Implementation
of Standards and Guidelines
for Quality Assurance in Higher Education
of Central and East-European Countries -
Agenda Ahead
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Studies on Higher Education

Implementation of the Standards and Guidelines for Quality Assurance in Higher Education in the Central and East-European Countries – Agenda Ahead

by

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PREFACE

“Quality assurance” must be part of a long term policy

There is no doubt that it is a timely publication. Its topic – quality assurance – is one of the key issues in contemporary policy debates at the international, European, national and institutional level. This multi-level concern is reflected in the structure of this volume different chapters analysing various conceptual considerations, historical developments, institutions responsible for quality assurance as well as organizational arrangements, academic and bureaucratic concerns and practical arrangements at Central and Eastern Europe level (see the first three chapters as well as the concluding one), followed by “national case studies” including Latvia, Hungary, Poland, Slovak Republic and Czech Republic; and finally supplemented by two chapters presenting the “institutional perspective”, i.e. that of the University of Western Bohemia in the Czech Republic.

It is self-evident that as this publication’s geographical remit is Central and Eastern Europe, the “quality assurance agenda” is reflected upon in the context of major changes which took place in that region since the early 1990s. The analysis presented had to take into consideration the consequences of departure from the previous conceptual and administrative model of higher education, a model in which a genuine concern for “academic quality” was not altogether absent but it was woven into a complex mix of ideology, party politics and bureaucratic procedures. In addition, the “departure reforms” had to deal with the “educational boom”, spectacularly illustrated by the dramatic increase in student enrolments in higher education. The sector was one of the exponents of opportunity which emerged at the beginning of the 1990s, when the countries and their societies of this region were finally given an opportunity to depart from the political and ideological shackles of the past. The boom has also provided a fertile ground for the emergence of private higher education with a whole range of local and foreign institutions and programmes. The means and ways of establishing such institutions and programmes were plentiful and yet, as in many other domains, the lack of regulatory mechanisms and experience with regard to financial and academic matters, required courage, ingenuity, determination and not least, luck. It has not been a “smooth journey” as some have disappeared as quickly as they appeared in the sector, but a substantial number has continued to function and some of them even managed to grow in academic status and labour market relevance and become an integral part of the system of higher education. No less important was the accompanying diversification of educational offers coming from the public higher education institutions also keen on taking advantage of and responding to an enormous demand for studies in higher education.

The above briefly sketched historical background of the major challenges for higher education in the region explains why the “quality agenda” and principal concern of those in charge of governance at the system as well as institutional level was, and still is,
the introduction and operationalization of one particular aspect of quality: accreditation. A prevailing number of contributions and practically all “national case studies” provide a detailed analysis of the way how accreditation was introduced and how it now functions in the respective jurisdiction. It is an important record, and an interesting one, as it shows some “small print” of the accreditation legal regulations and practical arrangements, which, for example, in the case of Latvia, makes a distinction between a “registration” which means the “right to legally exist and practice” (for a particular institution) while “accreditation” is the legal recognition of degrees and qualifications within the national system, or that accreditation procedure carried out by the Polish State Accreditation Committee (PAK) is free and its operations, being an integral part of the Ministry of Higher Education and Science, are financed from the state budget. Exactitude and details with which such workings are being presented and analyzed contributes to a better understanding of the complexity of accreditation process.

It is interesting to note that in all the countries presented in this volume accreditation is a sui generis expression of the public authority control over higher education as well as assumed guarantor of the academic value of the programmes offered by higher education institutions as well as labour-market validity of the degrees awarded by accredited-institutions. As such it is no longer a copy-cat of earlier inspirations of the US approach which is based on a soft formal policy measures with regard to quality assurance in which accreditation is mostly voluntary and carried out by bodies which can hardly be considered as integral part of the state or federal government. In those countries, voluntary and supplementary accreditation is exercised by national academic bodies, particularly well analyzed in the case of the Polish higher education, or by supra-national bodies such as the system developed for business education by the European Foundation for Management Development (EFMD) called EQUIS, the European Quality Improvement System.

The terms of reference of the research project which is at the origin of this set of contributions presented in this volume also required taking into consideration the degree of implementation of the Standards and Guidelines for Quality Assurance in the Higher Education Area (ESG), which was elaborated by ENQA, the European Association for Quality Assurance in Higher Education. It is probably the framework for the next generation of measures under the “quality assurance” agenda in higher education in Central and Eastern Europe and the way how national systems and particular institutions are going to respond to growingly stringent quality requirements in the framework of the Bologna Process as well as an increasingly competitive sui generis “educational market” to be affected by declining demographic trends and as of yet unknown consequences of a global financial and economic crisis. In this regard a creation of the European Quality Assurance Register under the overall umbrella of the Bologna Process is going to be part of the new supra-regional framework for all aspects of quality assurance.

This timely volume confirms that quality assurance in higher education is a highly complex phenomenon in which a variety of what is now referred to “stakeholders” has various interests. The improvement of quality standards must be part of a long-term policy – on the part of universities to embark on searching for “creative solutions”, and
on the part of public authorities to create regulatory frameworks and financial conditions to respond to such challenges. Searching for an appropriate balance between “regulatory interventions” and “self-steering” is what represents the potential for a better mastering of quality assurance while avoiding “assessment fatigue”. And it should always be kept in mind that the predominant responsibility for quality assurance will remain with those directly involved in higher education – teachers, researchers, students and administration staff. This publication, which UNESCO-CEPES has gladly included in its publication programme, is also demonstrating an enormous transformation on the road to normalcy and development of higher education which occurred over recent years in Central and Eastern Europe.

Jan Sadlak
Director UNESCO-CEPES

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In late autumn 2007, reflecting on the outcomes of the second European Quality Assurance Forum and on some of the chapters of the book co-edited by Stephanie Schwarz and Don F. Westerheijden, published back in 2004, I started toying with the idea of launching an enquiry into implementation of the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG) in the countries of Central and Eastern Europe. I wanted to address the subject of ESG implementation at the level of the quality assurance agencies. Given the paucity of research into what the ESG standards and guidelines mean or do not mean for higher education institutions, their implementation at institutional level also seemed to be worth investigating. Although the idea met with unanimous support from my superiors, it had to be put aside for a while due to the difficulties faced at the time by my research institution, the Centre for Higher Education Studies. Nonetheless, with some funding available in spring 2008, I was given the go-ahead by Helena Šebková, director of the Centre for Higher Education Studies, to carry the idea through.

My efforts put into producing this volume would have never met with success, however, had it not been for Agnese Rusakova and Andrejs Rauhvargers, Christina Rozsnyai, Ewa Chielecka, Jozef Jurkovič, and Helena Šebková, who kindly consented to write the country-specific case studies. In addition, to satisfy my curiosity about how higher education institutions go about the implementation of ESG, I entered into cooperation with Eva Pasáčková and Hana Rendlová from the University of West Bohemia in Pilsen. As quality enthusiasts, they undertook to contribute by case studies addressing the subject of ESG implementation from the institutional viewpoint, also with regard to policy learning from participation in supranational quality-enhancement projects.

I wish to express my sincere thanks to all of my colleagues named above. Their expert knowledge of the subject, their enthusiasm, as well as their ability to keep to the deadlines made cooperation a pleasure. I hope that they, too, found contributing to this volume an enriching experience. Obviously, this volume would hardly have reached the publication stage without support from UNESCO-CEPES, for which I am deeply grateful. Last but not least, my thanks go to Petr Pabian, research associate of the Centre for Higher Education Studies, for kindly providing me with some less generally accessible bibliographic items.

Jan KOHOUTEK
Prague, January 2009
CHAPTER 1

SETTING THE STAGE: QUALITY ASSURANCE, POLICY CHANGE, AND IMPLEMENTATION

Jan KOHOUTEK

From the perspective of a higher education researcher, it has become customary that works on quality in higher education, abundant in the new millennium (to list but few: Westerheijden, Stensaker, Rosa, 2007; Harvey, Newton, 2004, 2007; Stensaker, Harvey, 2006; Billing, 2004; Harvey, 2004a; Schwarz, Westerheijden, 2004a; Stensaker, 2003; Harvey, Askling, 2002; Rhoades, Sporn, 2002), rarely have the region of Central and Eastern Europe as the object of their scholarly attention. In their paucity, the existing accounts either date some years back (Rozsnyai, 2004a, 2003; Szanto, 2004; Temple, Billing, 2003; Van der Wende, Westerheijden, 2003) or cover the area of higher education quality assurance in Central and East-European (CEE) countries, with much emphasis on the US-accreditation context (Hendel, Lewis, 2005). For this reason, we can maintain that, with the exception of a survey of the practices of the Central and Eastern European Network of Quality Assurance Agencies in Higher Education (CEEN) (Hofmann, 2006), the collection of country case studies (Šebková, 2004; Rozsnyai, 2004b; Rauhvargers, 2004, Mockiene, 2004; Chmielecka, Dabrowski, 2004) in the volume Accreditation and Evaluation in the European Higher Education Area, edited by Schwarz and Westerheijden (2004b), remains the most up-to-date comprehensive overview of approaches, rationales and methodologies underlying higher education quality assurance in the countries of Central and Eastern Europe.

