

Transparency and Accountability in the Selection of Publishers for School Textbooks in Kosovo

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This policy paper was originally written in Albanian. Therefore, should there be any ambiguity in this translated and adapted version, please refer to the original version, **“Transparenca dhe llogaridhënia në përzgjedhjen e shtëpive botuese për tekstet shkollore në Kosovë”**.

Executive Summary

This research analyzes transparency and accountability in the process of evaluating, approving, selecting, and using school textbooks in Kosovo. The analysis is based on a review of the legal framework and institutional documents, interviews with education experts and stakeholders, a focus group, a thematic discussion, and a survey of citizens and teachers. The aim is to assess whether the current system establishes a clear and verifiable decision-making process and whether it ensures equal treatment of textbooks and publishers.

- The findings show that the legal framework defines the roles of reviewers, the Council of Experts for Curricula and School Textbooks (CECST), the Ministry of Education, and Science (MES), and schools, but does not always ensure full transparency regarding how the final decision is made. This becomes particularly important when a manuscript that initially fails to meet the required threshold is subsequently approved. In such cases, it should be possible to verify what was corrected, whether an expert reassessment was conducted, and on what basis the final decision was made. Publishing reviewers' reports, scores, required corrections, and the rationale for approval would make the process more transparent and help ensure that the same standard is applied to alternative textbooks.
- Another weakness emerges after approval, when the selection of textbooks is transferred to schools and teachers. The law recognizes their right to choose, but does not establish a uniform procedure for comparing textbooks, decision-making criteria, documentation of voting, or the pedagogical rationale behind the decision. This creates room for differing practices among schools and potential influence from publishers. This concern is also reflected in the survey, where 85.7% of respondents perceive that publishers have either a significant or some influence on textbook selection, while 44.6% do not believe at all that the selection is primarily based on quality.



The research recommends that the same quality standard be applied to all textbooks, that decision-making be documented and verifiable, that the selection process in schools be standardized, and that a public mechanism be established for reporting and addressing shortcomings after approval. These measures would reduce the scope for unjustified decision-making and external influence, while directing the process more clearly toward textbook quality and the best interests of students.

- The analysis also identifies a significant gap after textbooks enter into use. Errors and shortcomings may become apparent only during classroom use, yet there is currently no clear and centralized mechanism for reporting, recording, and addressing them. In the survey, 80.4% of respondents stated that they have frequently observed errors or shortcomings in school textbooks. Therefore, accountability should not end with the approval of a textbook but should continue through a system that clearly determines who is responsible for addressing identified problems and when correction, reassessment, suspension, or withdrawal from use is required.

The research recommends that the same quality standard be applied to all textbooks, that decision-making be documented and verifiable, that the selection process in schools be standardized, and that a public mechanism be established for reporting and addressing shortcomings after approval. These measures would reduce the scope for unjustified decision-making and external influence, while directing the process more clearly toward textbook quality and the best interests of students.

Definition of the Problem and Purpose of the Analysis

The quality of school textbooks directly affects the way students acquire knowledge, develop skills, and cultivate critical thinking, with the aim of successfully achieving the learning outcomes defined by the curriculum. For this reason, the selection of textbooks used in pre-university education is not merely a professional or administrative procedure, but a decision of significant public importance.

In Kosovo, the selection of textbooks takes place through several stages and involves professional reviewers, the Ministry of Education and Science (MES), the Council of Experts for Curricula and School Textbooks (CECST), teachers, and school governing bodies. The existence of several levels of evaluation and decision-making is intended to ensure the quality and impartiality of the process. However, the involvement of multiple stakeholders does not, in itself, guarantee transparency and accountability.

This research aims to analyze whether the legal framework and its implementation in practice establish a complete, transparent, and verifiable accountability chain. The objective is to identify procedural gaps and integrity risks that may lead to unjustified decision-making, conflicts of interest, favoritism, or the approval of textbooks that do not meet the required standards, even when procedures are formally compliant with the law. In this regard, transparency and accountability are treated as prerequisites for safeguarding the quality of textbooks and protecting the interests of students.

In addition to reviewing legislation, administrative instructions, institutional decisions, and public reporting, interviews were conducted with experts and stakeholders in the field of education, along with focus group discussions and a survey of citizens and teachers. These data were used to complement the analysis with experiences, perceptions, and concrete suggestions regarding the quality, approval, and selection of school textbooks.

