

Annual Report of the Accreditation Commission for 2012

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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 the activities accredited and subsequently publishes the results of these assessments. The ACCR delivers its opinions on the establishment, merger, breaking up or closure of public higher education institutions, on the granting of state approval to legal entities wishing to operate as private higher education institutions, and on determining the type of a higher education institution. Last but not least, the ACCR adopts positions on matters concerning higher education referred to it by the Minister of Education, Youth and Sports.

II. ACCR, standing working groups and the Secretariat

The ACCR's composition

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

In 2012 the composition of the ACCR changed in the following way:

As of 31 August 2012 the term of office of the following members of the ACCR ended:

prof. JUDr. Milan Bakeš, DrSc.,
prof. PhDr. Jana Geršlová, CSc.,
prof. PhDr. Petr Kyloušek, CSc.,

prof. Ing. Jaromír Příhoda, CSc.,
prof. PhDr. Svatava Raková, CSc.,
prof. Ing. Jan Roda, CSc.,
prof. Dr. phil Peter Schmidt,
prof. Dr.-Ing. Jiří Sobota,
prof. Ing. Antonín Stratil, DrSc.,
prof. PhDr. RNDr. Jan Štěpán, CSc.,
prof. Ing. Jan Uhlíř, CSc.

As of 31 August 2012 the following members of the ACCR resigned:

prof. Ing. Evžen Kočenda, Ph.D.,
prof. Ing. Zdeněk Strakoš, DrSc.

As of 1 September 2012 the following members were appointed to the ACCR:

a) for the second term of office

prof. PhDr. Jana Geršlová, CSc.,
prof. PhDr. Petr Kyloušek, CSc.,
prof. PhDr. Svatava Raková, CSc.,
prof. Ing. Jan Roda, CSc.,

b) for the first term of office

prof. Ing. Josef Arlt, CSc.,
prof. MUDr. Josef Fusek, DrSc.,
doc. JUDr. Hana Marková, CSc.,
doc. Dr. Françoise Mayer,
prof. Ing. Jaroslav Petr, DrSc.,
prof. Ing. Jindřich Petruška, CSc.,
prof. Ctirad Pospíšil, Th.D. OFM,
doc. RNDr. Jiří Tůma, DrSc.,
prof. Ing. Ivan Uhlíř, DrSc.

As of 1 September 2012 the following member was appointed vice-chair of the ACCR

prof. Ing. Jan Roda, CSc.

In 2012 the composition of the ACCR was as follows:

Chair:

prof. PhDr. Vladimíra Dvořáková, CSc.

Vice-chair:

prof. Ing. Jan Roda, CSc.

Members

List of the ACCR members effective until 31 August 2012

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. JUDr. Milan Bakeš, DrSc.**; Faculty of Law, Charles University in Prague
4. **prof. PhDr. Jana Geršlová, CSc.**; Faculty of Economics, VŠB-Technical University Ostrava
5. **prof. RNDr. Pavel Höschl, DrSc.**; Faculty of Mathematics and Physics, Charles University in Prague
6. **doc. Mgr. Ing. Karel Chadt, CSc.**; ŠKODA AUTO, a.s., Mladá Boleslav
7. **prof. Dr. MA Ing. Július Horváth, Ph.D.**; Central European University in Budapest, Hungary
8. **prof. Ing. Evžen Kočenda**; CERGE, Charles University in Prague
9. **prof. PhDr. Petr Kyloušek, CSc.**; Faculty of Arts, Masaryk University Brno
10. **prof. Ing. Jaromír Příhoda, CSc.**; Institute of Thermomechanics, Academy of Sciences
11. **prof. PhDr. Svatava Raková, CSc.**; Institute of History, Academy of Sciences
12. **prof. RNDr. František Sehnal, CSc.**; Biology Center, Academy of Sciences
13. **prof. Dr.phil. Peter Schmidt**; Hochschule Zittau/Görlitz, Germany
14. **prof. PhDr. Lubomír Slavíček, CSc.**; Faculty of Arts, Masaryk University Brno
15. **prof. Dr.-Ing. Jiří Sobota**; Hochschule RheinMain, Germany
16. **prof. Ing. Zdeněk Strakoš, DrSc.**; Faculty of Mathematics and Physics, Charles University in Prague
17. **prof. Ing. Antonín Stratil, DrSc.**; Institute of Animal Physiology and Genetics, Academy of Sciences
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. **prof. RNDr. PhDr. Jan Štěpán, CSc.**; Faculty of Arts, Palacký University Olomouc
21. **prof. Ing. Jan Uhlíř, CSc.**; Faculty of Electrical Engineering, Czech Technical University in Prague

