

**Report on the Accreditation Commission's
Internal Quality Assurance 2015**

February 2016

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1. Introduction

Internal evaluation is one of the key components of internal quality assurance of the Accreditation Commission Czech Republic (ACCR). It makes it possible to critically reflect on activities, set subgoals to facilitate improvement in quality of the activities and evaluate their achievement. Internal evaluation is carried out periodically and monitors adoption of measures as well as their impact over time. Internal evaluation involves analysis of strengths and weaknesses in the activities of the ACCR, formulation of conclusions and issuing of recommendations to help determine the direction of future development. Internal evaluation is closely linked to complex external review carried out by an international expert panel. Internal evaluation serves as the basis for a self-assessment report that the ACCR creates for the expert panel. External review critically assesses the compliance of the ACCR's external quality assurance activities with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG); its affirmative result is a condition for membership in the European Association for Quality Assurance in Higher Education (ENQA) that brings together European quality assurance agencies. ENQA is a major partner for other key institutions in higher education on the European level.

The ACCR has carried out regular internal evaluation since 2007. Since 2010, internal evaluation has focused on substeps towards fulfilment of recommendations from the international expert panel that had assessed the compliance of the activities of the ACCR with the ESG. In 2011-2012, the ACCR conducted survey research among its members and associates; consequently, it was possible to link recommendations of the expert panel with feedback from members and associates in the 2013 internal evaluation. The following year, the ACCR analysed involvement of stakeholders in its activities and their perception of mutual cooperation. The current internal evaluation for 2015 is carried out with attention to the external review that will take place over the course of 2016. Therefore, the focus is on summary evaluation of fulfilling recommendations of the expert panel from 2010 and analysis of compliance of the ACCR's activities with the ESG. This internal evaluation report thus serves as key material for the complex self-assessment report created for the purposes of external review. Furthermore, a deeper analysis of appeals of higher education institutions (HEIs) as a form of feedback was carried out and is part of this internal evaluation report.

Internal evaluation for 2015 took place in the context of preparation and discussion of an amendment to the Higher Education Act; at the time of writing this report, the amendment is subject to discussion in the Parliament. The amendment gives rise to a new quality assurance system in higher education and replaces the ACCR with a new National Accreditation Bureau (NAB). Its position, activities as well as structure will differ from the ACCR at present. The amendment reflects and partially addresses some of the current problems of the external quality assurance system, but at the same time generates new challenges and risks that will be faced by the NAB.

2. Reflection of recommendations from external review

In 2010, the ACCR underwent external review of compliance with the ESG; ENQA confirmed the ACCR's full member status for another five years as a result. The main recommendations of the expert panel towards improvement of the quality assurance system and compliance with the ESG were carefully analysed. The ACCR identified 16 main recommendations, while 10 related to Part 2 of the ESG valid at that time (marked with A) and 6 related to Part 3 of the ESG valid at that time (marked with B):

A) While complying with the ESG (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 (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 related to the activities of the ACCR has continuously been implemented in the last years and was already noted in previous internal evaluation reports. The majority of the 16 recommendations can be accommodated in the ACCR's activities under the current legislative conditions. Some of them, however, due to their nature target the institutions that make higher education policy in the Czech Republic (i.e. recommendations A5, A6, B1, B3, B5). Progress on these recommendations is largely dependent on the Ministry of Education, Youth and Sports of the Czech Republic ("ministry") and on legislative changes that have been discussed for several years and have not yet been implemented. The ACCR made a statement on some recommendations in the follow-up report submitted to ENQA in 2012 and gave the reasoning behind the state of affairs to date.

To address the recommendations of the expert panel:

A1. The ACCR pays great attention to the design of internal quality assurance systems of HEIs. When evaluating the systems, the ACCR also evaluates the ability of critical self-reflection demonstrated in self-evaluation reports of HEIs. In response to the revision of ESG, the ACCR amended its requirements on the self-evaluation reports and further elaborated the question forms to guide the HEIs in creation of the self-evaluation report. Self-evaluation should hereby generate more tangible findings about the design and functioning of internal quality assurance systems and enable better evaluation of the extent and ways in which the HEIs comply with Part 1 of the ESG (on internal quality assurance at HEIs). Internal quality assurance systems are also subject to assessment and discussion with the management and staff of the HEIs during the site visit.

Greater emphasis on the design of internal quality assurance systems of HEIs has translated also into the proposed amendment of the Higher Education Act. Representatives of the ACCR participated in the discussions about its preparation and gave their comments to its constituent parts. They actively advocated the necessity to

strengthen elements of internal quality assurance and emphasize the responsibility of HEIs for quality of their educational activities. The current version of the amendment of the Higher Education Act implies that design of internal quality assurance systems will be a key component in evaluation of HEIs by the future NAB. It will be crucial to lay down the methodology of evaluation effectively in order to enable assessment of real functioning of internal quality assurance systems as opposed to its mere formal design.

A2. Cooperation with students and professionals is very important to the ACCR. The ACCR has maintained longstanding cooperation with the Student Chamber of the Council of HEIs in evaluation of HEIs. The feedback from the Student Chamber obtained for internal evaluation of the ACCR in 2014 addressed the involvement of students in evaluation of HEIs. The students voiced overall content with the standing cooperation. The newly adopted Methodical Guidelines for Evaluation should also contribute to the effectiveness of student activities during evaluation. Furthermore, the proposed amendment of the Higher Education Act provides for membership of a student in the Council of the NAB.

Professionals have been involved in the ACCR's activities as members of permanent as well as ad-hoc working groups. Cooperation with the professionals has deepened in the last five years mainly on the level of the working groups. There are at present 12 professionals in 9 permanent working groups and they have been increasingly involved in evaluation of HEIs. The proposed amendment of the Higher Education Act provides for permanent and guaranteed membership of professional experts in the Council of the NAB.

A3. The ACCR has since 2014 used a modern database software developed on order for its needs. The software is fitted to maintain databases of applications for accreditation, accredited study programmes, ongoing administrative proceedings (pursued according to the Rules of Administrative Procedure) etc. The database software is continuously developed and updated with new functions. It serves to store and archive documents related to the accreditation process and is designed to enable the HEIs to submit applications for accreditation through its functions. However, in connection to the preparation of an amendment of the Higher Education Act, it is clear that the current software will need to be adjusted to the needs of the new accreditation agency that is planned to replace the ACCR. For this reason, the software has so far not been used for direct submission of applications for accreditation by the HEIs. Launching the new function at this time would mean a waste of financial resources.

