

# **Annual Report of the Accreditation Commission for 2011**

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## **I. Introduction**

### **Statutory definition**

The Accreditation Commission of the Czech Republic (the ACCR) is established pursuant to Act No. 111/1998 Coll. on Higher Education Institutions and on Amendments and Supplements to Some Other Acts (the Higher Education Act). The work of the ACCR is regulated, in particular, by provisions in Part VIII of the Act. The procedures and processes of the ACCR and its working groups are regulated by the ACCR's Statute that was approved by Resolution No. 744 of 28 July 2004 of the government of the Czech Republic.

According to Article 4 of the ACCR's Statute the ACCR is obliged to publish an annual report each year. The report contains the results of assessments, an overview of the ACCR's views and the conclusions adopted.

### **The ACCR's mission**

In compliance with the Higher Education Act the ACCR fosters the quality of higher education and ensures a comprehensive evaluation of the scholarly, scientific, research, development, artistic and other creative activities of higher education institutions. To this end it issues statements on applications for the accreditation of degree programmes and the fields of study within which proceedings for appointing associate professors ("habilitation") and full professors are carried out. Furthermore, the ACCR assesses the activities of higher education institutions and the quality of the activities accredited and subsequently publishes the results of these assessments. The ACCR delivers its opinions on the establishment, merger, breaking up or closure of public higher education institutions, on the granting of state approval to legal entities wishing to operate as private higher education institutions, and on determining the type of a higher education institution. Last but not least, the ACCR adopts positions on matters concerning higher education referred to it by the Minister of Education, Youth and Sports.

## **II. The ACCR, standing working groups and the Secretariat**

### **The ACCR's composition**

The ACCR is composed of 21 members appointed by the government of the Czech Republic. The members of the Accreditation Commission are appointed for a six-year term of office. They may be appointed for a maximum of 2 terms. As part of the first appointment procedure the government designated one third of the ACCR members for a two-year term and one third for a four-year term. Therefore a part of ACCR members are replaced regularly in even-numbered years.

In 2011 the composition of the ACCR changed in the following way:

In January 2011 prof. Ing. Pavol Vincúr, PhD. died.

As of 2 September 2011 prof. Ing. Július Horváth, PhD. was appointed a member of the ACCR (for the first term of office).

The composition of the ACCR in 2011 was as follows:

President:

prof. PhDr. Vladimíra Dvořáková, CSc.

Vice-president:

prof. Ing. Jan Roda, CSc.

Members

1. prof. PhDr. Vladimíra Dvořáková, CSc.; Faculty of International Relations, VŠE in Prague, president
2. prof. Ing. Jan Roda, CSc.; Faculty of Chemical Technology, ICT Prague, vice-president
3. prof. JUDr. Milan Bakeš, DrSc.; Faculty of Law CU Prague
4. prof. PhDr. Jana Geršlová, CSc.; Faculty of Economics, VŠB-TU of Ostrava
5. prof. RNDr. Pavel Höschl, DrSc.; Faculty of Mathematics and Physics CU Prague
6. doc. Mgr. Ing. Karel Chadt, CSc.; ŠKODA AUTO, a.s., Ml. Boleslav
7. prof. Dr. MA Ing. Július Horváth, Ph.D.; Central European University Budapest (Hungary) (since 1. 9. 2011)
8. prof. Ing. Evžen Kočenda; CERGE CU Prague
9. prof. PhDr. Petr Kyloušek, CSc.; Faculty of Arts MU
10. prof. Ing. Jaromír Příhoda, CSc.; Institute of Thermomechanics AS CR, v.v.i.
11. prof. PhDr. Svatava Raková, CSc.; The Institute of History AS CR, v.v.i.
12. prof. RNDr. František Sehnal, CSc.; Biology Centre AS CR, v.v.i.
13. prof. Dr.phil. Peter Schmidt; Hochschule Zittau/Görlitz (Germany)
14. prof. PhDr. Lubomír Slavíček, CSc.; Faculty of Arts MU
15. prof. Dr. Ing. Jiří Sobota; Hochschule Wiesbaden (Germany)
16. prof. Ing. Zdeněk Strakoš, DrSc.; Institute of Computer Science AS CR, v.v.i.
17. prof. Ing. Antonín Stratil, DrSc.; Institute of Animal Physiology and Genetics AS CR, v.v.i.
18. prof. PaedDr. Iva Stuchlíková, CSc.; Faculty of Education, USB in Č. Budějovice
19. doc. MUDr. Bohuslav Svoboda, CSc.; 3<sup>rd</sup> Faculty of Medicine CU Prague, Faculty Hospital
20. prof. RNDr. PhDr. Jan Štěpán, CSc.; Philosophical Faculty PU Olomouc
21. prof. Ing. Jan Uhlíř, CSc.; Faculty of Electrical Engineering CTU in Prague

**The structure of the standing working groups**

The ACCR sets up advisory working groups that arrange for the necessary expert data and activities before the ACCR's meetings. Their structure corresponds to the areas of activities that are subject to accreditation. These standing working groups carry out specialist work related to the assessment of applications for accreditation of degree programmes and the fields of study within which proceedings for appointing associate professors ("habilitation") and full professors are carried out.

