

# **Annual Report of the Accreditation Commission for 2015**

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## **I. Introduction**

### **Statutory definition**

The Accreditation Commission of the Czech Republic (the ACCR) is established in accordance with Act No. 111/1998 Coll. on Higher Education Institutions and on Amendments and Supplements to Some Other Acts (the Higher Education Act). The work of the ACCR is regulated, in particular, by provisions in Part VIII of the Act. The procedures and processes of the ACCR and its working groups are regulated by the ACCR's Statute that was approved by Resolution No. 744 of 28 July 2004 of the government of the Czech Republic.

According to Article 4 of the ACCR's Statute the ACCR is obliged to publish an annual report each year. The report contains the results of assessments, an overview of the ACCR's standpoints and the conclusions adopted.

### **The ACCR's mission**

In compliance with the Higher Education Act the ACCR fosters the quality of higher education and ensures a comprehensive evaluation of the scholarly, scientific, research, development, artistic and other innovative activities of higher education institutions (HEIs). To this end it issues statements on applications for the accreditation of study programmes and the fields of study within which proceedings for appointing associate professors ("habilitation") and full professors are carried out. Furthermore, the ACCR assesses the activities of HEIs and the quality of accredited activities and subsequently publishes the results of these assessments. The ACCR delivers its opinions on the establishment, merger, breaking up or closure of faculties of public higher education institutions, on the granting of state approval to legal entities wishing to operate as private higher education institutions, and on determining the type of higher education institution. Last but not least, the ACCR adopts positions on matters concerning higher education referred to it by the Minister of Education, Youth and Sports.

## **II. The ACCR, standing working groups and the Secretariat**

### **The ACCR's composition**

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

As of 1 May 2015, prof. MUDr. Josef Fusek, DrSc., resigned from this office as member of the ACCR. Prof. Ing. Zdeněk Vintr, CSc., was appointed member of the ACCR as of 1 September 2015.

In 2015 the composition of the ACCR was as follows:

Chair:

**prof. PhDr. Vladimíra Dvořáková, CSc.;** Faculty of International Relations,  
University of Economics in Prague

Vice-chair:

**prof. Ing. Jan Roda, CSc.;** Faculty of Chemical Technology, Institute of Chemical Technology Prague

Members:

**prof. Ing. Josef Arlt, CSc.;** Faculty of Informatics and Statistics, University of Economics in Prague

**prof. MUDr. Josef Fusek, DrSc.;** Faculty of Military Health Sciences, University of Defence Brno (until 1 May 2015)

**prof. Ing. Zdeněk Vintr, CSc., dr.h.c.;** Faculty of Military Technology, University of Defence (from 1 September 2015)

**prof. PhDr. Jana Geršlová, CSc.;** Faculty of Economics, VŠB-Technical University Ostrava

**prof. Dr. MA Ing. Július Horváth, Ph.D.;** Central European University in Budapest, Hungary

**prof. RNDr. Pavel Höschl, DrSc.;** Faculty of Mathematics and Physics, Charles University in Prague

**doc. Mgr. Ing. Karel Chadt, CSc.;** The Institute of Hospitality Management in Prague

**prof. PhDr. Petr Kyloušek, CSc.;** Faculty of Arts, Masaryk University Brno

**prof. JUDr. Hana Marková, CSc.;** Faculty of Law, Charles University in Prague

**doc. Françoise Mayer, Ph.D.;** Université Paul-Valéry Montpellier III (France)

**prof. PhDr. Svatava Raková, CSc.;** Institute of History, Academy of Sciences

**prof. Ing. Jaroslav Petr, DrSc.;** Institute of Animal Science, Academy of Sciences

**prof. Ing. Jindřich Petruška, CSc.;** Faculty of Mechanical Engineering, Brno University of Technology

**prof. Ctirad Pospíšil, Th.D.;** Sts. Cyril and Methodius Faculty of Theology, Palacký University Olomouc

**prof. RNDr. František Sehnal, CSc.;** Biology Center, Academy of Sciences

**prof. PhDr. Lubomír Slavíček, CSc.;** Faculty of Arts, Masaryk University Brno

**prof. PaedDr. Iva Stuchlíková, CSc.;** Faculty of Education, University of South Bohemia in České Budějovice

**doc. MUDr. Bohuslav Svoboda, CSc.;** Third Medical Faculty, Charles University in Prague

**doc. RNDr. Jiří Tůma, DrSc.;** Faculty of Mathematics and Physics, Charles University in Prague

**prof. Ing. Ivan Uhlíř, DrSc.;** Faculty of Mechanical Engineering, Czech Technical University in Prague

## **The structure of the standing working groups**

The ACCR sets up advisory working groups that assure the necessary expert preparation before the ACCR's meetings. Their structure corresponds to the areas of activities that are subject to accreditation. These standing working groups carry out specialist work related to the assessment of applications for accreditation of degree

