

Report on the Accreditation Commission's Internal Quality Assurance 2011/2012

June 2012

STARTING POINTS FOR EVALUATION

The Accreditation Commission (the ACCR) conducts, in line with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (hereinafter referred to as ESG), an internal evaluation and an external cyclical review (so-called peer review). The importance of the former consists in the ACCR's developing internal mechanisms through which it monitors and assesses the quality of its own activities. The internal quality assurance procedure also serves as a basis for the external review. This means that it becomes a starting point for developing a comprehensive self-evaluation report that will be assessed by an independent panel established for the purpose of peer review. Internal quality assurance is carried out approximately once a year. Therefore it provides for a regular analysis of topical challenges or setbacks, as well as for reflection on the ways in which the ACCR has managed to address the recommendations resulting from the previous internal quality assurance report within the external quality assurance process.

The first ACCR's internal quality assurance process was implemented in 2007 under the guidance of then Vice-President, professor Milan Sojka. It included a questionnaire survey intended to cover the key aspects of the ACCR's operations. The questionnaire, drafted in cooperation with the Accreditation Commission of the Slovak Republic (the Slovak government's advisory body), was conceived so as to provide the review panel with an overview of the work of the ACCR, including its standing working groups, working groups set up for a particular purpose (ad-hoc working groups) and the administrative apparatus. In the following two years the ACCR focused its attention on elimination of the shortcomings identified in the internal evaluation report. The following internal reports of 2008 and 2009 entailed, above all, analyses of the problems found and evaluation of their elimination (follow-up reports).

In 2010 the ACCR carried out, as part of its internal assurance procedure, a detailed analysis of the report on the external review of the ACCR implemented in line with the ESG. Based on this ENQA confirmed the ACCR's full membership status for another five-year period. One of the outcomes of the analysis was a list of major recommendations concerning improvement of the quality assurance system and compliance with the ESG. The internal evaluation report set out 16 major

recommendations of which 10 relate to the implementation of section 2 of the ESG (marked as A) and 6 deal with section 3 of the standards (marked as B):

A) While complying with the ESG standards (No. 2.1. – 2.8.) the ACCR should:

1. enhance the monitoring of the level of development of the internal quality assurance procedures at higher education institutions; contribute to the development of these systems and their harmonisation;
2. enlarge the scope of cooperation with students and experts from industry in external quality assurance;
3. streamline the process of submitting applications for accreditation; complete its new website design; arrange for the development of a web-based application that would facilitate modernisation of the ACCR's administrative procedures, including the system for archiving all materials and written documents;
4. emphasise the ACCR's general requirements and criteria at the expense of specific requirements of the working groups. These specific requirements of the working groups for various fields of study should not be accepted unless they are approved by the ACCR. The professional public should be involved in the design of the criteria and in discussion about standards.
5. reduce the length of the accreditation process and make it more flexible;
6. limit the proportion of repeatedly filed applications for accreditation that have not been granted as a result of the proceedings;
7. train members of the ACCR and the working groups in a systematic manner;
8. make the process of nominating members of working groups open to comments from representatives of higher education institutions, and introduce a system for regular change in the composition of the working groups;
9. strive for the introduction of uniform rules of procedure for all working groups and rules for remuneration of the members of working groups and reviewers;
10. enhance levels of cooperation with representatives of employers. This analysis should also include expert analyses. The summary analysis of the quality of higher education (that is part of the annual report) should be complemented by a chapter on research.

B) While complying with the ESG standards (No. 3.1. – 3.8.) the ACCR should:

1. ensure a stable budget for its activities each year; this means a certain minimum level of financial resources should be annually allocated to the ACCR from the national budget; expand the scope of funding so that the ACCR may develop its activities as a quality assurance agency; find alternative sources of funding and ensure they are incorporated with the national legislation;
2. formulate its own policy statement that should set out its policies and overall strategy;
3. change the procedure for nominating members of the ACCR so that the ACCR's composition is the result of a consensus between the government, representatives of higher education institutions and other key institutions; accept representatives of students as members of the Accreditation Commission;
4. make the operations of the working groups more formal; set the rules for selecting members of the working groups so that representatives of higher education institutions and other key institutions may express their views on the nominees; introduce an obligation to work as part of a working group so that no member of the ACCR can work on his/her own;
5. remove the ACCR's Secretariat from the organisational structure of the Ministry of Education, Youth and Sports; strengthen its autonomy and independence of the activities of the Ministry (including internal regulations, financial planning and human resources management);
6. formulate a methodology for the internal and external quality assurance of the ACCR; define formal requirements for reports (including follow-up steps and the action plan); identify instruments to be used in securing feedback and clarify the relationship between the annually published report on internal quality assurance and the self-evaluation report (prepared once in five years as a basis for external review); codify the internal and external assurance procedures in the ACCR's documents.

