

Annual Report of the Accreditation Commission for 2014

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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 standpoints 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. 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 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 2014 Professor Iva Stuchlíková was appointed for her second term. Apart from that, 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.;** The Institute of Hospitality Management in Prague
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 Slaviček, 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 2014 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 2014, 216 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
2014	177	18	15	6	216

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

(With the exception of the above, the data is valid as of 31 December of the given year.)

The operations of the ACCR's secretariat

In accordance with the Higher Education Act the material 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 2014 the secretariat of the ACCR was composed at first of five employees, in the course of the year it grew to seven. The growth has enabled more effective support to the ACCR's activities and adaptation to continuously increasing demands on the secretariat in connection to the growing demands on the ACCR.

In 2014 the ACCR's secretariat was headed by Jiří Smrčka, who was also the secretary general of the ACCR.

III. The ACCR's activities in 2014

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 10 evaluations of HEIs' activities, the activities of their units and their accredited activities in 2014 and eight of those were completed and approved at the ACCR's meetings during 2014. The evaluations

concerned faculties of public HEIs (4), HEIs of the non-university type (4), a state HEI (1) and an institute of a HEI (1).

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. 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.

In evaluating several **private HEIs**, the ACCR found that study programmes have not been carried out in compliance with accreditation. In a number of cases the obligation stipulated in Section 53(2) of the Higher Education Act has not been fulfilled and state exam committee members without habilitation have not been approved by the academic council.

The ACCR draws attention to the great degree of internal instability of private HEIs that is caused by non-conceptual measures taken by their owners. A number of private HEIs have suffered from repeated disruptions of continuity as each new academic leadership appointed by the company management (the owner) takes on the „crisis management“ role and creates a new concept, which is often based on a new set of academic staff. Without long-term stability, however, it is impossible to build a functioning HEI with high quality study programmes. The ACCR holds that the stability of the private HEIs sector cannot be maintained without legislative changes that will ensure that the internal structure and operation of private HEIs come close to the rules of functioning of public HEIs.

Concerning **state HEIs**, the ACCR pointed to the risk of non-transparency caused by different obligations stipulated by the Higher Education Act in respect to submission of data to central registers. The Higher Education Act does not impose the obligation on state HEIs to submit data to the register of associate professors and professors and to the central register of students maintained by the MEYS. As a result, the academic staff of the Police Academy of the Czech Republic in Prague and the University of Defence are not registered for the purposes of assessing applications for accreditation. This disallows the ACCR to verify the provided data on academic staff and to assess this data in the context of all HEIs. Also the fact that the data in the register of students of state HEIs are not collected by the MEYS (especially in the case of the Police Academy) prevents objective oversight over due course of studies of students or graduates. The ACCR has recommended that it is necessary to extend the obligation in relation to the register of associate professors and professors in preparing the revision of the Higher Education Act. The Register of Staff of the HEIs in Slovakia serves as a good example (publicly accessible at <http://www.portalvs.sk/regzam/>).

The ACCR indirectly encountered the issue of **foreign HEIs operating in the Czech Republic directly or through branches**. Carrying out of study programmes in

the Czech Republic in compliance with another state's legislation is not regulated or even contained in the Higher Education Act. The Czech law currently does not impose any obligation of accreditation or at least registration of these study programmes. Higher education in foreign study programmes in the Czech Republic constitutes a grey zone and a very serious threat to the quality of higher education in the Czech Republic. The ACCR and the MEYS lack the tools to oversee these institutions and cannot guarantee the quality of this education, comparability with accredited study programmes and in many cases cannot even determine whether there is fraud involving false diplomas and unrecognizable certificates (typically issued on the basis of so-called foreign accreditation granted by irrelevant or unrecognized accreditation agencies). The phenomenon of circumventing the absence of Czech accreditation through facilitating foreign programmes (branches of foreign HEIs), when a domestic subject without Czech accreditation for higher education programmes opens a foreign study programme, is also well-known. Such study programme is designed content-wise to appear as an alternative to a Czech study programme. This is an extremely dangerous practice that shakes the entire higher education system and damages its standard. The activity of institutions facilitating this type of study constitutes a significant security and social risk for the Czech Republic. It creates a strong pressure on issuing entry visas for students of these programmes, granting of student status and recognition (nostrification) of this education including the possibility of the graduate's entry into key regulated professions.