The body of research knowledge accumulated since the fall of communist regimes in Central and Eastern Europe at the very end of the 1980s has established (Tomusk, 2000; Šebková, 2002; Rozsnyai, 2004a) that, following the accountability rationale, the region’s predominant approach to assuring quality in higher education has been accreditation1 by a state-established agency2 with a corresponding set of methods to implement it at the mezzo level (institutional accreditation) and/or at the micro level (programme accreditation). In a region where, before 1989, central control of quality

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1 Preceded by state approval granting the right to exist within the system to a higher education institution, a degree programme, or a course. In this sense, state approval (also termed licensing or permission) thus works as an ex-ante accreditation mechanism, though approval, by definition, can also fall outside the accreditation-like scheme (cf. Hämäläinen et al., 2001; Schwarz, Westerheijden, 2004a).

2 Overall, accreditation awarded by private or professional bodies is of minor importance in the CEE context. For the Polish case, see Chapter 6 in this volume.
was based on bureaucratic means with state bureaucratic control mixed with overt and covert control mechanisms of the governing party’s *nomenklatura* system (Schwarz, Westerheijden, 2004a), and where the high quality of higher education was simply declared and announced (Šebková, 2004), and where thus the question of comparability of standards with other institutions, let alone foreign institutions, hardly arose (Ryan, 1993), the post-1989 turn to US-inspired accreditation signified an important change in the domain of quality assurance policy, which was being reformed at that time. As Brennan and Shah point out, “changes in approaches to quality in higher education are intimately bound up with much wider changes being experienced by higher education, both internally and in its relations to society” (2001). It can also be argued that such a change in approach to quality assurance policy owes much to what can be termed policy legacy and the actors’ learning process as two interrelated phenomena inducing policy change (Capano, 1996). In Capano’s words:

“the course and features (nature, intensity, modality) of changes in higher education policies are the result of power relations, of interest articulation and of policy beliefs by the actors involved. These, on both an individual and a collective level, interact in a public policy arena which is strongly influenced by past decisions and by the institutionalised organizational and cultural features of the sector (policy legacy), as well as by learning processes that may develop within the policy sector, thus contributing to the change of the belief system shared by decision-making actors and, therefore, to a reshaping of their interests (1996).”

The study of policy change can be subject to various conceptual frameworks. Within the confines of public policy, the Advocacy Coalition Framework (Sabatier, Jenkins-Smith, 1988, 1993, 1999), explaining policy change not as a simple result of the organizational affiliations of competing actors taken as given (e.g., legislators vs. administrators), but rather by means of policy-oriented learning within and between advocacy coalitions – i.e. actors from a variety of institutional settings sharing a particular set of policy beliefs – represents probably the most accomplished effort at conceptualising policy change. The study of policy change in the area of higher education makes use of typologies by Silvestre, Hall (Musselin, 2005) and by Becher and Kogan (1980, 1992), who identified four levels of change, i.e. changes to the system as a whole, changes at the institutional level, changes affecting the basic unit, and innovation and the individual (for empirical testing see Meek et al., 1991). As Musselin points out, Becher and Kogan “thus clearly defend the idea that change may refer to different processes at each level and that transformation at one level does not automatically imply transformation at another” (2005). Bringing forward the reduction of Becher and Kogan’s typology by one level (the individual level), Capano reflects on the choice of a

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3 For application of the Advocacy Coalition Framework to Mozambican higher education, see Beverwijk, 2005.
unit of analysis as follows: “a choice of the … level must be made on which the analysis of policy-change mechanisms in higher education policies can be placed. The analysis of comparative literature brings forward the relevance of the central level … That is to say, both lower levels seem to be ancillary inasmuch as they need material and immaterial resources made available by the policy-making process taking place on the highest level” (1996). In a similar vein, one might argue that, given the increasing importance of international and global processes in which national higher education systems, institutions, and academia are, willingly or not, involved, Becher and Kogan’s typology might just as well be supplemented by the supra-national level. Nevertheless, as a point of departure, this typology is useful.

The study of policy change often proceeds diachronically in a time-span of ten years or more, being divisible into shorter periods in which change in a given policy domain can be studied more thoroughly. Although such an approach is, to a greater or lesser extent, arbitrary, it has its advantages especially in the field of comparative studies. With regard to the CEE countries, Scott (2002, 2007) distinguishes three periods in which post-1989 reform changes within national higher education systems proceeded.

The period of breaking away from communist-like practices comes first. It comprised the following main characteristics of system-level educational change:

— de-politicisation of education, namely the end of rigid ideological control and orientation of the system (of compulsory and omnipresent courses on Marxism-Leninism, of prohibition of subjects and teaching not deemed compatible with the prevailing political ideology);

— the breaking down of the state monopoly in education by allowing private and denominational schools to be established;

— recognition of the right of [students] (or their parents) to choose their own education path according to their abilities and interests;

— decentralisation of the management and administration of the education system, including devolution to schools and to local and/or regional authorities of a number of decision-making powers previously reserved exclusively for the centre (Cerych, 1997; cf. Cerych, 1995).

Bringing the institutional level in focus, Westerheijden and Sorensen argue that the demise of communism in Central and Eastern Europe left hundreds of higher education institutions of the region with the challenge to:

— change their governance and management structures to more democratic ones that would allow more autonomous behaviour;

— change their curricula to match the transformation from the socialist economies to market economies;

— change their mission from mainly teaching-oriented to incorporate research; and
— compete with a new sector of private higher education institutions of varying kinds (1999).

The ongoing somewhat limited generalisation of these policy change characteristics — e.g. private higher education was not allowed in the Czech Republic and in the Slovak Republic throughout the early and mid 1990s — affects our assessment of the impact of policy change. Cerych (1997) stresses that these changes, being very radical, imply a real revolution with long-term consequences, however imperfect their implementation may have been. Scott, on the other hand, takes a more nuanced approach, attributing them to two imperatives: a desire to disengage the academic system from very tight association with, and subordination to, the economic system of the communist period, and a desire to liberalize academic structures as part of a wider liberalization of political structures, to the greatest possible extent, as evidenced by the conclusion of a so-called Transatlantic Dialogue in the early 1990s, stating that, “[a]utonomy is the first of many steps needed to restore the university in Central and Eastern Europe to its former vitality” (2002). Making a link between post-1989 higher education developments in the CEE and Western countries, Neave (2003a) sees the nature of policy change of the former as a transition challenged by simultaneity. Elaborating further on this point, Neave maintains:

Not only were [the CEE countries] faced with those aspects of transition with which Western Europe was struggling — funding, academic output, and efficiency. There were others both specific and additional to their particular circumstances. Amongst the latter, the tidal wave of student demand unleashed from the shackles of manpower planning, the restoration of academic self-governance, and the non-negotiable restoration of the freedoms basic to the academic community ... These pressed in upon governments, ministries, and academia at one and the same time, rendering both the setting of priorities and the negotiation of change more than ordinarily delicate and fraught ... Those directly involved in the events of the late Autumn of 1989 and throughout the following year, tend naturally to underline the radical nature of change. They point to the dissolution of the supremacy of Party over State, to the regaining of sovereignty (Jablecka, 1998), and to the triumph of civil society over a Nomenklatura whose time was quickly and suddenly up. Outside observers, however, often stress the degree of continuity beneath the apparent watershed (2003a).

With the degree of radicalism associated with the nature of policy change being a matter of normative beliefs, with the divide between the West and the East playing a role (although this is clearly not Cerych's case — for his testimony, see Cerych, 2002), taking account of the policy legacy phenomenon, it seems unlikely that the reforms in the CEE countries in the early 1990s can be presented as a total dissociation with the ways higher education in the region had been run in the preceding forty years, as “even in the Stalinist period, communism was never able either to completely suppress the
ideal and operation of an autonomous civil society, nor to exclude external influences entirely” (Scott, 2002). As Jář Jab (ibid.) points out:

In the sweeping political rejections of the former regime, its ugly and dehumanizing objectives were taken as results truly and generally achieved. But fortunately, they had in fact never accomplished their goals to the extent they might have thought. Due to inefficient bureaucracy and the rather lukewarm attitudes of many people working within the system, especially after 1968, the totalitarian educational project could not and did not fully succeed. It is also worth remembering and reminding ourselves and our Western colleagues that good teaching did not completely disappear from our schools with the introduction of communist ideology (p. 142).

