

Annual Report of the Accreditation Commission for 2013

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I. Introduction

Statutory definition

The Accreditation Commission of the Czech Republic (the ACCR) is established in accordance with 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 innovative activities of higher education institutions (HEIs). To this end it issues statements on applications for the accreditation of study 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 HEIs and the quality of accredited activities and subsequently publishes the results of these assessments. The ACCR delivers its opinions on the establishment, merger, breaking up or closure of faculties 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 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. 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 two 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 the ACCR members are replaced regularly in even-numbered years. In 2013 the composition of the ACCR did not change.

In 2013 the composition of the ACCR was as follows:

Chair:

prof. PhDr. Vladimíra Dvořáková, CSc.

Vice-chair:

prof. Ing. Jan Roda, CSc.

Members:

1. **prof. PhDr. Vladimíra Dvořáková, CSc.**; Faculty of International Relations, University of Economics in Prague
2. **prof. Ing. Jan Roda, CSc.**; Faculty of Chemical Technology, Institute of Chemical Technology Prague
3. **prof. Ing. Josef Arlt, CSc.**; Faculty of Informatics and Statistics, University of Economics in Prague
4. **prof. MUDr. Josef Fusek, DrSc.**; Faculty of Military Health Sciences, University of Defence Brno
5. **prof. PhDr. Jana Geršlová, CSc.**; Faculty of Economics, VŠB-Technical University Ostrava
6. **prof. Dr. MA Ing. Július Horváth, Ph.D.**; Central European University in Budapest, Hungary
7. **prof. RNDr. Pavel Höschl, DrSc.**; Faculty of Mathematics and Physics, Charles University in Prague
8. **doc. Mgr. Ing. Karel Chadt, CSc.**; Vysoká škola hotelová v Praze 8, spol. s r.o.
9. **prof. PhDr. Petr Kyloušek, CSc.**; Faculty of Arts, Masaryk University Brno
10. **prof. JUDr. Hana Marková, CSc.**; Faculty of Law, Charles University in Prague
11. **doc. Françoise Mayer, Ph.D.**; Université Paul-Valéry Montpellier III (France)
12. **prof. PhDr. Svatava Raková, CSc.**; Institute of History, Academy of Sciences
13. **prof. Ing. Jaroslav Petr, DrSc.**; Institute of Animal Science, Academy of Sciences
14. **prof. Ing. Jindřich Petruška, CSc.**; Faculty of Mechanical Engineering, Brno University of Technology
15. **prof. Ctirad Pospíšil, Th.D.**; Sts. Cyril and Methodius Faculty of Theology, Palacký University Olomouc
16. **prof. RNDr. František Sehnal, CSc.**; Biology Center, Academy of Sciences
17. **prof. PhDr. Lubomír Slavíček, CSc.**; Faculty of Arts, Masaryk University Brno
18. **prof. PaedDr. Iva Stuchlíková, CSc.**; Faculty of Education, University of South Bohemia in České Budějovice
19. **doc. MUDr. Bohuslav Svoboda, CSc.**; Third Medical Faculty, Charles University in Prague
20. **doc. RNDr. Jiří Tůma, DrSc.**; Faculty of Mathematics and Physics, Charles University in Prague
21. **prof. Ing. Ivan Uhlíř, DrSc.**; Faculty of Mechanical Engineering, Czech Technical University in Prague

The structure of the standing working groups

The ACCR sets up advisory working groups that assure the necessary expert preparation 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 2013 the ACCR had 22 standing working groups.

List of standing working groups:

1. Applied informatics and computer technology
2. Biology and ecology
3. Economics
4. Pharmacy
5. Philology and literary science
6. Philosophy, theology and religious sciences
7. Physics
8. Geosciences
9. History
10. Chemistry
11. Medical and health sciences
12. Mathematics and theoretical informatics
13. Health care
14. Subject didactics
15. Education, psychology and sport studies
16. Law and public administration
17. Social sciences
18. Technical sciences
19. Art sciences
20. Veterinary medicine
21. Military and security studies
22. Agriculture, forestry and food studies

The composition of working groups

In 2013, 217 persons were involved in the activities of the standing working groups. The vast majority of them were representatives of HEIs. The remaining members of standing working groups were from the Academy of Sciences, other research institutions and industry.

Year	HEIs	Academy of Sciences	Other institutions	International members	Total
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
2012a	173	22	14	3	212
2012b	182	19	12	4	217
2013	178	18	14	7	217

(2012a – composition of standing working groups as of 31 August 2012; 2012b – composition of standing working groups as of 31 December 2012.)

The activities of the ACCR's secretariat

In accordance with the Higher Education Act the physical and financial resources to cover the operation of the ACCR are provided by the Ministry of Education, Youth and Sports (MEYS). The administrative and technical support is assured by the secretariat of the ACCR, which is an organizational unit of the MEYS – a unit directly managed by the Minister. In 2013 the secretariat of the ACCR was composed of five employees. Despite the constant increase in the demands on the secretariat's activity in connection to the increase in demands on the activity of the ACCR, this number still did not correspond to that in 2006, when six employees worked at the secretariat.

In 2013 the ACCR's secretariat was headed by Jiří Smrčka, who was also the secretary general of the ACCR.

III. The ACCR's activities in 2013

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 31 evaluations of HEIs' activities, the activities of their units and their accredited activities in 2013 and all were completed and discussed at the ACCR's meetings during 2013. The majority of the evaluations in the first half of the year were focused on Doctoral study programmes. In addition, non-university HEIs (2) and accredited activities carried out by a HEI in cooperation with another legal entity in compliance with Section 81 of the Higher Education Act (1) were evaluated.

All evaluations of HEIs and evaluations of their accredited activities were implemented in a standard manner in accordance with the ACCR's Statute. The resulting evaluation reports were discussed at the ACCR's meetings in the presence of representatives of the concerned institutions and they have been made public on the ACCR's website.