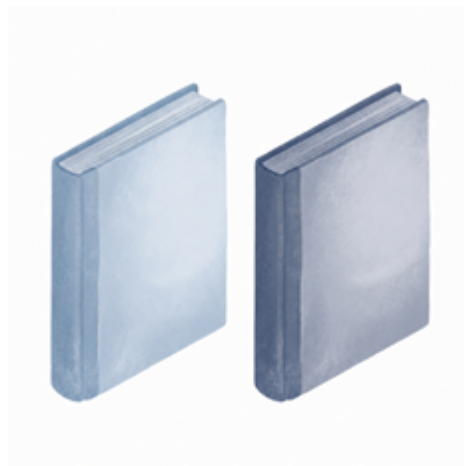
Legal and Institutional Framework

The process of drafting, evaluating, approving, and using school textbooks is regulated by the Law on the Publication of School Textbooks, Teaching Materials, School Reading Materials, and Pedagogical Documentation (No. 02/L-67),¹ *Administrative Instruction on Reviewers, the Evaluation and Approval of School Textbooks and Teaching Materials* (No. 18/2018),² as well as the *Administrative Instruction on the Implementation of Standards for School Textbooks* (No. 05/2011).³ These legal acts establish the procedures for evaluating and approving manuscripts, quality standards, and the process for selecting textbooks for use in schools.

The process involves several levels of decision-making. Reviewers evaluate the manuscripts, the Council of Experts for Curricula and School Textbooks (CECST) reviews the reports and proposes the final list to the minister, while the minister approves the textbooks for publication. Following approval, teachers select the textbook from the catalog of approved textbooks, and the selection is approved by the school council. This division defines the roles and responsibilities of each stakeholder in the process, from the evaluation of manuscripts to the approval and selection of textbooks for use in schools.



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1 MES, Law No. 02/L-67 on the Publication of School Textbooks, Teaching Materials, School Reading Materials, and Pedagogical Documentation, 2007, available at: <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2437>

2 MES, Administrative Instruction No. 18/2018 on Reviewers, the Evaluation and Approval of School Textbooks and Teaching Materials, 2018.

3 MES, Administrative Instruction No. 05/2011 on the Implementation of Standards for School Textbooks, 2011, available at: <https://gzk.rks-gov.net/ActDetail.aspx?ActID=8050&utm>.

Transparency and Accountability in the Evaluation and Approval of Textbooks

The division of responsibilities among reviewers, CECST, and the minister formally establishes a chain of accountability in the process of evaluating and approving textbooks. However, accountability requires more than simply knowing which institution has the authority to make a particular decision. It must be possible to verify the basis on which that decision was made, whether the required corrections were implemented, and how the final decision regarding a publisher's manuscript was justified.

The Law on the Publication of School Textbooks (No. 02/L-67) stipulates that manuscripts positively evaluated by reviewers are eligible for publication, while reviewers may propose one or more manuscripts.⁴ Meanwhile, the *Administrative Instruction on the Implementation of Standards for School Textbooks* (No. 05/2011) specifies the assessment standard in greater detail. For approval, a minimum score of 3 ("sufficiently fulfilled") is required for each standard, and a score of 2 ("partially fulfilled") for each indicator.⁵ Even when the overall score exceeds this threshold, the reviewer must request in writing that indicators rated 0 or 1 be addressed before publication is approved. This means that approval should be based on the fulfillment and documentation of the standards, rather than solely on an overall score.

The transparency problem becomes particularly evident when the outcome of different stages of the process is not consistent. If a manuscript is initially assessed negatively or fails to meet the required threshold, but is later included in the list of approved textbooks, it should be possible to determine who changed its status, on what authority, in accordance with which procedure, and following which corrections or expert reassessment. Administrative Instruction No. 18/2018 stipulates that CECST reviews and approves the reviewers' reports, proposes the final list to the minister, while the minister approves it.⁶ However, this institutional flow does not, in itself, make the process verifiable if the documentation on which the decisions were based is not publicly available.