The limits of the radicalism of higher education policy change in the CEE countries made themselves felt in the years 1992-1993, which, to Scott, mark the beginning of the second period of policy change.

This second period of the mid 1990s can be characterized by a retreat from calls for total disengagement of institutional governance from the authority of the state, leading toward legally unrestricted autonomy of higher education institutions and their units (faculties), largely due to limitations of the resource base. With the sudden and rapid increase in student demand far outstripping institutional capacities, facing the often significant economic difficulties in the wake of the changeover to a market economy (typically a slump in the country’s GDP and rising inflation⁴), the CEE state authorities found it somewhere between hard and impossible to allocate sufficient financial resources to meet the requirements of the public higher education sector. The under-funding of the public higher education sector and the limitations it imposed on student enrolments could be, to some extent, mitigated by replacing line-item funding by formula-based funding schemes to boost efficiency, and by passing legal measures to allow the operation of private providers, as in Poland, where seventy-five non-state higher education institutions were operating in 1995 (Kaiser, Wach, 2003). However, this latter option was not always open⁵. Although such economic limitations were in play, some CEE countries did succeed in increasing the overall capacity of their higher education systems to a significant extent, with total enrolments almost doubling between 1990-1995 in Poland (from 385,000 to 770,000) and in Hungary (from 108,376 to 195,586) (Kaiser, Wach, 2003; Csepes, Kaiser, Varga, 2003). However, the rising student enrolments, along with diversification of institutions and programmes in the mid

⁴ As Koucký (1995) notes, in 1991, the GDP of the Czech and Slovak Federal Republic dropped by 14 percent and inflation rose by about 60 percent.

⁵ In the Czech Republic, private higher education was disallowed till 1998; for similar developments in Lithuania, see Mockiene, 2003.
1990s, gave rise to concerns about lowering the quality of higher education (cf. Hendrichová, 1993), with the result that quality assurance agencies were established and threshold quality standards were implemented. Summing up the second period, Scott remarks:

[In] the second phase of post-communist reform, from the mid-1990s onwards ... Universities retreated from what could be called the “liberal absolutism” of the years immediately after 1989, when both opponents of the former communist regimes and their passive supporters had insisted on a high degree of institutional autonomy, but for different reasons. Autonomy, initially seen largely in terms of an absence of state power, was gradually replaced by new notions of civic and market accountability. The importance of higher education in terms of economic development, as well as political and cultural renewal, was more readily acknowledged as the emphasis switched from subordination to the manpower needs of planned economies to engagement with a “knowledge society”, albeit in the context of post-communist transition. More practical attention was paid to issues of institutional governance and management. This second stage, therefore, was one of emerging pragmatism. After the first stage characterized by utopianism and dominated by political-cultural issues, which lasted in most countries until 1992 or 1993, the emphasis switched to the need to expand and diversify higher education to meet new socio-economic demands (2002).

The participation of the CEE countries in the Bologna Process from 1999 onwards marks the third period of policy change, characterised by converging policies between the CEE and West-European countries. Following the impact of the Bologna Process agendas, the CEE countries and the countries of Western Europe have found, in general terms, their higher education policy priorities rapidly converging, most typically in the degree structure and in quality assurance. In the case of the degree structure, convergence has been attained by means of implementing a three-cycle study structure, while the policies of the Bologna signatories on quality assurance have become increasingly convergent due to the prevalence of the accountability rationale, manifested in instituting accreditation-like procedures.

Reflecting on the course of higher education policy changes in the CEE countries after 1989, one finds a general pattern in their time sequence. With some degree of simplification and overlap, one might argue that the first period of policy change (1990-1993) entailed liberalisation and decentralisation of the system governance structures, though probably not to the extent alluded to by those native to the region, seconded by rising student enrolments. In the second phase (1994-1999), the higher education policies of the CEE countries were confronted with a lack of financial resources to maintain and continue (significant) widening of the system capacity, which, along with the advent of private higher education providers, gave rise to the quality-issue turn. In the third period (1999-present), higher education policies in Central and Eastern Europe have been changing in certain domains – notably in degree programme structure and quality assurance – to the extent that they need to accommodate the essentials of the Bologna Process, which, in the latter case, entails implementation of the Standards and Guidelines for Quality Assurance in the European Higher Education Area.
What does this sequencing of policy changes imply for quality assurance and policy implementation? As suggested, with the emergence of quality concern in the mid-1990s, with the notable exception, at the system level, of Poland, where the state accreditation committee was set up as late as 2002, the CEE state authorities reacted by establishing state-funded quality assurance agencies as buffer organizations between the state and the institutions of higher education. Given the mandate to regulate the potentially uncontrollable system quality in the wake of rapid system expansion, the CEE quality assurance agencies set about instituting accreditation-like measures. Such top-down policy implementation as a reaction to the reform processes aiming at policy change (cf. Cerych, Sabatier, 1986), however, made quality assurance policies in CEE countries very accountability-heavy for bottom level implementing actors (institutions of higher education). Brennan and Shah (2001) suggest that the nexus between the establishment of quality agencies and changes in higher education is complex, with quality agencies as drivers of change, while at the same time they are charged with preventing unwanted consequences of changes occurring as a result of other factors. However, in the CEE context, it can be argued that the predominantly top-down elaboration and implementation of accreditation, compliance-oriented measures, often not doing enough to promote institutional internal quality mechanisms, continues in Central and Eastern Europe to the present day. Some attention has nevertheless been given to quality improvement – the rationale typically to be found in West-European countries in the 1990s – not least due to the participation of the CEE quality assurance agencies in international structures (INQAAHE, ENQA, CEEN).

However, it would be an oversimplification to dismiss the developments in quality assurance practices in the CEE countries from 1999 onwards as merely increasing convergence with Western practices (or vice versa, for that matter). These developments merit closer attention. Since 2005, the Bologna signatories have been faced with implementing the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ENQA, 2005), as the most significant outcome of the Bologna Process quality assurance agenda to date. The Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) can be conceptualised as a supranational Bologna policy programme that includes three sets of standards accompanied by the corresponding guidelines to be taken account of and implemented into the quality practices of the quality assurance agencies and higher education institutions of the Bologna-signatory countries. Although implementation of the ESG is not, in the strict sense, mandatory, failing to implement it may have unwanted consequences, especially for national quality assurance agencies, in terms of possibly not being granted full ENQA membership and not being listed in the European Quality 6

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6 The membership regulations of the European Association for Quality Assurance in Higher Education (ENQA) require all member agencies to undergo an external review at least once every five years. External reviews are expected to include consideration of how far agencies meet the criteria for full membership of ENQA. These criteria are identical with the European Standards and Guidelines in Quality Assurance (ESG) in the European Higher Education Area, adopted by ministers in Bergen in 2005 (ENQA, Guidelines).
Assurance Register for Higher Education (EQAR). In a similar vein, given the significant changes that CEE higher education institutions underwent in the 1990s (re-building of institutional governance and curricula, re-institutionalisation of research), full implementation of the ESG for institutional quality assurance may also turn out to be a challenge for them. One might thus argue that the adoption of the ESG makes the influence of the supranational level on quality assurance agencies (system level) and, to some extent, on higher education institutions (institutional level) of the Bologna-signatory countries more distinct than ever before.

The shaping of higher education quality assurance practices in the CEE countries in the new millennium, with increasing influence of the supranational level (Bologna Process), manifest in the ESG implementation agenda, brings the following research questions into mind: what have been the developments in the policy domain of higher education quality assurance in Central and Eastern Europe, especially in terms of the accountability-improvement continuum, in the last five years, what are the major challenges of ESG implementation that CEE quality assurance agencies and institutions of higher education face, and to what extent is implementation of the ESG likely to shift the balance on the accountability-improvement continuum at system and institutional level?

The book that you are about to read aims at answering these questions. Including contributions by scholars/practicioners from Latvia, Hungary, Poland, the Slovak Republic, and the Czech Republic, the book consists of five parts. With its main thrust on quality of educational activities, the first part of the book sets the stage for the major issues to be analysed i.e. quality assurance, policy change, and implementation (Chapter 1). The second, theoretical part reviews policy developments in higher education quality assurance, namely in Central and Eastern Europe, introducing Perellon’s conceptual framework (Perellon, 2005, 2007) for inter-national policy comparison (Chapter 2), respectively, demonstrates the heuristic utility of selected public policy approaches to analysing higher education policy implementation in relation to the ESG (Chapter 3).