In 2011 the ACCR had 21 standing working groups.

1. Agriculture, Forestry and Food Processing
2. Arts and Artistic Disciplines
3. Biology and Environment
4. Chemistry
5. Economy
6. Geosciences
7. Health Care
8. History
9. Law and Security Studies
10. Mathematics and Informatics
11. Medical and Health Sciences
12. Military Science
13. Pedagogical, Psychological Disciplines and Sports
14. Pharmacy
15. Philology and Literary Science
16. Philosophy, Theology and Religious Sciences
17. Physics
18. Social Sciences
19. Subject Didactics
20. Technical Disciplines
21. Veterinary Medicine

### **The composition of working groups**

In 2011 a total of 210 individuals were involved in the activities of the standing working groups. The overwhelming majority of them were representatives of higher education institutions. The remaining members of the working groups were from the Academy of Science of the Czech Republic, other research institutions and industry.

<b>Year</b>	<b>HEIs</b>	<b>Academy of Sciences</b>	<b>Other institutions</b>	<b>International members</b>	<b>Total</b>
1999	146	21	19	9	186
2000	171	20	14	6	205
2001	171	20	15	5	205
2002	166	21	15	6	208
2003	172	21	13	6	206
2004	176	21	14	5	211
2005	177	23	15	5	220
2006	191	23	20	7	241

2007	194	23	21	6	242
2008	193	25	23	6	247
2009	200	26	22	7	254
2010	169	20	14	3	206
2011	172	22	13	3	210

### **The activities of the ACCR's Secretariat**

Pursuant to the Higher Education Act the material and financial resources to cover the operations of the ACCR are provided by the Ministry of Education, Youth and Sports. The administrative and technical support is in the hands of the ACCR's Secretariat, which is an organizational unit of the MoEYS (until 31 May it was part of the higher education department, from 1 July 2011 it reports directly to the Ministry as a separate unit). In 2011 the Secretariat consisted of five members of staff. This number was still lower as compared to 2006 when 6 individuals worked at the Secretariat (despite the continuously increasing workload required of the staff in relation to the growing demands for the ACCR's operations).

In 2011 the ACCR's Secretariat was headed by Jiří Smrčka.

## **III. The ACCR's activities in 2011**

### **Evaluation of higher education institutions**

In compliance with Section 84(1)(a) of the Higher Education Act the Accreditation Commission carried out a total of 42 evaluations of higher education institutions' activities, the activities of their units and their accredited activities in 2011 (of these evaluations 40 were completed and discussed at the ACCR's meetings during 2011). The majority of the evaluations were focused on Doctoral study programmes. Non-university higher education institutions and branches of HE institutions were also evaluated.

All evaluations of HE institutions and evaluations of their accredited activities were implemented in a standard manner in line with the ACCR's Statute. The resulting evaluation reports were discussed at the ACCR's meetings in the presence of representatives of the institutions concerned and they are published on the ACCR's website.

The evaluation of Doctoral programmes at all higher education institutions was launched in 2010 at the request of the Minister of Education, Youth and Sports. All Doctoral study programmes delivered by HE institutions undergo the evaluation (with the exception of those that have recently been assessed). The evaluation process is scheduled to be finalised in 2013. The most important indicators are the quality of related research conducted at the particular organisation (unit) and the quality of the outputs of Doctoral studies. By the end of 2011 the ACCR had completed and discussed the evaluation of Doctoral programmes at 38 faculties.

Overall, the ACCR found that dissertations were of good quality. However, various problems of a rather general nature were encountered:

1) A disproportionately high number of dissertations supervised by some research supervisors raised doubts as to whether they have sufficient time for carrying out their work to the desired standard; 2) a high number of external research supervisors (from other organisations/units) or supervisors who are not associate professors or professors; 3) the topics of some dissertations fall in research areas other than that in which the Doctoral programme is delivered; in some cases the topic of the Doctoral programme does not align with the research work of the organisation delivering it; 4) major differences in the requirements for completion of studies and students' outputs at one faculty (e.g. different obligations on the part of Doctoral students in terms of the number and quality of publications); 5) underestimating the importance of an analysis of long-term trends (e.g. the development of the age and qualification structure of teachers); 6) an insufficient scientific profile of some of Doctoral programmes in terms of meeting the standards of research HEIs; the institutions lack specific research topics in the pursuit of which students would be involved; 7) low level of international mobility of Doctoral students, particularly as regards longer periods spent at foreign institutions.

As in previous years, the ACCR combined institutional evaluation with issuing a statement on an extension of the validity of accreditation of study programmes and fields. The ACCR considers this combination of evaluation and accreditation to be very efficient and useful, as it allows for a better understanding of the overall institutional climate in which the degree programmes in the various fields are provided and the ways they are interrelated. This combination of the two processes is beneficial for the higher education institution as it lowers the administrative burden. Moreover, it strengthens the institution's policy coordination and accreditation is viewed from a longer-term perspective and in the context of the institution as a whole.