List of the ACCR members effective from 1 September 2012

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
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11. **doc. Françoise Mayer, Ph.D.**;
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
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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.

As of 31 August 2012 the ACCR had 21 standing working groups, from September 2012 it had 22 standing working groups.

The new standing working group was for
applied informatics and computer technology.

The groups that have undergone structural changes since September 2012 are
mathematics and theoretical informatics (formerly mathematics and informatics)
military and security studies (formerly military studies)
law and public administration (formerly law and security studies)

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 2012, 217 persons were involved in the activities of 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

The ACCR appointed new members to some working groups at the September meeting in relation to appointment of new members of the ACCR effective 1 September 2012 (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 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 2012 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 2012 the ACCR's secretariat was headed by Jiří Smrčka, who was also the secretary of the ACCR.

III. The ACCR's activities in 2012

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 72 evaluations of HEIs' activities, the activities of their units and their accredited activities in 2012 and all were completed and discussed at the ACCR's meetings during 2012. The majority of the evaluations were focused on Doctoral study programmes. Non-university HEIs and branches of HEIs were also evaluated (3).

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. All Doctoral study programmes delivered by the HEIs undergo the evaluation (with the exception of those that have recently been assessed). The evaluation process is scheduled to be finalised in 2013. The most important indicators are the quality of related research conducted at the particular institution (unit) and the quality of the outputs of Doctoral studies. By the end of 2012 the ACCR had completed and discussed the evaluation of Doctoral programmes at 107 faculties or HEI of the university type that are not divided into faculties.

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

1) A disproportionately high number of dissertations supervised by some supervisors, which raised doubts as to whether they have sufficient time for supervision to the desired standard; 2) a high proportion of external research supervisors (from other institutions/branches) or supervisors who are not associate professors or professors; 3) the topics of some dissertations fall in research areas other than that in which the Doctoral study programme is realized; in some cases the specialization of the Doctoral study programme does not align with the research of the institution realizing it; 4) major differences in the requirements for completion of studies and students' outputs at one faculty (e.g. different requirements on the Doctoral students in terms of the number and quality of publications); 5) underestimating the importance of analysis of long-term trends (e.g. the development of the age and qualification structure of instructors); 6) an insufficient scientific profile of some of the Doctoral study programmes in terms of meeting the standards of research HEIs; the institutions lack specific research activities in the pursuit of which students would be involved; 7) low level of international mobility of Doctoral students, particularly regarding longer periods spent at foreign institutions; 8) a disproportionately high number of Doctoral students that does not correspond with the volume of research of the institution (it is not possible to involve all students in research carried out at the institution, thus it is not possible to provide adequate research opportunities to all of them).

As in previous years, the ACCR combined institutional evaluation with issuing a statement on an extension of the validity of accreditation of study programmes and fields 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 they are interrelated. This combination of the two processes is beneficial for the HEI as it lowers the administrative burden. Moreover, it strengthens the institution's policy coordination and accreditation is viewed from a longer-term perspective and in the context of the institution as a whole.