A4. The generic standards form the basis for assessment of all applications for accreditation and evaluation of HEIs. Specific standards for certain fields or areas are subject to approval by the ACCR. The standards are regularly updated, it is however necessary to regularly revise them as a whole. All up-to-date standards and criteria for assessment are published on the website of the ACCR. The specific standards are consulted with the expert public, professional associations and chambers. Recently, the concept and specific standards of pre-graduate training of future teachers were discussed by representatives of the ACCR, experts from the relevant working group of the ACCR and faculties training teachers; they were also consulted with representatives of the ministry. The ACCR accepted the agreed concept and adheres to it in assessment of applications for accreditation of study programmes preparing future teachers.

A5. The Higher Education Act grants the ACCR 120 days to discuss applications for accreditation and issue statements. An audit carried out by the ministry in 2014 (included applications from 2013 and the first half of 2014) showed

that the 120-day limit is kept; the limit was exceeded only in exceptional cases. Out of over 2000 applications submitted to the ACCR in 2013 and the first half of 2014, the limit was exceeded in 7 cases. In 6 of those, discussion of the application was temporarily suspended to request additional information from the applicant. In one case, the application was submitted too late to be tabled to the upcoming meeting of the ACCR and had to be postponed to the next one. However, due to the three-month gap between the two meetings as a consequence of the summer holidays, the 120-day limit was exceeded. In order to prevent exceeding the limit, the ACCR needs to be conscious to discuss the temporarily suspended applications on the basis of the originally submitted documents if additional information is not received in time.

The ACCR adopted several measures to speed up the assessment process. Most importantly, it is necessary to minimize temporary suspensions of applications for formal reasons (missing or vague information). The ACCR has been mindful to use as precise and unambiguous wording of the standards and requirements on applications as possible. In addition, the ACCR reacts when the same formal deficiencies reoccur in applications or follow-up reports of various HEIs. In these cases, an explanatory reminder of the requirements is issued. Thanks to the expansion of the Secretariat (two additional staff members), applications now undergo basic pre-screening at the Secretariat in order to capture formal errors, making it possible to react to the errors more quickly prior to expert assessment.

A6. When HEIs immediately re-submit applications for accreditation of the same or similar study programme that has received a negative statement from the ACCR, it poses a bureaucratic burden on the assessors and typically shows lack of critical self-reflection of the applicants. The representatives of the ACCR argued for introducing a mechanism to limit repeated re-submission of unsuccessful applications for accreditation in the amendment of the Higher Education Act. As a result, the amendment includes a two-year term during which the applicant may not re-submit application for accreditation of a study programme or for institutional accreditation of an area study, where accreditation has been denied.

A7. High quality team of peer assessors and evaluators is fundamental for quality assurance. The ACCR organized several seminars for members of the working groups in the last five years to better acquaint them with the standards for assessment and their application. A methodical guideline is available to the peer assessors, while the Methodical Guidelines for Evaluation serve to guide evaluators. The latter document elaborates in detail the set procedure and formal process of evaluation as well as the methodology of evaluation of various aspects of the HEI's activities. It is desirable to continue the activities aimed at better acquainting the members of the working groups with the standards of the ACCR and their application.

A8. The ACCR makes its own decisions on appointment of experts to working groups. The members of the ACCR always have the general information about the nominee: home institution, profile and professional CV. HEIs or other institutions do not interfere in appointment of members of the working groups as the working groups are advisory bodies of the ACCR rather than representative bodies of the HEIs. Any interference of HEIs in their appointment could seriously violate the independence of the ACCR and external quality assurance processes. On the contrary, conflict of interests is ruled out in assessment of applications and evaluation of HEIs. Thus, the current mechanisms do not allow violation of independence of the ACCR by HEIs or other representatives of partisan interests.

Composition of permanent working groups is changed as needed, at least every time the working group's chair changes. The ACCR is mindful to facilitate

change while maintaining a degree of continuity and ensuring adherence to the principle of acting (deciding) similarly in similar cases during assessment. Out of 198 members of the working groups in 2010, 131 (66 %) are still their members at the end of 2015. The total number of members of working groups has increased since 2010 to 219.

At the same time, the ACCR monitors the utility of working groups and changes their profiles to better reflect the spectrum of study programmes when needed. The working group for mathematics and informatics was split into a working group for applied informatics and computer technology and a working group for mathematics and theoretical informatics. The working group for military and security studies (formerly military studies) and the working group for law and public administration (formerly law and security studies) underwent a structural change. The working group for subject didactics was newly established to complement the working group for education, psychology and sports studies.

A9. Sample rules of procedure of the permanent working groups are accessible in the internal system of the ACCR. They are embedded in the Statute of the ACCR and can be altered to reflect experience from assessment, development of technologies (online data storage) etc. Even though each working group can amend and adjust the document for its needs, the basic principles grounded in the Statute of the ACCR must be followed. On another note, fees for the members of the working groups and peer assessors are determined by the ACCR's budget and reflect the number and quality of submitted assessments.

A10. Cooperation with employers and their representatives has not yet become more institutionalized and formalized. In part, the reason is that their motivation for contact is often to pursue the interests of a specific applicant rather than to act as real partners with a long-term and conceptual approach to higher education, profiling, student placements etc. Cooperation is better and more effective in the case of regulated professions as the regulatory bodies (mainly bodies of state administration and professional chambers) are required by the Higher Education Act to give statements to applications for accreditation of study programmes that lead to the execution of regulated professions. In this sense, communication and cooperation on the preparation of standards for teachers, conceptual discussions about non-medical professions in health (especially preparation of a new field of study „Infant Nurse“) and veterinary fields as well as the involvement of representatives of employers in evaluation of HEIs can be evaluated positively. Representatives of employers will be involved in evaluation of non-medical HEIs and faculties with a profile in health studies. On another instance, a conceptual discussion between the working group of the ACCR for veterinary medicine and the Chamber of Veterinary Surgeons of the Czech Republic took place and revolved around the content of study programmes and profiles of the graduates in veterinary medicine. In the area of unregulated professions, cooperation with employers is less pronounced and relates rather to specific cases. In 2013 for example, the ACCR met with representatives of a private company, which was supposed to participate in carrying out of a study programme applied for jointly by two faculties. The purpose of the meeting was to clarify requirements on their cooperation with respect to the legal framework and the ACCR standards.