In **evaluating the research activity** of HEIs, the ACCR encountered the practice of "purchasing" outputs of scientific activity that has not been carried out by the concerned HEI. Publication outputs entered into the RIV database that become a source of funding for HEIs are purchased from external academics that do not have to register their publications on behalf of another institution (foreign academics and academics employed at institutions without the status of research institution, etc.) These persons typically have an employment contract of 8 hrs/week (0.2) at the given HEI. This way the HEI achieves an excellent ratio of the recalculated number of staff and the number of outputs in the RIV database. These staff members however have minimal or no impact on the quality of educational activities because they usually do not take part in instruction and the students do not have the opportunity to participate in their research projects. The ACCR considers this practice very wrong.

Furthermore, the ACCR addressed the level of outputs of higher education and **the level of student theses**. The ACCR assessed these aspects foremost in relation to the evaluation of quality of the Doctoral study programmes and quality of study programmes in arts. The ACCR has encountered cases in the arts programmes when the evaluation by the Master theses supervisor had not in fact evaluated the student's performance but rather constituted an artistic piece in itself. The ACCR advised that despite the specificities of theses in arts study programmes that comprise of an artistic piece or performance usually supplemented by theoretical reflection, there is no reason for the basic methodology of evaluation of theses in the supervisor report to differ from any other study programme. The aim of any such report should be to evaluate if (and in what quality) the student has completed the exercise as required.

Statements on applications for accreditation

a) of study programmes:

In 2014 the ACCR issued a total of **1,681** statements on applications for accreditation, expansion and extension of accreditation. Of these 1,608 statements were affirmative and 73 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 number of new **Bachelor and Master study programmes** at the HEIs has not risen significantly.

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 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.

A significant rise in number can be observed in the case of applications for accreditation of study programmes in cooperation with a foreign HEI. The success of these applications is conditioned by the quality of the study programme and resources at the Czech HEI. The goal of this kind of cooperation must be a synergic effect. It cannot be the case that insufficient resources at one institution are compensated by cooperation with a foreign HEI.

A continuing 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 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 studies. The ACCR assesses 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).

The ACCR repeatedly faced the misleading behaviour of some instructors, who have signed a commitment to seal a full employment contract at two different HEIs if accreditation is granted to the concerned study programme at the given HEI. This has taken place despite the fact it must have obvious that they would not be able to keep one of these commitments. They misled both the future employers and the ACCR; as a result, the ACCR treated both applications as untrustworthy.

Another serious problem that the ACCR encountered is the practice of **circumventing the absence of Czech accreditation (or the 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 study programme (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. The ACCR strictly refuses this practice and considers the recognition of the credits received in lifelong learning programmes according to Section 60(2) of the Higher Education Act legitimate only if the credits were received when accreditation of the corresponding study programme was not restricted (in the sense of Section 85(2) of the Higher Education Act). The decision to restrict accreditation is taken in cases when severe deficiencies in carrying out of the study programme are found. If the HEI is not capable of providing quality education in an accredited study programme, there cannot be sufficient capability to carry out lifelong learning programmes in adequate quality. In case when the HEI admits students to a lifelong learning programme when accreditation of an identical or similar study programme is restricted, the programme is qualitatively different to the one that has been accredited. It follows that if the HEI recognizes credits received in lifelong learning commenced after accreditation of a comparable study programme was restricted (in line with Section 85(2) of the Higher Education Act) until the restriction is removed, the HEI recognizes credits received in education that is not qualitatively identical to the granted accreditation.

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 has 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 (nostrification), 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 2014 the ACCR issued a statement on 25 fields in which the habilitation procedure is carried out and 19 fields of proceedings for appointing full professors. The number of negative statements was reasonable with regard to the total number of applications (2) and (5), 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 2014 the ACCR received a total of 164 applications from legal entities applying for state approval to operate as private HEIs. Out of the 164 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 2014 the ACCR assessed 3 applications for state approval, in 2 cases a recommendation for approval was given and in case of 1 application the assessment process was temporarily suspended.