Reported cases concerning alternative textbooks illustrate this problem. In 2022, a media report alleged that several alternative textbooks for the third, eighth, and twelfth grades had been put into use even though they had previously received scores below the minimum threshold of 3. The publishing house stated that the inclusion of the textbook was the result of a decision by MES and not preferential treatment, while MES clarified that CECST had initially approved only one textbook for certain subjects and that the other textbooks were later selected as alternatives, based on the legal provision allowing schools to have more than one option.⁷

⁴ MES, Law No. 02/L-67 on the Publication of School Textbooks, Teaching Materials, School Reading Materials, and Pedagogical Documentation, 2007, available at: <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2437>.

⁵ MES, Administrative Instruction No. 05/2011 on the Implementation of Standards for School Textbooks, 2011, available at: <https://gzk.rks-gov.net/actdocumentdetail.aspx?actid=8050>.

⁶ MES, Administrative Instruction No. 18/2018 on Reviewers, the Evaluation and Approval of School Textbooks and Teaching Materials, 2018.

⁷ Kosova.Info, Alternative Textbooks in Schools Below the Minimum Assessment Threshold, 2022, <https://kosova.info/tekstet-alternative-ne-shkol-la-nen-minimalen-e-vleresimit/>.

This case highlights a significant transparency gap. If a textbook that fails to meet the minimum threshold at one stage is subsequently approved, there should be accessible evidence that the deficiencies have been corrected and that the manuscript has been positively reassessed. Without the reviewers' reports, scores by standard, requests for corrections, reassessment results, and the rationale for the final decision, it cannot be verified whether the same standard has been applied to all publishers and all approved manuscripts.

The need for this type of transparency is also supported by the results of the survey conducted as part of the research. When respondents were asked which information should be made public regarding approved textbooks, 67% called for the publication of scores and assessment results, required corrections, and the rationale for approval.⁸ This shows that transparency should not be limited to publishing the list of approved textbooks, but should enable verification of how each textbook reached the final decision.

The publication of this documentation is important not only for oversight of the decision-making of MES and CECST, but also for ensuring equal treatment of publishers. When the criteria, scores, corrections, and rationale for the decision are verifiable, there is less room for concerns that a manuscript has been favored or that standards have been applied differently. At the same time, transparency of this data provides a basis for the subsequent selection by teachers to be informed by the same and comparable information for each approved textbook.



The transparency problem becomes particularly evident when the outcome of different stages of the process is not consistent. If a manuscript is initially assessed negatively or fails to meet the required threshold, but is later included in the list of approved textbooks, it should be possible to determine who changed its status, on what authority, in accordance with which procedure, and following which corrections or expert reassessment.

⁸ Democracy Plus (D+), Citizen Survey conducted as part of the research "Transparency and Accountability in the Selection of Publishers for School Textbooks in Kosovo," July-August 2026.

Selection by Schools and the Risk of Influence

The approval of textbooks shifts an important part of the decision-making process from the central level to schools and teachers. This gives them greater autonomy to select the textbook they consider most appropriate for students' needs. Teachers' right to make this choice is supported by Article 13 of the *Law on the Publication of School Textbooks* (No. 02/L-67), which stipulates that teachers select textbooks from the catalog of approved textbooks, while the selection is approved by the school council.⁹ However, the law does not regulate in detail how textbooks should be compared, which criteria should be used, who makes the final decision at the school level, or how that decision should be documented.

In the absence of a uniform procedure, schools organize the selection process in different ways. The decision may be made by an individual teacher, a professional subject team, the principal, or the school council, without it always being clear which of them played the decisive role. Likewise, there is no clear requirement for the selection to be accompanied by minutes, a documented vote, and a pedagogical rationale. As a result, it becomes difficult to verify whether the textbook was selected because of its quality or as a result of external influence.¹⁰

The survey results show that this particular stage of the process is associated with a high level of distrust. When respondents were asked whether they believe that textbooks are selected based on their quality, 44.6% responded "not at all," while only 7.1% said they fully trust that selection is made on this basis. At the same time, 57.1% believe that publishers have

"a lot" of influence on the selection of textbooks by schools and teachers, while 28.6% believe that they have "some" influence. Overall, 85.7% of respondents perceive some degree of influence by publishers in this process.¹¹

This risk becomes more significant when the textbooks offered as alternatives do not have a comparable level of quality. A media report in 2022 alleged that some alternative textbooks had been put into use even though they had received scores below the minimum threshold of 3. According to the report, CECST had initially approved only one textbook for certain subjects, while the other textbooks were later included as alternatives.¹² This development highlights an important concern. If alternative textbooks differ significantly in quality, influence during the selection stage may result in the use of a lower-quality textbook, even when a higher-quality textbook is available.