The evaluation of Doctoral study programmes at all HEIs was launched in 2010 at the request of the Minister of Education, Youth and Sports. The evaluation process was completed and closed in June 2013. The ACCR evaluated Doctoral study programmes at 126 faculties, five parts of HEIs outside the faculty structure and at two HEIs that are not divided into faculties. In total 20 public HEIs, two state HEIs and four private HEIs underwent the evaluation (four artistic HEIs, one private HEI and one faculty of a state HEI did not undergo the evaluation within this process because they had been evaluated in the immediately preceding period). A total of 493 study programmes with 708 fields of study were subject to evaluation. The process was conducted by evaluating parts of HEIs one by one; they totalled over 130 faculties.

The main aims of the evaluation were:

1) A comparison of the quality of similar study programmes in the Czech Republic and of the faculties and HEIs with similar specializations, yet without creating rankings!

2) An insight into the dynamics of Doctoral studies (capturing the trends). The Doctoral study programmes affect higher education and scientific research in a fundamental way. The quality of Doctoral studies impacts the quality of the expert and scientific activity of the HEIs and academic entities and also the quality of the rising generation of academicians; it also indirectly predetermines the quality of Master and Bachelor study programmes in the mid- as well as the long-term perspective.

3) To point out the possible risks connected to some programmes and to prevent a possible decrease in quality.

The main criteria of the evaluation were:

1) The quality of outputs. While the accreditation process assesses whether the HEI has the preconditions for carrying out a Doctoral study programme (inputs), the evaluation made it possible to focus on the complex assessment of outputs. The quality indicators used were the quality of defended dissertations (including the opponent process) and the quality of publication activity of the graduates in the course of their studies and upon their completion.

2) The quality of the related research activity. The quality of the related research activity was evaluated by the character and expert focus of the research projects carried out by the unit and expert and publication activity of the academic staff involved in the realization of the Doctoral study programme (the supervisors in particular).

Aside from these basic criteria the ACCR also assessed other aspects of carrying out Doctoral study programmes:

- the requirements on the applicants
- international mobility of the students

- the means and criteria of assessment of students in the course of their studies
- the amount of workload of the teaching staff (number of supervised dissertations per supervisor)
- information resources and technical conditions for carrying out the study programme
- the degree of adequacy of the regulations stipulated in the study and examination code and compliance with the regulations.

The overall approach of the ACCR was dynamic rather than static. Not only had the current state of affairs been assessed, but also the trends that indicated improvement, stagnation or decline in quality were captured. The ACCR laid out the strengths of the Doctoral study programmes in the evaluation reports, but also identified a number of problems and risks. In general terms the positive findings can be summarized as follows.

There is a sufficiently wide spectrum of Doctoral study programmes of high quality at the Czech HEIs. The requirements on the quality of dissertations and the publication outputs of the graduates have been increasing. In the recent years the significance of continuous control of the studies and of compliance with the regulations laid out by the study and examination code has been rising. The majority of HEIs have recently adopted new regulations or made the requirements on the students stricter or more explicit. The mass increase in the number of students in Doctoral study programmes has stopped. The claim can thus be made that promotion of quality over quantity has been the trend in Doctoral studies in the recent years. The current graduates have quality publication activity and are involved in international research. The quality of information resources and technical equipment of the HEI units is very high.

The main shortcomings of the Doctoral study programmes encountered during the evaluation are the following.

1) Formalism in internal evaluation (self-evaluation) of the HEI; issues with defining its own mission and concept. One of the elements that the ACCR considered was the self-evaluation as a whole – the ability of the HEI (faculty) to realistically assess the quality of the development of the Doctoral study programme in the mid- and long-term perspective, to identify the weaknesses, determine the causes of the problems and propose a solution. The self-evaluation report (internal evaluation of the HEI) was often restricted to provision of the requested data with minimal effort to interpret them. The weaknesses were often not even identified and thus a solution was not sought.

2) In some fields of study the connection to research is problematic, which is a serious issue because the Doctoral studies are fundamentally tied to the development of science. Without quality scientific research it is impossible to produce quality outputs. This shortcoming is caused by difficult access to major grants (especially in the field of fundamental research). In practice this problem is manifested in the insufficient involvement of students in fundamental research and also the absence of profile subjects of research at some units.

Among the other encountered problems (with varying severity) in the general terms are:

- Disproportionately high number of dissertations supervised by some supervisors. Even though no single line can be drawn between the proportionate and disproportionate number of supervised dissertations per supervisor, it was obvious that in case of some study programmes the high number of supervised dissertations was to the detriment of their quality. The concern is not only the involvement of a supervisor in one study programme, but also the total number of student papers (including Bachelor and Master theses) that he or she supervises at a time.

- A high proportion of external research supervisors or supervisors who are not associate professors or professors. This issue shows a certain degree of inability to secure supervision by the unit's own means and leads to a low level of involvement of students in the research activity of the unit. The consequences range from lower cooperation among students in the Doctoral study programmes to issues with organization of the Doctoral studies and with fulfilling the uniform requirements on the quality of outputs. The high proportion of supervisors who are not associate professors or professors and even supervisors with low quality expert activity is a serious problem. If the supervisor is not a renowned expert authority, is not involved in research in the given field and lacks quality outputs (publications), it is unlikely that he or she will be able to bring up a graduate with high expertise.

- The topics of some dissertations fall in research areas other than that in which the Doctoral study programme is realized. It happens in all fields that some individuals go beyond the boundaries of the Doctoral field of study (typically due to their research interest), but it becomes a serious problem when dissertations do not respect the boundaries of the field regularly and systematically. Usually this situation arises when the unit cannot reach to a particular field in terms of the quality of scientific background and academic staff and realizes it in fact through another field of study.

- Major differences in the requirements on completion of studies and the students' outputs. In the case of some faculties the study programmes had been developing separately, which resulted in different requirements on the student performance, the number and quality of publications, other requirements in the course of the studies or even the extent and formal layout of the dissertation. These discrepancies mean, in fact, a diverse system of studies and diverse standards for graduates of different study programmes at one faculty. The current trend is to unify the requirements on completion of studies within one faculty or HEI and set the minimum requirements common for all study programmes. It seems that introduction of a credit system can make a positive contribution to this trend, but only if it carefully accounts for the specifics of the Doctoral studies. Credits must be earned on the basis of publications, participation in conferences, study stays, organization of workshops etc. rather than for passing courses.

