Report on the Accreditation Commission's Internal Quality Assurance 2012-2013

December 2013

STARTING POINTS FOR EVALUATION

The Accreditation Commission of the Czech Republic (ACCR) conducts, in compliance with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG), regular internal evaluation. It is also subject to external review by an independent panel in the so-called peer review, closely interrelated with the internal evaluation. The internal evaluation reflects the findings of the external review and vice-versa. The regularity and continuity of the internal evaluation process allows for monitoring of the development of the ACCR's own activities, identification of drawbacks and analysis of the foregone changes along with their consequences in a long-term perspective. The external review serves to provide feedback for the development of the accreditation agency's activities and initiate further improvements embedded in an international perspective. In the context of membership of the European Association for Quality Assurance in Higher Education (ENQA), conditioned by successfully passing an external review every five years, the regular reports on internal quality assurance comprise a crucial resource for a self-evaluation report that in turn serves as a basis for the external review.

Internal evaluation took the form of a survey several times in the past. The first time was in 2007 when the survey focused on the main aspects of the ACCR's operation. The reports on internal quality assurance in 2008 and 2009 then consisted mainly of analysis of the identified problems and assessed the effectiveness of steps taken towards their elimination (so-called follow-up reports).

The ACCR underwent external review in 2009 – 2010 in compliance with the ESG. Its membership in ENQA was renewed for another five-year period. The ACCR analysed the report from external review in the framework of its internal evaluation in 2010 and put emphasis on the problems noted in the previous reports on internal quality assurance and the external review on one hand and the steps taken towards their elimination on the other. The report on internal quality assurance in 2011-2012 was based on another survey, making it possible to evaluate the foregone changes from the perspective of the ACCR's members, its working groups, the secretariat and other involved persons.

The present internal evaluation was carried out with awareness of the external review upcoming between 2014 and 2015. The internal evaluation therefore concentrated on the fulfilment of the recommendations made by the review panel in

2010 and a reflection of the results from the last internal evaluation. This report aims to draw attention to the changes and measures that have continuously contributed towards fulfilment of the recommendations and elimination of the drawbacks identified in the survey in 2011. The report also shows awareness of the interconnectedness with the ESG, especially with the planned changes in the ESG and the current European trends in quality assurance in higher education.

FULFILLING THE RECOMMENDATIONS MADE BY THE EXTERNAL REVIEW PANEL IN 2010

In 2010 the ACCR conducted a thorough analysis of the external review report as a part of its internal evaluation process. The external review took place in compliance with the ESG and led to the confirmation of the ACCR's full membership status in ENQA for another five-year period. The analysis produced a list of main recommendations for improving the quality of the system of quality assurance and compliance with the ESG. The report on internal quality assurance defined 16 main recommendations: 10 of them relate to the part 2 of the ESG (labelled "A") and 6 pertain to the part 3 of the ESG (labelled "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. emphasize 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 within 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 from 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 ACCR were addressed in the previous years as part of the internal quality assurance process. However, it is necessary to note that not all the recommendations can be implemented under the current conditions for higher education quality assurance in the Czech Republic. Most of the 16 recommendations can be addressed in the framework of the ACCR's activities under the current legislative conditions. The evaluation panel however also formulated several recommendations that are, due to their nature, addressed to institutions developing higher education policies in the Czech Republic rather than to 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 the legislative process.

The Ministry of Education, Youth and Sports prepared two new legislative drafts that would affect the ACCR: the new Higher Education Act in 2011 and an extensive amendment to the existing Higher Education Act in 2013. In both cases the drafts were unsuitable with regards to the ACCR's operation. Had they been implemented, they would only have led to deterioration of the present conditions. Particularly the separation of evaluating "processes" from evaluating "the higher education institution's activities and outputs", as was proposed, is completely inappropriate and contradicts the European standards. Conceptualizing institutional accreditation as an empty box that clings on to the "processes" goes against the purpose of quality assurance and accreditation. The representatives of the ACCR participated in drafting the amendment of the Higher Education Act in 2013, but its final version failed to satisfactorily reflect the main inputs of the ACCR. If new legislation pertinent to the system of accreditations is drafted in the future, it must be qualitatively different from the 2013 draft.