The ACCR also paid attention to the evaluation of branches of 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. The ACCR found that the realization of study programmes at some branches violates the terms under which they were granted accreditation. The ACCR has repeatedly emphasized that the terms of accreditation must be adhered to by all units of the HEI in which instruction takes place. If the conditions at a unit of a HEI fail to meet the quality standards declared in the application for accreditation, this constitutes a reason for proposing measures as described in Section 85 of the Higher Education Act to be applied to the institution as a whole (i.e. limitation, suspension or revocation of accreditation – depending on the gravity of the deficiencies found).

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

In the course of 2012 the ACCR also evaluated the quality of the internal regulations of HEIs and their implementation in relation to educational activities. The objective of the evaluation is to assist HEIs in the development of internal quality evaluation and assurance processes. This evaluation is a systemic step for the ACCR, taken in reaction to the recommendations following from the Report on the external review of the ACCR on compliance with membership criteria of the European Association for Quality Assurance in Higher Education (ENQA). According to these criteria the ACCR should pursue the development of internal quality assurance systems at HEIs and their gradual harmonisation. Three key areas were subject to evaluation: internal regulations, implementation of studies and assurance of their quality. As concerns the internal regulations and other normative acts of the HEI's bodies, their accessibility and compliance of selected acts decisive for studies as well as quality assurance with the law are subject to evaluation. The implementation of studies is evaluated on the basis of the legality of the admission procedures with attention to the

review proceedings according to Section 50(7) of the Higher Education Act, legal arrangements and the rules for transferring between or changing fields of study, particularly with respect to recognizing credits and passed courses. The keeping of records and control mechanisms are also subject to evaluation. Finally to quality assurance in terms of instruction and the graduates, the ACCR enquires whether the Research Board and the committees for state final examinations adequately fulfill their respective roles. Attention is paid to the accessibility and the practice of filing the theses. An additional subject to examination is the extent of transparency of the HEI and its activities, as to what extent it publishes information about itself and its activities. The ACCR completed the evaluation of one HEI of the university type (Silesian University in Opava) in 2012 and did not find severe deficiencies.

Statements on applications for accreditation

a) of study programmes:

In 2012 the ACCR issued a total of 2,435 statements on applications for accreditation, expansion and extension of accreditation. Of these 2,275 statements were positive and 160 negative.

In assessing the applications for accreditation of Doctoral study programmes the ACCR paid consistent attention to evaluation of 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 the product of institutions that carry out fundamental (or equivalent) research related to the field of the Doctoral study programme. This means that the HEI applying for accreditation must be the carrier of major Czech or international projects and grants (e.g. 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 personnel and research cannot be compensated for by collaborating with another institution).

The ACCR has nevertheless encountered the practice, in relation to research of HEIs, of paying a foreign expert in order to obtain a grant. However, in reality the expert does not carry out any research activity at the HEI, in other words he or she continues to be paid from the grant that he or she does not in fact realize at the HEI. As regards the grant this practice is acceptable, but it makes no contribution to the development of the HEI and to involvement of students. The ACCR has therefore 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).

A certain trend that the ACCR has noticed in assessing the applications for accreditation of not only Doctoral but also of Bachelor and Master study programmes is the excessive fragmentation of the structure of study programmes and fields of study (this also concerns the requirements on the professional capability and qualification of the graduates). The trend has declined to some degree in connection to the implementation of the Amendment of the Higher Education Act that established the concept of “study programme guarantor” effective from 1 July 2010. Section 70(5) of the

Higher Education Act stipulates that only a professor or associate professor can guarantee the quality and development of a study programme realized at the HEI or its part. In compliance with this stipulation of the Higher Education Act the ACCR resolved upon a standard that each study programme (a field of study if the study programme is divided into fields of study) must have its own guarantor who is not involved at another institution to a significant extent and does not act as a guarantor of another study programme.