The ACCR also paid attention to the evaluation of branches of HE institutions (i.e. units located outside the main HE facility where education is provided). The branches have for long been the weakest point as regards the quality of higher education in the Czech Republic and they pose a major risk to the graduates' educational attainment levels. The ACCR found that, in delivering degree programmes, some branches violate the terms under which they were granted accreditation. The ACCR reiterated that the terms of accreditation must be adhered to by all units of the HE institution in which education takes place. If the conditions at a unit of a higher education institution fail to meet the quality standards declared in the application for accreditation, this constitutes a reason for proposing measures as described in Section 85 of the Higher Education Act to be applied to the institution as a whole (i.e. limitation, temporary termination or revocation of accreditation – depending on the gravity of the deficiencies found).

One specific issue is the provision of study programmes outside the territory of the Czech Republic (branches in other countries). The ACCR believes it is nearly impossible to ensure that the programmes meet the terms under which they were accredited. The ACCR has only limited means to monitor the quality of Czech degree programmes implemented abroad. What is alarming is the fact that the Ministry of Education, Youth and Sports fails to do justice to its role as an administrative body. Not only does it fail to monitor and evaluate systematically the activities of HE institutions as concerns the launch and delivery of degree programmes at branches (particularly in terms of material and technical resources), but it also fails to use the legal means to enforce appropriate levels of quality in operations. .

In the course of 2011 the ACCR also evaluated the quality of the internal regulations of HEIs and their implementation in relation to educational activities. The

objective of the evaluation is to assist HE institutions in the development of internal quality evaluation and assurance processes. This evaluation is a systemic step for the ACCR, taken in order to respond to some repeatedly found deficiencies in this area. Moreover, it is in line with the recommendations resulting from the Report on the External Review of the ACCR and concerning compliance with the European Association for Quality Assurance in Higher Education (ENQA) membership criteria. According to these criteria the ACCR should pursue the development of internal quality assurance systems at higher education institutions and their gradual harmonisation. Three key areas were subject to evaluation: internal regulations, implementation of studies and assurance of their quality. In 2011 the ACCR completed the evaluations at two institutions (one university and one non-university HE institution). In none of the cases was any major malpractice found.

### **Statements on applications for accreditation**

#### a) of study programmes:

In 2011 the ACCR issued a total of 1,574 statements on applications for granting, expanding and extending accreditation. Of these 1,438 statements were positive and 136 were negative.

In discussing the applications for accreditation of Doctoral degree programmes the ACCR paid consistent attention to evaluation of the performance in the academic research (or creative activities) of the units applying for accreditation. It is the view of the ACCR that high quality Doctoral students (researchers) may only be the product of organisations that conduct basic (or equivalent) research related to the field in which the Doctoral programme is provided. This means that the higher education institution applying for accreditation must be involved in implementing major Czech or international projects and grants (e.g. those funded by the Czech Science Foundation) dealing with a topic that relates to the Doctoral programme (or a field of study provided that the programme is delivered in various fields). If several units are jointly applying for accreditation, each unit must meet this criterion (i.e. the failure of one unit to meet the requirements as regards human resources and research activity cannot be compensated for by means of collaboration with another institution).

The ACCR pays special attention to the quality of Doctoral degree programmes. The reason for this is that these programmes play a key role in the development of higher education and science. Deficiencies in the quality and implementation of these programmes would result in bad higher education teachers and researchers. This would have a very negative impact on the quality of both Bachelor and Master degree programmes as well as the quality of research in the Czech Republic. This is why Doctoral programmes must not be seen as the continuation of, or as an advanced level of, Master studies. Nor is the aim of Doctoral studies to expand one's professional education or to acquire yet another title/qualification that can be used on the labour market (Doctoral studies cannot replace the system of professional education required for the practice of various professions after completion of Bachelor or Master studies). Doctoral studies consist in demanding research and training undergone by individual Doctoral candidates. Interconnection with the research conducted by the institution offering Doctoral studies plays a fundamental role in Doctoral programmes. An institution that carries out no research activities in a particular field cannot implement Doctoral studies in this field. The principal rule for all Doctoral studies across all disciplines must be their comparability with internationally recognised standards for

the given field. As the research supervisor is the key person in Doctoral studies, the institution should undertake to make sure that only those individuals can be supervisors who are actively engaged in research in the given area (including good quality publications).

A certain trend that the ACCR discerns in the applications for accreditation, not only of Doctoral but also of Bachelor and Master programmes, consists in excessive fragmentation of the structure of study programmes and fields of study (this also concerns the professional and qualification requirements for graduates). The reason for this fragmentation may be seen from the efforts of some HE institutions to secure accreditation for the highest possible number of programmes and fields of study. This is achieved by narrow specialisations being “upgraded” to the level of fields of study. Another approach is to have several fields accredited that are nearly identical and only differ in terms of minute changes in the subjects offered. The ACCR seeks to prevent this inefficient fragmentation of degree programmes and fields of study that is primarily guided by marketing purposes (superficially attractive names of programmes and specialisations with a very narrow graduate profile) – the aim is to “visually” increase the number of accredited programmes and fields. However, the ACCR lacks appropriate legislative support for its efforts to halt such a practice. The legislation in place only makes it possible to reject accreditation if the study programme is in conflict with the provisions of the Higher Education Act or if there are insufficient resources to deliver the programme.