Concerns about the influence of publishers were also raised during the implementation of alternative textbooks in the 2021/2022 school year. MES had stated that professional bodies within schools were responsible for making decisions in a professional manner, and that schools and municipalities should ensure that the process was carried out without pressure or interference.¹³ However, this establishes responsibility only in principle and does not specify what concrete measures have been put in place to prevent, identify, and sanction potential influence by third parties, such as publishers.

9 MES, Law No. 02/L-67 on the Publication of School Textbooks, Teaching Materials, School Reading Materials, and Pedagogical Documentation, 2007, available at: <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2437>.

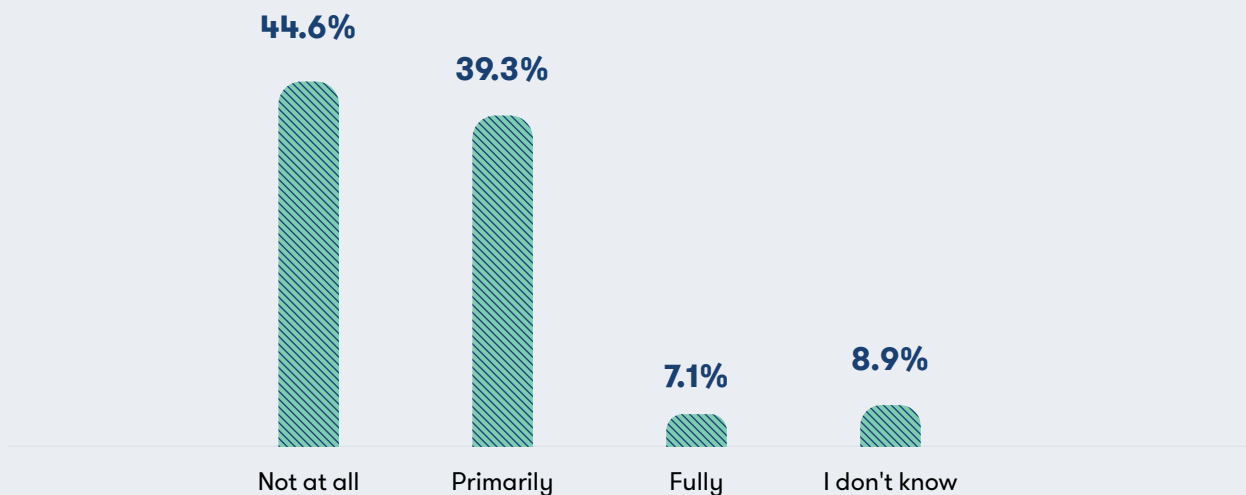
10 Focus group discussion with relevant stakeholders from the responsible institutions and experts in the field, held on 28 August 2026.

11 Democracy Plus (D+), Survey conducted with citizens as part of the research "Transparency and Accountability in the Selection of Publishers for School Textbooks in Kosovo"