The assessment of the quality and the perspective composition of personnel of study programmes in the accreditation proceedings should be facilitated by a Register of Associate Professors and Professors administered by the MEYS. The ACCR first used data from the Register as early as at the end of 2010. During the first year of its existence the Register turned out to be a major benefit for the quality assurance system as it enables verification of employment contracts of associate professors and professors at HEIs. However, during 2011 the technical quality of the Register deteriorated, the data became outdated (delayed or no updating) and serious technical problems occurred (accumulation of up-to-date and archive data, insufficient functions for searching and sorting data and generating sets). For most of 2012 the Register of Associate Professors and Professors was not functional, disallowing its use in the accreditation proceedings.

The number of applications for accreditation of study programmes and fields of study taught in foreign languages (mostly in English, other languages are rare) 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 makes a negative statement on the application only in exceptional cases when there is reasonable doubt about the credibility or capacity to fulfill the declared intentions.

In 2012 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 also 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 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.

Traditional Master study programmes (with a standard length of study of 4-6 years) were only accredited in 2012 in exceptional and justified cases or only for the period needed for completion of studies by the existing students .

Accreditation of study programmes for future teachers poses a specific problem. The ACCR has continued the discussion on the advantages and disadvantages of structured and traditional Master teacher training programmes for Stage 2 of primary schools and for secondary education. The following main problems related to the structuring of teacher education programmes have emerged: unclear employment prospects for graduates of Bachelor programmes (the Educational Staff Act stipulates that teachers must have qualifications at the Master level); unclear transition between Bachelor and Master study programmes (in most fields all those who complete Bachelor studies continue at the Master level); and inclusion of training in pedagogy and psychology, teaching placement and educational theory (“didactics”) for the relevant subjects in the programme. Some faculties of education focus on the knowledge of specialized content and thus partially overlap with other non-pedagogical faculties (faculties of humanities, sciences). The didactic character of teacher training hereby diminishes, although it should be dominant for teaching in Stage 2 of primary schools. The time for a more extensive placement and teaching practice is also lacking. Consequently, this may affect the quality of education in primary schools. Structured studies have a particularly negative impact on some specialisations (combinations of subjects taught – especially natural sciences but also social sciences). There is no comparison of the quality of outputs because it is impossible to evaluate parallel five-year Master and structured programmes. The ACCR has therefore recommended that an evaluation of the impact of structured teacher training programmes should be carried out as part of a project. Moreover, the ACCR believes that a five-year Master study programme should be accredited alongside the structured teacher training, as the accreditation of a modern five-year Master teacher training programme could lead to increased quality of teacher training and improved situation at the pedagogical faculties.

In the upcoming years the ACCR’s assessment of applications for the extension of accreditation of study programmes will also focus on whether programmes realized outside of the domicile of the HEIs at detached sites are carried out under the same conditions as in the domicile (including personnel). Furthermore, in assessing applications for extension of accreditation of Master programmes, the ACCR will concentrate on the quality of the advanced Master state examinations (“rigorous” examinations). When assessing the applications for extending accreditation of Doctoral study programmes, attention will be paid to the performance of students and graduates in their specialization.

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

2011 was an exceptional year as concerns the accreditation of fields covering the habilitation procedure and the procedure for appointment of a professor. A large number of the fields had to be accredited again because their accreditation ended that year. Nonetheless, the year 2012 saw a return to the steady state. The ACCR issued a statement on 48 fields in which the habilitation procedure is carried out and 44 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 (7). 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 2012 the ACCR received a total of 157 applications from legal entities applying for state approval to operate as a private HEI. Out of the 157 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 52 cases.

In 2012 the ACCR assessed 5 applications for state approval and in none of these cases was a recommendation for approval given. There is a continuing trend of unsuccessful applicants applying repeatedly, 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.

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 personnel 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 setting up and breaking up of faculties

In 2012 the ACCR assessed 2 requests from public HEIs to issue a statement on the establishment of a faculty. The statement was positive in both cases. 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 setting up 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.

Statements on determining the type of a higher education institution

In 2012 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 (2012 – 0, 2011 – 0, 2010 – 0, 2009 – 1 application, 2008 – 0, 2007 – 4, 2006 – 1, 2005 – 0).