programmes and the fields of study within which proceedings for appointing associate professors (“habilitation”) and full professors are carried out.

In 2015 the ACCR had 22 standing working groups.

List of standing working groups:

1. Applied informatics and computer technology
2. Biology and ecology
3. Economics
4. Pharmacy
5. Philology and literary science
6. Philosophy, theology and religious sciences
7. Physics
8. Geosciences
9. History
10. Chemistry
11. Medical and health sciences
12. Mathematics and theoretical informatics
13. Health care
14. Subject didactics
15. Education, psychology and sport studies
16. Law and public administration
17. Social sciences
18. Technical sciences
19. Art sciences
20. Veterinary medicine
21. Military and security studies
22. Agriculture, forestry and food studies

### **The composition of working groups**

In 2015, 227 persons were involved in the activities of the standing working groups. The vast majority of them were representatives of HEIs. The remaining members of standing working groups were from the Academy of Sciences, other research institutions and industry.

<b>Year</b>	<b>HEIs</b>	<b>Academy of Sciences</b>	<b>Other institutions</b>	<b>International members</b>	<b>Total</b>
1999	146	21	19	9	186
2000	171	20	14	6	205

2001	171	20	15	5	205
2002	166	21	15	6	208
2003	172	21	13	6	206
2004	176	21	14	5	211
2005	177	23	15	5	220
2006	191	23	20	7	241
2007	194	23	21	6	242
2008	193	25	23	6	247
2009	200	26	22	7	254
2010	169	20	14	3	206
2011	172	22	13	3	210
2012a	173	22	14	3	212
2012b	182	19	12	4	217
2013	178	18	14	7	217
2014	177	18	15	6	216
2015	189	17	15	6	227

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

### **The operations of the ACCR's secretariat**

In accordance with the Higher Education Act the material and financial resources to cover the operation of the ACCR are provided by the Ministry of Education, Youth and Sports (MEYS). The administrative and technical support is assured by the secretariat of the ACCR, which is an organizational unit of the MEYS – a unit directly managed by the Minister. In 2015 the secretariat of the ACCR was composed of seven employees. It was headed by Jiří Smrčka, who was also the Secretary General of the ACCR.

## **III. The ACCR's activities in 2015**

### **Evaluation of higher education institutions**

In compliance with Section 84(1)(a) of the Higher Education Act the Accreditation Commission carried out a total of 6 evaluations of HEIs' activities, the activities of their units and their accredited activities in 2015 and 5 of those were completed and approved at the ACCR's meetings during 2015. The evaluations concerned faculties of public HEIs (10), HEIs of the non-university type (3), a state HEI (1) and an institute of a HEI (1).

All evaluations of HEIs and evaluations of their accredited activities were implemented in a standard manner in accordance with the ACCR's Statute. The resulting evaluation reports were discussed at the ACCR's meetings in the presence of representatives of the concerned institutions and have been made public on the ACCR's website. As in previous years, the ACCR combined institutional evaluation with issuing statements on the extension of the validity of accreditation of study programmes and

fields of study. The ACCR considers this combination of evaluation and accreditation to be very efficient and useful, as it allows for a better understanding of the overall institutional climate in which the degree programmes in the various fields are carried out and the ways in which they are interrelated. The combination of the two processes is beneficial for the HEI as it lowers the administrative burden. Moreover, it strengthens the institution's conceptual framework and accreditation is viewed from a longer-term perspective and in the context of the institution as a whole.