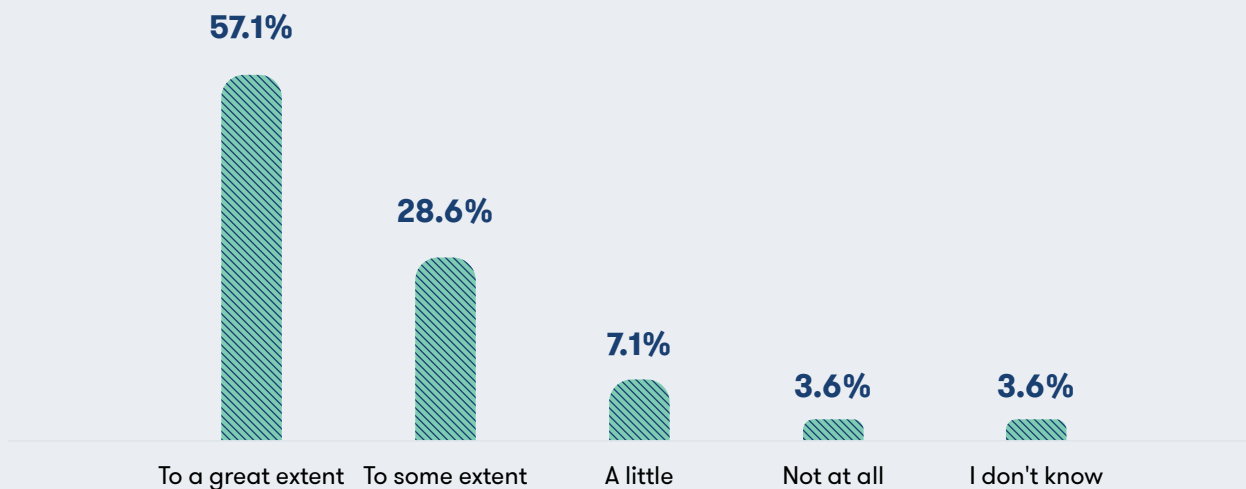
12 Kosova.Info, Alternative Textbooks in Schools Below the Minimum Assessment Threshold.

13 RTV21, "Alternative Textbooks to Be Introduced This Year," RTV21, 2021, <https://rtv21.tv/sivjet-hyjne-ne-perdorim-tekstet-alternative/>.

To what extent are school textbooks selected based primarily on their quality?



To what extent do you think publishers can influence the selection of textbooks by schools and teachers?



The risk of influence may arise through individual contacts with teachers and school administrators, selective presentations, promotional materials, training sessions, sponsorships, gifts, or other forms of relationship-building with individuals involved in decision-making.¹⁴ Even when such actions do not constitute corruption in the criminal sense, they may create a conflict of interest or influence the professional judgment of those involved in selecting textbooks.

These potential forms of influence were also mentioned in the open-ended survey responses and during the focus group. The findings indicated that publishers provide teachers with various materials, such as personal diaries, USB drives, and laptops, or promise schools support for projects. Therefore, such benefits may influence the selection of textbooks, shifting the focus away from their quality.¹⁵ Other respondents expressed concerns about the interference of school administrators or officials from municipal directorates in the selection process. One of the comments explicitly called for “officials from the directorates not to interfere in the selection process.”¹⁶ These statements indicate that there is a perception of interference and potential benefits that should be addressed through clearer rules on conflicts of interest, gifts, sponsorships, and interactions between publishers and individuals involved in the selection process.

Publishers with greater promotional capacity and stronger connections with local stakeholders may have an advantage over other publishers, regardless of the quality of their textbooks.¹⁷ This risk is particularly high when teachers do not have access to reviewers’ reports, scores, and identified shortcomings for each textbook. In such circumstances, the information they receive may come primarily from the publishers themselves, who have a direct interest in having their textbooks selected.



43.8%

of respondents believe that stronger promotion or influence by a publisher could significantly contribute to the selection of a lower-quality textbook. Meanwhile, **41.1%** believe that this could happen in some cases. Overall, **84.9%** of respondents consider such an outcome possible, at least under certain circumstances

The survey results show that this concern is widespread, as 43.8% of respondents believe that stronger promotion or influence by a publisher could significantly contribute to the selection of a lower-quality textbook. Meanwhile, 41.1% believe that this could happen in some cases. Overall, 84.9% of respondents consider such an outcome possible, at least under certain circumstances.¹⁸

For this reason, teachers’ autonomy should be accompanied by transparency and documented accountability.¹⁹ MES should provide schools with standardized and comparable data for each approved textbook, while schools should document how the decision was made. Without these measures, transferring responsibility to teachers and municipalities does not ensure full accountability and does not guarantee that the final selection will be based on the quality of the textbook and the interests of students.

14 Interview with A.D., Civic Education teacher at “Pavarësia” School in Prishtina (at the teacher’s request, their identity is presented by initials), 8 August 2026.

15 Focus group discussion with relevant stakeholders from the responsible institutions and experts in the field, held on 28 August 2026.

16 Democracy Plus (D+), Survey conducted with citizens as part of the research “Transparency and Accountability in the Selection of Publishers for School Textbooks in Kosovo.”