Based on Perellon’s framework, the third, empirical part provides an insight into the higher education quality assurance practices of the national agencies in Latvia, Hungary, Poland, the Slovak Republic, and the Czech Republic, including strategies for ESG implementation (Chapters 4-8). Following Brennan’s (1999) argument on the lack of attention paid to the institutional dimension in the body of literature on quality, and, importantly, the lack of empirical evidence on implementation of the ESG at institutional level, thus pointing to a “black box” in the sense of factual knowledge of the corresponding policy processes (cf. Palumbo, Calista, 1990), the fourth part comprises two case studies from the University of West Bohemia in Pilsen, Czech Republic (Chapters 9, 10). Following the post 1989 transformation challenges, the University of West Bohemia in Pilsen (UWB), a new public university established in 1990, had to tackle internal quality assurance issues from the beginning of its existence.

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7 As the developments up to 2003 were analysed by Schwarz and Westerheijden (2004b).
in order to set the threshold quality standards. To that end, a quality management system was set up with the risk management component aimed at reducing the danger of institutional malfunctioning. Profiling itself as modern, comprehensive regional university, the ongoing elaboration of internal quality assurance mechanisms has made UWB one of the Czech universities with the most developed institutional quality assurance. Chapter 9 details implementation of the ESG by UWB, while Chapter 10 sets the case of UWB implementation of the ESG in the context of the university’s policy, learning from participation in three projects oriented at quality improvement. The book closes with some generalisations on the role of ambiguity and conflict in CEE quality assurance policies, and a synthesis of policy development at system and institutional level, based in the case of the quality assurance agencies on applying Perellon’s framework, with special reference to the ESG implementation processes (Chapter 11). Due to the importance of the accountability rationale in CEE quality assurance practices, Chapter 11 also explains its post-1989 dynamics in reflection of state, academic, and market forces. Finally, yet importantly, it must be stressed that the viewpoints and conclusions included in this book are in no way meant to impinge on and substitute for authorised assessments of the compatibility with the ESG of the quality assurance practices of the national accreditation agencies of the CEE countries discussed here.
CHAPTER 2

QUALITY ASSURANCE IN HIGHER EDUCATION: A CONTENTIOUS YET INTRIGUING POLICY ISSUE

Jan KOHOUTEK

2.1. INTRODUCTION

The quality issue turn in CEE countries, signifying the formation of higher education quality assurance policies in view of the transition from elite higher education to mass higher education (cf. Trow, 1974), was marked by influences from outside the region. The fall of the Iron Curtain left CEE higher education open to consultancy, assistance and support by individual foreign advisors as well as supranational bodies (World Bank, OECD, European Union), which provided a “guiding hand” and much needed funding to those involved in instituting policy changes to make system reforms. As Brennan reasons, “the international influence has been as much about models and values as it has been about money” (2005). It was assumed that communist policy left behind a legacy of few if any formal centralised evaluation schemes to build upon, so that the quality assurance policy domain in transforming CEE higher education systems had to be started from scratch. Faced with a rapid expansion of system capacity (the beginnings of massification following the abolition of numeros clausus), cuts in the resource base, and institutional diversification due to the emergence of a private higher education sector, the CEE state authorities turned to western, namely US expertise, to furnish them with regulatory mechanisms appropriate to such changing conditions. This resulted in the adoption of US accreditation as a normative base for formulating and implementing system-level quality assurance policies. To what extent this accreditation-based quality assurance policy saved the CEE state authorities from Pirsing’s dilemma (1974) about what quality is or is not, and to what extent it has served the CEE countries well to the present day can, however, hardly be explained without endeavouring to trace back the developments in higher education quality assurance in the United States and Western Europe, as they point to examples of intriguing inter-regional policy borrowings and learning.

1 The term region is used interchangeably to highlight the differences of socio-economic and political nature between a set of countries (Western Europe, Central and Eastern Europe), as well as to denote further geographic distinctiveness within a large country (USA).
2.2. UNITED STATES: FOUNDING FATHERS

There can be little if any dispute that the principal, overarching approach to assuring higher education quality in the USA is that of accreditation. The historical developments in US higher education, characterized, in comparison to continental Europe, most notably by symbolic powers of the federal government, greater institutional autonomy and market sensitivity, reverberate in facets of its quality assurance policy, or rather policies, as responsibility for quality assurance is, to a greater or lesser degree, taken by the individual states (cf. Turlington, 1994). As Ewell points out:

The absence of a national system of public higher education (and its associated ministry), coupled with the presence of myriad independent colleges and universities, mean that the function of quality assurance is both decentralised and dispersed. Individual states hold responsibility for funding and governing public institutions with concommitant variations in how they define “quality” as well as their commitment and approach to determining if it is present. In parallel, responsibility for directly assuring quality for all institutions is delegated to a range of non-governmental accrediting organizations, which operate under the regulatory aegis of the federal government, but which are otherwise diverse and independent (2007).

This complexity and bewildering variety (ibid.), leading, in the late nineteenth century, to a level of chaos in the US higher education system, gave rise to a need for regulatory threshold standards. As Kells (1989) remarks, if the institutions had not addressed this increasing level of chaos, strong government intervention would probably have become unavoidable. Because of this, accreditation evolved in the US as an instrument initially to pre-empt the imposition of federal structures of accountability (Adelman, Silver. In Westerheijden, 1995). With its history spanning more than 100 years, accreditation in the United States can be defined as consisting of certification by a regional or professional accreditation body that a programme or institution has a generally recognized and appropriate set of goals and objectives that are being achieved (Gaither. In Bogue, Hall, 2003), or a process by which an institution of post-secondary education evaluates its educational activities, in whole or in part, and seeks an independent judgment to confirm that it is substantially achieving its objectives and is generally equal in quality to comparable institutions of post-secondary education (Young, Chambers, Kells et al. In Bogue, Hall, 2003). As suggested by the first definition, in the US, two types of accreditation are in existence: institutional and professional (programme) accreditation, with the former focusing on the characteristics of the institution as a whole, i.e. educational offerings, services to students, financial conditions of the institution, and the latter on accreditation of study programmes against standards of the profession associated with that field (typically medicine, nursing, law, teacher education), which often secures (easier) access to the profession for respective graduates (Schwarz, Westerheijden, 2004a), in some cases with recognition practices in place between the corresponding accreditation agencies (e.g., in legal education).
However, over time, accreditation has come to serve a wider range of purposes, which can be specified as follows:

- Sustaining and enhancing the quality in higher education particularly in terms of serving as a gatekeeper for a threshold level of quality, as a primary incentive for institutional/programme quality development, and as a provider of an exchange of expertise at regional and national fora on higher education quality;
- Maintaining the academic values of higher education;
- Being a buffer against the politicising of higher education;
- Serving public interest and need (CHEA, 2003a).

Conceptualised generally as an assessment of institution performance (college, university) or programme performance against a set of predefined minimal standards in an environment where institutions are buffeted by state priorities to increase access, improve graduation rates, and operate with less financial support (Wolff, 2005), institutional/programme accreditation proceeds along the following lines:

- The faculty, administrators, and staff of the institution or academic programme conduct a self-study using the accrediting association’s set of expectations about quality (standards, criteria) as their guide;
- A team of peers selected by the accrediting association reviews the evidence, visits the campus to interview faculty and staff, and writes a report of its assessment including a recommendation to the commission (a group of peer faculty and professionals) of the accrediting association;
- Guided by a set of expectations about quality and integrity, the accreditation organization reviews the evidence and recommendation, makes a judgment, and communicates the decision to the institution and other constituencies as appropriate (CHEA. In Bogue, Hall, 2003).
- With exceptions and some variations according to the specifics of the accreditation agency, institutions are required during the accreditation process to examine their goals, policies, procedures and achievements; to consider the expert advice, suggestions and recommendations of a visiting team, and to develop strategies for dealing with the visiting team’s recommendations. Virtually every accrediting body requires institutions to maintain programmes for continuous self-study and improvement in conjunction with the period review concept (Bogue, Hall, 2003). As Bogue and Hall (ibid.) and Rhoades and Sporn (2002) further point out, the period for which accreditation is granted ranges from five to ten years, though with a possibility for accreditation agencies to review institutions/programmes at any time for cause or when substantive change (e.g., expansion to the graduate level) has been made.

According to Ewell (2007), four major actors can be identified in shaping US quality higher education assurance policies, i.e. individual states, federal government,
accreditation agencies, media and the market. Ewell sees three reasons for the states’ involvement in assuring quality: concern about efficiencies and returns on investment of publicly subsidized colleges and universities, concern about students obtaining value for money in terms of academic rigour and employability following their often substantial state scholarship support, and concern about institutional contributions to the state’s socio-economic development in line with the public interest (2007). Given the distribution of substantial need-based support to individual students in the form of grants and guaranteed low-interest loans, the primary federal government concern about quality of higher education is to make sure that institutions obtaining federal funds via students’ grants/loans that are used to pay the cost of tuition administer these funds effectively and efficiently, and that students on federal support earn a credential of sufficient value in the labour market to be able to pay back their loans (ibid.). Execution of accreditation-related tasks is within the competence of accreditation agencies; eight regional agencies perform institutional accreditation, while forty-eight professional agencies are in charge of programme accreditation (CHEA, 2008). Given the variety of agencies’ tasks and missions, at federal level, two umbrella bodies acting in the public interest – the US Department of Education (USDoE) and the Council for Higher Education Accreditation (CHEA) – ensure that the agencies’ accreditation practices fulfil the accepted standards, with an important difference since only the recognition of the former counts to make students eligible for federal support (Schwarz, Westerheijden, 2004a).