This practice of some HEIs has been reduced to a degree in the wake of the application of the recent amendment to the Higher Education Act. Effective from 1 July 2010 it has introduced the concept of a “study programme guarantor”. Section 70(5) of the Higher Education Act stipulates that only professors or associate professors who are members of the academic staff of the relevant HEIs can guarantee the quality and development of a degree programme provided by the institution (or its unit). Following upon this provision of the Higher Education Act, the ACCR has resolved to introduce a standard requirement that each study programme (and each field of study if the programme is divided into fields of study) should have a guarantor. The guarantor should not have significant working duties at another institution and should not act as a guarantor of another programme.

The assessment of the quality and the likely future organisation of human resources within the programmes applying for accreditation should be facilitated by a Register of Associate Professors and Professors. The Register will be administered by the Ministry of Education, Youth and Sports. The ACCR used data from the Register for the first time as early as the end of 2010. During the first year of its existence the Register turned out to be of major benefit for the quality assurance system. It makes it possible to check on the workloads associate professors and professors at higher education institutions. However, during 2011 the technical quality of the Register deteriorated, the data became outdated (delayed updating) and serious technical problems occurred (failure to accumulate up-to-date and archive data, inappropriate data searching, sorting and report generation capabilities). At the end of the year the ACCR asked the MoEYS to upgrade the user environment of the Register and ensure regular and timely updates.

There are an exceptionally high number of applications for accreditation of programmes taught in foreign languages (mostly in English). The reason for this high number of applications may be seen in the simplified rules concerning submission of

such applications where the proposed study programme (field of study) is identical to the one accredited in the Czech language. As in assessing these applications the ACCR focuses primarily on the guarantees provided by the rector, it is possible that some institutions apply for accreditation of programmes in a foreign language not because there is demand for such a programme, but because this is a good marketing move that increases “visually” the number of accredited activities. In principle the ACCR does not delve into these practices. Accreditation is only refused in exceptional circumstances where there are doubts about the credibility of the data presented or the capacity to implement the programme.

2011 also saw the continuing trend of non-university higher education institutions applying for accreditation for Master degree programmes. This fact reflects the extensive efforts of many HE institutions to expand their provision and offer Master studies without having the relevant human, material, technical and information resources and without carrying out research in the relevant discipline. We would like to note that the ACCR rejected a high number of such applications not only from non-university HEIs but from HEIs in general. In this context the ACCR often met a lack of understanding of the essence of research at HE institutions. Research that the academic staff of an HEI applying for accreditation conducted elsewhere was presented as evidence of the quality of their home HEI. One of the requirements for accreditation of a Master programme is implementation of external research projects by the HEI that are related to the given programme. Another requirement is participation of students in scholarly, research, development or artistic activities.

Traditional Master degree programmes (with a standard length of study of 4-6 years) are only accredited in exceptional and justified cases. They may also be given accreditation in order for the existing students to complete their studies.

Accreditation of study programmes for future teachers poses a specific problem. The ACCR has initiated discussion on the pluses and minuses of structured and traditional Master teacher training programmes for Stage 2 of basic schools and for secondary education. The following main problems related to the structuring of teacher education programmes have emerged: unclear employment prospects for graduates of Bachelor programmes (the Educational Staff Act stipulates that teachers must have qualifications at Master level); unclear transition between Bachelor and Master programmes (in most fields all those who complete Bachelor studies continue at Master level); and inclusion in the programme of training in pedagogy and psychology, teaching practice and the educational theory (i.e. “didactics”) for the relevant subjects. Some faculties of education focus on the professional (content) knowledge and skills. In this they partially overlap with other faculties not focusing primarily on education (faculties of arts, sciences). This means that the “didactics” components, which should be of key importance in teacher training for Stage 2 of basic schools, are disappearing from the curricula. There is also insufficient time for gaining practical experience in schools. Consequently, this may affect the quality of education at basic schools. Structured studies have a particularly negative impact on some specialisations (combinations of subjects taught – especially natural sciences but also social sciences). There is no comparison in terms of the quality of outputs because it is impossible to evaluate Master and structured programmes running in parallel. The ACCR therefore recommended that there should be evaluation of the impact of structured teacher training programmes carried out as part of a project. Moreover, consideration should be given to whether it would be possible to allow for accreditation of a five-year Master programme in teacher

training. It is also advisable to consider the fields of study where accreditation of a Master programme could lead to improved quality of teacher training provided by education faculties.

In the upcoming years the ACCR's assessment of applications for the extension of accreditation of study programmes will also focus on whether programmes are delivered at branches and at the main premises of the higher education institutions (including human resources) under the same conditions. Furthermore, during the assessment of an application for extension of the validity of accreditation of Master programmes, the ACCR will concentrate on the quality of the state "rigorous" examinations. In assessing the applications for prolonging the accreditation period for Doctoral programmes, the ACCR will pay attention to the professional performance of students and graduates.

b) of fields within which proceedings for appointing associate professors and full professors are carried out:

As concerns the accreditation of fields covering the habilitation procedure and the procedure for appointment as a professor, 2011 was an exceptional year as a large number of the fields had to be accredited again (the accreditation period expired in 2011). The ACCR issued a statement on 249 fields in which the habilitation procedure takes place and 216 fields where full professors are appointed. The number of negative statements was reasonable in view of the number of applications (18). The reason for not granting accreditation was an insufficient number of internal associate professors and professors who have produced relevant publications in their fields.