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

The ACCR draws attention to the great degree of internal instability of private HEIs that is caused by non-conceptual measures taken by their owners. A number of private HEIs have suffered from repeated disruptions of continuity as each new academic leadership appointed by the company management (the owner) takes on the „crisis management“ role and creates a new concept, which is often based on a new set of academic staff. Without long-term stability, however, it is impossible to build a functioning HEI with high quality study programmes.

The amendment of the Higher Education Act has fallen short from dealing with the position of private HEIs. However, stability of the private HEIs sector cannot be maintained without legislative changes that would ensure that the internal structure and operation of private HEIs come close to the rules of functioning of public HEIs.

Concerning **state HEIs**, the ACCR pointed to the risk of non-transparency caused by different obligations stipulated by the Higher Education Act in respect to submission of data to central registers. The Higher Education Act does not impose the obligation on state HEIs to submit data to the register of associate professors and professors and to the central register of students maintained by the MEYS. As a result, the academic staff of the Police Academy of the Czech Republic in Prague and the University of Defence are not registered for the purposes of assessing applications for accreditation. This disallows the ACCR to verify the provided data on academic staff and to assess this data in the context of all HEIs. Also the fact that the data in the register of students of state HEIs are not collected by the MEYS (especially in the case of the Police Academy) prevents objective oversight over due course of studies of students or graduates.

The ACCR indirectly encountered the issue of **foreign HEIs operating in the Czech Republic directly or through branches**. Higher education in foreign study programmes in the Czech Republic constitutes a grey zone and a very serious threat to the quality of higher education in the Czech Republic. The ACCR and the MEYS lack the tools to oversee these institutions and cannot guarantee quality of this education, comparability with accredited study programmes and in many cases cannot even determine whether there is fraud involving false diplomas and unrecognizable certificates (typically issued on the basis of so-called foreign accreditation granted by irrelevant or unrecognized accreditation agencies). The phenomenon of circumventing the absence of Czech accreditation through facilitating foreign programmes (branches of foreign HEIs), when a domestic subject without Czech accreditation for higher education programmes opens a foreign study programme, is also well-known. Such study programme is designed content-wise to appear as an alternative to a Czech study

programme. This is an extremely dangerous practice that shakes the entire higher education system and damages its standard. The activity of institutions facilitating this type of study constitutes a significant security and social risk for the Czech Republic. It creates a strong pressure on issuing entry visas for students of these programmes, granting of student status and recognition (nostrification) of this education including the possibility of the graduate's entry into key regulated professions.

In relation to the activities of „foreign HEIs“, the ACCR emphasized that the public is being misled by not only the providers of such education but also by misinformed media that fail to verify facts prior to publishing them. As a result, paradoxically, the media automatically label so-called foreign accreditation (or what the higher education providers present as such) as “prestigious”, although this “accreditation” does not at all need to guarantee quality or even the education being higher education.

The ACCR has vocally called on the public to make sure that the applicants thoroughly verify whether the institution provides study programmes that are a part of a higher education system of a foreign country and whether education in these study programmes can be recognized in the Czech Republic as foreign higher education.

In addition, the ACCR has warned of the degree of trustworthiness of **rankings of HEIs** (or faculties) composed by the media (including print media with country-wide coverage). Comparison of the quality of HEIs (or their parts) on the basis of several quantitative criteria tells very little about their actual quality and carrying out of study programmes. Conclusions published in the form of rankings in the print media have only marketing purposes. The public should in no way consider them a reliable indicator of quality.

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

Related to that, the ACCR pointed out the growing number of cases of fraud, in which publications in foreign journals fail to be subject to peer review (in some cases even journals listed in Scopus). These journals have a number of common characteristics: they commonly cover multiple disciplines (articles from various scientific fields are accumulated in a single journal), the time span between submission and publication of an article is very short, non-existent persons are listed as editors (fictional persons from existing renowned institutions), there can be multiple articles by one author in an issue, fictional co-authors from renowned institutions are added to increase the credibility of an article. The following list maintained by Jeffrey Beall, librarian at the University of Denver, constitutes a “black list” of journals and publishers suspect of unethical (predatory) practices. The list, although in no way complete, serves as a reference point for a number of academic and scientific institutions worldwide:

<http://scholarlyoa.com/individual-journals/> In 2015, there has been signs that these practices occur also in the Czech environment.