While in the past the great majority of private HEIs intended to deliver study programmes in economics, tourism, administration, media and communication, **the newly emergent private HEIs** focus on law, arts, education and psychology.

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.

A new trend is the applications for state approval that are submitted as a result of **the owner/founder's intention to change the legal nature of the legal entity**. As the Higher Education Act states that state approval from the ministry is non-transferable and cannot be carried over to the new legal entity, it is necessary that a new state approval as well as accreditation to the intended study programmes is granted to the applicant when the company changes its legal nature. In order to comply with the sections of the Higher Education Act on the non-transferability of state approval and accredited activities, a proceeding on granting of state approval and accreditation must take place. This trend could in the future involve especially the entities for public benefit that cannot be transformed to business entities.

In some cases the applications for state approval come from legal entities that are active in the Czech Republic and **facilitate 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 2014 the ACCR did not assess any request from a public HEI to issue a statement on the establishment of a faculty. 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 off 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 2014 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 (2014 – 0, 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

During the course of 2014 the ACCR monitored the drafting of **the revision of the Higher Education Act**. Representatives of the ACCR were part of the expert body that engaged in preparation of the revision. The ACCR engaged primarily in assessment of whether the draft revision of the Higher Education Act complies with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). The ACCR stressed the obvious lack of compliance of the draft revision with Standard 3.3 Independence; compliance with Standard 3.4 Resources can also be a risk factor:

1) According to Section 83(1) of the draft revision of the Higher Education Act, the new Accreditation Office will be an organizational unit of the MEYS, which will secure its operation materially, financially and administratively. This can be in conflict with the criterion of organizational independence as the Accreditation Office is defined as an organizational unit of the MEYS, and also the criterion of functional independence. The 2010 external review of the ACCR that assessed its compliance with the ESG showed that ENQA considers the organizational interconnection with the MEYS problematic. Although the ACCR itself is independent from the MEYS and only its secretariat is a part of the MEYS, the final report from the external review recommended to entirely separate the secretariat from the MEYS to secure full autonomy and independence (including internal regulations, financial planning and human resources of the secretariat). It can be derived that in a situation when the entire Accreditation Office is an organizational unit of the MEYS and its three key leaders are employees of the MEYS (thus in a subordinate relationship), the degree of compliance with the independence standard will be judged low. The Accreditation Office will be in an unreadable position; on the one hand it will appear as an independent expert body, on the other it will issue decisions on behalf of the ministry.

2) From the point of functional independence, it is problematic that the nomination and appointment of experts is not to be independent of third parties. According to Section 83(3) of the draft revision, experts will be nominated to the Pool of Experts by the ministry or another central public administration body, representation of HEIs or another body specified in the Section. The nominees will be included in the pool upon statement from the representations of the HEIs. The result is that third parties – state administration bodies and stakeholders – have influence on the nomination as well as inclusion of experts in the pool. It would be appropriate to open the nomination process to a wider circle of nominating bodies to prevent any doubt about influence of only certain privileged groups and organizations. This option is crucial also because the prepared revision of the ESG puts greater emphasis on the involvement of foreign experts in the evaluation panels. Restricting the nomination to a narrow circle of domestic institutions practically disallows the participation of foreign experts. The nomination of members to the Accreditation Office Council is also problematic as the procedure creates the impression that the principle of representation of the nominating bodies will be put above the principle of expertise, which is unacceptable in terms of the ESG.

3) The explanatory report to the draft revision states that the Accreditation Office will be part of the ministry in terms of organization and budget. Its operation including staff and other expenses on the Secretariat will be financed from the ministry's budget. The draft revision does not provide any guarantees that the ministry will not be able to interfere with the Accreditation Office's operations through the budget or changes in the Secretariat's organizational structure. This can have a negative impact also on the independence of the Accreditation Office as evaluated by ENQA. It is clear from the explanatory report that financing of the Accreditation Office will be dependent on increasing the state budget chapter. It would be appropriate if the revision guaranteed a certain amount for the Accreditation Office budget and erased any doubts about possible interference in its operation through disbursement of funds from the ministry's budget.