### **Statements on applications for granting state approval**

From the Higher Education Act's coming into force (1999) until the end of 2011 the ACCR received a total of 155 applications from legal entities asking for state approval to operate as a private higher education institution. Out of the 155 applications 9 aspired to the status of university, while the rest sought the status of a non-university HE institution. The ACCR recommended that state approval should be granted to 52 entities.

In 2011 the ACCR discussed 3 applications for state approval and in none of these cases was a recommendation for approval given. There is a continuing trend of unsuccessful applicants applying repeatedly.

The great majority of private HE institutions intend to deliver degree programmes in business, tourism, law, administration, media and communication, education and psychology. These are largely programmes that are not demanding in terms of finance for various technologies and laboratory equipment. Extensive interest in these studies is expected from the population, including those at a higher age who wish to study part-time. For this reason the application for accreditation covers, in addition to full-time, on-site courses, other combined modes of study (forms of blended learning).

In some cases there are applications for state approval from legal entities that organise foreign higher education programmes in the Czech Republic. The reasons they apply for state approval and Czech accreditation may involve efforts to legalise a foreign

programme or efforts to make visa procedures easier for students from countries outside the EU.

The justification behind the failure to grant state approval was, in all cases, related to refusal to grant accreditation to a study programme. The prevalent reason for the ACCR issuing a negative statement was lack of appropriate human resources for the given programme.

### **Statements on the setting up and breaking up of faculties**

In 2011 the ACCR did not discuss a single request from a public HE institution asking it to issue a statement on the establishment, merger, fusion, breaking up or closure of a faculty. Since 2010 there has been a major decrease in the robust expansion of the number of faculties. In previous years new faculties were set up mainly at smaller universities.

In line with the Higher Education Act the ACCR pays no attention to the setting up of faculties at private higher education institutions of a non-university type. Faculties at private HEIs do not represent institutional units that are described in the legislation and that could be independently targeting the pursuit of academic freedoms and be held accountable for the implementation of accredited activities. Any establishment of faculties at private non-university HE institutions does not constitute an act of delegating academic powers. Instead, it is a decision of the owner as to how he/she chooses to name the organisational units of his/her institution.

### **Statements on determining the type of a higher education institution**

In 2011 the ACCR did not issue any statements on determining the type of an institution. In the past such statements were always associated with the ACCR's position on applications for accreditation of a Doctoral programme from a non-university HE institution. If the ACCR granted accreditation to the relevant Doctoral programme, it simultaneously agreed to the act of changing a non-university institution into a university.

Following the significant increase in the number of applications in this area in 2007 the numbers have been more or less stable (2010 – 0, 2009 – 1 application, 2008 – 0, 2007 – 4, 2006 – 1, 2005 – 0).

### **Preparation of documents and policy papers**

In 2011 the ACCR followed the work on drafting the consultation document for the new law on tertiary education. The ACCR was primarily concerned with the ways in which the draft law addresses quality assurance and accreditation. The ACCR believes that transition to institutional evaluation linked to decisions on accreditation is necessary. Similarly, the separation of the Accreditation Commission (as a body providing for external quality assurance) from the Ministry of Education is seen by the ACCR as a step in the right direction. Moreover, this is in line with the recommendations of the international external review panel. On the other hand, the ACCR had major doubts concerning the viability of the system for quality assurance as described in the consultation document of spring 2011. The process of accreditation as set out in the consultation document drafted in autumn 2011 was viewed as more efficient and realistic. According to the proposal the new law should establish a National Accreditation Agency (NAA) and the Accreditation Commission should act as its board.

The status of this institution corresponds to what is common in the rest of Europe. The only difference is that, according to the draft consultation paper, the NAA will not be able to carry out evaluation (nor, as it seems, will it be able to conduct any checks on evaluations conducted by other entities). It will only take over the results of evaluation implemented by other entities (so-called “authorised evaluation bodies”). The status of the authorised evaluation body constitutes the key challenge in the consultation document. These will most likely be commercial organisations without any specific responsibility for the statements they make in the accreditation process. Moreover, they are likely to see quality assurance as business. There was also a major risk involved in the draft document, in that the Ministry of Education will authorise the “evaluation bodies” to operate at its own discretion and the NAA will only be able to express its views on this. The NAA will then be obliged to take over the results of evaluations and be accountable for them (including the consequences of possible court disputes). This would mean that the NAA would be responsible for quality (also in terms of public perception), but it would not have any effective power to evaluate this quality. Granting licences to authorised evaluation bodies would worsen the transparency of the system. Furthermore, identification of shortcomings would be made impossible and the quality evaluation process would be relegated to a business transaction in which HE institutions would effectively have to “pay for their existence”. (Evaluation by an external body may only be positive if international evaluation bodies are involved that meet European standards and whose quality and evaluation procedures are in accord with Czech conditions). The MoEYS refused to accept these comments made as part of the internal commenting procedure, but it incorporated them into the draft as part of the external commenting process.