17 Interview with Prof. Assoc. Drita Kadriu, Professor at “Fehmi Agani” University and education expert, 7 August 2026.

18 Democracy Plus (D+), Survey conducted with citizens as part of the research “Transparency and Accountability in the Selection of Publishers for School Textbooks in Kosovo.”

19 Interview with Prof. Assoc. Drita Kadriu, Professor at “Fehmi Agani” University and education expert, 7 August 2026.

Accountability After Textbook Approval

The approval and selection of school textbooks should not be considered the end of the process. Pre-publication evaluation is conducted based on the manuscript and accompanying documentation, while the full quality of the textbook can only be assessed once it is used in the classroom. For this reason, accountability should continue after publication approval through monitoring of textbook use, reporting of deficiencies, and clearly assigning responsibility for addressing them.

The *Administrative Instruction on the Implementation of Standards for School Textbooks (No. 05/2011)* addresses quality more broadly than merely formal compliance with the curriculum and scientific accuracy. The fifteen standards cover age-appropriateness for students, didactic development, the quality of questions and exercises, linguistic aspects, gender equality, work materials, and the practical testing of the textbook.²⁰

However, even when a textbook passes the professional evaluation and meets the minimum threshold, it may still contain factual inaccuracies, inconsistencies with the curriculum, unclear wording, or exercises that do not promote critical thinking.²¹ For this reason, approval for publication should be understood as the beginning of a new phase of oversight, rather than the end of the responsibility of reviewers, publishers, and the institutions that approved the textbook.

The experiences reported by respondents indicate that such problems are perceived as frequent during the use of textbooks as well. In the survey, 80.4% stated that they had frequently observed errors or shortcomings. Unclear content was the most commonly reported problem, identified by 66.1% of respondents, followed by linguistic errors at 50%, shortcomings in questions, exercises, or illustrations at 49.1%, and scientific or factual errors at 30.4%. Only 4.5% stated that they had not observed any of the listed shortcomings.²²

The problems reported after the new textbooks were introduced into use demonstrate the need for such a mechanism. In 2022, MES publicly acknowledged that errors had been identified even after the textbooks had undergone a double review by the reviewers. In the same article published by Koha Ditore, teachers had identified spelling, content-related, and technical errors, as well as cases where the content was not appropriately adapted to the students' age. Due to these shortcomings, they had also reported the need to use supplementary resources during teaching. The article also highlighted the case of a mathematics textbook which, although it had received a score of 3.01 out of a maximum of 4, still contained content-related errors. This case shows that merely meeting the formal evaluation threshold does not in itself guarantee that a textbook will be free of serious shortcomings during its use.²³

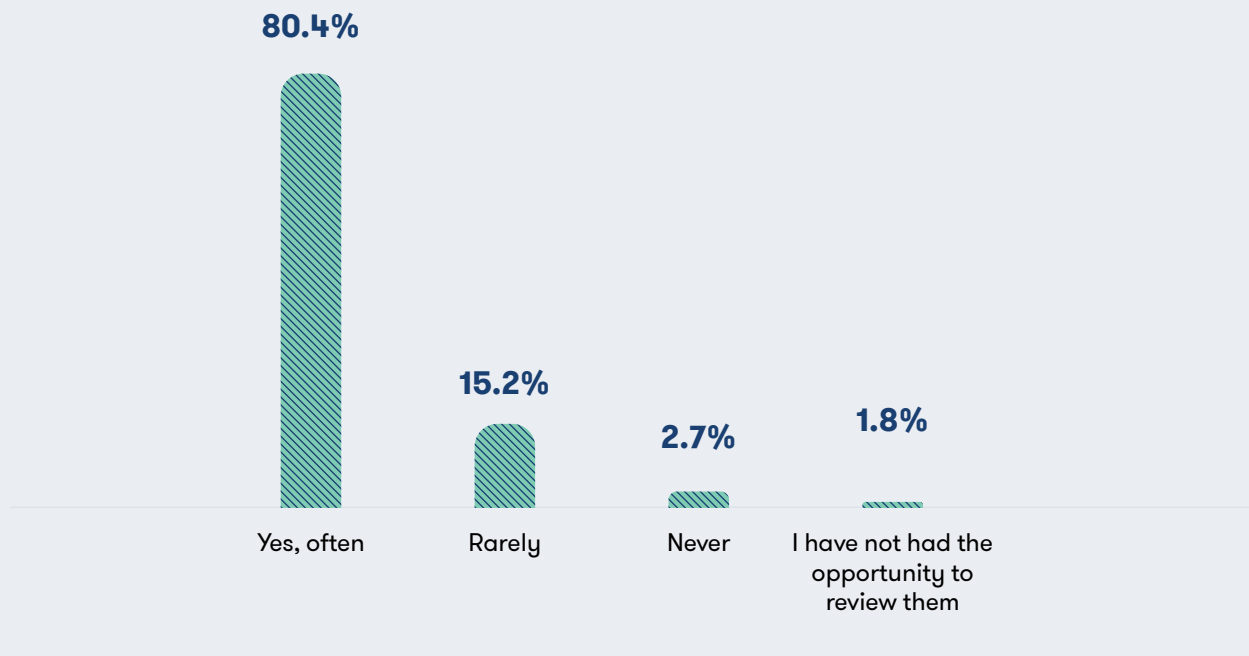
20 MES, Administrative Instruction No. 05/2011 on the Implementation of Standards for School Textbooks, 2011.