4) According to Section (83c)(2)(d) of the draft revision, the Accreditation Office Council lays out the recommended procedures and methods of evaluation in line with accreditation standards as stated in Section (78a) of the draft revision. The independence of the Accreditation Office in laying out its procedures and methods is in compliance with the ESG guideline, but the fact that standards, from which these procedures and methods will follow, are to be determined by the ministry in a decree, do not have to be in compliance with the ESG. In this case, it is necessary to strictly separate standards (that can be given by the ministry) and procedures and methods of activities (that the Accreditation Office has to lay out).

The ACCR also systematically dealt with **the concept of pregradual education of teachers** and education in other programmes that lead to the entitlement to carry out the profession regulated by the law on pedagogical staff.

The representatives of the ACCR took part in roundtables dedicated to the issue of education of future teachers, which was organized by the MEYS. They pointed out the key problems in pregradual education of teachers at the HEIs that the MEYS should pay attention and search for solutions to. There are several significant risk factors in the field that will create great problems in the near future if they are not timely addressed (from the chaos in the system of teacher education to its reduction only to economically preferential fields and to the lack of qualified teachers). The activities of the MEYS vis-à-vis the HEIs that educate teachers should not be restricted to the standard activities that the section for higher education and research of the MEYS commonly carries out. The MEYS is the regulatory body for pedagogical professions and as such has responsibility for the education of teachers. The MEYS should pay attention to the higher education of teachers, its concept and quality in the full range of its activities (on the level of all the relevant sections).

The MEYS needs to address the following priorities in the short term:

- 1) setting a standard for teachers (and possibly other pedagogical professions) – in the first phase it is not necessary to make it part of the law, but it is necessary that the MEYS accepts the standard and recommends adherence to it;
- 2) completion of a career system for pedagogical staff;
- 3) creation of systemic resort research for the HEIs that carry out study programmes for teachers – through which it would be possible to obtain grants for research in didactics;
- 4) attention to the social need for study programmes in education when financing per capita (without this regard there is a risk that the economically demanding fields of

study at pedagogical faculties will be closed down – in particular music, fine arts, physical education, natural sciences).

As far as the long discussed **model of pregradual education of teachers at non-pedagogical faculties** is concerned, the ACCR formulated the following guidelines for developing the model:

1. The basic and most suitable model of teacher education is the continuous model, in which the focus on education (teaching) appears already in the Bachelor stage of studies. The consecutive model that concentrates teacher education solely to the Master level of studies leads to a reduced version of teacher education and disallows continuity of education in the specific subject to be taught.
2. The basis of quality teacher education is subject didactics. The ACCR expects that subject didactics will be closely tied to subject-specific, subject-teaching as well as pedagogical-psychological education and its instructors will be of adequate quality.
3. Practical training with reflexion can be strengthened by allocating certain space among the compulsory elective courses; the practical training aimed at orientation in the profession should be completed in the Bachelor stage of studies.
4. The overload in content of study modules in teacher education can be addressed also by greater integrity of the contents (the crucial content does not have to be taught within the traditional constituting disciplines; it can be integrated into courses designed specifically for teachers, such as school pedagogy and the like).
5. The ACCR supports activities aiming at defining the expected standard of the graduate and at specifying professional education in the teacher career system to make clear what skills the graduate needs to acquire in pregradual education (and which will be subject to further education after having entered the teacher profession).
6. The ACCR has warned that the currently proposed model of education of high school teachers does not enable capturing the specificities of education of elementary school teachers in terms of content nor time. Therefore, the ACCR considers it necessary to restrict the model of education of high school teachers. If it is desired to offer education of teachers for elementary schools, the model must be expanded in content and time devoted, including sufficient practical training at this level of schooling.

At the ACCR meetings the discussion also revolved around **standards for assessing accreditation applications** (ACCR Standards for study programmes). In line with unifying the requirements on terms of application for accreditation in Czech and English the ACCR amended its standards in the sense that when applying for accreditation of a study programme in a foreign language in the combined mode of study, a set of study aids for distance study in the given language must be provided. The study aids in the foreign language are to be presented in the same extent as in case of applications for accreditation of a study programme in the combined mode of study in the Czech language, that is for at least one third of theoretical courses at the time of application, while at least the first semester of studies should be fully backed by study aids. When applying for extension of accreditation, a full set of study aids in the foreign language must be provided.