## **Statements on applications for accreditation**

### a) of study programmes:

In 2015 the ACCR issued a total of **1,320** statements on applications for accreditation, expansion and extension of accreditation. Of these 1,252 statements were affirmative and 68 negative.

In assessing the applications for **accreditation of Doctoral study programmes** the ACCR assessed the performance in science and research (or artistic activities) of the units applying for accreditation. It is the opinion of the ACCR that high quality Doctoral students (researchers) may only be brought up at institutions that carry out fundamental (or equivalent) research related to the field of the Doctoral study programme. It implies that the unit on behalf of which the HEI applies for accreditation must be the carrier of major Czech or international projects and grants (such as those funded by the Czech Science Foundation) in a field related to the Doctoral study programme (or the field of study if the programme is divided into fields of study). If several units jointly apply for accreditation, each unit must meet this criterion on its own (i.e. the failure of one unit to meet the requirements in terms of human resources and research cannot be compensated for by collaborating with another institution).

The number of new **Bachelor and Master study programmes** at the HEIs has not risen significantly. The ACCR has drawn attention to the fact that many conceptual documents and summaries give misleading data on the number of accredited study programmes at HEIs. The commonly given number of 8,500 fields of study (counted for each HEI and its part separately) is incorrect. The number reflects the number of items in a database maintained by the MEYS. However, the items do not equal the number of fields of study, but accredited activities – such as separately accredited full-time and combined modes of study, double terms of validity of accreditation of a study programme, accreditation of study programmes in multiple languages, accreditation of study programmes in cooperation with other legal entities etc. Moreover, a high number of study programmes are accredited only to enable completion of studies of the remaining students or they are not carried out by the HEIs despite valid accreditation. The ACCR pointed out that the real number of fields of study is much lower and does not exceed 6,000.

The number of applications for **accreditation of study programmes and fields of study taught in foreign languages** (mostly in English) continues to be high. The reason for such high number of applications may be seen in the simplified rules for submission of applications for accreditation of study programmes (fields of study) in a foreign language where the proposed study programme (field of study) is identical to one accredited in the Czech language. As the ACCR focuses primarily on the guarantees provided by the rector in assessing these applications, it is possible that some institutions apply for accreditation of study programmes in a foreign language not due to their sincere intention to carry out the study programme in a foreign language at the moment, but for reasons having to do with marketing and visual increase in the number of accredited activities. In principle the ACCR does not investigate these circumstances and issues a negative statement on the application only in exceptional cases when there is reasonable doubt about the credibility or capacity to fulfil the declared intentions.



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

A continuing trend is the increased interest of HEIs in **accreditation of traditional (unstructured) Master study programmes** (with the standard length of study 4 – 6 years). The ACCR has issued an affirmative statement on accreditation of these study programmes in some areas where structured study programmes had been carried out. A precondition for accreditation of traditional Master study programmes is a justification of their need and unambiguously demonstrated contribution in comparison with structured studies. A five-year Master study programme cannot be designed by joining together the Bachelor and Master levels and leaving out the Bachelor state exam, but has to be qualitatively different in content and reflect this difference in the graduate's profile and the composition of studies. The ACCR assesses traditional Master study programmes by criteria for accreditation of Master study programmes (a condition for accreditation is therefore also adequate research and creative activity of the HEI in the concerned study programme).

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

Another serious problem that the ACCR encountered is the practice of **circumventing the absence of Czech accreditation (or the lawfully restricted accreditation) through programmes of lifelong learning**, alternatively through provision of foreign programmes. There are cases of HEIs lacking accreditation for the concerned study programme (field of study) that open lifelong learning programmes with the same content as the study programme (field of study). If the HEI is later granted accreditation, it admits the students of the lifelong learning programme to the study programme and according to Section 60(2) of the Higher Education Act recognizes as completed the assignments and examinations necessary for due completion of studies. The ACCR strictly refuses this practice and considers the recognition of the credits received in lifelong learning programmes according to Section 60(2) of the Higher Education Act legitimate only if the credits were received when accreditation of the corresponding study programme was not restricted (in the sense of Section 85(2) of the Higher Education Act). The decision to restrict accreditation is taken in cases when severe deficiencies in carrying out of the study programme are found. If the HEI is not capable of providing quality education in an accredited study programme, there cannot be sufficient capability to carry out lifelong learning programmes in adequate quality either. In case when the HEI admits students to a lifelong learning programme when accreditation of an identical or similar study programme is restricted, the programme is qualitatively different to the one that has been accredited. It follows that if the HEI recognizes credits received in lifelong learning commenced after accreditation of a comparable study programme was restricted (in line with Section 85(2) of the Higher

Education Act) until the restriction is removed, the HEI recognizes credits received in education that is not qualitatively identical to the granted accreditation.