The ACCR acquires a great amount of data and tangible experience with design of quality assurance systems in the accreditation process and evaluation of HEIs. It is thus imperative that the ACCR provides expert information to the political sphere (that creates higher education policy), the HEIs and other partners

(stakeholders) as well as the expert and general public. Most information (without sensitive data) is published on the website of the ACCR (statements, their substantiation, evaluation reports etc.) To reach the expert and scientific community, an article about the findings of evaluation of Doctoral study programmes was published in the academic journal *Pedagogika (Pedagogy)* in 2013. The ACCR played an important part in preparing the amendment of the Higher Education Act; the representatives of the ACCR emphasized the necessity to comply with the ESG and contributed their experience with weak spots in quality assurance encountered in their activities. Furthermore, the ACCR participated in creation of the career system for teachers and gave impetus for development of didactics in specific fields. The ACCR has also been engaged in spreading knowledge about quality assurance processes in seminars and by presenting key documents to the expert public. Last year, one of the Secretariat staff members translated selected parts of the revised ESG into Czech and these were published on the ACCR's website and also provided to representations of HEIs and the political representation involved in drafting the amendment of the Higher Education Act. As far as publishing information, the representatives of the ACCR have commented on the ACCR's activities and issues in quality assurance of higher education in the media in addition to publication in printed and electronic media.

B1. The ACCR's budget is determined by the ministry that allocates funding from its own budget. The Memorandum of the Minister from 2010 guarantees the amount of funding necessary to carry out tasks in care for quality of higher education. The ACCR's budget has been stable in the long term; it has not been cut or abused to put pressure on the decision-making processes in the ACCR. When the ACCR applied for increase in the budget during the year, the requests were always satisfied. Complete separation of the ACCR's budget from the ministry's budget to formally ensure financial independence of the ACCR would be desirable, but it cannot be anticipated even in the amendment of the Higher Education Act. The ACCR, moreover, is not a legal entity and cannot carry out any activities to generate funding.

B2. The ACCR has formulated its mission in the mission statement that has been published at its website. The mission statement reflects the ACCR's activities and goals as well as defines its relationship with other actors in higher education and its role internationally.

B3. Procedures for nomination and appointment of ACCR members are stipulated by the Higher Education Act. The Act states that nomination of ACCR members is consulted with HEIs, the Research, Development and Innovation Council and the Academy of Sciences of the Czech Republic. Moreover, the Memorandum of the Minister from 2010 guarantees that the nominations will be based solely on expertise of the proposed members. The Higher Education Act does not enable students to be members of the ACCR; only recognized expert authorities can become members. Students nevertheless participate in the ad-hoc working groups for evaluation of HEIs. It would be appropriate to expand cooperation in the areas where they can contribute to the mission of the ACCR in care for quality of higher education.

The proposed amendment of the Higher Education Act significantly changes the nomination procedures. The members of the Council of the NAB are supposed to be appointed by the government on the nomination of the minister. A part would be appointed from persons proposed by the ministry, other bodies of state administration, professional chambers and employer associations; a part from persons proposed by

representations of HEIs and one member from students proposed by the student representative body. The advantage of this mechanism is the likelihood of greater involvement of various stakeholders, but a possible risk is decline in expertise, strengthening of clientelistic networks and tendencies to represent a partisan interest as opposed to the public interest.

B4. Members of the ACCR's working groups are appointed on the basis of their expertise and with consideration of representation of various subfields in the working groups. They are advisory bodies established by the ACCR to help prepare its meetings according to the Higher Education Act and its Statute. Involvement of HEIs in nominating members of the working groups is not purposeful as the members do not represent their home HEIs or other institutions. On the contrary, they have to be independent. Conflict of interests must be ruled out, therefore, an expert cannot assess study programmes of his or her home institution or any study programme that he or she is engaged in. In the evaluation process, the HEIs under evaluation are informed about the composition of the working group that will evaluate them. No member of the ad-hoc working group can have close ties to the HEI, i.e. be its academic staff member etc. Procedures in the working groups follow the rules of procedures of the working groups..

B5. Since the external review of the ACCR in 2010, the Secretariat split from the higher education department and became a separate department of the ministry. It is not subordinated to any other head of department or deputy minister that could influence its activities and assign it with tasks. The Memorandum of the Minister guarantees that the tasks of the Secretariat related to the ACCR's activities will be directed by the Chair of the ACCR without interference from the ministry. In terms of internal regulations, financial planning and staffing, however, the Secretariat remains an organizational unit of the ministry. Its complete separation from the ministry would require a change in legislation and would be financially demanding.

B6. The ACCR summarized some of the methodologies of internal evaluation and external review of its activities and their relationship in the follow-up report for ENQA in 2012. Also other documents, such as internal evaluation reports, address these issues. Internal evaluation has been carried out since 2007. Internal evaluation focuses on fulfillment of recommendations of the review panel and the links to feedback from partners and interest groups. While the ACCR makes effort to continuously work on all the recommendations, it also sets specific priorities each year and concentrates on particular aspects of its activities in depth to improve the quality of its activities. The internal evaluation reports always contain analysis, findings and recommendations for the ACCR. Lately, the ACCR laid down a complex methodology of quality assurance of its activities that also relates to the activities of the working groups and obtaining feedback from partners. The methodology reflects standing practice as well as the revised ESG.

External review is not a requirement by law or other actors on the national level; the ACCR takes on this obligation as a member of ENQA. The methodology and requirements on the self-assessment report are thus determined by the stipulations of ENQA. External review provides a great opportunity to gain critical outlook on the activities of the ACCR from an independent international expert panel. It also generates findings on the degree of compliance of the ACCR with the ESG in the community of quality assurance agencies. External review needs to be seen as valuable impetus for improvement of quality of evaluation and thus quality of higher education in the Czech Republic.

3. Translation of the revised ESG into the activities of the ACCR

The ACCR has closely followed the revision of the ESG and made effort to flexibly respond to it. Therefore, this internal evaluation included an analysis of the extent to which the revised ESG is already present in the activities of the ACCR and where it is still necessary to incorporate them. Internal evaluation will thus contribute to the self-assessment process that the ACCR carries out in preparation for the ENQA external review. The analysis addresses all three parts of the ESG.

a. Part 1 of the ESG: Internal Quality Assurance

In Part 1 of the ESG, it is clear that great attention is paid to quality of assessment and evaluation of HEIs and their options of appeal. The present analysis provides a good opportunity to examine assessment by the ACCR on the general level with regard to effectiveness and correctness of assessment as well as possible errors. A sample of appeals of HEIs against negative statements of the ACCR to applications for accreditation and proposals of sanctions has been selected to allow examination of both aspects. When analysing appeals of HEIs against statements of the ACCR, it is important to ask what the main reasons for negative statements are (i.e. deficiencies in study programmes), in what cases the ACCR changes its statement on the basis of the HEI's appeal as well as if, when and where there are errors in the ACCR's assessment. The analysis should contribute to formulation of recommendations to improve the activities of the ACCR in assessment of study programmes and to show which areas need to be focused on in incorporation of the ESG.