The principal problem associated with the draft consultation document for the new tertiary education law results from the fact that most major procedures and standards must be addressed at general level and not, as the draft proposes, by means of shifting them to the level of statutes and other internal regulations of institutions (that will be subject to decisions by MoEYS officers). In practice this could lead to the absence of a level playing field and the rise of favouritism and corruption.

Pursuant to Section 79(7) of the Higher Education Act the ACCR discussed the MoEYS’s proposal for an amendment to the decree stipulating the content of a written application for accreditation of a study programme (Decree No. 42/1999 Coll.). The reason for this lies in the fact that the existing decree is partly outdated in factual terms. Another reason is the need for alignment with terminology used in the National Qualifications System. The ACCR considered some of the changes proposed to be positive and beneficial (for example, those concerning the place of programme delivery), while others were deemed to be merely formal (e.g. changes in the approach to describing the graduate profile). The ACCR believes the decree should not contain any redundant information and sentences that lack substance and are not related either to quality assurance or to the wording of the Higher Education Act. What should also be considered is the effectiveness of formulating objectives by means of skills/knowledge categories. The use of these official terms means no change at ground level. It is just a universal newspeak, the consistent use of which in all degree programmes, fields and subjects will lead to superfluous bureaucracy and constitute a trivial rhetorical exercise with zero relevance. On the contrary, specific objectives for studies in various fields should continue to be set out (provided the programme is divided into fields). The ACCR pointed to the necessity of making further modifications in the decree. These concern

the requirement to submit data about related creative, research or artistic activities and data on other activities of teachers. The ACCR expressed its agreement with the decree amendments and with the launch of the related legislative process, provided that the aforementioned comments will be incorporated into its wording.

The ACCR posted its position on an analysis presented by the National Economic Council of the Government (Chapter III – Education) on its website. The position was also sent to the Minister of Education, Youth and Sports. The ACCR welcomed this analysis, but strongly warned about a simplistic understanding of education as a (preferably profitable) economic good. This approach may lead to attempts to pursue short-term solutions that are efficient from the economic point of view, but that are overly simplistic and generate unpredictable long-term effects. The ACCR was alarmed by the following formulations in the report: ... “decreasing the qualification requirements for teachers in schools at lower and upper secondary level from a Master to a Bachelor degree (...)”; ... “in education, Master degree qualifications should only be required – in addition to primary education teachers – for demanding, specific activities and for school headmasters”; ... “introducing short teacher training courses as a follow-up study attached to any non-teaching Bachelor degree programmes – i.e. allowing talented graduates of institutions other than those focused on education to teach after several weeks of teacher training“. In its position the ACCR explained where it sees the major drawbacks of these proposals. According to the ACCR the most effective way to achieve changes at education faculties that would improve and recognise the importance of practical training is through a higher level of involvement of these faculties in the continuing training of teachers as part of a career system. This will lead to both an increased inflow of finance and closer links to practice. At the same time it is necessary to acknowledge the specificities of creative and research work in teaching. This involves, most importantly, support for applied research in didactics in various subjects, including the recognition of newly developed top didactic materials (e.g. peer-reviewed national textbooks) as legitimate outputs of creative and expert work.

Furthermore, the ACCR opened discussion on the advantages and disadvantages of structured (divided) teaching programmes for lower and secondary education teachers on the one hand and traditional Master studies on the other hand. The main problems that have occurred in dividing teacher training studies are as follows: unclear employment prospects for graduates of Bachelor programmes (the Educational Staff Act stipulates that teachers should have a Master qualification); unclear transition from Bachelor to Master studies (in most fields all Bachelor graduates continue in Master programmes); inclusion of training in pedagogy and psychology, teaching practice and didactics in the relevant subjects. Some faculties of education use Bachelor studies to focus on professional knowledge in the subjects to be taught (i.e. the content). In this they partially overlap with non-education faculties (arts, natural sciences), while the pedagogical methods (didactics), which should be dominating in programmes for lower secondary teachers, are disappearing from the studies. There is also insufficient room for practical training at school. This may affect the quality of education at basic schools. There are some teaching specialisations that are particularly suffering from the dividing up of the originally long programmes (natural sciences as well as social sciences). In addition to this, there is no comparison of the quality of outputs, since it is not possible to evaluate the parallel Master and structured programmes. The ACCR recommends that there should be a project aimed at evaluating the impact of structured teacher training programmes.

The ACCR also discussed the Register of Associate Professors and Professors. During the first year of its existence the Register turned out to be of major benefit for the quality assurance system. It makes it possible to check on the workloads of associate professors and professors at higher education institutions. However, the technical parameters appear to be a continuing problem (accumulation of up-to-date and archive data, inappropriate data searching, sorting and report generation capabilities). At the end of 2011 the Register was nearly non-operational. The ACCR therefore asked the MoEYS to upgrade the user environment of the Register and ensure regular and timely updates.