The ACCR addressed some of the recommendations in its follow-up report for ENQA in 2012 and justified the current state and its stance on the concerned issues. This was the case particularly for recommendations A8 and B4 that refer to the procedure for nominating members of the working groups and also recommendation B3 about the procedure for nominating the members of the ACCR. Recommendation B2 was fulfilled by formulating a mission statement and publishing it at the ACCR's website http://www.akreditacnikomise.cz/cs/mission-statement-.html. Similarly, the recommendation A9 was reflected by introducing a common working code. Many recommendations related to drawbacks were already identified by the survey in 2011 (e.g. recommendations A2, A3, A4, A10, B1, B5). Therefore, they constitute a clear intersection between the understanding of the current problems by the ACCR's members and its working groups and the point of view of the international panel. The next main part of this report on internal quality assurance analyses specifically these points in common.

Several recommendations were made in areas that had not been explicitly addressed in the survey.

The recommendation A1 emphasized monitoring of internal evaluation systems of the higher education institutions under evaluation and support to the development and harmonization of monitoring systems. The ACCR pays attention to the internal evaluation systems of higher education institutions. Since 2011 the ACCR has been evaluating the internal processes related to quality assurance in higher education institutions, contributing to the development of the internal mechanisms of quality assurance and self-evaluation of the higher education institutions. The internal evaluation systems and the extent of critical self-reflection of the higher education institutions are subject to evaluation by the ACCR also in the framework of institutional evaluation of higher education institutions. In compliance with the Decree 42 of the Ministry of Education, Youth and Sports of 10 February 1999 on the content of applications for the accreditation of study programmes, internal mechanisms are since 2011 evaluated during assessment of applications for accreditation of study programmes; in the case of extension of accreditation the higher education institution's evaluation of carrying out the study programme to date is assessed.

Turning to cooperation with students as in recommendation A2, the ACCR has maintained and developed cooperation with the Student Chamber of the Council of

Higher Education Institutions. The Student Chamber nominates student representatives that participate in evaluating higher education institutions and their accredited activities. The ACCR considers the cooperation very good and beneficial for its activities.

With respect to recommendation A4 about elevating general criteria and standards over specific requirements of the working groups, emphasis is placed on approving specific standards for groups of study programmes in one academic field by the ACCR and publishing these standards on the ACCR's website. Standards for assessment of applications are continuously updated in order to reflect the developments in quality assurance in higher education and the real changes in this area.

The ACCR has systematically trained its members and the members of the working groups, as was recommended in A7. The members of the working groups got more deeply acquainted with the standards for evaluating higher education institutions and their application in seminar. A methodical aid for assessment of applications for accreditation is also available to them.

A part of recommendation A10 has to do with research activity of the ACCR. Although the ACCR engages in research only on an occasional basis, since 2010 it has taken part in the "Reform of tertiary education" project and conducted five studies for the project. Some collaborators of the ACCR are also involved in individual national projects "Quality" and "Credo". With regards to publication and popularization activity, the members, collaborators and secretariat employees of the ACCR publish and contribute to articles about the ACCR's activities and the problems in quality assurance in higher education in the newspaper as well as the electronic media.

Since 2007 the ACCR has developed a mechanism of regular internal evaluation in compliance with the ESG. Both its methodology and the relationship between reports on internal quality assurance and the self-evaluation reports produced every five years as the basis for external review have been explicitly formulated in response to recommendation B6. The self-evaluation report summarizes the findings of internal evaluation in the foregone period and it is also a culmination of the internal evaluation process of the ACCR. It is expected that these mechanisms will be incorporated into the ACCR's statute (subject to approval by the Government of the Czech Republic).

ELIMINATION OF PROBLEMS IDENTIFIED IN THE SURVEY

The previous internal evaluation was based on a survey conducted between the years 2011 and 2012, offering an insight of the persons involved in the ACCR's activities (its members, members of the working groups, secretariat employees) into the current problems, challenges and risks that the ACCR faces. The survey focused on various aspects of the ACCR's activities and the working groups, assessment of applications for accreditation, the ACCR's standing in the national legislative framework and compliance with the ESG.

The survey revealed that the majority of drawbacks are not only perceived by the persons involved in the ACCR's activities, but also were pointed out by the external reviewers in the report on the external review from 2010. A significant part of their recommendations thus reflects the direction that the ACCR should take in the view of many of its members, members of the working groups and the secretariat employees. The identified problems have appeared in the reports on internal quality assurance of the ACCR repeatedly, suggesting that a number of them are determined by the conditions (e.g. legislative) under which the ACCR operates. It is also necessary to stress that improvement in quality and gradual elimination of problems is a continuous process and some phenomena can only be changed in the long term.