Preparation of documents and policy papers

At the end of 2012 the ACCR followed the preparation of the substantive intent of the amendment to the Higher Education Act, termed “the catalogue of changes” by the MEYS. At its last meeting in 2012 the ACCR emphasized that it was necessary for a HEI to have a functional system of internal quality assurance and to realistically evaluate the outputs of this system. The internal system of quality assurance as well as its outputs and the way they are interpreted by the heads of the HEI must both be subject to external evaluation. The institutional accreditation cannot, in the view of the ACCR, be separated from the accreditation of specific activities (study programmes) as the MEYS has proposed in the draft amendment. The internal system of quality assurance can be evaluated only in relation to the mission of the HEI and to the concrete realization of study programmes. Institutional accreditation on its own is redundant in the opinion of the ACCR and will unnecessarily overburden the system. The decision on accreditation should be, according to the ACCR, a result of an external evaluation of the institution given that the functionality of the internal system of quality assurance and the quality of realization of each study programme are evaluated at the same time.

Turning to the implementation of standards for systematic external evaluations of the educational and research activities of the HEIs, the ACCR has pointed out that it was not possible to create unequivocal formalized standards and that the evaluation of quality in higher education could not rely on mechanical verification of whether the formally defined standard is fulfilled or not. There is a high risk that the standards for evaluating processes will follow from the ISO norms and the standards for accreditation of study programmes will come close to school curricula. This is not a principle of evaluation of quality but a principle of public control of fulfilling duties. When formulating the standards, the accreditation agency must play the dominant role. As the body responsible for quality of higher education it cannot evaluate quality on the basis

of externally defined standards. The role of the ACCR (external evaluation) would be reduced merely to bureaucratic comparisons of the situation at the HEI with the standards determined by the ministry (even if the ACCR does not identify with these standards), using a methodology of the ministry. According to the amendment proposed by the MEYS the ACCR will cease to be an expert authority with the right to determine standards and methodology and to propose or resolve on possible sanctions, but will become an administrative buffer between the MEYS and the expert public that will be controlled by the ministry while being responsible for possible problems.

In relation to the proposed amendment of the Higher Education Act the ACCR has also pointed to the fact that the majority of significant procedures and standards is delegated from the general level to the level of sublegislative norms, such as decrees, government orders, contracts etc. (that the bureaucrats of the MEYS will decide on). This could lead to the creation of untransparent rules and unequal conditions among the HEIs. The ACCR strictly refused overestimating of the significance of the qualification framework to which quality assurance as well as the accreditation system would be subordinated. In a situation when the qualification framework exists only in theory (as an output of one of the individual national projects), it has not been properly tested and it is neither functional nor widely accepted, it cannot be made superior to all other activities in the process of quality assurance.

The ACCR also rejected some other elements of the amendment to the Higher Education Act related to quality assurance; they include a system of certifying ACCR employees, separation of decision-making powers from responsibility for the decisions, incompatibility with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG), excessive complexity and financial demandingness of the amendment etc. The ACCR pointed out that the current system had not been analysed (in terms of advantages and disadvantages) and consequently its authors seek to change the current system without knowing how it really works. In an attempt to assist the MEYS, the ACCR has prepared its own draft of a functional quality assurance system that would be less financially demanding and would comply with the European standards.

The ACCR has repeatedly stated that if an amendment to the Higher Education Act is being drafted, it should primarily deal with the real problems rather than the areas that are functional. For example, the question of the organization of private HEIs and the academic freedoms at private HEIs should be addressed. Furthermore, the problem of branches of foreign HEIs active in the Czech Republic, which are the main problem threatening the higher education standard in the Czech Republic at the moment, should be solved. The state must not be rid of its responsibility for education that takes place on its territory (and prevalently for Czech citizens), especially when in most cases the state recognizes its outputs as equivalent to those from Czech HEIs.