Moreover, the MoEYS should regulate the conditions under which HE institutions are allowed to search data in the Register that concern the employment relations of their staff. At present, only the MoEYS and the ACCR can see such information in the Register if such data are needed as part of the accreditation proceedings. This means that a higher education institution cannot check whether a member of its staff is employed at another HE institution. An HEI may, in good faith, employ an associate professor as a guarantor of a study programme without having information about his/her workload at other institutions. The ACCR is aware that this is primarily an ethics issue. However, it believes that wider access to the Register on the part of HEIs could assist them in dealing with various human resource issues.

## **IV. External cooperation in 2011**

### **The ACCR's cooperation with other institutions in the Czech Republic**

The cooperation established between the ACCR and other institutions in previous years continued to develop in 2011. Most importantly, this cooperation concerned representatives of HE institutions – the Czech Rectors Conference and the Council of Higher Education Institutions. The members of the two bodies regularly attended the ACCR's meetings and contributed to discussions on issues related to the quality of higher education. In turn, the vice-chairman of the ACCR participated in meetings of the boards of the Czech Rectors Conference and the Council of Higher Education Institutions. 2011 also saw continuing cooperation with the Students' Chamber of the Council of HE Institutions – students took part in the work of ad-hoc groups dealing with evaluations. This cooperation has proven to be good. It turned out that the perspectives of students on the educational activities of the institution undergoing evaluation provide a major enriching contribution to the work of the ad-hoc groups. The role of students is indispensable, particularly in the evaluation of Bachelor and Master degree programmes – i.e. in discussions with students of the institution being evaluated. Their contribution lies in creating an atmosphere of trust leading to openness, as in the accounts given by the students themselves, and also allows for the possibility of comparing the institution with the home institution of the student participating in the ad-hoc group. The ACCR envisages such cooperation developing in years to come.

The ACCR also cooperated with the Ministry of Education, Youth and Sports. The Deputy Minister responsible for research and higher education attended two meetings of the ACCR, and the director of the higher education department was present at three meetings. The matters that Minister of Education presented to the ACCR for review concerned appeals against decisions on the non-granting of accreditation. As a rule, the Minister asked the ACCR to comment on expert arguments stated in the reasons behind

the appeals. The evaluation of Doctoral programmes that is requested by the Minister is considerably time-consuming for the ACCR. Cooperation with the MoEYS in 2011 was not as smooth as in previous years. The ACCR felt very upset about unusual decisions made by the director of the MoEYS's higher education department that concerned some of its proposals for restricting or removing accreditation in cases where major irregularities had been found in the delivery of study programmes. Due to its inactivity or unlawful decisions the MoEYS effectively tolerated a situation where, in the name of the Czech Republic, higher education diplomas were issued abroad based on studies the quality of which could not be verified. The MoEYS ignored security risks for the Czech Republic and allowed for the downgrading of Czech higher education. It also sent a signal that gross violation of the terms of accreditation constitutes no reason for imposing sanctions.

As concerns the assessment of some applications for the accreditation of study programmes that train graduates to practise specific professions (healthcare programmes), the ACCR cooperated with the relevant state administration bodies – mainly the Ministry of Health. There is also a specific group of fields of study delivered by state HE institutions (*Defence University in Brno and Police Academy of the Czech Republic in Prague*) that are governed by the relevant ministries (i.e. the Ministry of Defence and the Ministry of the Interior).

### **International cooperation** (*ENQA, CEE Network, INQAAHE, Russian NCPA*)

The ACCR continues its membership of major organisations that bring together accreditation agencies and other evaluation bodies in the area of higher education –at regional level (*Central and Eastern European Network for Quality Assurance – CEE Network, or CEENQA*), European level (*European Association for Quality Assurance in Higher Education – ENQA*) and global level (*International Network for Quality Assurance Agencies – INQAAHE*).

Members of the ACCR took part in the extraordinary meeting of the General Assembly of “Central and Eastern European Network for Quality Assurance“(CEE Network) on 27 – 29 May 2011 in Split (Croatia). The purpose of the meeting was to set up a new legal entity – the CEENQA. The General Assembly meeting was preceded by a meeting of the outgoing steering committee of the CEE Network and an annual seminar dealing with two topics. The first topic covered external evaluation of agencies and an analysis of final ENQA reports, the second concerned evaluation of joint programmes particularly with respect to the recognition of academic titles and approaches by various quality assurance agencies/commissions to their accreditation. Moreover, new CEENQA management was elected. Iring Wasser (ASIIN, Germany) was elected chairman and Todor Shopov (NEAA, Bulgaria) vice-chairman. Registration of the organisation in Düsseldorf, Germany, was then approved and so was the residence of the Secretariat that should remain in Budapest, Hungary.

The registration of CEENQA as an organisation with a legal status opens up new possibilities for applying for international grants for projects. The Accreditation Commission sees an interesting opportunity in cooperation as concerns evaluations and quality assurance procedures for joint degrees as part of the European Consortium for Accreditation (ECA). In view of the growing number of these programmes delivered in the Czech Republic (and the related accreditation issues), it would be advisable to consider possible involvement in the work of this consortium and establishment of cooperation with European agencies in this area.