1. Structure of the ACCR and its working groups

Among the ACCR's members as well as among the standing working groups there is a significant degree of inequality of work load.

Solution:

a) at the ACCR level attention is paid to greater involvement of all members into the ACCR's activities,

b) at the working group level a reorganization of some working groups took place in September 2012 in order to prevent their excessive overload:
   - a self-standing working group for applied informatics split from the working group for technical sciences and also took up some of the agenda of the working group for mathematics and informatics,

- the area of security studies was taken out from the working group for law and security studies and incorporated into the agenda of the working group for military and security studies,

- the agenda of the working group for law expanded its focus to the field of public administration.

2. Membership in working groups

The survey drew attention to the relatively low level of involvement of non-academic experts and international experts. Expanding and deepening of cooperation with non-academic experts in external reviews and other activities was also included in the recommendations A2 and A10 of the report on external review. Since September 2012 the share of non-academic experts in some standing working groups grew (law and public administration, economics) and they are currently represented in nine working groups. Since June 2013 the representation of non-academic expertise is missing from the ACCR itself. International experts are represented in five working groups, which shows an increase in their number since the time the survey was analysed. Nevertheless, there is space for the share of international and non-academic experts in the standing working groups to grow further.

3. Submission of accreditation files, their distribution and assessment process

The ACCR addressed the issues of submission, distribution and assessment of accreditation files both in the analysis of the survey findings and the follow-up report for ENQA from 2012. Modernisation of application submission and the administration of the ACCR was explicitly mentioned in the recommendation A3. A change of the current system is, however, a long-term process from the organizational as well as technical point of view. Over the course of 2013 an application was created that should simplify the administration of the ACCR's activities and change the way of submitting applications for accreditation. The database will be put into use gradually: first the internal part for administration of the ACCR's activities and keeping of data, then in 2014 submission of applications will be enabled through the new application (currently this part of the application is being tested in cooperation with the higher educational institutions and the results will have to be assessed first).

The effort is also being made to communicate more with the applicant not only during evaluation of the higher education institutions but also during the assessment of an application for accreditation.

Other improvements in this area:

    a) increased emphasis on submitting applications in a uniform, binding format,

    b) attention to harmonising the periods of validity of accreditation of study programmes (fields of study) for a given higher education institution or its part,

    c) the assessors have access to previous applications for accreditation and evaluation reports.

4. Standards and criteria for assessment of applications and giving reasons for statements

The recommendation A4 suggested elevating the general requirements over the specific requirements of the working groups and communicating to the expert public about the standards more. In response to the survey findings and the recommendation, the ACCR puts emphasis on the process of assessment and on correct application of its standards. It makes sure that the reasons given for the negative statements are directly related to non-fulfilment of specific ACCR standards. In cases when the reasons are thought to be too general, anonymous assessment reports and other material prepared for the ACCR's meeting are provided in an effort to make the reprehensions and shortcomings as comprehensible as possible.

The tasks stated in the internal evaluation remain in place:

    a) devote regular discussions to the standards not only within the ACCR but most importantly at the meetings of the working groups; the role of the working group chairs is crucial in this matter as they are the intermediaries between the ACCR and the experts in the working groups,

    b) inform the members of the working groups about changes in the standards and criteria also electronically, hold expert seminars with case studies, etc.,

    c) pay high attention to the reasons given for the ACCR's statements, to their unambiguousness and greatest possible specificity (same concerns temporary suspension of the assessment process and requests for additional information to supplement the application); if the reason cannot

be stated in the record from the ACCR's meeting, define a mechanism for its transmission to the Ministry of Education, Youth and Sports and the concerned higher education institution.

5. Independence

The independence of the persons involved in the ACCR's activities is perceived as sufficient. A greater risk for preserving independence, however, is the conduct of the Ministry of Education, Youth and Sports. It must not interfere with the ACCR through financing, the ACCR's secretariat or direct intervention in its decision-making and nomination processes. In 2013 no such attempts to interfere with the ACCR's independence occurred.

The ways of strengthening independence proposed in the last report on internal quality assurance remain relevant. It is especially necessary to continue to carefully monitor and evaluate cases of possible interferences with independence (or attempts to do so) by the Ministry or other institutions and to react promptly.