The origins of the CHEA are not without interest. CHEA’s predecessor – the Council on Postsecondary Accreditation (COPA), established in 1975 through the merger of the National Commission on Accrediting and the Federation of Regional Accrediting Commissions of Higher Education – faced mounting dissatisfaction from heads of regional accreditation agencies throughout the 1990s. They claimed that COPA had furnished little leadership or direction on the major issues facing accrediting agencies (Leatherman. In Bogue, Hall, 2003). COPA’s reputation received a further blow with the passing of the 1992 amendment to the Higher Education Act, which stipulated the establishment of State Postsecondary Review Entities, introducing for the first time, in view of charges of fraud and abuse of federal need-based support schemes, highly prescriptive new regulations for accrediting bodies (Dill, 1997). Although the amendment was never acted upon, it produced a firestorm of protests (CHEA, 2003b), for its passage was seen as a serious threat to the principles of voluntary accreditation. The mounting criticism culminated in 1993 in the withdrawal of six regional accreditation agencies from COPA membership. As Magner points out, “faced with the loss of 40 percent of its income, the COPA board voted to dissolve the Council by the end of the year” (In Bogue, Hall, 2003). Following the proposal of the National Policy Board on Higher Education, received very favourably by US institutions of higher education as well as accreditation agencies, CHEA was established in 1996 as a private,

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2 For a more detailed discussion of reasons for the failure to implement SPREs, see El-Khawas, 2005.
non-profit organization which will serve students and their families, colleges and universities, sponsoring bodies, governments, and employers by promoting academic quality through formal recognition of higher education accrediting bodies and will coordinate and work to advance self-regulation through accreditation (CHEA, 1996). In its 2002 survey among degree-granting institutions, accrediting agencies, and national higher education organizations, CHEA’s recognition function received positive feedback, with about 60 percent of institutions responding that CHEA performed this function extremely well or very well, and with solid majorities of both accreditors and associations perceiving CHEA’s performance favourably (CHEA, 2003b).

On top of the shared responsibility of the state-federal government-agency “triad” (Ewell, 2007, cf. El-Khawas, 2005) for quality assurance, the media has stepped in, creating institutional rankings (most notably the rankings of ‘America’s Best Colleges’, issued each fall since 1983 by US News & World Report). These rankings have made the general public more knowledgeable about the educational offer available in the market. Drawing on works by McDonough et al. and by Machung, Ewell maintains, “quality in this [media] view is almost entirely about institutional reputation, which is in turn fuelled by visible institutional assets and, above all, admissions selectivity. The evidence is slim that potential students pay much attention to these rankings but the evidence is overwhelming that the rankings influence administrative choices and behaviours as institutions seek to maximise their prestige” (2007). Not mentioned by Ewell but certainly of importance in view of institutionalising accreditation policy measures and corresponding media/market influences are the US higher colleges and universities themselves.

The effectiveness and impact of institutional and programme accreditation on US institutions of higher education have varied over time, being the subject of a complex interplay of the policy beliefs of the actors involved. These can be traced back in a retrospective overview of accreditation measures. With the 1787 New York legislation as a precursor, the very first accreditation was performed by the American Osteopathic Association in 1901, followed by the American Medical Association, which developed a rating system for medical schools four years later. The first institutional accreditation came about at the end of the first decade of the twentieth century (1909-1910) by the North Central Association of Colleges and Secondary Schools. With accreditation gaining ground as an instrument for assuring the quality of institutions and professionally oriented programmes, figuring into federal governments policies from 1952 onwards, further developments were summed up in 1983 by Young et al. as follows:

The universe of accreditation has changed as the concept of higher education has changed. It began as one of the degree-granting colleges and universities

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3 For further discussion of the influence of markets on academic quality, see Zemsky (2005) and Dill (2007).

4 The formation of the six regional accrediting agencies dates between 1885 (New England) and 1924 (Western) (Wolff, 2005).
offering traditional academic programmes and serving mainly full-time students immediately upon graduation from high schools. Now it is more accurately described as postsecondary education comprising an ever-expanding variety of institutions, programmes and delivery systems involving a growing diversity of students. During the past seventy years, both the philosophy and practice have changed: from a quantitative approach to one relying more on qualitative factors ... from a heavy dependency on external review to an emphasis on self-evaluation and self-regulation. Accreditation has changed through the years as society’s expectations have changed. In retrospect, the initial expectations of accreditation seem rather mundane, for example, developing a consensus on the meaning of a high school. Accreditation began with a mixture of support and suspicion, but with little or no governmental involvement. As time has passed, and increased demands for accountability from colleges and universities have occurred ... governmental involvement has increased (In Bogue, Hall, 2003).

Since the 1980s, US quality assurance has began to change in view of a greater concern with educational outcomes through student learning, with their assessment being increasingly linked to performance indicators. As Rhoades and Sporn point out, “In the 1980s, quality issues began to be introduced and implemented in distinctive ways in US higher education. At the state level, state boards and legislatures began to emphasize and to connect assessment and accountability. At the institutional level, quality review processes began to take on new meaning and to be exercised through different mechanisms and processes in the context of strategic management efforts to refocus institutions ... throughout the 1980s and 1990s state bodies have raised the issue of and discussed student learning and programme quality measures in the context of resource allocation cycles” (2002). As suggested, this change in quality assurance measures towards output parameters (learning outcomes), in practical terms reflected in requirements to conduct relevant research and assessment laid upon institutions by regional accrediting agencies, can be ascribed to re-orientation of state policies to higher institutional accountability in the wake of criticism of institutional inefficiency due to insufficient student achievement and low graduation rates (El-Khawas, 2005). In his up-to-date analysis of the evolution of US higher education quality assurance, Ewell (2007) distinguishes four development stages characterized, in brush strokes, as follows: Pre-Quality (1965-1982), marked by expansion and efficiency; Quality I (1983-1991), bringing learning outcomes into focus; followed by a stage (1992-1999) in which performance measures rose to prominence; and the Quality II (2000-present) stage, with major changes in institutional review procedures applied by accreditation agencies and attention shifting back to teaching/learning processes and relevant outcomes.

Finally and importantly, considering the impact and effectiveness of US accreditation measures throughout history, important differences between US accreditation and its European modifications, which are the subject of policy borrowings from the US, need to be briefly sketched out. For most higher education institutions in Europe it is obligatory to obtain institutional or programme accreditation (except e.g. in the UK), with accreditation as a regulatory instrument for European
nation-state governments, where applicable (except where there is a federal state structure, e.g. in Spain, Germany). In contrast, US accreditation is a voluntary, non-governmental system with programme accreditation applied to organized professions (medicine, nursing, engineering, law, teaching). However, as Bogue and Hall (2003) admit, certain conditions and realities such as eligibility for some federal research support and student participation in federal financial aid programmes have moved US accreditation toward a quasi-governmental status. In this respect, it can be argued the category of the least accredited US institutions includes those that are not research-intensive and that are not dependent on students eligible for support and grants, i.e. the category of teaching-only low-prestige, for-profit private colleges (Schwarz, Westerheijden, 2004a).

2.3. WESTERN EUROPE: PIONEER OF EVALUATION

Quality assurance in the sense of what makes higher education higher (Westerheijden et al., 2007), understood as continuous striving to achieve academic excellence, underlie the European tradition of higher education. In it, two distinct models of quality assurance emerged; the French model of vesting control in an external authority (Cobban, 1975), and the English model of a self-governing community of scholars. The French model is an archetype of quality assurance in terms of accountability, while the English model assures quality by means of peer review (Van Vught, Westerheijden, 1993, 1994; cf. Wnuk-Lipińska, Wójcicka, 1995b). In this respect, the European tradition may also be an imprecise term, as the two fundamental approaches to higher education quality assurance developed in reflection of different traditions. The French version is part of the tradition of continental Europe, while the British version corresponds to a distinct UK tradition (Clark, 1983; cf. Westerheijden, 1995). Despite the inherent differences between the traditions, especially in terms of the extent of execution of state governing powers (e.g., Neave, 1988; Brennan, Shah, 2001), they both worked reasonably well in assuring the quality of the respective higher education systems – the continental system largely through bureaucratic ex-ante controls, and the British system through academic checks by peer review as well as professional accreditation (cf. Schwarz, Westerheijden, 2004a). This worked satisfactorily until about the beginning of the 1980s, when the pressures of massification, intensified by limitations in the resource base, led to the initiation of more pronounced government policies, with borrowings from the management cultures of business and manufacturing industry (Brennan, Shah, 2001).