A representative of the ACCR attended the general meeting of the “European Association for Quality Assurance in Higher Education” (ENQA) on 6 and 7 October 2011 in Bucharest, Romania. The meeting focused on three main topics: 1) policy frameworks and their implications for quality assurance; 2) evaluation of the impact of quality assurance; and 3) quality assurance and its impact on the recognition of education. An interim report mapping the implementation of European standards and guidelines in higher education was presented at the meeting (the so-called MAP-ESG project). The final version of the report was produced in November 2011. The general meeting saw the approval of new members and the confirmation of ENQA members, partners and associated organisations. The Board of Directors was elected and Achim Hopbach from the German Accreditation Board was confirmed as president.

Representatives of the ACCR took part in the 6<sup>th</sup> annual conference of experts in higher education organised by the Russian NCPA (National Centre for Public Accreditation – a Russian agency for quality assurance in higher education focusing on public accreditation at programme and institutional level). The conference was held on 11 – 13 November and the topic was “Implementation of European standards and guidelines concerning quality assurance systems”. Presentations were delivered both by representatives of Russian HE institutions and the National Council of Experts in Higher Education, and members of accreditation agencies from Slovakia, Croatia, Estonia, Kazakhstan and Uzbekistan. The contributions of foreign guests mainly concerned the process of implementation of institutional accreditation. Their experience may be used if transition to a similar system takes place in the CR. Moreover, chairman of the CEENQA association, Iring Wasser, presented the opportunity for cooperation among international associations and joint implementation of projects as part of various grant schemes.

### **The fulfilment of international criteria (ENQA)**

In view of its commitments resulting from its membership of the ENQA, in 2011 the ACCR focused on the fulfilment of the requirements set out in the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* that concern external quality evaluation. This involved, above all, more emphasis being placed on monitoring the outcomes of internal evaluation processes at HE institutions that were assessed. Moreover, consistency in decision-making in the implementation of the relevant criteria was stressed and so was the higher level of comprehensibility and aptness of recommendations and explanatory comments. Another major step towards compliance with the *Standards and Guidelines* is the fourth internal evaluation of the ACCR.

Compliance with the standard related to the ACCR’s independence is a specific problem. This is so mainly due to the fact that the ACCR’s Secretariat is part of the organisational structure of the Ministry of Education, Youth and Sports and the ACCR’s budget is part of the MoEYS’s budget.

The ACCR’s independence from the MoEYS’s decision-making (including the independence of its administrative apparatus) is one of the most important recommendations made by the international review panel during the ACCR’s external review in 2010. The ACCR was to present a report to the ENQA in June 2012 on the implementation of the recommendations set out in the review report. Therefore the ACCR asked Minister of Education to address the organisational position of the ACCR and to remove its Secretariat from its internal structure in order to form an independent

unit of the Ministry. The aim is to ensure its independence from the department of higher education (i.e. to make sure that the administrative apparatus of the ACCR, which provides for its activities as an independent expert body, is detached from the administration of the department that is the decision-making body in administrative procedures. Minister of Education granted this requirement and, as of 1 June 2011, the Secretariat of the Accreditation Commission is an independent unit of the MoEYS.

Furthermore, the ACCR also sees the need to enhance communication with the management of the section at the MoEYS that is responsible for research and higher education. When representatives of the MoEYS are not present at the ACCR's meetings, the MoEYS not only lacks appropriate information about topical issues, but also, and most importantly, fails to follow policy developments and long-term issues in the area of HE quality assurance.

## **V. Evaluation of the ACCR**

### **The ACCR's internal and external evaluation systems**

*Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* set out a cyclical review of accreditation agencies (so-called peer review) as a necessary part of the quality assurance process. This evaluation must be implemented in two ways – as an external review and as an internal quality assurance process. The latter consists in the accreditation body's developing internal mechanisms through which it monitors and assesses the quality of its own activities. The internal quality assurance procedure should also serve as a basis for the external review. This means that once in a maximum of 5 years a comprehensive self-evaluation report should be developed that will be assessed by an independent panel established for the purpose of external review. However, internal quality assurance must be carried out every year, since it is necessary to implement a regular analysis of topical problems and of ways in which the Accreditation Commission has been dealing with the recommendations resulting from the previous internal quality assurance report.

### **Implementation of the ACCR's internal quality assurance process**

The first internal evaluation of the ACCR was implemented in 2007. In 2008 a so-called "follow-up" report was presented. It dealt with the ways in which the ACCR addressed the recommendations resulting from the internal quality assurance report of 2007. The report issued in 2009 also focused on implementation of the recommendations set out in the follow-up reports of 2007 and 2008, and on the extent to which the drawbacks and risks identified earlier were being eliminated. The report on internal evaluation carried out in 2010 reflects, among other things, on the ACCR's external review of April 2010.

The responsibility for the internal quality assurance process lies with a panel consisting of three members. Their task is to draft the respective evaluation report, present the draft at the ACCR's meeting and develop a report on the results of internal evaluation to be published. The report also contains an analysis of the implementation of recommendations set out in previous internal evaluation reports. In 2011 the members of the internal quality assurance panel were as follows: Jaromír Příhoda, Jan Roda and Jan Štěpán.

The panel's activities also included a survey of the view of the ACCR members, members of the standing working groups and the staff of the ACCR's Secretariat.