- The number of students exceeds the capacity of the unit. The previous years saw an enormous increase in the number of students in some Doctoral study programmes, but the human resource and the volume of related quality research that the students could be involved in did not correspond with this number.

- The unit is not sufficiently scientifically profiled (in the sense of schools of science). The units that take part in the realization of a Doctoral study programme often lack profile subjects of research that would enable student involvement. The units are composed of sets of individuals with different research interests rather than of teams that would work on common research projects and create a scientific profile of the unit. At the same time, it is impossible to hold up in international comparison without building greater research projects and schools of science.

- The Doctoral study programme is conceived as a “continuation of the Master study programme”. One of the signs is that the students are required to pass a high number of courses and take exams in these subjects (in some cases courses for Master and Doctoral students are not even distinguished). On the other hand, individual work with the student and his or her involvement in research activities is absent. The studies of a typical unsuccessful Doctoral student are in the beginning restricted to completing assignments and passing exams (as he or she has been used to from the Master study programme). He or she proceeds to writing the dissertation with a delay only in the later years of studies, but without previous systematic work he or she is unable to finish and submit it.

- Low level of international mobility of Doctoral students, particularly regarding longer stays at foreign institutions. A contributing factor is the prevalence of the combined mode of study that is not conducive to traditional mobility. A problem of its own as concerns mobility in Doctoral studies is the difficulty of finding the suitable foreign institution that would enable the student to be involved in research related to the topic of the dissertation (the model of mobility typical for Bachelor and Master studies cannot be replicated in Doctoral studies).

- Fragmentation of Doctoral studies into too narrowly profiled specializations. It is usually driven not by an objective need of the HEIs to internally structure the study programmes but by the effort of distinctive experts to build their own fields of study at the HEI. Small, narrowly profiled fields of study usually rely on one strong expert authority, with whose departure the field of study loses the perspective of further development.

- Underestimating the importance of the evolvement of the age and qualification structure of instructors. The development of the Doctoral study programme is conditioned by the building up of the unit, the upbringing and scientific growth of staff in the younger and middle generation. A number of study programmes, where systematic attention had not been paid to the development of human resources in the field, failed to handle the generation change and saw a decline in quality or even were terminated with the departure of the older experts.

As in previous years, the ACCR combined institutional evaluation with issuing statements on the extension of the validity of accreditation of study programmes and fields of study. 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 carried out and the ways in which they are interrelated. The combination of the two processes is beneficial for the HEI as it lowers the administrative burden. Moreover, it strengthens the institution’s policy coordination. As a result, 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 HEIs** (i.e. detached sites located outside the main HEI where instruction takes place). The branches have for long been the weakest point in terms of quality of higher education in the Czech Republic and they pose a major risk to the overall graduates’ educational standard. 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 study

programmes implemented abroad. The MEYS should devote more attention to the issue of branches of HEIs and use the instruments prescribed by the Higher Education Act. The activities of the HEIs in terms of the launch and realization of study programmes at the branches should be systematically monitored and evaluated (particularly as concerns physical and technical resources), but also due operation of adequate quality should be enforced by legal instruments.

When evaluating the quality of carrying out the accredited activities, the ACCR found that some HEIs have been **admitting the graduates of the tertiary professional schools' study programmes** to the third year of Bachelor study and recognized as completed all the first and second year study requirements (including the compulsory core courses). These students fulfil only the minor study requirements at the HEI level and do not encounter the HEI level of instruction in courses that lead to achieving the aims of study and the profile of the graduate. The ACCR considers this practice unambiguously as bad practice. The Higher Education Act does not stipulate any limitations to recognition of study requirements as completed. Nevertheless, as the Higher Education Act does partially refer to tertiary professional schools in the Section 49(3), it can be assumed that while there is space for recognition, its extent is certainly not the same as for recognition of study requirements completed in a study programme at another HEI. It follows from the Education Act and the Higher Education Act that the content of tertiary professional education is different from the content of higher education – while the tertiary professional school deepens the knowledge and practical skills introduced at a secondary school (Section 92(1) of the Education Act) and therefore aims to “teach more”, Bachelor studies at a HEI incorporate current affairs and include a theoretical grounding (Section 45 of the Higher Education Act) and therefore aim to “teach something qualitatively different”. That is why there is no overlap between instruction at a tertiary professional school and at a HEI. In relation, the ACCR has encountered a serious problem tied to recognition of study requirements that concerns unrealistic study programmes at tertiary professional schools. The content of courses at some tertiary professional schools was (as accredited) at the same level as a Master study programme at a HEI. This level of knowledge and skills is highly overrated and cannot be reached by studying at a tertiary professional school. The ACCR believes that the Czech School Inspectorate should verify whether the tertiary professional schools truly educate their students in line with the accredited study programmes or whether the content of these programmes is only declaratory or even misleading and used for the purposes of recognition of courses upon admission of a tertiary professional school graduate to a HEI.

Statements on applications for accreditation

a) of study programmes:

In 2013 the ACCR issued a total of 1,711 statements on applications for accreditation, expansion and extension of accreditation. Of these 1,617 statements were affirmative and 94 negative.

In assessing the applications for **accreditation of Doctoral study programmes** the ACCR assessed the performance in science and research (or artistic activities) of the units applying for accreditation. It is the opinion of the ACCR that high quality Doctoral students (researchers) may only be brought up at institutions that carry out fundamental (or equivalent) research related to the field of the Doctoral study

programme. It implies that the unit on behalf of which the HEI applies for accreditation must be the carrier of major Czech or international projects and grants (such as those funded by the Czech Science Foundation) in a field related to the Doctoral study programme (or the field of study if the programme is divided into fields of study). If several units jointly apply for accreditation, each unit must meet this criterion on its own (i.e. the failure of one unit to meet the requirements in terms of human resources and research cannot be compensated for by collaborating with another institution).