At its fourth meeting in 2012 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 several changes and amendments (dealing mostly with the requirements on the “rigorous” exam, personnel of study programmes and submission of applications in the electronic version). All changes have been worked into the texts and the amended standards have been published on the ACCR’s website.

IV. External cooperation in 2012

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 2012. 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 2012 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. This cooperation has proven to be useful. It turned out that 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 years to come.

The ACCR also cooperated with the MEYS. The Minister participated in the ACCR's meeting on one occasion and so did the Deputy Minister for research and higher education on three occasions and the Director of the Higher Education Department also on three occasions. 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 expert arguments stated in the grounding of the appeals. The evaluation of Doctoral study programmes that was earlier requested by the Minister is considerably time-consuming for the ACCR.

Relations with the MEYS became cooperative only following the resignation of the Minister in March 2012. In the first quarter of the year the ACCR viewed very negatively the non-standard decisions of the Minister in some cases when the ACCR had proposed a limitation or revocation of accreditation on the basis of serious deficiencies in the realization of study programmes (Banking Institute/College of Banking, Faculty of Law of the University of West Bohemia). The members of the ACCR filed a motion to the highest public prosecutor to commence legal proceedings in the public interest in order to revoke the unlawful decision of the Minister. The unlawful decision was later revoked in a review procedure by the new Minister.

As concerns the assessment of applications for the accreditation of study programmes that train graduates to practise 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, EURASHE, EQAF, Slovak AC*)

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).

A representative of the ACCR participated in the Members' Forum of ENQA that took place on 23–24 April 2012 in Paris, France. The meeting saw discussions of two main topics – the impact of quality assurance and the independence of quality assurance agencies in higher education. ENQA established a working group to investigate to what extent external quality assurance really improves the quality of HEIs and their activities. With respect to the independence of agencies, major factors that endanger the independence of agencies were examined and the question of how to assure agreement on this matter between agencies, governments and the HEIs was explored. The most important points that emerged include the independence of experts conducting external evaluations, the statute of the organisations, organisational independence, appointment of members of the main bodies, working methods, the evaluation framework and the decision-making process.

Representatives of the ACCR took part in the General Assembly of CEENQA on 11–12 May 2012 in Sarajevo, Bosnia and Herzegovina. The General Assembly was preceded by the annual seminar that pertained to three topics: the conclusions of the Bucarest conference of the Bologna Process; the upcoming steps and changes resulting from the Bologna Process up to 2020; the results of the revision the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG) and the significance of these changes for CEENQA members. Furthermore, a new agreement of cooperation was signed between CEENQA and ENQA. Among the projects that CEENQA currently realizes or plans to take part in in the future include a database of experts administered by CEENQA and the Tempus project led by the Bosnian Agency for Development of Higher Education and Quality Assurance (HEA).

From the point of view of the ACCR, the possibility of cooperating in accrediting joint programmes, their evaluation, quality assurance and recognition of joint diplomas within the European Consortium for Accreditation (ECA) appears to be an interesting element of the new projects. Considering the rising number of these programmes in the Czech Republic and the emerging issue of their accreditation, it would be useful to consider the option of becoming a part of the consortium and establishing cooperation with European agencies in this matter. The ACCR has already been offered cooperation in accrediting joint programmes, their evaluation and quality assurance by a representative of the Polish accreditation agency. Moreover, several representatives of accreditation agencies expressed interest to involve Czech experts and evaluators in the accreditation processes and evaluation of HEIs abroad (for example in Kosovo, Russia, North Cyprus). The above mentioned database of experts could facilitate this.

A representative of the ACCR attended two seminars focused on the realization of internal and external evaluation and the connection between them. The first event was the annual seminar about internal quality assurance organized by ENQA that took place on 7-8 June 2012 in Valladolid, Spain. The seminar was devoted to presentation of findings of a survey, pertaining to the impact and significance of external evaluation for

the internal quality assurance systems, which had been conducted by the member agencies prior to the seminar. The findings and the varied experience of member agencies were discussed in three thematic circles (the general principles of internal quality assurance, the internal impact of external evaluation, assessing the impact of external evaluation on internal learning). The agencies use different systems of internal quality assurance (some use ISO 9001, others favor the EFQM model), however there are some common problematic issues or areas for improvement shared by almost all agencies (e.g. integrating the findings of internal evaluation into the agency's operations, sufficient involvement of all stakeholders in higher education, cooperation in international networks, using good practice examples in internal evaluation, etc.).