Another variant is the practice of opening a programme of a foreign HEI in the concerned field when the Czech HEI does not hold the accreditation for the study programme (field of study). The foreign study programme has the same in content as the original study programme (including teaching staff) that was found ineligible for accreditation. The graduates obtain foreign higher education (although at a Czech HEI in the Czech Republic), creating a precondition for its later recognition as equal to Czech higher education (the process of validation of degrees). This is an exceptionally dangerous practice that destabilizes the entire higher education system and degrades the higher education standard in the Czech Republic. HEIs and other entities that carry out foreign study programmes put increasing pressure on the state authorities to legalize foreign studies realized in the Czech Republic in terms of subsequent recognition (nostrification), acknowledgement of student status and granting of student visas to citizens from outside the EU.

The ACCR has advised the HEIs and the public that it is possible to recognize (validate) only those foreign study programmes that are a part of the higher education system of the foreign country and that are carried out as higher education programmes in compliance with the law of that country. When in doubt about applications for recognition, the HEIs should verify whether the institution that has awarded the diploma truly is a foreign HEI and whether the study programme has been realized in compliance with the law of the foreign country. The ACCR has in the past encountered the case of an entity operating in the Czech Republic that only pretended to carry out foreign higher education programmes while in fact the study programmes were not accredited in the foreign country. The ACCR has also called attention to the activities of the so-called unrecognized accreditation agencies that provide certificates of quality and accreditation of study programmes to the HEIs and other entities for a fee. These “accreditations” have no legal or factual basis. If an entity carries out study programmes on the grounds of such accreditation, these study programmes cannot be recognized as a part of higher education.

**The ACCR considers inappropriate the practice** of some foreign HEIs that offer study programmes training the graduates to carry out regulated professions in the Czech Republic, while some regulatory bodies (such as the MEYS) declare ex-ante, without knowledge of the quality of the HEI, that the graduates will be qualified to carry out these regulated professions.

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

In 2015 the ACCR issued a statement on 460 fields in which the habilitation procedure is carried out and 433 fields of proceedings for appointing full professors. The number of negative statements was reasonable with regard to the total number of applications (19) and (20), respectively. The most common reason for not granting accreditation was an insufficient number of internal associate professors and professors who have produced adequate publications in their fields.

**Statements on applications for granting state approval**

Since the Higher Education Act's coming into force (in 1999) until the end of 2015 the ACCR received a total of 170 applications from legal entities applying for state approval to operate as private HEIs. Out of the 170 applications 9 aspired to the status of university, while the rest sought the status of a non-university HEI. The ACCR recommended state approval to be granted in 57 cases.

In 2015 the ACCR assessed 4 applications for state approval, in 3 cases a recommendation for approval was given and in case of 1 application the statement was negative.

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

### **Statements on the establishment and breaking up of faculties**

In 2015 the ACCR did not assess any request from a public HEI to issue a statement on the establishment of a faculty. Since 2010 there has been a major slow-down in the expansive increase of the number of faculties. In previous years new faculties were set up mainly at the smaller universities by splitting off of pedagogical faculties.

In line with the Higher Education Act the ACCR pays no attention to the establishment of **faculties at private HEIs of the university type**. Faculties at private HEIs are not a part of institutions that the legislation pertains to and that could autonomously take part in implementing academic freedoms and be held accountable for the implementation of accredited activities. Splitting of private HEIs of the university type into faculties does not constitute an act of delegating academic freedoms but a decision of the owner as to how he or she chooses to name the organisational units of the legal entity. It would be transparent if the private HEIs did not use the term "faculty" at all, or if the legal rights and duties of faculties applied to the private HEI sector as well.