The appeals system is regulated by the Rules of Administrative Procedure. During the accreditation procedure, a HEI has several opportunities to express its discontent with the statement or procedure of the ACCR. In the case of negative statement of the ACCR to application for accreditation and procedure towards imposing sanctions (restriction, suspension or revocation of accreditation), the ministry asks the HEI to deliver its response to the ACCR's statement within a given deadline. If the HEI does so and its response includes expert arguments (regarding issues that are in the competence of the ACCR to assess), the ministry passes the response on to the ACCR for discussion. The ACCR issues another statement based on discussion of the HEI's response. If the new statement is again negative, the ministry informs the HEI and again asks for its response within a deadline. If the HEI responds to the new statement of the ACCR, the ministry either passes the matter on to the ACCR again or decides on its own. According to the Rules of Administrative Procedure, it is possible to file remonstrance against the decision (and also against a "positive" decision that grants accreditation) that will be decided by the minister. The ministry considers the remonstrance and can revoke the decision or pass the remonstrance on to the minister. The remonstrance committee appointed by the minister submits to him or her a proposal of a decision on remonstrance. The minister either accepts the remonstrance and revokes the decision under question or adopts another measure in favour of the HEI, or rejects it and confirms the decision. At the highest instance, it is possible to file a lawsuit to the court.

To analyse appeals, a sample including all responses of HEIs from the beginning of 2014 to the end of 2015 was selected; they are responses discussed at 10 meetings of the ACCR. The sample should be large enough to allow for drawing general conclusions. Although the period of examination is firmly set, some of the

responses relate to applications submitted and first discussed in 2013, while in other cases the administrative proceedings have still not been completed.

In analysing remonstrance, cases of remonstrance submitted by HEIs against accreditation decisions of the ministry since the last external review in 2010 were considered. As it is the next level of appeal after response, it is used much less frequently (generally several submissions of remonstrance a year); the longer time span will thus enable obtaining more representative results.

I. Substantiation of negative statements of the ACCR and proposals of sanctions

In line with Article 79 (5) (a) and (b) and Article 6 of the Higher Education Act, the ACCR will not issue a positive statement on an application for accreditation of a study programme if the study programme does not fulfil the requirements of Section 4 of the Higher Education Act or if the teaching staff, equipment and information resources are not sufficient.

- Section 4 of the Higher Education Act

The most common reason for issuing a negative statement according to Article 79 (5) (a) of the Higher Education Act is that the proposed study programme (or field of study if it is divided into fields of study), aims of study, the graduate's profile, employment possibilities, core courses, content of the state final exam and proposed thesis topics are not in mutual correspondence and thus do not create a logical whole. The content of the study programme is the most common reason for a negative statement also in cases when the HEI applies for accreditation of a study programme of a higher type than those carried out so far (i.e. application for a Master study programme when the HEI has only carried out Bachelor study programmes to date). The frequency of deficiencies in the content of the study programme decreases with repeated submission of applications for accreditation.

In case of Master and Doctoral study programme, the ACCR issues a negative statement also because the HEI does not hold any external research projects related to the study programme (field of study). The requirement to carry out an external research project (a significant domestic or international project or grant such as the Czech Science Foundation in the field related to the study programme for Doctoral study programmes) is stipulated in the standards of the ACCR and grounded in the Higher Education Act. Negative statement on the grounds that the HEI does not hold any related external research project is, again, most frequent when the HEI applies for a new study programme or field of study. To obtain an affirmative statement of the ACCR, it does not suffice when the HEI presents a research project of its staff member as its own in cases when the academic staff member carries out the project under his or her employment contract at another institution.

At present, the number of applications for accreditation of a Master or Doctoral study programmes when the HEI does not hold any external project (which does not comply with the standards of the ACCR) has been decreasing. On the other hand, the number of applications from HEIs that hold an external project but it is not related (or barely) with the proposed field of study has been increasing.

HEIs submit a list of grants and projects carried out in the last five years in the proposed field of study as a part of application for accreditation of a Master and Doctoral study programme. In many cases, the HEIs submit extensive lists of

innovative and research activities regardless of their connection to the field of study. As a solution, the ACCR could restrict the number of listed projects (as it is already the case for publications of teaching staff) and require external access to the results and published outputs of projects where possible. Assessment of external projects is necessary especially in cases where the relevancy of the project to the field of study is on the borderline and the project needs to be assessed not only for content but also for methodology.

- Teaching staff, equipment and information resources

The most frequent reason for negative statement of the ACCR is insufficient expert and publication activity of teaching staff related to the subjects they teach. The ACCR standards referring to publication activity are embedded in the idea that if instructors are to bring to students current knowledge in the taught courses, they also need to have publication activity in the fields they teach. The requirements on quality and topicality of publication activity increase with a higher type of study programme. In the recent years, the ACCR rarely encounters cases where instructors have no publication activity at all, but their publication activity (especially at smaller HEIs) focuses on different topics than those taught by the respective instructors. It is partially caused by a limited number of associate professors and professors. In consequence, they tend to cover a broad range of courses at a given HEI. The HEIs sometimes object in their responses to statements of the ACCR that listing a maximum of 5 most significant publication outputs in the last five years, as required, does not allow the instructors to demonstrate publication activity to all taught courses if they teach multiple. The objection is partially valid. In exceptional cases, more publications could be listed or they could be specified for the various courses. At the same time however, it is necessary to bear in mind that the spectrum of courses taught by a single instructor should not be too wide; an instructor can hardly be an expert in multiple fields of research. This applies in particular to Master and Doctoral study programmes.

From the qualitative point of view, a common problem are lacking publications of teaching staff published outside the applicant HEI. However, it is the ability to succeed in renowned or peer-reviewed journals and publishing houses that tells about the quality of research of the instructor. It would be useful to adjust the standards of the ACCR to reflect this idea.

Another reason for issuing a negative statement to an application for accreditation is unsatisfactory guarantor of the study programme (field of study if the study programme is divided into fields of study). An amendment of the Higher Education Act from 2010 introduced the stipulation that only an associate professor or professor can guarantee the quality and development of a study programme. According to the standards of the ACCR, publication activity of a guarantor must be of sufficient quality and relate to the proposed field of study. A discrepancy between publication activity and the field of study is a reason for negative statement of the ACCR. When evaluating teaching staff, the ACCR considers also the total sum of employment contracts, perspective of involvement of the guarantor in the development of the study programme etc.