The bad practice of paying a foreign expert who in reality does not carry out any research activity at the HEI in order to obtain a grant was pointed out by the ACCR in the previous years and has continued. He or she becomes the carrier of the grant and is also paid from it, but the grant is not in fact realized at the HEI. In terms of institutional background, contribution to the development of the HEI and involvement of students in such a grant has no significance. The ACCR has therefore strongly recommended that the assessors take into account the unit where the grant is to be implemented and the institutional qualifications for awarding it when assessing research grants and projects (including their completion and the evaluation of completed projects).

The number of applications for **accreditation of study programmes and fields of study taught in foreign languages** (mostly in English) continues to be high. The reason for such high number of applications may be seen in the simplified rules for submission of applications for accreditation of study programmes (fields of study) in a foreign language where the proposed study programme (field of study) is identical to the one accredited in the Czech language. As the ACCR focuses primarily on the guarantees provided by the rector in assessing these applications, it is possible that some institutions apply for accreditation of study programmes in a foreign language not due to their sincere intention to carry out the study programme in a foreign language at the moment, but for reasons having to do with marketing and visual increase in the number of accredited activities. In principle the ACCR does not investigate these circumstances and issues a negative statement on the application only in exceptional cases when there is reasonable doubt about the credibility or capacity to fulfil the declared intentions.

In 2013 the trend of **HEIs of the non-university type applying for accreditation for Master study programmes** has persisted since the preceding years. In relation to not only the HEIs of the non-university type but HEIs in general it is necessary to point to the high number of negative statements of the ACCR on applications for accreditation of Master study programmes. This fact reflects the extensive efforts of many HEIs to expand their selection of study programmes and offer Master studies without having the appropriate personnel, material, technical and information resources and most importantly without carrying out adequate research in the relevant field. The ACCR has repeatedly encountered a lack of understanding of the essence of research activity of a HEI and the practice of presenting research carried out by the academic staff of an institution at another institution, where they are also employed, as evidence of the quality of the institution itself. One of the requirements for accreditation of a Master study programme is implementation of external research projects at the HEI that are related to the given study programme. The participation of students on scientific, research, development or artistic activities is also expected.

Another significant trend is the increased interest of HEIs in **accreditation of traditional (unstructured) Master study programmes** (with the standard length of study 4 – 6 years). The ACCR has issued an affirmative statement on accreditation of these study programmes in some areas where structured study programmes had been carried out. A precondition for accreditation of traditional Master study programmes is a justification of their need and unambiguously demonstrated contribution in comparison with structured studies. A five-year Master study programme cannot be designed by joining together the Bachelor and Connected Master levels and leaving out the Bachelor state exam, but has to be qualitatively different in content and reflect this difference in the graduate's profile and the composition of the studies. The ACCR assess traditional Master study programmes by criteria for accreditation of Master study programmes (a condition for accreditation is therefore also adequate research and creative activity of the HEI in the concerned study programme).

A serious problem that the ACCR encountered in 2013 is the practice of circumventing a non-existent Czech accreditation (or lawfully restricted accreditation) through programmes of lifelong learning, alternatively through provision of foreign programmes. There are cases of HEIs lacking accreditation for the concerned study programme (field of study) that open lifelong learning programmes with the same content as the field of study. If the HEI is later granted accreditation, it admits the students of the lifelong learning programme to the study programme and according to Section 60(2) of the Higher Education Act recognizes as completed the assignments and examinations necessary for due completion of studies.

Another variant is the practice of opening a programme of a foreign HEI in the concerned field when the Czech HEI does not hold the accreditation for the study programme (field of study). The foreign study programme is the same in content as the original study programme (including teaching staff) that was found ineligible for accreditation. The graduates obtain foreign higher education (although at a Czech HEI in the Czech Republic), creating a precondition for its later recognition as equal to Czech higher education (the process of validation of degrees). This is an exceptionally dangerous practice that destabilizes the entire higher education system and degrades the higher education standard in the Czech Republic. HEIs and other entities that carry out foreign study programmes put increasing pressure on the state authorities to legalize foreign studies realized in the Czech Republic in terms of subsequent recognition (validation), acknowledgement of student status and granting of student visas to citizens from outside the EU.

The ACCR has advised the HEIs and the public that it is possible to recognize (validate) only those foreign study programmes that are a part of the higher education system of the foreign country and that are carried out as higher education programmes in compliance with the law of that country. When in doubt about applications for recognition, the HEIs should verify whether the institution that has awarded the diploma truly is a foreign HEI and whether the study programme has been realized in compliance with the law of the foreign country. The ACCR has in the past encountered the case of an entity operating in the Czech Republic that only pretended to carry out foreign higher education programmes while in fact the study programmes were not accredited in the foreign country. The ACCR has also called attention to the activities of the so-called unrecognized accreditation agencies that provide certificates of quality and accreditation of study programmes to the HEIs and other entities for a fee. These

“accreditations” have no legal or factual basis. If an entity carries out study programmes on the grounds of such accreditation, these study programmes cannot be recognized as a part of higher education.

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

In 2013 the ACCR issued a statement on 41 fields in which the habilitation procedure is carried out and 33 fields of proceedings for appointing full professors. In most cases the fields were new. The number of negative statements was reasonable with regard to the total number of applications (2) and (3), respectively. The most common reason for not granting accreditation was an insufficient number of internal associate professors and professors who have produced adequate publications in their fields.

The next period of increased number of applications for accreditation of fields in which proceedings for appointing associate professors and full professors is carried out is expected in 2015.

Statements on applications for granting state approval

Since the Higher Education Act's coming into force (in 1999) until the end of 2013 the ACCR received a total of 160 applications from legal entities applying for state approval to operate as private HEIs. Out of the 160 applications 9 aspired to the status of university, while the rest sought the status of a non-university HEI. The ACCR recommended state approval to be granted in 54 cases.

In 2013 the ACCR assessed 4 applications for state approval and in 2 cases a recommendation for approval was given. There is a continuing trend of unsuccessful applicants applying repeatedly, in some cases several times.

