuition Law	
Insights about the stated objectives given the approach adopted by the policy	
2. Service Delivery and Utilization	
Service delivery <ul style="list-style-type: none"> • Details about the target beneficiaries of each program component (i.e. TES, Free Higher Education) • Details on the selection/prioritization of program beneficiaries of the TES program • Details on how reimbursement is implemented for each program component (i.e. TES, Free Higher Education) • Details on the accreditation process for LUCs • Initial assessment of impact of the law on enrollment in public and private HEIs 	
Challenges and facilitating factors to the delivery and implementation of the following program components: <ul style="list-style-type: none"> • Free Higher Education • Tertiary Education Subsidy • Student Loan Program 	
Utilization—Assessment of the demand for the program’s benefits relative to resources provided: <ul style="list-style-type: none"> • Ratio of TES grantees to applicants (particularly those who have satisfied the minimum requirements of eligibility)? • Trend of applications (for first year enrollment) to SUCs/LUCs • SUC/LUC university slots • Feedback from SUCs/LUCs 	
3. Program Organization	
Organizational support developed to implement Free Tuition Law	
Details on UniFAST’s involvement in the crafting of the law and IRR	
Stakeholders of the program	
Implementation guidelines	
Development of monitoring and evaluation system	

F. Questionnaire – KII with University Associations

Topic	Responses
1. Program Logic and Plausibility	
What are the objectives of the free tuition policy for SUCs and LUCs?	
Are these objectives realistic and achievable given the approach adopted by the policy?	
Is there a better approach of achieving the stated objectives? If yes, please describe.	
2. Service Delivery and Utilization	
<i>Which components of the free higher education law (free tuition, TES, student loans) were implemented? What systems were put in place to respond to the free higher education law and on the intended clients? Assess the response of the HEI to the policy change.</i>	
These sets of questions should be answered separately for each type of subtopic:	
<p>How were you affected by the following?</p> <ul style="list-style-type: none"> Free tuition in 2017 <ul style="list-style-type: none"> For SUCs/LUCs: How was the reimbursement of tuition fees implemented in member schools? For Private HEIs: Did free tuition in SUCs/LUCs have an effect on enrollment in member schools? Free tuition Law in 2018 (RA 10931) <ul style="list-style-type: none"> Free tuition for SUCS and LUCs TES Student loan 	
Which components of the free higher education law (free tuition, TES, student loans) did member schools implement? What systems were put in place to implement these components?	
<p>Did CHED release any guidelines for the implementation of the component programs?</p> <ul style="list-style-type: none"> What is your evaluation of these guidelines? (e.g. in terms of completeness, practicality, clarity, etc.) Are these guidelines consistent across member schools? What is the cause of any inconsistencies (e.g. different region or district, etc.) Was there any deviation from the guidelines in terms of actual implementation? (e.g. computation of the amount of subsidy) If yes, please elaborate. 	
<p>Service delivery</p> <ul style="list-style-type: none"> Who are the intended beneficiaries? How did you identify the beneficiaries? 	

Topic	Responses
<ul style="list-style-type: none"> How are the benefits delivered to beneficiaries? Comparing those who received the benefits and the intended beneficiaries, is the program reaching the target beneficiaries? 	
What are the possible challenges and facilitating factors to its delivery and implementation?	
Utilization <ul style="list-style-type: none"> How is the demand for the program's benefits relative to resources provided? Do the beneficiaries have any feedback? Are they satisfied? Do you have feedback from non-beneficiaries? Please describe your own perspective on the reactions of the beneficiaries and non-beneficiaries. 	
Are you satisfied with how the program has been implemented? What would you have wanted differently?	
3. Program Organization	
Was the association consulted prior to implementation? After implementation?	
Did the association conduct any information dissemination activities regarding the Free Tuition Law? If yes, to whom did the association direct this towards?	
What did the association do to provide support to member schools to prepare for implementation?	
Did the association receive any assistance (e.g. technical) from CHED? If yes, please specify.	
Who do you think are the stakeholders of the program? What is your relationship with them?	
Did you develop a monitoring and evaluation system specifically for the program? If yes, please describe, particularly, how is it different from the M&E system of your other programs. Please describe in particular what information are being gathered, the sources of the information, and the reporting system.	