The ACCR issues a negative statement also when profile courses (courses of the theoretical basis that are part of the state final exams and that have significant impact on the knowledge and skills of the graduate) are taught by external instructors. Notably, the term “external instructor” is not explained in the standards of the ACCR;

it is not clear if it is an instructor employed with a less than full-time contract, or an instructor that is engaged on another basis than employment contract. Furthermore, there is a possible discrepancy in the standards as they state that profile courses of the field of study cannot be taught by external instructors, but also that they have to be taught mostly by teachers employed full-time at the applicant HEI. It would be suitable to put them in line, distinguish between core and profile courses and explicitly define the term “external instructor”.

In terms of information resources, the most common reason for negative statement is insufficient support of the combined mode of studies by study aids to make up for low extent of direct teaching. Study aids should enable independent study, give assignments to verify comprehension of the material, provide a guide to studies and communication with the tutor, etc. Textbooks or expanded syllabi, often submitted by HEIs as study aids, are not qualitatively sufficient. In applications for accreditation of a combined mode of study of a Bachelor or Master study programme, the ACCR requires submission of study aids for at least one third of theoretical subjects; at least the first semester should be fully covered. It would be appropriate, nevertheless, to stipulate in the standards and requirements on applicants that in cases of extending existing accreditation of a study programme in the combined mode of study, a full set of study aids for all core and compulsory elective courses must be submitted. Only then can the quality of resources for distance part of studies be assessed. The stipulation is lacking in the standards and some applications for extension of accreditation have been accompanied by only samples of study aids only for selected courses.

II. Analysis of appeals of HEIs

- Responses

The subject of analysis are statements of the ACCR that have been challenged by HEIs through a response within the administrative proceedings and through remonstrance against an accreditation decision of the ministry. The analysis covers responses that the ACCR received and discussed at its meetings in 2014 (meetings no. 1/2014 – 5/2014) and 2015 (meetings no. 1/2015 – 5/2015) along with remonstrance submitted against ministerial decisions since the external review in 2010.

From the beginning of 2014 until the end of 2015, the ACCR discussed 75 responses from HEIs to its negative statements to applications for accreditation and to proposals of sanctions, precisely restriction of accreditation. In 35 cases, the ACCR confirmed its original statement (not granting, not extending or not expanding accreditation) or proposal of sanctions. In 40 cases, the ACCR did not insist on its original statement and agreed with granting, extending or expanding accreditation or no longer proposed sanctions.

Total number of responses from HEIs	ACCR confirmed its statement	ACCR did not insist on its statement
75	35	40

Note: In 18 cases, the HEI submitted another response to the new negative statement of the ACCR on the request of the ministry. The ACCR discussed the new

responses. In 10 cases, the original negative statement was again confirmed; in 8 cases the ACCR changed the statement to affirmative or did not insist on sanctions.

Analysis of cases of appeals from HEIs that led the ACCR to change its original negative statement or proposal of sanctions showed that in the vast majority of cases, the ACCR revised its statement on the basis of qualitative changes in the study programme. The responses of HEIs can be distinguished by their content: they may explain existing circumstances and add missing information to enable assessment of the present state of affairs, and/or inform about new circumstances and qualitative changes on the study programme and its resources. Out of 40 cases when the ACCR revised its original statement following a response from HEI, 36 responses presented qualitatively new circumstances (such as study aids for the combined mode of study) and changes made in the concerned study programme (such as changes in the study plan, teaching staff etc.) 21 of these responses included both explanations and addition of missing data (such as expert argumentation related to the concept of the field of study, publication outputs of teaching staff etc.) as well as information about changes in the study programme and its resources. In only 4 cases, the ACCR revised its earlier statement on the basis of a response that did not introduce any qualitatively new circumstances but only further explained the existing state. It can be derived from the examined sample that the ACCR changes its negative statement or does not insist on sanctions almost exclusively in cases when the study programme and its resources undergo qualitative changes. Revision of the statements thus appears to be substantiated and induced by changes in the study programme called for in the original statement.

Number of responses that included explanation of existing circumstances & qualitatively new circumstances	21
Number of responses that included only qualitatively new circumstances	15
Number of responses that included only explanation of existing circumstances	4
Total number of responses that led the ACCR to revise its earlier statement	40

The examined sample also points to some deficiencies and space for improvement on the part of the ACCR.

1. In the case of two study programmes (with the same name and content, one to allow for parallel study in combination with another study programme), the ACCR substantiated its original negative statement to application for accreditation in two ways: first, unsatisfactory guarantor and second, absence of sufficient research related to the field of study. The HEI fully solved the issue of the guarantor, but did not address insufficient research in its response. The ACCR, however, did not insist on its earlier statement and agreed with reaccreditation. The final statement of the ACCR omits the question of research, although it was originally a reason for not extending accreditation and the HEI did not satisfactorily remedy the issue.
2. In at least one case, the ACCR brought up certain deficiencies in the study programme not in the first, but only in the second and third discussions of

the application. In this specific case, the ACCR issued a negative statement substantiated by insufficient teaching staff in specific courses and inadequate study aids for the combined mode of study. The HEI submitted a response and the ACCR discussed it. In its second statement, the ACCR temporarily suspended discussion of the application and pointed to additional deficiencies in the study programme that related mainly to student placements and content of the state final exam. The HEI again responded to this new statement. After discussion of the response, the ACCR agreed with accreditation but made additional demands on adjustments of the study programme by incorporating certain missing topics to the study plan. All remarks that were made in substantiations of statements and recommendations in the final statement should have been voiced already in the first discussion of the application.

3. In at least one case, the HEI did not adequately react to a remark by the ACCR, because it interpreted the remark differently than it was meant. The concerned statement noted that the combined mode of study was not sufficiently supported by study aids. The HEI declared in its response that it considered the set of 25 study aids submitted earlier along with the application to be adequate. The ACCR specified only in its second statement that the problem was the form and content of study aids. In reaction, the HEI supplied revised study aids in its next response. If the ACCR had specified already in its first statement that the deficiencies were the form and content of study aids, not their assumed absence or low number as the HEI most likely had understood, the accreditation procedure could have been faster and less administratively demanding.
4. Following remarks made in two responses of HEIs, it was found that the recommended forms for application for accreditation published at the ACCR's website do not entirely correspond with assessment practice. Several other responses also showed that the standards of the ACCR and the recommended forms can be interpreted inaccurately. As challenges to the interpretation of standards and accreditation forms only occur rarely, it can be assumed that the vast majority of applicants do not struggle with comprehension. Even though misunderstandings are exceptional, they point to the need to pay increased attention to regular revision of standards and forms, their updating and utmost precision and unambiguity in wording.