The great majority of private HEIs intend to deliver study programmes in economics, tourism, law, administration, media and communication, education and psychology. These are largely programmes that do not pose high financial demands on the technical, laboratory or information resources and that expect mass interest on the part of the applicants, including applicants of a higher age who study while working. For this reason, applications for accreditation of the combined mode of study are often submitted alongside the full-time mode. A new trend constitutes the focus on specific artistic fields (architecture, fine arts).

The justification behind the negative statement on the applications for state approval was, in all cases, tied to the negative statement on the application for accreditation of a study programme. The most common reason for a negative statement was the lack of sufficient human resources for the proposed programme.

In some cases the applications for state approval come from legal entities that are active in the Czech Republic and offer foreign higher education programmes here. The reasons they apply for state approval and Czech accreditation may involve efforts to legalise an existing foreign programme or efforts to make visa procedures easier for students from countries outside the EU.

Statements on the establishment and breaking up of faculties

In 2013 the ACCR assessed 1 request from a public HEI to issue a statement on the establishment of a faculty (Ladislav Sutnar Faculty of Design and Art of the University of West Bohemia) and issued an affirmative statement. Since 2010 there has been a major slow-down in the expansive increase of the number of faculties. In previous years new faculties were set up mainly at the smaller universities by splitting of pedagogical faculties.

In line with the Higher Education Act the ACCR pays no attention to the establishment of **faculties at private HEIs of the university type**. Faculties at private HEIs are not a part of institutions that the legislation pertains to and that could autonomously take part in implementing academic freedoms and be held accountable for the implementation of accredited activities. Splitting of private HEIs of the university type into faculties does not constitute an act of delegating academic freedoms but a decision of the owner as to how he or she chooses to name the organisational units of the legal entity. It would be transparent if the private HEIs did not use the term “faculty” at all, or if the legal rights and duties of faculties applied to the private HEI sector as well.

Statements on determining the type of a higher education institution

In 2013 the ACCR did not issue any statements on determining the type of a HEI. In the past such statements were always tied to the ACCR’s statement on applications for accreditation of a Doctoral study programme from a HEI of the non-university type. If the ACCR issued a positive statement on the accreditation of the Doctoral study programme, it simultaneously agreed to the change of type of HEI from non-university to university.

Following the significant increase in the number of applications in this area in 2007, the numbers have been more or less stable (2013 – 0, 2012 – 0, 2011 – 0, 2010 – 0, 2009 – 1 application, 2008 – 0, 2007 – 4, 2006 – 1, 2005 – 0).

Preparation of documents and policy papers

In the first half of 2013 the ACCR monitored the preparation of the amendment to the Higher Education Act. Representatives of the ACCR took part in the expert body that engaged in preparation of the amendment. The draft amendment of the Higher Education Act transformed from the initial entirely incompetent drafts prepared by the MEYS, that would cause rapid deterioration of the quality assurance system and its lack of transparency, create security risks and enable channelling of funds out to external entities, into a document that could become a suitable basis for further changes and discussion. The ACCR has provided important comments to the final version of the draft in June 2013, but the MEYS did not integrate them. The comments concerned prevalently the following:

- The basic unit of study is supposed to no longer be a study programme but an “area” of education. As currently defined, however, it does not constitute a sufficient

substantial and legal basis for accreditation. An area of education is still a vague category; there is a risk that its future definition will disregard the approach to classification of scientific fields used in science, where individual scientific fields are characterized by their particular methodologies. The difference between study programmes (which is the overarching category for fields of study) and areas of education (which is supposed to be the overarching category for programmes) is unclear. In addition, the provision that authorizes the release of a separate decree postpones the actual definition of the area of education until after the adoption of the amendment. This conduct is wrong. The area of education will be a key category in the operation of the HEIs and thus should be entirely clarified in terms of terminology and content (including the relationship between the faculty structure of HEIs and accreditation) at the time of deliberating the amendment. There is no agreement on the principles of what the definition of an area of education should follow from. It seems that the MEYS was simply concerned with the possibilities for projects related to the qualification framework (Q-Ram) and funded from the European funds. Its outputs are prevalently inadequate in terms of expertise and it is not accepted by the wider academic community.

- The emergence of private HEIs as empty boxes without an accredited study programme is unacceptable. If private HEIs were set up as empty boxes and only applied for accreditation of a study programme in the following two years, there would be a great risk that the label “higher education institution” is misused for offering commercial courses, producing expert opinions, facilitating foreign study programmes, etc. If the current legislation is criticized for not providing effective instruments to prevent the emergence of a great number of new private HEIs, the new legislation will rapidly worsen the situation.

- The proposed research profile for bachelor study programmes is an element entirely inconsistent with the higher education reality and the needs of the professional world.

- The new model of accreditation will result in a significant increase in bureaucratic burden for the HEIs as well as for the state administration. The current two-level model of educational activities (study programme – field of study), that is already burdensome, is supposed to be substituted by a four-level model (area of education – study programme – field of study – profile). The HEIs will be burdened by new administrative duties: creation of internal regulations, establishment and operation of new bodies, in relation to accreditation the HEIs will have to compile not only the current applications for accreditation of study programmes (at the minimum for the purposes of internal accreditation), but also applications for institutional accreditation, for accreditation of areas of education, reports for evaluation (mandatory external evaluation of HEIs that do not have institutional accreditation usually every five years) and progress reports. The new state bureau, the National Accreditation Agency (NAA), will on one hand be constantly immersed in assessing hundreds of applications for accreditation of study programmes without a link to evaluation, on the other it will conduct institutional accreditation and accreditation of areas of education (given the vagueness of both new types of accreditation it is likely not possible to determine their administrative demandingness or their real contribution to quality assurance).

- The link between institutional accreditation and accreditation of areas of study remains unclear. The amended Higher Education Act allows for the possibility that a HEI obtains institutional accreditation while lacking accreditation of an area of education. Two institutionally separated types of evaluation within the NAA do not make sense. Two sections with two closed lists of experts working in separate groups constitute an ineffective and administratively burdensome structure. Furthermore, it is impossible to evaluate the set-up of management and control processes without concurrently evaluating how the educational and creative activities are specifically carried out and what their quality is. Paradoxically the situation may arise that a) the assessors of institutional accreditation never come in contact with the assessors of the area of education and b) the NAA grants to a HEI institutional accreditation but not accreditation of an area of education. In such case a HEI with institutional accreditation but lacking an accredited content will emerge (creation of empty boxes).