The second seminar was held by the European Association of Institutions in Higher Education (EURASHE) in Nicosia, Cyprus on 27–28 September 2012. The main focus lied not only on the implementation of internal and external quality assurance but also on the revision of the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG) and their relation to quality assurance systems. Research findings on the ESG and the final report of the four European higher education associations (ENQA, EURASHE, EUA¹, ESU²) were presented. The discussions with the representatives of these four institutions defined the need to revise the ESG in order to make them clearer and more useful in practice.

On 13-15 June 2012 Prague hosted a meeting of the ACCR and the Accreditation Commission, the advisory body to the government of the Slovak Republic. The two Accreditation Commissions agreed on several areas of possible cooperation – developing a deeper discussion about criteria for the proceeding for appointment of associate professors and professors, increased attention to the higher education of prospective primary and secondary school teachers, evaluation of HEIs and their accredited activities, assessment of study programmes and fields of study, involvement in international associations (ENQA, CEENQA).

Representatives of the ACCR took part in ENQA's General Assembly in Basil, Switzerland on 18–19 October 2012. The outputs of the ministerial conference in Bucharest related to quality assurance in higher education and the mandate of the ministers to revise the ESG were presented. Furthermore, the experience from the GIQAC project was elaborated. The General Assembly elected new members of the ENQA Board – Tove Blytt Holmen (Norway), Caty Duykaerts (Belgium) and Rafael Llavori (Spain). Helka Kekäläinen (Finland) and Fiona Crozier (Great Britain) were re-elected as vice-presidents.

The ACCR will host the upcoming Members' Forum of ENQA in April 2013 in the Czech Republic.

A representative of the ACCR participated in the 7th annual conference of experts in higher education of the European Quality Assurance Forum on 22-24 November 2012 in Tallinn, Estonia. The conference was organized by four European higher education associations (ENQA, EURASHE, EUA, ESU). The Forum addressed the question of what impact, if any, quality assurance makes on the quality of learning and education. Discussions were based in both the experience from practice and in research. The Forum also dealt with the development of accreditation systems in individual countries and the planned revision of the ESG.

¹ *European University Association.*

² *European Students Union.*

The fulfillment of international criteria (ENQA)

With regards to the commitments tied to membership in ENQA, the ACCR concentrated in 2012 on fulfillment of the requirements stipulated in the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG) in the area of external quality assurance. This focus led to increased emphasis on monitoring the outputs of internal evaluation of the evaluated HEIs, on the consistency of decision-making with regard to applying criteria and on a more coherent and precise formulation of recommendations and explanatory comments. Another area where the ACCR has progressed significantly towards compliance with the ESG is the realization and completion of the fifth internal evaluation of the ACCR.

In the framework of fulfilling international criteria the ACCR focused in 2011 and 2012 primarily on adopting measures that responded to the recommendations and conclusions of the external review of 2010. An overview of these measures is included in the follow-up report submitted by the ACCR to ENQA in June 2012. These measures address the ACCR's activities, evaluation of the accredited activities of the HEIs, as well as its standing and organisation (e.g. strengthening of the assessment of internal evaluations of HEIs, simplifying the administrative procedures for submitting applications, implementing a uniform working code for all working groups, introducing a formal methodology of internal evaluation, etc.).

In compliance with ENQA requirements and the recommendations that had followed from the external review in 2010, the ACCR discussed the possibility of formulating a mission statement to declare the ACCR's concept and strategy (so-called "mission"). At its meeting no. 2/2012 the ACCR approved this mission based in its legal purpose and the statute; subsequently the mission statement was published on the ACCR's website.