21 Thematic discussion with relevant stakeholders from the responsible institutions and experts in the field, held on 31 August 2026.

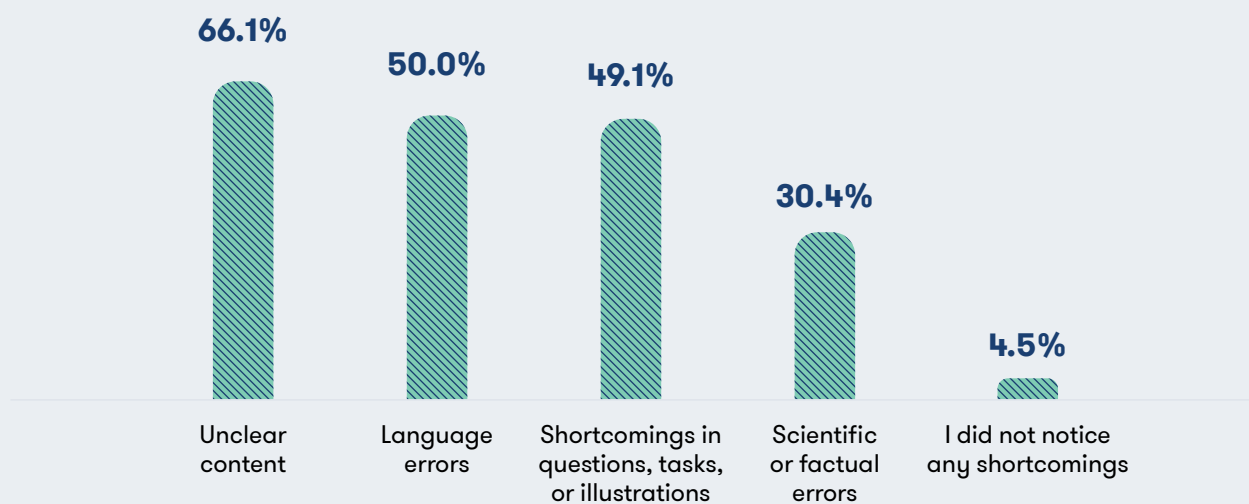
22 Democracy Plus (D+), Survey conducted with citizens as part of the research "Transparency and Accountability in the Selection of Publishers for School Textbooks in Kosovo."

23 Koha Ditore, "Ministry of Education Admits There Are Errors in the New School Textbooks," KOHA.net, 2022, <https://www.koha.net/arberi/mashti-pra-non-se-ka-gabime-ne-tekstet-shkollore-mesimdhensit-perdorin-burime-tjera>.

Have you noticed any errors or shortcomings in school textbooks



What types of shortcomings have you noticed most often



Other reported cases have also identified discrepancies between the content of textbooks and the requirements of the curriculum. In one mathematics textbook for seventh grade, a chapter included in the curriculum was missing, which had led teachers to instruct students to use the eighth-grade textbook for that particular section. Other textbooks were reported to lack certain topics, as well as to contain questions focused more on memorization than on analysis and the development of critical thinking. These cases show that some shortcomings in textbooks may become more apparent only after they are put into use and tested in everyday teaching practice.²⁴

Despite the importance of this stage, the *Law on the Publication of School Textbooks (No. 02/L-67)* and *Administrative Instruction (No. 18/2018)* focus primarily on the procedure leading up to approval for publication. The law sets out the publisher's obligations regarding publication, the printing of identifying information, the provision of copies, and the distribution of the textbook, but it does not establish a public register of errors or a clear procedure for correcting, suspending, or withdrawing a textbook due to problems identified after its approval.