### **Statements on determining the type of a higher education institution**

In 2015 the ACCR did not issue any statements on determining the type of a HEI. In the past such statements were always tied to the ACCR's statement on applications for accreditation of a Doctoral study programme from a HEI of the non-university type. If the ACCR issued a positive statement on the accreditation of the Doctoral study programme, it simultaneously agreed to the change of type of HEI from non-university to university.

Following the significant increase in the number of applications in this area in 2007, the numbers have been more or less stable (2015 – 0, 2014 – 0, 2013 – 0, 2012 – 0, 2011 – 0, 2010 – 0, 2009 – 1 application, 2008 – 0, 2007 – 4, 2006 – 1, 2005 – 0).

### **Preparation of documents and policy papers**

The ACCR discussed the **Framework concept of pregradual education of teachers of primary and secondary schools**. The aim of the concept is not to unify the model (create a single model of a study programme) but to define the framework of requirements on pregradual training of teachers to ensure the qualification of graduates. The requirements are set to leave space for the HEIs (including faculties and departments) for further specification, continuous innovation and integrating the specificities of each faculty and region. The basic model that fits best the requirements on training of teachers is the continuous model. It can be realized both in the structured as well as un-structured study. In structured study, the focus on education needs to be included as early as in the Bachelor study programme. A consecutive model, in which the training of teachers is concentrated only in the Master level of study, leads to a reduced version of training of teachers and does not allow for the necessary continuity of studies in the specific subject to be taught. The concept respects the autonomy of HEIs in the context of the upcoming system of institutional accreditation.

The document has been subject to comments by HEIs and other stakeholders and was also discussed with representatives of the MEYS. It is expected that the MEYS will adopt the document and tie it with the career system of teachers. The ACCR considers the new concept of pregradual training of teachers to have been sufficiently discussed with stakeholders and will reflect it in assessment of applications for accreditation of study programmes / fields of study training teachers. The document has been published on the website of the ACCR.

The ACCR discussed **requirements on scientific, research, development and artistic activities related to study programmes**. In response to the recent trend of founding research centres that constitute separate parts of HEIs (institutes), the ACCR set to specify its standards to make clear that participation of faculty staff on university-wide research is in compliance with the standards of the ACCR.

The Standards for study programmes were amended by the following explanatory note: “The unit is, in the context of accreditation, understood to be the higher education institution. If the higher education institution is divided into faculties, the unit is understood to be the faculty. The employment of faculty staff at a unit with institution-wide scope, at which they carry out exclusively scientific, research, development, artistic and other innovative activities, is not considered as employment at another unit for accreditation purposes. In the context of accreditation, the total extent of the staff member’s employment at the faculty and other non-faculty scientific units of the same higher education institution is considered in these cases.”

Based on the need to codify standing practice and to incorporate the revision of the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG), the ACCR created a **methodical guideline for evaluation of HEIs** that sets the methodology grounded in the Statute of the ACCR and reflects the revised ESG. The methodical guideline includes the procedures of evaluation, methodology of evaluation

of the activities of HEIs and the recommended structure of evaluation reports. The ACCR has adopted the methodical guideline and published it on its website.

## **IV. External Cooperation in 2015**

### **The ACCR's cooperation with other institutions in the Czech Republic**

The cooperation established between the ACCR and other institutions in previous years continued to develop in 2015. Most importantly, this **cooperation concerned representations of HEIs** – the Czech Rectors Conference and the Council of Higher Education Institutions. The members of the two bodies regularly attended the ACCR's meetings and contributed their experience to discussions on issues related to the quality of higher education. The year 2015 also saw continuing cooperation with the Students' Chamber of the Council of HEIs – students took part in the work of ad-hoc working groups for evaluations. The perspectives of students on the educational activities of the institution undergoing evaluation make a major enriching contribution to the work of the ad-hoc working groups. The role of students is indispensable, particularly in the evaluation of Bachelor and Master study programmes – e.g. in discussions with students of the institution being evaluated. Their contribution lies in creating an atmosphere of trust leading to openness of the students in their accounts and also allows for comparison between the visited institutions and the home institutions of the student members of the ad-hoc working groups. The ACCR expects this cooperation to further develop in the years to come.

The ACCR also **cooperated with the MEYS**. Its representatives regularly participated in the ACCR meetings.