- It is necessary to consider the usefulness of setting standards by a decree. Evaluation of quality cannot be reduced to verification whether quantitative criteria are fulfilled (the principle of assessing quality must be the assessor's rational deliberation). If evaluation of quality is reduced to verification whether a standard set by a body not competent for evaluation of quality and not primarily responsible for quality is fulfilled, the system of external evaluation and accreditation becomes exclusively formal. With respect to this issue the Accreditation Commission points out that authorization to set standards by a decree is a "blank cheque" that postpones the definition of standards (including the factual implications of the terms "institutional accreditation" and "accreditation of areas of education") until after the enactment of the amended law. This conduct is wrong and can lead to a rapid decline in quality.

- The order of authority NAA – MEYS in appeals procedures is unsuitable; revocation and remit of decisions could be used to delay the adoption of appropriate sanctions or to make legally binding interpretations for decision-making at the first level. The appeals procedures should be restricted within the NAA exclusively.

- A hidden goal of changing the accreditation system was the breach of continuity; to disable resuming the work of the current Accreditation Commission (in terms of expertise as well as administration), establishing an entirely new system of accreditation without a link to the previous one (creating insecurity) that will cover up the problematic HEIs and study programmes.

- The category of "Professor Emeritus" constitutes an element that does not belong to the system. Under the current system a foreign expert with an adequate scientific performance can be appointed professor or the HEI can employ him on the position of professor (if it has created one) although he or she does not have the title of professor embedded in the Czech legislation. Experts from the professional world that lack the adequate scientific performance should not be appointed professor in principle. It will not contribute to quality, the risk of misuse is high and the reasoning that "institutional accreditation is an element of regulation that will prevent possible inflation of such job positions" does not justify why such post should be created at all.

The ACCR has repeatedly stated that if an amendment to the Higher Education Act was being drafted, it should primarily deal with the real problems rather than the areas that were functional. For example, it should address the issues of the branches of

foreign HEIs in the Czech Republic (currently they belong to free entrepreneurial activity that is not regulated), establishment of branches of Czech HEIs abroad, internal structure and functioning of private HEIs (currently private HEIs are commercial entities or entities of public benefit for whom higher education is only one field of entrepreneurial activity; in contrast to public HEIs they are not “higher education institutions by nature”; they have no academic self-government in the sense public HEIs do; they have no obligation to have an academic senate with clear competences, etc.; there is no guarantee of plurality of opinion – everything is governed by the decision of the owner).

At its fifth meeting in 2013 the ACCR discussed the standards for assessing applications for accreditation, expansion and extension of accreditation of study programmes and their fields of study (Standards of the ACCR for study programmes) and approved an amendment dealing with the recognition of study requirements (assignments and examinations) passed at tertiary professional schools by students admitted to a Bachelor study programme. Upon admission of a graduate or a student of a tertiary professional school into a study programme at a HEI, it is not permissible to recognize as completed the courses that lead to achieving the aims of study and the graduate’s profile. These courses need to be passed at the higher education level, which can only be ensured by completing them in an accredited study programme. It concerns mostly compulsory and compulsory elective theoretical courses that enter into the State final examination. All changes have been worked into the standards and published on the ACCR’s website.

The ACCR has engaged in the development of specific requirements on study programmes/fields of study that prepare experts in applied management and applied informatics. Furthermore, the ACCR was occupied with setting specific requirements on applications for extension of accreditation of Master study programmes in Medicine and Dentistry (so that the requested information comply the requirements of the National Committee on Foreign Medical Education and Accreditation – NCFMEA). All requirements have been published on the ACCR’s website.

The ACCR has paid closed attention to the developments in technical fields of study. Ties to the professional world are key to education in the technical fields. The graduate has to have a certain range of specific knowledge and skills in order to succeed in the professional world. In the traditional (long) Master study programmes it was not a problem to compose the courses into study plans in a way that after a thorough absorption of the theoretical basis there was a transition to courses of preparation for the applied field. If the today’s graduate (with a Bachelor’s degree) is to be employable in the technical professional world, he or she must be sufficiently theoretically equipped and get the necessary grasp of the application of this knowledge in his or her field in the term of standard length of study. The result is that a number of specialized courses are inserted into the Bachelor studies at the expense of theoretical knowledge. In the Connected master studies the theoretical knowledge is supplemented and the introduced specialized courses are similar to those taught at the Bachelor level. They are often courses of the same title designated either for Bachelor or for Master studies. Some HEIs recognize the course as previously completed due to the “similarity”. Not only does such HEI knowingly restrict the range of knowledge of its students, but it also receives more funds from the budget than what corresponds to its real performance. A decrease in the number of graduates of Bachelor study programmes who continue on to Master level studies is expected in the case of public HEIs. For the technical HEIs the

question emerges of what the quota for admissions into Master studies will be based on. It could be either the entry number of applicants admitted to the Bachelor programmes, or the number of graduates of these programmes. They are two completely different indicators. The necessity of introducing Bachelor studies was justified among others by the high number of students that had not succeeded in the initial years of their studies. The situation has not improved. Therefore, if a faculty manages to bring up students to continue on to the Master level of studies, it will have to significantly limit their number through narrow selection in the admission process. Alternatively there could be two models of Bachelor study: an easier one and a more difficult one. The graduates of the former could continue on to the Master level of study only in exceptional cases; the latter study programme would be explicitly designed for this purpose. A valid counterargument would claim however that there is only a single standard of education necessary for quality preparation of graduates in the given field. If the student is incapable of completing the requirements of a Bachelor study programme where the content of the study plans corresponds to a three-year standard length of study, he or she has the option to spread the study requirements over four years. The extension should nevertheless not come at the expense of the public resources from the HEIs' budget. A related question arises of whether and for whom the introduction of four-year Bachelor study programmes is effective. It is usually said to be grounded in Act No. 360/1992 Coll. on the execution of professions of authorized engineers and technicians in construction. The act states that education in a Bachelor study programme with a four-year standard length of study or a Master study programme is a condition for obtaining the license of authorized engineer. Such license is an example of a legislative possibility of expanding the employment prospects of graduates-Bachelors, but the engineers' chamber does not in practice grant the license to Bachelors.