Most of the recommendations concerning the work of the Accreditation Commission were addressed in the previous years as part of internal quality assurance procedures. However, we must state in this context that not all the aforementioned recommendations can be implemented under the current system of higher education quality assurance in the Czech Republic. Moreover, the ACCR does not fully identify with some of the recommendations (e.g. the diverging views concerning the position

of working groups within the ACCR's operations). Most of the 16 recommendations can be addressed as part of the ACCR's work in the current legislative conditions. The evaluation panel also formulated several recommendations that, due to their nature, are designed for institutions developing higher education policies in the CR rather than for the ACCR (e.g. recommendations A3, A6, B1, B3, B5). Implementation of these recommendations depends on the activities of the Ministry of Education, Youth and Sports and other institutions involved in policy making and legislative drafting at national level.

The aforementioned analysis of 2010 served as major background material for developing a "progress report" on the implementation of recommendations that the ACCR submitted to ENQA in June 2012.

The internal assurance procedures that were launched in 2011 and completed in 2012 are no longer based only on analysing the ways in which the tasks set out in previous reports were carried out and the shortcomings eliminated. It also includes a separate survey of the current views of individuals involved in the ACCR's work (ACCR members, members of the working groups and of the Secretariat staff). Attention is paid to their views of the ACCR's operations, compliance with the ESG and the current problems, challenges and risks.

QUESTIONNAIRE SURVEY

The questionnaire survey is a result of a joint project of the ACCR and the Accreditation Commission of the Slovak Republic (the Slovak government's advisory body) concerned with the building of a system of internal quality assurance and preparation for external review (implemented in 2006 and 2007). The original methodology (including questionnaires) has been upgraded to take account of the recent developments and the needs of the moment.

The questions focused on the following criteria: evaluation of the ACCR's structure, evaluation of the quality of processes and evaluation of the outcomes of accreditation procedures. These criteria were further divided into sub-criteria that were broken down into questions. Each question allowed for two types of answers: a mark (quantitative) or written assessment (qualitative). Written assessment was only obligatory where the respondent identified problems or shortcomings. There were

different questionnaires for the ACCR members, members of the working groups and the Secretariat staff.

EXISTING PROBLEMS AND HOW TO SOLVE THEM

The survey results pointed to issues and risks similar to those mentioned in the previous reports on the ACCR's internal quality assurance. The reasons for this can be seen as follows: 1) there has been virtually no change in the conditions in which the ACCR operates (including legislative ones) over the last five years; 2) quality improvement and problem elimination are continuous processes and some features may only be changed over the long term.

The launch, in 2007, of the internal quality assurance process with ensuing feedback has had a positive impact on the outcomes of the recent survey. No respondent sees any major setback - either in the structure or in the operations of the ACCR - that would jeopardise the quality of its work and outputs or pose a major risk to its future. The problems identified are of minor importance and operational in nature. The ACCR should analyse them and see to the gradual implementation of steps to redress them.

Overall, the following issues have been identified:

1. The structure of the ACCR and the working groups

There is major imbalance in terms of the workload between the ACCR members and between the standing working groups.

Solution:

- a) making sure that more attention is paid to the proper engagement of all members of the ACCR in the ACCR's activities;
- b) considering an overhaul of some working groups so as to avoid their overload; the rearrangement should be made with a view to the new composition of the ACCR as of September 2012 with regard to an effective division or combination of expertise.

2. Membership of working groups

Experts from industry participate only in some working groups and there is a very low level of involvement of experts from non-university higher education institutions.

International experts are engaged only in two working groups. As concerns the rules of working group membership, there is a view (identical with that of the external review panel) that they should be made more formal.

Solution:

- a) carrying out an analysis of the effectiveness of involvement of experts from industry in various working groups; identify the appropriate individuals;
- b) enhancing the participation of international experts in working groups (both standing and ad hoc) and consider the possibility of their deployment as experts assessing applications;
- c) initiating discussion on ways to make the membership of working groups more formal (including the nomination of candidates).

3. Submitting accreditation documents, their distribution and assessment

Assessment of applications for accreditation is complicated by the fact that they differ in terms of their format and, often, quality. The electronic application form lacks a uniform structure, which makes its distribution and assessment difficult.

Assessing the activities that are subject to accreditation separately is less efficient. It is always advisable to evaluate more activities at once. Account must also be taken of the previous results of assessment/accreditation in order to establish continuity.

As part of assessing applications for accreditation (not only within the process of evaluating the higher education institution) more extensive personal communication with the applicant would be appropriate.

Solution:

- a) stressing the need to submit the application in a specific, binding format; new software for the ACCR administration should assist in this;
- b) setting the same period of validity of accreditation for similar fields of study (programmes) at one higher education institution (faculty) so that applications may be submitted and evaluated at one time; there should be no further fragmentation in evaluation of the activities that are subject to accreditation;
- c) allowing assessors access to previous applications for accreditation or evaluation reports; in evaluating applications for extension of accreditation more attention should be paid to the changes and developments that have

occurred since the accreditation was granted; newly developed software for the ACCR administration should assist in this;

- d) initiating discussion on the possibilities of expanding communication with representatives of the higher education institution applying for accreditation.