As concerns the assessment of applications for the accreditation of study programmes that train graduates to execute specific professions (study programmes in health care), the ACCR cooperated with the relevant state administration bodies – mainly the Ministry of Health. There is also a specific group of fields of study delivered by state HEIs (*University of Defence in Brno* and *Police Academy of the Czech Republic in Prague*) that are governed by the relevant ministries (the Ministry of Defence and the Ministry of the Interior, respectively).

The ACCR representatives participated in debates with representatives of certain **professional organizations and chambers** on study programmes leading to execution of regulated professions. For instance, the ACCR took part in expert discussion about training of infant nurses at the Ministry of Health. The aim was to consider the possibility to create a new Bachelor field of study. The representatives of the ACCR did not recommend the creation of a new field of study on the grounds of the specialization being too narrow and the employment possibilities of the graduates being too limited. On another instance, representatives of the ACCR and its working groups discussed the prepared framework concept of training of teachers with representatives of HEIs and the MEYS. The ACCR will reflect the concept in assessment of applications for accreditation of study programmes and fields of study focused on training teachers.

**International cooperation** (*ENQA, CEENQA, etc.*)

The ACCR continued its membership in major organisations that bring together accreditation agencies and other evaluation bodies in the area of higher education – at the regional level (*Central and Eastern European Network for Quality Assurance – CEENQA*) and the European level (*European Association for Quality Assurance in Higher Education*, or ENQA).

On 16 – 17 April 2015, the Members' Forum of ENQA took place in Cordoba (Spain). It was attended by representatives of the ACCR. The discussed topics included internationalization of European quality assurance agencies and involvement of stakeholders in their activities. Furthermore, the revision of the external review process was discussed in consequence of the revision of the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*, which was subsequently approved in May 2015 in Yerevan. The external review of the ACCR initiated in late 2015 is conducted in line with the revised procedures and regulations.

The General Assembly of CEENQA was held on 22 – 23 May 2015 in Ljubljana (Slovenia) and attended by a representative of the ACCR. The general assembly elected Board members including its President and a staff member of the secretariat of the ACCR was among those elected to the Board. The workshops dealt with the impact of quality assurance on quality of higher education from the point of view of representatives of HEIs, students, employers and the relevant ENQA working group.

In June 2015, the representatives of the ACCR held a meeting with the representatives of **the Slovak Accreditation Commission** in Bratislava (Slovakia). They discussed the upcoming changes in legislation, quality assurance of branches of HEIs carrying out activities in the other state, compliance with the revised ESG, preparation of external review of both Commissions and involvement in international associations.

The Chair and Secretary-General of the ACCR participated in the General Assembly of ENQA on 22 – 23 October 2015 in Dublin (Ireland). The lectures and workshops revolved around working with the revised ESG and quality assurance of transnational education. Elections to the Board of ENQA were held at the General Assembly.

A member of the ACCR continued to act as a member of the Appeals Committee of the Agency for Quality Assurance and Accreditation Austria (AQ Austria) in 2015. The Committee has three members and is tasked to deal with the objections of educational institutions against procedures and certification decisions of AQA.

A member of the ACCR participated in evaluations of faculties with study programmes in chemistry in Croatia as a foreign expert. The evaluations were conducted by the Croatian Agency for Science and Higher Education (ASHE).

### **Compliance with international criteria (ENQA)**

In 2015 the ACCR continued to pay great attention to the fulfilment of the requirements tied to membership in ENQA, especially those stipulated in the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. The ACCR continued to improve compliance of its activities with the ESG revised in May 2015 and places emphasis on monitoring of outcomes and processes of internal evaluation of quality of HEIs and continuous discussion and revision of its standards. Great effort was made to incorporate the revised ESG into evaluation of HEIs and their

accredited activities and involvement of professionals and employers in its activities, mainly in evaluation. The ACCR carried out regular internal evaluation in line with the ESG in 2015.

The ACCR continued to strive for compliance with the recommendations made by the international expert panel in its external review report of 2010. The ACCR concentrated, among other issues, on measures ensuring faster and more effective assessment of applications and greater support of standing working groups by the secretariat. Furthermore, the ACCR set a methodology for evaluation of HEIs and their accredited activities, a code of ethics and methodology of internal quality assurance. The ACCR continued to be active internationally. In 2015, the ACCR participated in international conferences on quality assurance of higher education and maintained cooperation with the Slovak Accreditation Commission. Over the course of the year, the functionalities of the software for administration of applications for accreditation at the secretariat improved and expanded.