6. Financial and material resources

Reports on internal quality assurance have repeatedly pointed out deficiencies in the financial and material resources of the ACCR. These are also reflected in the recommendation B1 that advises securing a stable annual budget in order for the ACCR to be able to carry out its activities. The ACCR's activities, however, still rely on voluntary engagement (work in the public interest for the development of higher education or the expert's field). The current yearly budget does not allow the ACCR to remunerate the assessors, the members of the ACCR (and of the working groups) adequately. The persons tasked by the ACCR are remunerated only symbolically. Moreover, their activities are not sufficiently secured financially (expenses incurred for related administration, phone calls etc.). Thus, the expenses tied to their work for the ACCR are covered from their own resources or from their employer's. Similarly, the financing of the secretariat of the ACCR from the Ministry's budget cannot be considered adequate; it gives rise for example to the fact that the Ministry's officials have discretion over the salary and the personal bonuses of the secretariat employees.

Recent developments: The ACCR's budget has not increase; in contrast the proposed budget for 2014 brings a 90,000 CZK decrease. The present budget does not allow for remuneration of international experts and of participation of experts in the evaluation

of higher education institutions. At the moment, without a single increase in the budget, it is not possible to carry out the external review that the ACCR is supposed to undergo between the years 2014 and 2015.

7. Administrative support of the ACCR

The problem of insufficient administrative support has been repeatedly identified and directly relates to the recommendation B5, which stresses the need for strengthening the autonomy and independence on the Ministry of Education, Youth and Sports, including the areas of financial planning and personnel. The ACCR has lacked a professional bureaucratic apparatus. With the current number of the secretariat employees it is extremely difficult to carry out all the ACCR's duties prescribed by the Higher Education Act in the adequate quality. Furthermore, it is impossible to carry out all the duties that follow from the role of the ACCR as the national accreditation agency and its international obligations. Aside from a sufficient administrative apparatus, a legal support of the ACCR's activities and its working groups is lacking. The present state contrasts with that in comparable foreign agencies, whose tasks are smaller in extent but whose secretariat has much greater personnel resources (the usual number of employees of foreign agencies is 20 to 25).

The tasks stated in the last internal evaluation report remain in place:

a) initiate an increase in the number of secretariat employees so that all necessary duties can be carried out (including sufficient support to the working groups and the formal assessment of applications),

b) strive for greater independence of the ACCR's secretariat from the Ministry (including administrative duties).

8. International activities of the ACCR

The area of international activity has seen major improvement in the last year. In 2013 the ACCR hosted the ENQA Member's Forum in Prague; it was the first meeting of the association located in the Czech Republic. In addition, the representatives of the ACCR made appearances at international conferences and contributed their articles to international publications on quality assurance. An agreement of cooperation was signed with the Russian accreditation agency (NCPA), enabling active involvement of Czech experts in evaluations of higher education institutions in Russia.

PROPOSED CHANGES IN THE ESG IN RELATION TO THE ACCREDITATION COMMISSION'S ACTIVITIES

Assessment of the extent to which the ACCR complies with the ESG will constitute a part of the external review that the ACCR will undergo between the years 2014 and 2015 and that will determine the future membership status of the ACCR in ENQA. Currently a discussion is ongoing on the European level about the proposed changes in the ESG and therefore it is important to analyse the relation of the upcoming changes (as they are currently proposed) to the ACCR's activities. Part 2 of the ESG on external quality assurance of higher education and part 3 on the quality assurance agencies directly pertain to the ACCR's activities.

A more detailed analysis of the ACCR's activities in relation to the ESG will form a part of the self-evaluation report, which the ACCR will produce over the course of 2014 as a basis for the upcoming external review. The ACCR complies with most of the revised standards. Nevertheless, several points in the proposed new ESG deserve attention.

2.2 Designing processes fit for purpose
Standard:
All external quality assurance processes should be defined and designed specifically to ensure their fitness to achieve the aims and objectives set for them, while taking into account relevant regulations. Stakeholders should be involved in the design and continuous improvement of processes.

It would be appropriate for the standard to specify which actors are understood by the term "stakeholders" (whether they are only representatives of the employers or also representations of the higher education institutions, labour unions etc.). A justification is also needed for why the significance of the involvement of these specific actors in the designing of processes of external quality assurance is crucial.

The involvement of stakeholders in the ACCR's activities must not be self-serving (in the sense of everyone having their representative who will protect his or her interests), but has to positively reflect into the ACCR's mission, that is accountability for quality assurance in higher education. A sole principle of representation, where the stakeholders are not accountable for the activities and

mission of the agency, is counter-productive. The ACCR has already been involving stakeholders in selected activities.