4. Standards and criteria for the assessment of applications and justification of decisions taken

Although the ACCR's standards and criteria are viewed as correct and appropriate, there should be more profound discussion on the ways they are applied in specific cases. More attention should also be paid to communication with the public on these issues. In some cases the assessment of applications is only loosely connected with the standards and the criteria. It should be stressed that application of the ACCR's standards and criteria constitutes the core of the assessment process. The reasons for the non-granting of accreditation should be directly linked to non-compliance with specific ACCR's standards. In some cases the reasons behind the ACCR's negative standpoint are perceived as too general. The same applies to the ACCR's demands for missing data to be filled in the application.

Solution:

- a) discussing regularly the standards not only within the ACCR, but also at working group meetings; the chairpersons of working groups play an important role in this as they facilitate contact between the ACCR and the experts in the working groups;
- b) informing working groups members of any modifications made to the standards (also via electronic communication), holding specialist seminars presenting case studies, etc.;
- c) paying considerable attention to justification of ACCR's standpoints and to the clarity and the highest possible level of specificity (as allowed by data protection legislation) of the reasons behind them (this also applies to situations where the assessment procedure is interrupted and requests for missing data are made); if such specific data cannot be presented in the minutes from ACCR's meetings, a transparent mechanisms should be established for submitting these data to the MoEYS and the relevant higher education institution.

5. Independence

Provisions to foster independence of individuals involved in the ACCR's operations are considered to be appropriate. In spite of this, the ACCR might consider introduction of uniform rules for assessing applications with regard to a possible conflict of interests.

However, it is the Ministry of Education, Youth and Sports that poses a higher risk to the ACCR's independence. In no way should the Ministry influence the ACCR through funding, the ACCR's Secretariat, or direct interference with the decision-making and nomination processes.

Solution:

- a) considering amendments to the ACCR's Statute, or developing an internal code of practice, setting out ways to proceed in the event of a possible conflict of interests;
- b) monitoring and assessing the situation carefully so as to identify (attempted) infringement of the ACCR's independence on the part of the Ministry and other institutions; making a timely and appropriate response.

6. Financial and material resources

The ACCR's work continues to be based on volunteering (work for the public good represented by the development of higher education or a specific field). The current level of annual budgetary resources allocated to the ACCR does not allow for a proper remuneration of reviewers and ACCR and working group members. There is only a symbolic financial reward given to individuals involved in the ACCR's tasks. Moreover, they must use their own material resources (or those of their employer) in order to carry out work for the ACCR (administrative costs, telephone calls, etc.). What is also inappropriate is the ACCR's Secretariat being funded directly from the budget of the Ministry (for example, representatives of the Ministry determine the level of pay and compensation for the Secretariat staff).

Solution:

- a) pursuing a permanent increase in the ACCR's budget that would allow for appropriate remuneration and support in terms of material resources for those working for the ACCR.

7. Administrative support for the ACCR

For a long time the ACCR has lacked an appropriate, professional administrative apparatus. With the current number of staff it is very difficult for the Secretariat to carry out properly all the tasks as set out in the Higher Education Act. Moreover, it is impossible for the staff to handle all the activities resulting from the ACCR's position as a national accreditation body with a view to its international commitments. In addition to the need for a sufficient administrative apparatus there is also need for more robust legal services for the ACCR and the working groups. This situation contrasts with that of similar foreign agencies whose remit is less extensive, while the number of administrative staff is much higher (normally there are 20-25 staff at these agencies).

Solution:

- a) pursuing an increase in the number of staff at the ACCR's Secretariat so as to ensure that all necessary tasks are carried out (including the appropriate arrangements for the operations of working groups and formal assessment of applications);
- b) striving to increase the level of independence of the ACCR's Secretariat from the Ministry (including activities of administrative nature).

8. International activities of the ACCR

Since the departure of professor Milan Sojka the ACCR has not been sufficiently engaged in international cooperation. Only members of the ACCR Secretariat regularly attend events organised by the ENQA and CEENQA - instead of members of the ACCR who should act at such events as representatives of this institution appointed by the government. No seminars and conferences are held, nor are there any publications issued. Consequently, the ACCR's international position has been weakening. This also means decreasing chances of ACCR members being appointed as members of major international committees and to various important positions. The ACCR and working group members should also be more involved as experts in evaluation of foreign higher education institutions.

Solution:

- a) developing a strategy for participation in international cooperation – following changes in the ACCR's composition in September 2012;

- b) provided that the ACCR's budget and the number of staff are increased, using the resources to strengthen international activities.