The deterioration of standard in technical secondary education is also reflected in the current state of higher education in the technical fields. A number of technical faculties admit applicants who lack the necessary pre-requisites. In some cases the HEIs respond to the level of their students by exerting internal pressure on letting as high number of students advance into their next year of study as possible. The consequence then is lowering of demands and worsening of outputs. A positive development can currently be observed in the Doctoral study programmes. The emphasis on their quality and development has brought an increased focus on involving the academic units in research projects (including grant support to scientific work of the students) and pressure on producing recognized publications (for students as well as the academic staff who participate in teaching and supervision in Doctoral study programmes). Another positive element is very high level of information and device resources of the technical HEIs.

IV. External cooperation in 2013

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 2013. Most importantly, this cooperation concerned representatives of HEIs – 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 their experience to discussions on issues related to the quality

of higher education. In turn, the chair of the ACCR participated in a general assembly of the Czech Rectors Conference. The year 2013 also saw continuing cooperation with the Students' Chamber of the Council of HEIs – students took part in the work of ad-hoc working groups for evaluations. The perspectives of students on the educational activities of the institution undergoing evaluation make a major enriching contribution to the work of the ad-hoc working groups. The role of students is indispensable, particularly in the evaluation of Bachelor and Master study programmes – e.g. in discussions with students of the institution being evaluated. Their contribution lies in creating an atmosphere of trust leading to openness of the students in their accounts and also allows for comparison between the visited institution and the home institution of the student members of the ad-hoc working groups. The ACCR expects this cooperation to further develop in the years to come.

The ACCR also cooperated with the MEYS. The Minister participated twice in the ACCR's meetings. The matters that the Minister of Education presented to the ACCR for assessment concerned appeals against decisions on the non-granting of accreditation. As a rule, the Minister asked the ACCR to comment on the expert arguments stated in the grounding of the appeals. The evaluation of Doctoral study programmes that was earlier requested by the Minister was considerably time-consuming for the ACCR.

As concerns the assessment of applications for the accreditation of study programmes that train graduates to execute specific professions (study programmes in health care), 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 HEIs (*University of Defence in Brno* and *Police Academy of the Czech Republic in Prague*) that are governed by the relevant ministries (the Ministry of Defence and the Ministry of the Interior, respectively).

International cooperation (*ENQA, CEENQA, INQAAHE, 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 the regional level (*Central and Eastern European Network for Quality Assurance – CEE Network*, or CEENQA), the European level (*European Association for Quality Assurance in Higher Education*, or ENQA) and the global level (*International Network for Quality Assurance Agencies*, or INQAAHE).

On 25-26 April 2013 the ACCR hosted the Members' Forum of ENQA in Prague as the first assembly of this most significant European quality assurance in higher education organisation in the Czech Republic. Over 80 delegates from 28 countries attended. Given the significance of the event for Czech higher education, Professor Václav Hampl, the Chair of the Czech Rectors Conference, sponsored the meeting. The event consisted of the ENQA Board meeting, General Assembly of the member accreditation agencies, expert workshops, plenary lectures and discussions. The discussions pertained to, among others, the issue of methodology for evaluating excellence at the HEIs and the revision of the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). Additional elections to the ENQA Board also took place.

The ACCR was represented at the CEENQA General Assembly on 31 May – 1 June 2013 in Bucharest (Romania). The General Assembly was preceded by a workshop

where several topics were presented and discussed. They dealt with a new approach of the EU to educational projects, projects with CEENQA participation that had been proposed within the TEMPUS VI framework and the use of benchmarking for improving the quality of education. The General Assembly approved changes in the CEENQA Statute, welcomed the representations of new member agencies and elected new members of the Board. Opening up of new opportunities for cooperation within the existing as well as new CEENQA projects is anticipated in the future.

A representative of the ACCR took part in the ENQA General Assembly on 29-30 October 2013 in Vilnius (Lithuania). The new leadership of the association was elected at the General Assembly - Pdraig Walsh (Ireland) became Chair, Helka Kekalainen (Finland) and Joseph Grifoll (Spain) were elected Vice-chairs. The plenary discussions concerned mostly the anticipated revision of the ESG. The proposed changes should put more emphasis on the concentration of the HEIs on the students; in the case of accreditation agencies the significance of independence is stressed. The standards support the understanding of evaluation of quality not as verification whether explicitly set indicators are fulfilled but as verification of the existence of wider preconditions on the basis of rational experienced deliberation by the evaluators. Discussion further developed about the possibilities of cross-border cooperation in quality assurance of higher education, especially in evaluation of HEIs.

The Chair and the Secretary-General of the ACCR attended an international conference in Moscow (Russia) about quality assurance in higher education, annually organised by the National Centre of Public Accreditation (NCPA). The topic of this year's conference that took place on 14-16 November 2013 was the application of the ESG in quality assurance systems. From the programme point of view several topics were significant for the ACCR: the issue of the current theoretical and methodological problems in programme and institutional evaluation and accreditation; methods and techniques of evaluation of quality in higher education; and the participation of students and staff in the evaluation of quality in higher education. On 16 November 2013 the Chair of the ACCR and the Director of the NCPA signed a framework agreement of cooperation that will enable the involvement of Czech experts in evaluation of the quality of HEIs in Russia and in turn the involvement of Russian experts in evaluation of the quality of Czech HEIs.

A member of the ACCR was elected to the Appeals Committee of the Agency for Quality Assurance and Accreditation Austria (AQA) in February 2013. AQA was created on 1 March 2012 by merging three Austrian accreditation agencies into one agency with all their former competences. The Appeals Committee has three members and is tasked to deal with the objections of educational institutions against procedures and certification decisions of AQA.