The analysis also found that the ACCR temporarily suspended proceedings of 12 responses and asked for additional information necessary to assess them. In one case, the request was to reconsider and clarify the concept of studies; in one other case the request concerned additional data about the study plan, state final exams, placements, combined mode of study etc. In the remaining 10 responses, however, the ACCR asked for updated study plans with data on instructors in each course and their professional CVs. Greater awareness on the part of HEIs of the necessity to submit these documents when they declare changes in study plans or new teaching staff should lead to speeding up of the administrative proceedings and lowering of the administrative burdens for both parties.

- Remonstrance

The HEIs filed several remonstrances against ministerial accreditation decisions per year in the examined period. In most cases, the remonstrance committee of the minister rejected them. If remonstrance was accepted, the reason was mainly deficiencies in the decision issued by the ministry. One remonstrance, however, deserves a closer look at the statement of the ACCR.

The minister accepted remonstrance against the ministerial decision to restrict accreditation of a study programme (not allowing the HEI to admit new students into the study programme). At the beginning of the proceedings, the ACCR proposed restriction of accreditation because serious deficiencies were found in the composition of the study plan and teaching staff of certain courses. The HEI responded to the statement with expert arguments about the composition of the study plan and explained some of the circumstances related to teaching staff. Nevertheless, the ACCR confirmed its statement and demanded most importantly change of the name of the study programme to better correspond with the study plan. The ministry decided on restriction of accreditation on the basis of this statement; the HEI filed remonstrance to the minister. The minister concluded that it was not obvious which deficiencies found by the ACCR were “serious” (only serious deficiencies can be the grounds for sanctions according to the Higher Education Act) and if the study plan had been subject to qualitative changes since initial accreditation of the study programme (field of study) several years earlier. If there had not been any qualitative changes, serious deficiencies should have been found already in the initial application for accreditation of the study programme. The minister invited the ACCR to discuss the remonstrance. The ACCR determined, on the basis of the remonstrance and the statement of the minister, that there were no sufficient grounds to restrict accreditation of the study programme and limited itself to issuing recommendations in the line of its earlier remarks to the study programme. The minister accepted the remonstrance and the decision was revised to not restrict accreditation.

The HEI did not present qualitatively new circumstances in its remonstrance; expert arguments were made to defend the existing state. The revision of the statement of the ACCR was thus not induced by changes in significant circumstances related to the study programme. In contrast, it was of key importance that there had been no qualitative changes in the study plan or the graduate’s profile since initial accreditation. Therefore, it appears that assessment of the ACCR upon accreditation and subsequent reaccreditation (when restriction of accreditation was proposed) was not consistent as the ACCR assessed the same state of affairs differently each time. The ACCR needs to be highly mindful of consistency of assessment. Substantiating a negative statement or proposal of sanctions by deficiencies that had not been found during previous assessment of the study programme, although the circumstances had not qualitatively changed, is not a good practice, does not contribute to fostering trust in the ACCR and is not legally grounded.

III. Reflection of the ESG

The revised ESG adopted at the ministerial conference in May 2015 are reflected in the ACCR’s activities to a large degree. Some of their aspects, however, have not been entirely incorporated. HEIs occasionally refer to elements of the ESG in their statements (without explicit reference to the ESG as a document). One of the aims of this internal evaluation is to identify possibilities and space for greater translation of the ESG into the statements of the ACCR. At the same time, it should

be kept in mind that although the ACCR has been assigned with the task to care for quality of higher education, it is also bound by the stipulations of the Higher Education Act in assessment of applications for accreditation and in evaluation.

Standard 1.1 emphasizes internal quality assurance policy as necessary for HEIs, because HEIs are primarily responsible for the quality of higher education. In their responses to negative statements of the ACCR, HEIs sometimes make arguments referring to internal quality assurance, for example describe the expert discussions and considerations related to the problematic aspects of the study programme and give reasons for adopted measures. In addition, some responses of HEIs show lack of critical self-awareness and lack of ability to analyse and evaluate their own activities.

The ACCR typically does not evaluate the internal quality assurance system at HEIs in its statements to applications for accreditation; the ACCR assesses mainly its outputs such as conceptualization and resources of the study programme. The reason is, in part, that the ACCR does not have complex information about the functioning of the internal quality assurance system from the application for accreditation. Most importantly, however, the ACCR is bound by the duties assigned by the Higher Education Act in assessing applications. These are to assess teaching staff, equipment and information resources of the study programme and its compliance with Part 4 of the Higher Education Act (see above for elaboration). Evaluation of HEIs, on the other hand, provides greater space for assessment of internal quality assurance systems. The ACCR has been reflecting this aspect in evaluation and will continue to do so increasingly in reaction to the revision of the ESG.

The ACCR has been taking into consideration the provisions of standard 1.3 in assessing applications. Standard 1.3 emphasizes student-oriented teaching, active involvement of students in the learning process and assessment of students. The ACCR assesses syllabi of courses in the study plan, form of delivery (lectures, seminars etc.), form of completion of the course (exam, assignment etc.) and other requirements placed on students in their courses. Evaluation of courses appears in the statements of the ACCR almost exclusively in the sense of how their content is related to the graduate's profile and the achieved knowledge. Remarks tend to be made on the general level (i.e. courses from a certain area missing, necessity to include certain topics in the study plan etc.) It would be possible to focus more on tangible analysis of if and how the form of delivery and assessment of students enables achievement of the skills declared in the graduate's profile. This issue receives more attention also in the evaluation of HEIs and their accredited activities.

The issue referred to in standard 1.5 – teaching staff – is crucial for assessment of study programmes by the ACCR. The ACCR assesses the teaching staff of study programmes in detail and to this purpose requests professional CVs of all teaching staff and data about their engagement at the applicant HEI as well as other HEIs. The ACCR requires course instructors to be active in their fields and publish on the topics of their expertise. Another requirement is that their teaching and other duties need to be adequate (the standards of the ACCR state that an instructor may not exceed 1,75 full employment contracts or 70 hours a week total at all her employers). Publication activity, qualification growth and extent of engagement of academic staff in teaching also shows the kind of policy that the HEI applies towards its academic staff. More generally, quality of teaching staff in a study programme tells about the functionality of internal quality assurance at the HEI. Finally, the ability of critical self-reflection of a HEI is revealed in adopted measures and in responses of the HEI to the deficiencies identified by the ACCR in its statement.

As unsatisfactory teaching staff is one of the most common reasons for a negative statement of the ACCR, it is also often the subject of argumentation in the responses from HEIs. The analysis of responses showed that responses were successful almost exclusively when the HEI had made qualitative changes in the study programme and its resources. Assertion of the argument that the teaching staff is sufficient does not, most of the time, induce revision of the statement of the ACCR unless new circumstances are presented (see analysis above).