Among others, Vroeijenstijn gave the following detailed reasons leading towards such a “value for money” policy change: first, since the 1950s, there has been talk of mass higher education. More and more students are enrolling in higher education, causing pressure on the national budgets. Expenditure per student is much lower. The government must assure society that it does not endanger quality. This problem has

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5 For a recent detailed account of higher education reforms in the British tradition, see Bauer, Kogan, 2006.
been aggravated by economic reasons. On behalf of society, governments have wanted a better insight into costs and benefits of higher education. Second, the relationship between higher education and society has changed in the last decades. Society has become more and more interested in higher education. The relationship between higher education and labour market has become a topic for discussion. Third, quality has become more and more important for the higher education institutions, because the question is whether it is still possible to deliver the same quality within the given boundary conditions. Since the 1950s one can talk of a “quality gap”: on the one hand, governments are striving to increase the number of students enrolled ... on the other hand, we see a continuous decrease in investments. Higher education has to do more with less money. But at the same time, quality is expected to be maintained or to improve. Fourth, student exchanges and international cooperation require insight into quality. There always has been an exchange of students between countries. However, since the introduction of programmes like ERASMUS, it has become increasingly clear that it is very important to know about the quality in the other faculty. Fifth, governments have assigned themselves a strong steering role in the development of higher education. The dominant thought was that it should be possible to develop higher education by detailed regulations. Since the 1980s, governments have abandoned the idea of the “makable society” and a new philosophy with regard to higher education has arisen (1993).

As Vroeijenstijn concludes, “therefore, in many European countries, governments are stepping back and promising more autonomy to higher education. However, in exchange, the governments require quality assurance” (1993). Such a major change in government higher education policies across Europe, embedding “steering from a distance” (Ball, 1994) i.e. lesser direct government supervision in return for greater institutional accountability, came about in the mid 1980s. In the quality assurance policy domain, the United Kingdom, France and the Netherlands as the “pioneer countries” introduced their first formal quality assurance policies around 1985, with Denmark to follow in 1992 (Van der Wende, Westerheijden, 2003; Schwarz, Westerheijden, 2004a). Such policies typically entailed the creation of a buffer agency putting evaluation methodology into operation, and reporting back to public authorities (ministries) on the results (see common elements of western QA systems).

The fact that the “quality issue” in higher education quickly emerged into the limelight of influential supranational bodies (EU, OECD-IMHE) helped to put quality assurance high on the agenda of the individual national states. After the signing of the Treaty of Maastricht, authorizing the European Community to contribute to the

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6 In the UK context, this has applied to the outcomes of government policies since the 1980s, with self-regulation overtaken by the highly prescriptive activities of first the funding agencies and later the Quality Assurance Agency (Kogan et al., 2006).

7 See the OECD-IMHE project Quality Management, Quality Assessment and the Decision-Making Process.

development of quality education\(^8\) (Article 126), the European Commission, as a reflection of its growing interest in quality of higher education – due to the capacity growth of national higher education systems as well as international developments (see EU mobility programmes) – initiated a study on the methods of quality assurance in the then member states and certain other countries, notably the United States (Van Vught, Westerheijden, 1993; Brennan, Shah, 2001). The authors of the study identified the following common elements in practically all quality assurance systems of Western Europe (Van Vught, Westerheijden, 1994):

- Managing agents at the system level, operationally more or less independent from the government;
- Self-evaluation, as the cornerstone of the evaluation methodology, in combination with:
  - Peer review (or external review), denoting that fellow academics rather than other stakeholders, or in some cases even governmental inspectors, take part in external evaluations;
  - Public reporting, for accountability reasons, of at least a summary of the evaluation results;
  - Some relationship with governmental funding decisions, although most often in an indirect and non-formulaic manner.

Conceptualised into a general, four-element\(^9\) model of quality assurance (ibid) with self-evaluation as a cornerstone of the evaluation methodology, the report’s findings helped to get the quality assurance agenda off the ground and elevate it to the highest echelons of political power. This led at supranational level to the one-off EU pilot project on programme assessment in 17 European countries\(^10\) and the pilot project of the then CRE (now EUA). This, after its pilot stage in 1993-1994, was to become the EUA’s Institutional Evaluation Programme, offered to its member institutions as an external supportive review for strategic and quality development (Van der Wende, Westerheijden, 2001), without providing a blueprint for development (Trow. In Kristoffersen et al., 1998). As Van der Wende, Westerheijden (2003) suggest, with the conditions of higher education similar all across Western Europe, as were the tendencies to mimic, the former became an important instrument in spreading the

\(^8\) Though, as Westerheijden (1999) points out, the simultaneous adoption of the subsidiarity principle immediately closed the window of opportunity for direct EU involvement.

\(^9\) The elements being a coordinating agency, institutional self-evaluation, external peer review, and reporting of the results. Originally, there was a fifth element of the model \(i.e.,\) that there should be no direct link between the outcomes of quality assurance and institutional funding (see Van Vught, Westerheijden, 1994), however, its inclusion, couched in a negative formulation, did not go down well with academia, to which the improvement function can be attributed (Brennan, Shah, 2000).

\(^10\) Involving all the then EU countries and five EFTA member states (Westerheijden, 1999).
gospel of external quality assurance. Hence, with the enthusiastic support for the quality assurance agenda by the EU, virtually all countries have followed suit, with the Commission promoting the general model by pilot assessments\(^{11}\) not just among member states, but also in CEE countries, where no accreditation agencies existed at the time of the fall of the Iron Curtain (Brennan, Shah, 2001). Exploring the applicability of the model, Brennan and Shah (1997, 2001) found variations from the model in terms of the functioning of national agencies, the level and focus of the assessments, the purposes of self-evaluations, external peer reviews, and the way of reporting. They concluded that it is most applicable to countries with medium-sized, less diverse HE sectors, and with a tradition of state regulation. Similarly, Billing (2004) argues that the general model provides a starting point from which to map deviations, and to which to relate them. In each country, there may be specific additions of elements or omissions from the model, but more usually there are modifications or extensions of elements rather than omissions. These variations are determined by practicalities, the size of the HE sector, the rigidity/flexibility of the legal expression of quality assurance and the stage of development towards the “Evaluative State” (cf. Neave, 1988).

However, all was not too well, the picture becomes less idyllic when we consider the real impact on national higher education policies in the formulation of which the states traditionally had a vested interest. From this perspective, the 1993 pilot study revealed that the member states’ sensitivities limited the potential for the EU to move ahead collectively; higher education policy appeared to be a national prerogative\(^{12}\), leaving little room in the subsidiarity philosophy for EU activity beyond the ERASMUS programme. The study could do little more than make an inventory of the current practices at that time in the Western European states (Van der Wende, Westerheijden, 2001). Nevertheless, as Van der Wende and Westerheijden further state, the interest in the experiences of other member states that surfaced in the course of this study enabled the EU to initiate the pilot project in 1994-1995. However, given the national sensitivities, comparison of quality judgments was out of the question, let alone international rankings. The pilot project succeeded mainly in the area of introducing external quality assessment to countries that had not had national systems in place before, and in comparing experiences regarding evaluation methodology. There was somewhat belated follow-up in terms of the EU recommendation to establish a supportive agency network (ENQA), which came into operation in 2000 (ibid., see also Kern, 1998).

\(^{11}\) Though, as one of its authors recently noted, the model was so general that it hid as much as it revealed about external quality assessment (Westerheijden, 2007; cf. Brennan, 1999).

\(^{12}\) This prerogative of the states had already shown itself in the Commission’s first involvement in incorporating the international dimension into higher education. The negotiations between the member states of the then EEC and the Commission in the wake of Guichard’s initiative enabled the latter to put into action the Education Action Programme in 1976, based, however, on two conditions: no notion of harmonisation of education, and implementation of the programme in the responsibility of the member states (Neave, 2003b).
Nonetheless, taking into account the sensitivities of the EU member states about higher education policy, just before the Sorbonne and Bologna Declarations shifted the whole scene, as Schwarz and Westerheijden (2004a) argue, the two 1998 inventories of quality assurance practices in Western Europe pointed to the existence of government policy on higher education quality assurance in almost all West European countries13 (cf. Frazer, 1997), with accreditation playing a marginal role at best (Westerheijden, 1999).