IV. External Cooperation in 2014

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 2014. Most importantly, this **cooperation concerned representations 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. The year 2014 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 institutions and the home institutions 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**. Its representatives including the Deputy Minister for higher education regularly participated in the ACCR 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.

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).

The ACCR representatives participated in debates with representatives of certain **professional organizations and chambers** on study programmes leading to execution of regulated professions. The ACCR addressed the input from the Chamber of Veterinary Surgeons of the Czech Republic regarding the education of future veterinary surgeons in Master study programmes at the University of Veterinary and Pharmaceutical Sciences Brno. One of the issues of debate was differentiated profiling of graduates of the two veterinary faculties at this HEI.

International cooperation (*ENQA, CEENQA, INQAAHE, PKA*)

The ACCR continued its membership in 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 16 – 17 January 2014 a representative of the ACCR attended a seminar to the EQArep project of ENQA in Zurich (Switzerland). The accreditation agencies had the opportunity to contribute their experience and examples of good practice to the creation of general rules of reporting from external evaluation of HEIs (using the *Standards and Guidelines for Quality Assurance in the European Higher Education Area – ESG*). The seminar was directly linked to the needs and role of stakeholders in producing reports from evaluations of HEIs.

Participation of its representative at the ENQA seminar on compliance with the ESG was very significant for the ACCR with regards to the upcoming external review of the ACCR by ENQA. The seminar took place on 2 – 3 June 2014 in Brussels (Belgium). The ACCR will undergo the external review in 2015 and will be assessed in terms of the degree of compliance of its operations with the ESG. A positive result of the review is decisive for renewal of ACCR membership in ENQA for another five-year term. The seminar focused also on the external review process in the light of transition to the revised ESG in that are expected to be adopted in May 2015.

The representatives of the ACCR including its Secretary-General took part in the general assembly of ENQA on 16 – 17 October 2014 in Zagreb (Croatia). The event involved expert discussion on the revision of the ESG, development of new forms of education and the adaptation of accreditation agencies to these new conditions. ENQA introduced a proposal for revision of the external review process in response to the revised ESG that will also impact the ACCR external review. The general assembly elected members to the Board of ENQA and the representatives of member agencies contributed to the formulation of a new strategic plan for the upcoming period.

The ACCR was represented for the first time at the INQAAHE bi-annual conference that took place on 27 – 28 May 2014 in Tallinn (Estonia). The conference consisted of thematic workshops on the involvement of stakeholders, international accreditation agencies and quality assurance of new forms of education such as the MOOCs. Another subject of discussion was the application of the Guidelines of Good Practice.

A representative of the ACCR participated in the general assembly of CEENQA on 23 – 24 May 2014 in Pristina (Kosovo). New members of the Board as well as the vice-president of CEENQA were elected by the general assembly. The thematic workshops compared the external quality assurance procedures in higher education used by the CEENQA member agencies and their connection to the national qualification frameworks and learning outcomes.

In March 2014 a meeting of representatives of the ACCR and **the Slovak Accreditation Commission** was held in Prague. The discussions revolved around the criteria and standards for assessment of quality of study programmes and HEIs in the two countries. The possibility to create joint minimum qualitative frameworks for the proceedings of appointment of professors and associate professors in the two countries was debated with the aim to prevent the applicants unsuccessful in one country from obtaining the title in an easier procedure in the other country. Another subject of the meeting was the activities of some HEIs from one country in the other country (so-called branches) and the activities of both Commissions in international associations.

On 15 – 17 December 2014 a representative of the ACCR visited the Polish Accreditation Committee (*Polska Komisja Akredytacyjna* – PKA) in Warsaw. The purpose of the visit was to gain in-depth knowledge of the Polish accreditation system, standards and procedures in quality assurance of higher education. The visit included also observation of a site-visit at a Polish HEI as a part of its evaluation by the PKA. The ACCR established closer cooperation with the PKA that could be in the future confirmed in a memorandum. Cooperation will enable oversight over the operation of branches of Polish HEIs in the Czech Republic and vice versa.