Standard 1.6 sets that students have to have adequate study resources and support in their studies. The ACCR assesses equipment and information resources in line with the Higher Education Act. Apart from study aids for the combined mode of study, these issues do not frequently appear in the statements to applications for accreditation. Equipment and information resources are more targeted in evaluation of HEIs. Nevertheless, it would be possible to pay greater attention to them also in assessment of applications for accreditation.

The ACCR assesses the quality of study aids for the combined mode of study when discussing applications for accreditation. The standards of the ACCR set requirements on study aids; information on the organization of studies in courses and the combined mode of study is requested in applications for accreditation. Unsuitable concept of the combined mode of study and insufficient quality of study aids are common grounds for a negative statement to an application for accreditation of a study programme in the combined mode of study.

Revision and updating of study programmes is necessary to adjust them to the development of fields and society. Standard 1.9 emphasizes the need to regularly revise study programmes and continuously improve their quality. When assessing applications for extension of accreditation, the ACCR checks and assesses the changes that have taken place since last assessment of the study programme. Emphasis is placed on the long-term trend of development of the HEI (or its part) mainly in terms of teaching staff.

As was revealed in the analysis, in exceptional cases assessment by the ACCR is not consistent with earlier statements. Therefore, it would be appropriate to work with earlier statements more systematically and carefully when discussing applications for extension of accreditation. It would also contribute to assessment of study programmes in their own context and enable formulation of recommendations to provide clear clues for improving the quality of the study programme with regard to its specifics and development. In consequence, the ACCR could better play its role in supporting HEIs in improving the quality of their educational activities. An obstacle to greater concentration on qualitative changes in study programmes over time is high number of discussed applications for accreditation that overloads the ACCR. Systematic and more detailed analysis of the histories of individual study programmes as part of assessment of applications would be very problematic with the current human and financial resources.

b. Part 2 of the ESG: External Quality Assurance

Part 2 of the ESG deals with external quality assurance of higher education, in the case of the ACCR accreditation of study programmes and evaluation of HEIs and their accredited activities. Many of the standards of Part 2 are more relevant to evaluation due to their nature, but many can also be reflected in assessment of applications for accreditation. Their interconnectedness with standards of Part 1 is

crucial as external quality assurance needs to take into account and assess internal quality assurance at HEIs. The HEIs are primarily responsible for the quality of educational activities.

As regards processes and procedures of evaluation of HEIs (standard 2.2), the ACCR complies with the essence of the ESG. The goal of evaluation is mainly to help the HEI and provide it with tangible clues to improve the quality of accredited activities as well as internal evaluation. The evaluation procedures are designed towards this goal. In compliance with the ESG (standard 2.3), the ACCR asks for self-evaluation and a self-evaluation report from the HEIs to be followed with evaluation and a site visit by the ad-hoc working group of the ACCR. Afterwards, the ACCR accepts the final evaluation report, issues recommendations for the HEI and sets follow-up measures. They generally include submission of a follow-up report within a deadline. The request for a follow-up report to be submitted within a deadline (often after several years) is also common in statements to applications for accreditation. The follow-up processes of quality assurance could be improved if the ACCR had a mechanism for regular verification whether all requested follow-up reports had been received to their deadlines and of notification of HEIs that their follow-up reports had not been received.

Assessment of applications for accreditation and evaluation of HEIs both rest on the standards of the ACCR (standard 2.5) that contain clear conditions for the minimum quality of educational activities. The procedures are, however, not limited to flat verification of compliance and non-compliance with the conditions; assessors and evaluators conduct their own rational expert consideration even if the minimum conditions are met. Doing so, they take into account the specific context of the HEI or the study programme. The standards of the ACCR as well as the methodical guidelines for assessors and for evaluators are published on the ACCR website. Although in some cases appeals against the statements of the ACCR express doubt about consistent application of standards or assessment practice, the ACCR is mindful to proceed similarly in similar cases. The decision-making bodies in the administrative proceedings according to the Rules of Administrative Procedure have never concluded otherwise. In the cases when it would be appropriate to pay greater attention to consistency of statements, the issue is not unequal treatment of HEIs or varied interpretation of standards towards different applicants.

External quality assurance is, in line with the ESG, carried out on the basis of peer-review (standard 2.4). Assessment of applications for accreditation on the level of working groups as well as evaluation of HEIs are conducted in working groups composed of recognized experts in the given fields, mainly from among academic staff, students and professional experts. Efforts are made to continuously expand the involvement of students and professional experts in working groups. It is also necessary to continue to search for opportunities for further cooperation and to take advantage of them.

Final evaluation reports of the ACCR have a set structure in compliance with the ESG and carry value for both the evaluated HEI and the public (standard 2.6). They always start with an introduction about the formal arrangements of the evaluation, proceed with the substantive part and end with conclusions, statements on accreditation and sanctions if relevant, recommendations and follow-up measures. The ACCR considers it to be good practice that the HEI can always point out factual errors in the draft report and state its own views on the evaluation and its conclusions in discussion with the ACCR. Representatives of the evaluated HEI are always invited to discussion of the evaluation in line with the Statute of the ACCR.

The mechanism of appeal against a statement of the ACCR or other formal outcomes of external quality assurance processes is explicitly stated and embedded in the legislative framework (standard 2.7). It involves most importantly the opportunity to respond to a negative statement of the ACCR and to file remonstrance and lawsuit against a decision of the ministry (see description of the proceedings above). On the contrary, the mechanism of complaint against the procedures of the ACCR is not separately designed. If HEIs file complaints, they usually do so as a part of their appeal (response to a statement of the ACCR, remonstrance against a decision of the ministry). The ACCR addresses them in discussions of the response; the ministry deals with them in deciding on accreditation or sanctions, alternatively the minister takes them into account in deciding on remonstrance. To conclude, although the mechanism of complaint is not formally separately designed, in practice complaints are addressed on the relevant levels of administrative proceedings according to Rules of Administrative Procedure.

c. Part 3 of the ESG: The ACCR as a quality assurance agency

As regards compliance with Part 3 of the ESG, standards for quality assurance agencies, it is key that the ACCR is the legally recognized body caring for quality of higher education on the national level (standard 3.2). The role and tasks of the ACCR are embedded in the Higher Education Act and its Statute approved by the government. Its mission has been formulated in the mission statement that is publicly available on the ACCR website. In the field of external quality assurance, the ACCR issues statements on applications for accreditation and other matters and evaluates HEIs and carrying out of their accredited activities (standard 3.1).