The initiation and further progress of the Bologna Process saw a shift in the evaluation methodology of the general QA model towards an accountability rationale, in practical terms, typically “assured” by implementing an accreditation scheme on top of already existing institutional (self) evaluations14 (see e.g. the case of the Netherlands). This lessened the sense of ownership of evaluation schemes by academe – in other words, strengthening extrinsic over intrinsic values (cf. Brennan, Shah, 2000). The reasons for such a shift in the national policies of the West European countries on higher education quality assurance towards accreditation schemes can be explained by: first, the demand for higher education institutions to be publicly accountable and trustworthy (to the state, students, and other major stakeholders) rising in prominence on the political agenda due to the effects of the New Public Management rationale; second, the demand for converging labour market and student mobility requirements due to the recognition issues related to (parts) of Bachelor’s – Master’s studies as a Bologna two-cycle study structure; third, the demand for a borderless market for higher education to keep rogue providers out and retain shares in the benefits for the accredited (Hämäläinen et al., 2001).

A year before Hämäläinen’s study, the then CRE (EUA), supported by the European Commission, launched a project *Towards Accreditation Schemes for Higher Education in Europe*, with the aim to explore the context and the feasibility of accreditation across Europe, thus contributing to the development of possible collaborative accreditation schemes at supranational level (CRE, 2001). The project’s final report listed six options: do nothing, bilateral and multilateral institutional agreements for mutual recognition including between accreditation and QA agencies, a European clearing house collecting/disseminating information on QA systems and studying their impact, a European platform to perform voluntary-based validation of existing national and professional accreditation/quality processes as well as of any bilateral or multilateral institutional agreements, option four + the ability to directly accredit on demand15, and a European accreditation agency with mandatory accrediting power (ibid.) Options one and six were deemed not acceptable. The more promising scenarios two and three, though with a shadow of doubt cast on governments’ preparedness to trust an agency not within their own legal control (Van der Wende,

13 With Germany, Italy and Greece being the most notable exceptions.

14 Obviously not considering long-existing professional accreditation in some European countries (UK, Portugal), as well as cases of institutional self-evaluations undertaken for internal accountability purposes.

15 Typically where no national accreditation scheme is in existence or if a European label is sought.
Westerrheijden, 2001), despite falling by the wayside in the run-up to the Prague Communiqué (Jeliazkova, Westerrheijden, 2002), were adopted by ENQA, the more so after the 2005 ministerial adoption of the ESG agenda (see Chapter 3) and the quality register, with the latter administered jointly by the E-4 group as of March 2008 (cf. Tremblay, Kis, 2008).

Generalizations are difficult to make in such a diverse policy arena as quality assurance in higher education, as suggested by attribution of the implementation of accreditation-based schemes mainly to system diversification by creating new regional colleges to assure open access to mass higher education, respectively, low system-level efficiency (see Schwarz and Westerrheijden, 2004a). In general terms, however, it can be reasoned that the combination of factors identified by Hämäläinen et al. factored into the adoption and implementation of accreditation across Western Europe. This took place with rapidity, scope (public/private, university/non-university, institutional/programme), and thoroughness (agency operational practices) subject to national idiosyncrasies. This finding is in line with the finding of Schwarz and Westerrheijden (2004a). Whereas in 1998 fewer than half of the European countries in our study had implemented accreditation schemes for (parts of) higher education, in 2003 all European countries, with the exception of Greece and Denmark, defined their system as having implemented some type of accreditation scheme with evaluation activities. Specifying this finding more precise in a recent publication (Westerrheijden, 2007)\(^{16}\), pointing to national specifics and, I believe, also partly to the distinction between the “first” and “second” generation of accreditation mechanisms (Westerrheijden, 2001, see further), at present, it can be reasoned that an accountability-oriented quality rationale has penetrated the European Higher Education Area and made it more uniform than ever before\(^{17}\). Greece, where the Act of 2005 does not make provisions for a formal accreditation scheme (National Report-Greece, 2005-2007), is an exception. This gives credence to the warning about pressures toward uniformity associated with the predefined criteria necessary in accreditation (Schwarz and Westerrheijden, 2004a).

Nevertheless, the role of the Bologna Process as a supranational catalyst for change can be, to some extent, problematised. As Neave maintains:

> Bologna is the logical extension of [the European programmes such as COMMETT or ERASMUS launched in the mid-1980s] and infinitely more

\(^{16}\) See the following statement: “The estimate in Schwarz and Westerrheijden that out of the 20 countries they included in their study, 18 had an accreditation scheme, overstates the issue. Their finding, more exactly, was that in 18 countries there was at least a minor accreditation scheme (taken in a theoretical sense, as it might be called differently for political or path-dependent reasons) for some part of the higher education system. Germany and Flanders/the Netherlands provided clear examples of countries where the impact was to introduce a major accreditation scheme” (p. 88).

\(^{17}\) The situation in Denmark, with accreditation of programmes at private institutions to give them access to student grants and loans (National Report-Denmark, 2005, 2007), much resembles US institutional accreditation.
ambitious. As an observer of various aspects of Europe’s higher education policy, one cannot fail to be struck by what may be called the “constructive duality” of the Bologna Process. On the political level, clearly, it has been presented as a “new start”, a new sense of adventure in the continuing pattern of system and institutional change ... But it also is firmly grounded in certain elements of continuity. In short, it draws upon various technical programmes, ACTS, ENIC-NARIC and is, to a certain extent, rooted in and builds upon medium term trends within individual national systems of higher education [such as] quality assurance, accreditation.... That is, it is built upon – and brings together – trends already present in different systems and presents them as part of the Bologna Process. It does not create them. From a political perspective, this is useful indeed. By bringing existing developments, or those moving towards the implementation stage at the national level, under the shadow of Bologna’s wing, it is possible to impart an unprecedented sense of achievement, apparent consensus and agreement, all in a miraculously short space of time. However, from the standpoint of a policy analyst, and very certainly the methodology buff, it is exceedingly difficult to draw a distinction between the lines of policy the origins of which are prior to Bologna and those which Bologna might reasonably claim to have initiated (2002).

This statement is not to deny the role of the Bologna Process in changing the higher education landscape of national states in Europe18. It is to remind us that Bologna has not been the sole catalyst, or somehow the embodiment (or, put differently, the enshrinement) of the loss of national state prerogatives. There has also been an important institutional “push-effect” of seeking – willy-nilly – market-based solutions in reaction to the failure of national funding levels to rise commensurately with massification pressures. These pressures have become increasingly international and global. Indeed, as Westerheijden notes, “there were as many Bologna declarations19 as there were countries signing” (2007).

Finally, the question remains how borrowings from the US have factored into West European quality assurance politics20. The exact pattern is hard to tap, following the analysis of Rhoades and Sporn (2002), given the US lead in coining higher education strategic management as a result of mimetic and coercive processes of isomorphism under the influence of private sector and state government practices. Nevertheless, these management practices were subject to Western policy borrowing, even if they

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18 With implications beyond the European continent for e.g., South America.

19 In this regard, it is worth stressing the non-obligatory nature of the Bologna Declaration. Huisman and Van der Wende (2004) point out that, as the Bologna Declaration does not bind the signatory countries, the respective national governments have considerable leeway either to deviate from the declaration or to achieve the objectives later than declared, with no formal penalties incurred.

20 Generally referring to the macro and micro agendas that accompany the introduction of quality monitoring procedures (Harvey, 2004b).
have been implemented through different structures. As Rhoades and Sporn point out, “multinational business was a source of mimetic isomorphism (e.g., TQM), and national government, with New Public Management, was a source of coercive isomorphism. Those were supplemented by the influence of US academics effected through professional mechanisms – normative isomorphism” (2002). As to the quality assurance policy domain, the UK and the Netherlands took the lead in “translating” quality assurance mechanisms from the US to Europe (ibid.), and the UK was also borrowed from, in policy terms, by Austria when creating its non-university sector (Pechar, 2002; Pechar, Klepp, 2004). The inference of Rhoades and Sporn is partly shared by Westerheijden. Adding France to the list of leading countries performing policy borrowing from the US, he asserts that “the Netherlands consciously borrowed from the country with longest experience in self-regulation combined with explicit attention for quality of teaching, the United States of America” (1995). Hence, the normative propositions quoted here give ground to the argument that the pioneer countries of higher education quality assurance policies – the UK, France, and the Netherlands, formed these policies by borrowing from the US – certainly in terms of managerial practices (NPM-related agenda). To what extent they borrowed from US accreditation can be a matter of dispute – given the improvement-oriented rationale of the general model, it can be conjectured that the evaluation element present in US accreditation practices may have factored into the formulation of the model-related methodology (cf. Billing, 2004). However, given the differences in polity and policy conditions, we should be cautious when assessing the extent of policy borrowing from US accreditation by Western Europe – as Billing argues, “the UK [quality assurance] model since 1992, when the CNAA was disbanded, is not one of accreditation, and for universities it never was – except for professional bodies” (2004). What is less disputable is that the three countries in question, once having introduced their quality assurance policies, became the source of a policy-related diffusion, with the elements of the general model being borrowed (and modified) by other countries (Denmark and others). So much for Western Europe. How the US quality assurance schemes have been utilised in the countries of Central and Eastern Europe is the subject of the following section.