The ACCR played a significant role in the preparation of materials and the meeting for **recognition of Czech medical faculties in the U.S.** The U.S. organization NCFMEA (National Committee on Foreign Medical Education and Accreditation) last recognized the Czech standards for accreditation of study programmes in medicine as comparable to the American standards in 2011. The requested national report was discussed at its September 2014 meeting in Washington, D.C., where NCFMEA confirmed its recognition of the Czech standards as comparable to the standards in the U.S. for another three years. The NCFMEA decision is a necessary condition to make American students at Czech medical faculties eligible for financial support from the U.S. ministry.

The ACCR representatives took part in meetings with the representatives of the Ministry of Education and Science of Ukraine and the representatives of HEIs in Ukraine. The meetings were held in September and October 2014 as a part of a developmental project to aid Ukraine and addressed the implementation of a new accreditation system and quality assurance of higher education at Ukrainian HEIs.

A member of the ACCR continued to act as a member of the Appeals Committee of the Agency for Quality Assurance and Accreditation Austria (AQA) in 2014. The Committee has three members and is tasked to deal with the objections of educational institutions against procedures and certification decisions of AQA.

Experts delegated by the ACCR were involved in evaluation of the Stavropol State Agrarian University by the Russian accreditation agency (NCPA) as foreign panel members.

Compliance with international criteria (ENQA)

In 2014 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 in 2014.

The ACCR continued to strive for compliance with the recommendations made by the international expert panel in its external review report of 2010. The ACCR concentrated, among other issues, on monitoring quality of study programmes in the period between (re)accreditations through requested follow-up reports and also on the consistent and systematic administration of follow-up reports. The ACCR continued to

be active in international affairs. In 2014 its representatives participated in international conferences about quality assurance in higher education and established cooperation with the Polish Accreditation Committee (PKA). A new web application was introduced that will make the administration of applications at the ACCR secretariat as well as, prospectively, the submission of applications easier and more modern.

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 constitutes 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 ACCR has carried out internal evaluation in line with the ESG since 2007 and focuses on the reflection of deficiencies and recommendations set in previous internal evaluations. The ACCR has several times conducted survey research among its members and co-workers to get feedback on its strengths and weaknesses. Since 2010, when the ACCR underwent external review by ENQA, the internal evaluation has paid great attention to the recommendations of the expert panel.

The internal evaluation for the period 2012-2013 analysed the measures taken to fulfil recommendations of the international panel that had conducted the review in 2010, in relation to the state of affairs captured in the 2012 follow-up report for ENQA. Some of the same problems and risks identified in earlier internal evaluations persisted into the 2012-2013 period. Other aspects of the ACCR's activities, however, made good progress thanks to the measures taken.

The ESG as well as European-level debates about quality assurance in higher education place an ever greater emphasis on the role of stakeholders. In light of the upcoming external review, the internal evaluation in 2014 analysed the involvement of stakeholders and its strengths and weaknesses in various aspects of its activities. The ACCR defined groups of stakeholders and other partners and evaluated how they participate in the fulfilment of the ACCR's role and what direction the cooperation could take in the future.

The internal evaluation emphasized the importance of purposeful involvement of stakeholders as opposed to a purely representative principle and the significance maintaining independence of the ACCR on third parties. The internal evaluation included survey research among stakeholders and other partners, which greatly confirmed the results of self-analysis and showed the interest of stakeholders and partners to continue the cooperation or even further develop it.

The internal evaluation report for 2014 was adopted at the ACCR meeting no. 1/2015 and published on its 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. ENQA however adopted transitional arrangements in response to the ESG revision and conditionally extended the ACCR membership until the review against the revised ESG can be carried out. In 2014 the ACCR set off the processes towards the realization of the external review; the external review is expected to take place in 2015.

In the course of 2015 the ACCR will prepare a complex self-evaluation report as a key document for external review conducted by an independent international panel. The review will concentrate on fulfilment of the recommendations and changes since 2010. The self-evaluation process will build on the periodic internal evaluation, so the internal evaluation reports will serve as important material for the self-evaluation report. Unlike the previous external review, the ACCR will be assessed against the new revised ESG.