2.3 Processes

Standard:

External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. These processes include:

• a self-assessment or equivalent;

• an external assessment normally including a site visit by a group of experts, including student member(s);

• the publication of the experts' full report, including formal outcomes;

• a consistent follow-up.

The guideline expanding this standard emphasizes the wide spectrum of expertise that lies in the focal point of external quality assurance processes. It is however unclear whether there is a binding requirement to involve all experts mentioned in the guideline (institutions, academicians, students and non-academic experts). Again, the involvement of stakeholders in the ACCR's activities must not be self-serving (in the sense of everyone having their representative who will protect his or her interests), but has to positively reflect into the ACCR's mission. A sole principle of representation is counter-productive. The ACCR has already been involving the mentioned categories of stakeholders in selected activities.

2.5 Reporting

Standard:

Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If any formal outcome is based on the reports, it should be published together with the report.

The guideline expanding this standard specifies that the report should include a number of elements, for instance context description; description of the procedure; evidence, analysis and findings; conclusions; features of good practice and recommendations. The guideline is rather detailed and lists a wide spectrum of requirements on reports on external quality assurance. In relation to the ACCR's activities it is important to note that the description of the procedure for evaluation of

higher education institutions is a part of its statute and a binding requirement on the inclusion of the description in each evaluation report can be considered redundant.

3.1 Activities, policy and processes for quality assurance
Standard:

Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their work.

Similarly as for standard 2.2, it would be appropriate to specify the meaning and scope of the term "stakeholders", their involvement in various aspects of the agency's activities and the extent to which this requirement is binding. As per the involvement of stakeholders in the activities of the ACCR, the same as for standard 2.2 applies.

3.3 Independence
Standard:

Agencies should be independent and act autonomously. They should have sole responsibility for their operations. Third parties should not influence the formal outcomes of their processes.

The guideline expanding this standard defines several aspects of independence: organisational independence, operational independence, independence of formal outcomes. The ACCR maintains independence of formal outcomes in the sense that although various external experts and students are involved in its activities, the ACCR alone is accountable for the formal outcomes of the quality assurance process. Organisational independence is declared in the mission statement of the ACCR, stressing that it is an independent institution. Its independence has also been confirmed by the Memorandum of the Minister of Education, Youth and Sports on the Independence of the Accreditation Commission. With respect to operational independence however, the ACCR might not fully comply with the guideline as its members are appointed by the government upon the Minister's nominations. The concept of operational independence is problematic for national agencies functionally tied to the execution of public authority. Nevertheless, according to the standard 3.3

the members of the ACCR are independent in exercising their positions and do not represent the government or their home institutions. The Ministry of Education, Youth and Sports does not interfere with the decision-making processes and functional mechanisms of the ACCR.

CONCLUSIONS

It is possible to conclude that while in some areas the ACCR has faced persisting issues in the longer term, other important areas have seen improvement with regards to fulfilling the tasks defined in the last report on internal quality assurance and the recommendations of the external review panel. The ACCR has recently improved especially in its active involvement in international activities. Moreover, the number of standing working groups, where international and non-academic experts are represented, has been significant. Changes have occurred in the reorganisation of the working groups, which should contribute to a more equal work load among them. A web application has been gradually implemented in order to simplify and clarify the process of submitting and assessing applications as well as the ACCR's administration. When assessing applications the ACCR places greater emphasis on direct reference to specific standards and giving more precise reasons for its statements.

At the same time, there is still space for greater involvement of non-academic experts and international experts in the ACCR's activities and also for more frequent discussion about the standards and their amendments in the ACCR and in the working groups. The situation in the financial and personnel resources of the ACCR and its standing vis-à-vis the Ministry of Education, Youth and Sports have not changed much. The identified problems that are largely determined by the current legislative conditions persist. It is yet to be seen whether changes will take place in the upcoming year in relation to the new composition of the government and a possible amendment to the Higher Education Act. It is clear that some drawbacks can be eliminated only gradually in a long-term horizon.

Between the years 2014 and 2015 the ACCR will undergo external review by an international panel of experts, which will be crucial for the renewal of full membership in ENQA for the next five years. The ACCR will produce a self-evaluation report for the purposes of the external review over the course of 2014; the

report will already be based on the new ESG. The next report on internal quality assurance will be published in about two years.