Fulfilling the standard of the agency's independence is another specific issue, especially with regards to the fact that the secretariat of the ACCR is a part of the organizational structure of the MEYS. Moreover, the ACCR's budget constitutes a part of the Ministry's budget. The detachment of the ACCR's secretariat into a self-standing unit of the Ministry in June 2011 contributed to an increase in the ACCR's independence, as the administrative apparatus of the ACCR as an independent expert body formally separated from the administration of the department that has discretion over the appeals and sanction procedures. Nevertheless, it would be desirable to further strengthen the autonomy and independence of the ACCR's secretariat in matters such as its internal regulations, financial planning and personnel.

## **V. Evaluation of the ACCR**

### **The ACCR's internal and external evaluation systems**

The *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG) identified periodic review of accreditation agencies (so-called "peer review") as a crucial part of the quality assurance process. Evaluation must be conducted in two ways – as external review and as internal evaluation. The purpose of internal evaluation lies in the effect that the accreditation agency creates its own internal mechanisms to monitor and evaluate the quality of its activities. Internal evaluation should also serve as a basis for the external review. Therefore, a complex self-assessment report should be written at least every five years and it becomes subject to evaluation by an independent panel for external review. Internal evaluation must, however, be carried out more frequently in order to perform regular analysis of the current problems and the measures adopted to respond to the recommendations made in the previous external review report.

### **Implementation of the ACCR's internal evaluation process**

The ACCR has carried out internal evaluation in line with the ESG since 2007 and focused on the reflection of deficiencies and recommendations set in previous internal evaluations. The ACCR has several times conducted survey research among its members and co-workers to get feedback on its strengths and weaknesses. Since 2010, when the

ACCR underwent external review by ENQA, the internal evaluation has paid great attention to the recommendations of the expert panel.

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

In light of the upcoming external review, the internal evaluation in 2014 analysed the involvement of stakeholders and its strengths and weaknesses in various aspects of its activities. The ACCR defined groups of stakeholders and other partners and evaluated how they participate in the fulfilment of the ACCR's role and what direction the cooperation could take in the future.

In 2015, internal evaluation served as a framework for the creation of the self-assessment report that the ACCR prepared for the purposes of the ENQA external review. Internal evaluation reflected the revision of the ESG adopted in 2015 as the external review is to assess compliance of the ACCR with the revised ESG. Internal evaluation in 2015 was closely tied to previous internal evaluation and addressed continuous progress towards fulfilling the recommendations of the evaluation panel of 2010. Moreover, incorporation of the revised ESG into the activities of the ACCR, showing where the ESG had already been reflected and where it needed to be further incorporated. Internal evaluation involved also analysis of appeals from HEIs against the statements of the ACCR as a form of feedback on the quality assurance activities of the ACCR. Conclusions and recommendations were drawn from these analyses.

The internal evaluation report for 2015 was adopted at the ACCR meeting no. 1/2016 and published on its website.

## **Implementation of external review of the ACCR**

The ACCR underwent external review in 2009-2010. The international peer review panel assessed its compliance with the ESG. As a result, the ACCR gained full-member status in ENQA for five years. The ENQA Board requested a follow-up report about the measures adopted in response to the review two years after the completion of the review. In June 2012 the ACCR submitted a follow-up report that responded to 16 recommendations made in the final report of the external review and informed about the measures taken towards compliance.

Another external review that would enable renewal of membership of the ACCR in ENQA was scheduled to take place over the years 2014 a 2015. However, ENQA adopted transitional arrangements in relation to the revision of the ESG and temporarily extended membership of the ACCR in order for external review to take place under the revised ESG. The review was initiated in 2015 and will be carried out over the course of 2016.

The ACCR completed a complex self-assessment report in 2015 that will serve as the basis for the independent international panel. As it is already a second review of the ACCR, the focus will be on fulfilling recommendations and progress since the first review



in 2010. The self-assessment process was tied to periodic internal evaluation and used internal evaluation reports as a starting point for the self-assessment report. As a part of the self-assessment process, the ACCR analysed its activities in depth in terms of compliance with the revised ESG and obtained additional feedback on its activities and cooperation with stakeholders.