The ACCR is independent in its decision-making and thus its members and associates also act independently (standard 3.3). The independence of the ACCR is, from the organizational point of view, grounded not only in the Higher Education Act and its Statute, but also the Memorandum of the Minister from 2010. The ACCR as a body is not subordinated to any other body. The mentioned documents guarantee also functional independence in the sense of non-interference of the ministry in the expert activities of the ACCR through material and financial provisions. The ministry does not influence the decision-making and functional mechanisms of the ACCR. It is, however, necessary to continuously monitor and evaluate if any attempts at violation of independence of the ACCR are made and to respond accordingly.

The resources that the ACCR has at its disposal for its activities are provided by the ministry (standard 3.5). In 2014, the ACCR succeeded to have the number of Secretariat staff members increase to the total of seven, which significantly contributes to fulfilling the necessary tasks related to care for quality of higher education. Further strengthening of the Secretariat would nevertheless be desirable as the number of its staff members still does not reach the numbers common in other European countries. The financial resources allocated to the ACCR enable financing of its activities to the full extent. However, they do not allow rewarding the persons involved in the ACCR for their work adequately (symbolic rewarding means that involvement in the ACCR is work in the public interest or in the interest of development of the expert fields). This applies also to expert fees for international experts and for experts that evaluate HEIs.

The Higher Education Act assigns the ACCR with the task to publish results of evaluation of HEIs. The ACCR publishes all evaluation reports and also minutes from its meetings where statements to applications for accreditation and other

discussed matters are issued. All documents are available on the ACCR website, disseminating findings from external quality assurance to the public (standard 3.4). Representatives of the ACCR also applied the findings in discussions about the preparation of the amendment of the Higher Education Act and related legislation that have been taking place since 2014. One of opportunities to present experience and outputs from external quality assurance in higher education will be a workshop planned for June 2016 that should evaluate the activities of the ACCR to date and stress the current problems in quality assurance of higher education.

A significant element for quality assurance agencies is design of internal quality assurance mechanisms (standard 3.6). Same as they are a requirement placed on HEIs, quality assurance agencies must apply these mechanisms in their own operation. The ACCR carries out regular internal evaluation aimed at evaluation of steps taken towards compliance with the ESG and recommendations from external review on the one hand, and more detailed analysis and monitoring of issues of particular interest to the ACCR in its specific context on the other. Mechanisms of internal quality assurance are embedded in the methodology of internal quality assurance of the ACCR that enhances transparency and accountability of the ACCR. With respect to the ESG related to internal quality assurance, additional means to obtain feedback and impetus for improvement could be explored.

4. Conclusions

Internal quality assurance of the ACCR for 2015 took account of the current external review and recommendations from the previous external review as well as the need to comply with the revised ESG. Compliance with the revised ESG will be subject of assessment by the current external review. This internal evaluation thus serves as a basis for the self-assessment report of the ACCR addressed to the international review panel.

Since the last external review in 2010, the ACCR has continuously made effort to improve and make progress in the areas identified by the expert panel. In some areas change was not possible as it would require legislative change or as it depends on decisions of other bodies, such as the issue of the position of the ACCR Secretariat and financing of the ACCR. In other areas, in contrast, the ACCR has made significant progress or improvement, most prominently in standardization of documents supporting the expert activities of the ACCR, involvement in conceptual discussions with other parties, modernization of technical resources etc. Measures adopted to fulfil the recommendations of the review panel are continuous and translate into the activities of the ACCR gradually. Some can only be completed in the long term, such as legislative and systemic changes.

On the basis of the analysis of compliance with the ESG, it can be concluded that the ACCR performs its tasks in quality assurance of higher education in compliance with the ESG. Procedures are set in line with the ESG and to fit their purpose in quality assurance. At the same time however, the analysis showed that some areas deserve greater attention. These include mainly consistency of statements and regular revision of criteria and requirements made in the accreditation process. It is also imperative to continue to foster independence of the ACCR and strive to strengthen the ACCR in terms of finances as well as personnel, which has been stressed in internal evaluations of the ACCR for several years. The ACCR values involvement of professional experts and students in its activities and is interested in purposeful enforcement of mutual cooperation.

The ACCR took tangible measures to incorporate the revised ESG into its activities. Methodical Guidelines for Evaluation were adopted to ground the procedures of evaluation of HEIs and their accredited activities; they emphasize elements of Part 1 of the ESG (internal quality assurance of HEIs) as subjects of evaluation. Some of these had not received significant attention before. The ACCR also laid down the methodology of internal quality assurance of its activities that develops the concept of internal quality assurance. Furthermore, it captures how the basic elements of internal quality assurance translate into the daily activities of the ACCR. In a single document, the methodology also sets the procedures and structure of internal evaluation and clarifies its relationship with external review. The ACCR thereby codified the existing practice and incorporated the revised ESG.

5. Recommendations

On the basis of the analyses carried out in the present internal evaluation, the ACCR makes the following recommendations to improve the quality of its activities.

In assessment of applications for accreditations and evaluation of HEIs:

- 1) Pay increased attention to consistency of statements. Address all deficiencies mentioned in the original statement in the subsequent statement to a response of the HEI. Make all remarks and point to all deficiencies (if they are known from the available documents) already in the first negative statement. When deficiencies are found in a study programme during discussion of extension of existing accreditation, always compare it with the state of affairs at the time of last (re)accreditation.
- 2) Carefully choose the wording of statements with effort to utmost precision and unambiguity in order to provide the HEIs with clear clues to what needs to be qualitatively changed and what information needs to be added. This is to prevent incorrect interpretation of the requirements of the ACCR. Continue the effort and conceptual work aimed at deeper acquaintance of assessors with the standards of the ACCR and their application.
- 3) Regularly revise the standards of the ACCR and the recommended forms for application to rule out ambiguous expressions and to ensure they correspond with assessment practice and needs. Table the revised standards to the earliest possible meeting of the ACCR for discussion and approval.
- 4) Set and apply a firm requirement that HEIs submit updated study plans and valid professional CVs of new teaching staff when they introduce changes to the study plan and teaching staff in their responses to the statements of the ACCR.
- 5) Set a mechanism of verification whether requested follow-up reports were received and of notification of HEIs in case of missing follow-up reports.

In the activities of the ACCR:

- 6) Consider further possibilities of involving students and professional experts in the activities where their participation can make a real contribution and is viable. Regularly evaluate the effectiveness of mutual communication with the representations of HEIs and seek their feedback.

- 7) Monitor independence of the ACCR and take effective measures against potential attempts to violate it. Strive for adequate financial, material and administrative resources.
- 8) Seek and use, if possible, other means to publish general findings about quality of higher education. Continue to be actively involved in the debate about amending the Higher Education Act and related legislation and advocate for incorporation of the lessons learned from the activities of the ACCR.