In the absence of such a mechanism, the reporting of shortcomings remains fragmented. Teachers may address their concerns to the school, the municipal education directorate, the Ministry, the author, or the publisher. However, it is unclear who should register and handle the case, within what timeframe the publisher should respond, and who decides whether the textbook should be corrected or reevaluated.²⁵

Not all shortcomings in textbooks carry the same weight. A spelling error can be corrected easily. However, a scientific inaccuracy, discriminatory content, unclear text, or a serious discrepancy with the curriculum may require reevaluation, suspension, or withdrawal from use.²⁶

Respondents make a similar distinction regarding the institutional response to serious problems in textbooks. More than 40% of respondents believe that a textbook containing serious errors should be corrected and re-evaluated, while 37.5% believe that its use should be suspended until it is corrected and reevaluated. Meanwhile, 20.5% support withdrawing it from use. Overall, 58% support the suspension or withdrawal of a textbook when serious errors are identified.

For this reason, accountability after the approval of a textbook requires more than simply allowing errors to be reported informally. A centralized mechanism is needed where every concern is recorded, its severity is assessed, the responsible institution is identified, and the action taken is made public.²⁷ Only in this way can it be determined whether the publisher has fulfilled its obligations, whether the institutions have responded in a timely manner, and whether the textbooks that continue to be used in schools maintain the standard for which they were approved.

24 Majlinda Ibrahim, "School Textbooks at Odds with the Curriculum," KOHA.net, Koha Ditore, 2022, <https://www.koha.net/arberi/tekstet-shkollore-ne-shperputhje-me-kurrikulen-mesimore>.

25 Interview with B.K., Albanian Language teacher at "Ismet Raci" School in Klinë (at the teacher's request, her identity is presented by initials), 05.08.2026.

26 Focus group discussion with relevant stakeholders from the responsible institutions and experts in the field, held on 28.08.2026.

27 Thematic discussion with relevant stakeholders from the responsible institutions and experts in the field, held on 31.08.2026.

Conclusion and Recommendations

The research shows that transparency and accountability in the process of selecting publishers for school textbooks remain insufficient at several critical points. It is not always possible to verify whether all approved textbooks have been subject to the same quality standards or how differences between the initial assessment and the final decision have been justified. Following approval, the lack of a uniform procedure for selecting textbooks in schools creates room for external influence, while mechanisms for reporting, correcting, and addressing deficiencies identified during use remain unclear. Improving the process requires greater transparency in decision-making, proper documentation of textbook selection at the school level, and clear accountability after textbooks enter use.

For the Ministry of Education and Science

- Ensure the consistent application of the quality threshold established by Administrative Instruction No. 05/2011 to every manuscript, including alternative textbooks. CECST and MES should not propose or approve a textbook solely to create an alternative, without evidence that it has met the threshold for each standard and indicator and that the identified deficiencies have been addressed.
- Establish a public platform for reporting errors in school textbooks. For each report, publish the classification of the issue, the publisher's response, the action taken, and the deadline for correction.
- For each approved textbook, publish the reviewers' reports, scores by standard, required corrections, and the rationale for the final decision.

For Municipal Education Directorates and Schools

- Ensure that textbook selection is carried out through a uniform procedure and a platform where the textbooks reviewed, criteria, recommendation of the professional team, voting results, school council decision, and pedagogical rationale are recorded.
- Before the selection, ensure that teachers have equal access to alternative textbooks and comparable information on their assessment, so that the decision does not rely primarily on publishers' promotional materials.

For the Education Inspectorate

- Following the establishment of a uniform procedure for textbook selection in schools, the Education Inspectorate should verify its implementation, including the documentation of decisions and compliance with rules on conflicts of interest and the influence of publishers.
- Verify whether the textbooks used in schools correspond to the version approved by MES and whether the corrections required during the assessment process have been incorporated.