The fulfilment of international criteria (ENQA)

In 2013 the ACCR continued to pay great attention to the fulfilment of the requirements tied to membership in ENQA, especially those stipulated in the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. The ACCR continued to improve the compliance of its activities with the ESG and in particular put emphasis on monitoring the results and processes of internal quality assurance of the evaluated HEIs and on continuous discussion and revision of its standards. Related to that, the ACCR focused on a comprehensible and explicit wording

of recommendations and explanatory comments to the ACCR's statements and on reference to non-compliance with specific ACCR standards in case of negative statements. In compliance with the ESG the ACCR conducted internal evaluation for the period of 2012-2013.

The ACCR concentrated on implementing the recommendations of the independent external review panel from 2010 when the external review of the ACCR took place, and also on further reflection on its follow-up report for ENQA from 2012. Significant progress was made particularly in international activities. The ACCR hosted the ENQA Members' Forum in 2013, participated in international conferences on quality assurance of higher education and opened cooperation with the Russian accreditation agency NCPA. A trial version of a web application was introduced as a measure taken towards compliance with the recommendations. It will make the administration of applications at the ACCR secretariat as well as, prospectively, the submission of applications easier and more modern.

The ACCR commented on the proposed revision of the ESG and its position was included in the Czech Republic's stance towards the changes that was presented in the Bologna Follow-Up Group (BFUG). The ACCR complies with most of the standards in their currently proposed form. The ACCR's comments pertained to a more precise definition of one of the key terms ("stakeholders") and their role in specific processes of external quality assurance in higher education. Furthermore, the ACCR emphasized the significance of creative activity as one of the key roles of the HEIs and drew attention to ambiguous wording in the standards and guidelines that could lead to their incorrect interpretation. At the same time, the ACCR appreciates that the proposed revision of the ESG supports the current line of quality assurance in the wider context of existence of preconditions based on the rational experienced deliberation by the evaluators. This European trend is in line with the direction of the ACCR's activities.

Fulfilling the standard of the agency's independence is another specific issue, especially with regards to the fact that the secretariat of the ACCR is a part of the organizational structure of the MEYS. Moreover, the ACCR's budget consists a part of the Ministry's budget. The detachment of the ACCR's secretariat into a self-standing unit of the Ministry in June 2011 contributed to an increase in the ACCR's independence, as the administrative apparatus of the ACCR as an independent expert body formally separated from the administration of the department that has discretion over the appeals and sanction procedures. Nevertheless, it would be desirable to further strengthen the autonomy and independence of the ACCR's secretariat in matters such as its internal regulations, financial planning and personnel.

V. Evaluation of the ACCR

The ACCR's internal and external evaluation systems

The *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG) identified periodic review of accreditation agencies (so-called "peer review") as a crucial part of the quality assurance process. Evaluation must be conducted in two ways – as external review and as internal evaluation. The purpose of internal evaluation lies in the effect that the accreditation agency creates its own internal mechanisms to monitor and evaluate the quality of its activities. Internal

evaluation should also serve as a basis for the external review. Therefore, a complex self-evaluation report should be written at least every five years and it becomes subject to evaluation by an independent panel for external review. Internal evaluation must, however, be carried out more frequently in order to perform regular analysis of the current problems and the measures adopted to respond to the recommendations made in the previous external review report.

Implementation of the ACCR's internal evaluation process

The first internal evaluation of the ACCR was implemented in 2007. In 2008 a so-called "follow-up" report was presented to address the ways in which the ACCR responded to the recommendations resulting from the internal evaluation report of 2007. The report issued in 2009 also focused on the extent to which the drawbacks and risks identified earlier were being eliminated and on implementation of the recommendations set out in the follow-up reports of 2007 and 2008. The report on internal evaluation produced in 2010 reflects on the external review report of April 2010 and it became the point of departure for the follow-up report on compliance with the recommendations submitted to ENQA in June 2012. The internal evaluation for the period of 2011-2012 was based on another survey research and offered an insight into the current view of persons involved in the ACCR on its work, compliance with the ESG and a summary of the current problems, challenges and risks.

The internal evaluation for the period of 2012-2013 analysed other measures taken towards fulfilling the 2010 recommendations of the review panel and followed up on the state of affairs recorded in 2012. In the 2012-2013 period similar kinds of problems and risks as identified in previous internal evaluation reports persisted. The reasons may lie in the fact that 1) the conditions under which the ACCR operates (including legislative) have in fact not changed in the last five years, and 2) improvement in quality and gradual elimination of problems is a continuous process and certain phenomena can only be changed in the long term.

In other aspects that lay in the intersection of the drawbacks identified by the 2011 survey and the recommendations of the independent international review panel from 2010 the ACCR has improved. It is the case particularly for the increase in international activity (among other news the ACCR hosted the ENQA Member's Forum and opened cooperation with NCPA in 2013) and continuous efforts to make the workload of the standing working groups as well as the members of the ACCR more equal. The number of standing working groups in which international experts and experts from the professional world are represented is significant.

The internal evaluation report was approved at the meeting no. 1/2014 of the ACCR and published on the ACCR's website.

Implementation of external review of the ACCR

The ACCR underwent external review in 2009-2010 in compliance with the ESG. As a result, the ACCR gained full-member status in ENQA for five years. The ENQA Board requested a follow-up report about the measures adopted in response to the review two years after the completion of the review.

In June 2012 the ACCR submitted a follow-up report that responded to 16 recommendations made in the final report of the external review and informed about the measures taken towards compliance. The next external review of the ACCR is anticipated in 2014-2015 and its result will determine the ACCR's membership status in ENQA for another five-year period.

The ACCR is aware that compliance with the recommendations made in the previous external review report and the tasks set during the internal evaluation process in the last years will form a significant part of the external review. The internal evaluation report of 2012-2013 deals with both issues and finds common points of the two evaluation processes. The report also reflects the stance of the ACCR towards the proposed revision of the ESG that will be crucial for the upcoming external review.

In the course of 2014 the ACCR will prepare a complex self-evaluation report as a key document for external review conducted by an independent international panel. The ACCR expects that in 2014 a new legislative grounding and the impact of the ongoing political changes on the ACCR as well as further measures taken towards the fulfilment of the recommendations made by the review panel in 2010 should already be known.