Corresponding with the recommendations, the ACCR held a seminar for the members of the working groups in November 2012. The seminar focused on application of the ACCR's standards in assessing applications for accreditation of study programmes and the proceeding to appointing associate professors and professors. A discussion then followed on the topic of the legal standing of the ACCR and its working groups and on the methodological issues that the assessors encounter when evaluating applications.

Fulfilling the standard of 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 administrative procedures. Nevertheless, it would 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 fact 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 every year 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 2010 reflects on the ACCR's external review report of April 2010 and it became a point of departure for the follow-up report on fulfillment of the recommendations, submitted to ENQA in June 2012.

The most recent internal evaluation commenced in 2011 and was completed in 2012. It was no longer based only on analysis of fulfilling the goals set out in previous evaluation reports and eliminating the identified drawbacks, but also on a new survey research. As a result, an insight into the views of the persons involved in the ACCR (its members, members of the working groups, employees of the secretariat) on the activities of the ACCR, compliance with the ESG and a sum of current problems, challenges and risks was provided.

Evaluation of the survey revealed similar kinds of problems and risks as identified in previous internal evaluation reports. 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.

The introduction of internal evaluation of quality (with subsequent feedback) in 2007 was positively reflected also in the results of the recent survey. None of the respondents saw a severe drawback in the structure or the activities of the ACCR that could threaten the quality and outputs of its work or that would pose a great risk into the future. The identified problems are rather minor; and the ACCR will continue to analyse them and take gradual steps towards their elimination.

The internal evaluation report was approved at the meeting no. 3/2012 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 another five years. The ENQA Board requested a follow-up report about the measures adopted in response to the review panel 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 steps taken towards compliance.

The majority of recommendations pertaining to the activities of the ACCR have already been addressed in the internal evaluations of the previous years.³ Most of the recommendations can be addressed under the present legal conditions. Nevertheless, the review panel made also recommendations that are intended to the institutions responsible for higher education policy in the Czech Republic (e.g. recommendations regarding the ACCR's budget, nomination of its members, organisational independence from the MEYS, etc.) rather than the ACCR. Compliance with these recommendations is dependent on the MEYS and on other institutions that participate in national politics and the legislative process.

In the report the ACCR also draws attention to the changes that are not directly related to the recommendations made in the external review report. In comparison with 2010, the factual independence of the ACCR has been significantly accentuated. The independence of the ACCR has to do with serious cases that the ACCR had to deal with in the last two years and that put the ACCR under scrutiny of the media, the representations of the HEIs and the expert public. The awareness about ACCR's activities and its standing greatly increased as a result. The ACCR's activities have been closely followed and there is a public debate about its legal standing and the quality of the ACCR's work. Clearly such scrutiny places greater demands on its internal accountability and also on the accountability of external actors including politicians and the expert public.

The ACCR is aware that it must systematically focus on compliance with the ESG and the recommendations made in the internal evaluation report. This process has been outlined in two ways:

- 1) The external review report as a starting point for preparation of new higher education legislation.
- 2) Strive for regular monitoring, detection of problems and drawbacks, their elimination and improvement in quality within the framework of the existing legislation.

In 2014 the ACCR will produce a complex self-evaluation report as a basis for external review. The ACCR expects that a possible new legal standing of the ACCR will be

³ However, it is necessary to note that not all recommendations can be complied with in the present conditions for quality assurance in higher education in the Czech Republic and that the ACCR has not fully identified with all recommendations (e.g. different perception of the standing of working groups in the ACCR's operating system).

known at that time, as well as the progress made in relation to the recommendations of the external review report of the ACCR.

The follow-up report of June 2012 was discussed at the ACCR's meeting no. 3/2012 and later by the ENQA Board at its meeting on 14 September 2012. The Board expressed content and appraisal of the improvements and measures adopted in response to the conclusions of the external review.