2.4. CENTRAL AND EASTERN EUROPE: OPTING FOR ACCREDITATION

In Central and Eastern Europe, the imperative for redefining the contract between society and the state in the wake of sweeping socio-economic reforms in countries in transition from one specific vision of society into another (Neave, 2003a) also

21 With the British Council for National Academic Awards (CNAA) having the role of a policy broker. As Pechar and Klepp add, “there is some irony in the fact that the CNAA served as a kind of role model for Austria at the time when it was abolished by the British government” (2004, p. 61).

22 Though their real effects on the “inner life” of higher education institutions are difficult to ascertain and should not be overestimated. In this respect, Birnbaum’s (2000) findings on managerial fads in higher education come to mind.
manifested itself in change in the respective national higher education policies. However, as Sadlak (1995) argues, the understanding of the politics of change factoring heavily into reformulation of the higher education policies of CEE countries, also labelled as a search for the “post-communist university”, require not only knowledge of post-1989 economic and social conditions but also knowledge of the history of academic life and of higher education institutions. Summing up the post 1948 developments in higher education across the CEE region, Sadlak points out:

The ideological premises of the communist system were certainly relevant in the way that higher education was organised, but the internal political situation in the particular socialist country was equally important in the implementation of the “communist” model of higher education. Therefore, since the late 1950s, the policy towards higher education became less pragmatic ... Evidently, there was some progressive understanding with the policy-makers’ circles that there was some inherent need for a certain degree of professional autonomy ... Overall, the combination of utilitarian and ideological expectations and tasks resulted in unstable policies, particularly with regard to student admissions, graduation standards, and graduate employment regulations, while ideological dogmatism and artificially justified restrictions on the freedom of research caused considerable damage in terms of retarding development and learning (1995).

In the 1980s, despite the inherent tension (regime rhetoric vs. institutional leeway due to the specifics of the academic profession) and cracks appearing (in citizens’ belief in communist ideology), CEE higher education policies were still very centralist and restrictive, with key facets that can be summarized as follows:

− Higher education was not only a functional instrument for academic and professional training, but also a place for political formation within a dominant ideological doctrine – Marxism-Leninism;
− Student enrolment and graduate employment were linked to centrally-established manpower plans;
− The teaching and research activities of higher education institutions were part of the centrally determined plans, in which academic interests were correlated with economic interests and the ideological indications of the communist party and the state administration;
− Democratisation of access to higher education and the student aid system were carried out as a part of the ideologically determined social policy;
− The institutional structure of higher education included a separation of the major groups of disciplines while their governance was controlled and coordinated with policy objectives by the central political and state bodies;
− Academic nominations, and in some countries higher academic degrees required the final approval of central ... bodies which took into account academic as well as political criteria;
The institutional and collective autonomy of academics and students was limited and supervised by the political organization;

The international relations of academic institutions and individual scholars were closely coordinated and supervised by political as well as state bodies (Sadlak: 1995, 53-54).

Such a policy legacy – with a variety of policy borrowings from the Soviet Union, such as the separation of teaching and research as a result of establishing the academies of science, removal of faculties of theology from universities, and the establishment of independent institutes of teacher training, to name just a few – bore on the pursuit of post-1989 policy reforms of higher education systems that necessitated fundamental changes in key domains (curricula, access, funding), including quality assurance. While the curricula content could have been rid of the Marx-Communist ideological bias relatively easily (cf. Tomusk, 2000), the interdependence of the three other policy domains, also known as the funding-quality-access trinity (Jongbloed, 2003), in which funding levels affect the quality of institutional services which in turn, because of a commonly applied formula-funding scheme, affect the number of study opportunities available to potential applicants for study, called for a more complex solution. Hence, the newly formed quality assurance policies had to account for rapid system massification, diversification, and under-funding. As Brennan and Shah point out:

Expansion, by increasing costs and extending the numbers and types of people interested in higher education, draws attention to issues of quality. At the same time, it removes the prime traditional mechanisms for achieving it, namely exclusiveness. Small, elite systems of higher education could rest their claims to quality and excellence on selectivity: only the “best” were admitted as students, only the most able were allowed to teach them. The fact that at many times in many places gaining entry to higher education has as much to do with social selectivity as with educational selectivity did not matter ... An elite could justify its social and economic advantages by reference to the qualities bestowed by a university education. The qualities of that university education could be demonstrated by reference to its exclusiveness... With expansion has come diversity... [and] diversity implies choice: what kind of institution to be, what kind of programme to design, where and what to study, what sort of graduates to hire, and what kind of higher education to fund ... Expansion has made higher education more costly everywhere. And hardly anywhere have funding levels kept pace with expansion. Higher education may not always have been asked to do “more with less”, but it has been asked in recent years to do “more with not enough” (2001).

In reflection of quality assurance developments in East-European higher education, he points out, “discontinuation of previously obligatory courses of orthodox Marxist-Leninist philosophy and communist/socialist party histories may be the only wide-scale changes” (p. 181).
Despite being generally applicable, these pressures manifested in the CEE countries in a very telling fashion, not only because of the policy legacy in place but also due to factors working against it. Ryan (1994) summarizes these factors as the restoration of university autonomy, structural change in view of the emergence of private institutions as well as disciplines formerly disfavoured, the free market environment, and the need for international recognition. Not mentioned by Ryan, but also of great importance, were reforms of formerly centrally planned economies imposing limitations on transforming national higher education systems. As Hüfner pointed out, “not a single post-communist country has been able to avoid a long and deep economic recession after the event of 1989” (1995), obviously with the length and depth subject to country specifics, as e.g. Hungary and Poland24 had experimented with partial more market-oriented reforms before 1989, whereas the Czech and Slovak Republics (former Czechoslovakia) started with the most balanced macro-economic situation (ibid.).

Though eased by support from supranational bodies (EU, OECD, World Bank, Council of Europe, UNESCO), providing funding, expertise, and not least frameworks for reforms, the journey of the CEE countries towards establishing what we could nowadays call workable quality assurance systems was arduous. Judging from the outcomes of various cross-cutting initiatives in the early and mid-1990s, such as TEMPUS, the EC’s pilot project on regional cooperation in reforming higher education, and OECD reviews of national higher education policies, the search for quality assurance as a domain of reform and also a way to define and implement it (Vlăsceanu, 1993) was marked by a plethora of contradictory views on which line of policy to pursue, personal antagonism (the Party-affiliated vs. the “reformers”), and above all ambiguity, reflecting a high degree of goal conflict and multiple veto points in the legislative process (cf. Mazmanian, Sabatier, 1989). Although the available accounts of the project and other activities mentioned above never explicitly, in writing, attest to Pirsing’s (1974) famous “what the hell is quality”, how we can measure it, and what can we do about it, we are tempted to proclaim, in somewhat sarcastic phrasing, that, implicitly, this question was being asked at that time (cf. Brennan, 1994). This inference can be corroborated by the fact that, before 1989, quality of higher education was largely perceived as given. In 1989, there was no domestic expertise, and no ready-made solutions were available in the CEE region. The legislation that was introduced, often rather hurriedly – as evidenced by the passage of the Czechoslovak Higher Education Act in May 1990 (cf. Hendrichová, Šebková, 1995) and the Polish Act, which followed only four months later – was of not of much help. It provided the actors involved with little more than the granting of institutional autonomy and of academic rights, including restoration of freedom of research at the universities. Though, to many, the “little

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24 As Sorensen stated, “my colleagues in Poland in the past often proudly stated that they were not the happiest campers in the socialist camp, but probably the freest” (1995, p. 212).
more” probably meant very much at the time, the legally codified establishment of academic rights and freedoms in the higher education acts in the CEE countries in the early 1990s could not conceal the almost complete absence of fundamental legal measures pertaining to other policy areas, such as the funding-quality-access trinity. Analysing the overall pattern of legislative reforms in the CEE countries, Papadopoulos (1995) attributes it to a two-stage cycle, in which the first stage addressed the most urgent issues of transition (codification of academic freedoms), while leaving aside further policy implications to the second stage, in which the establishment of a more elaborate framework, covering all aspects of higher education development in the medium term, could take place.

As suggested, in their post-1989 reform efforts, higher education included, the CEE countries were subject to various forms of supranational assistance. The multitude of diverse activities, involving both organizations and individuals makes a comprehensive account impossible. Instead, a couple of examples pertinent to the CEE countries are given as illustrations. The rapid socio-economic and political transformation under way in the CEE countries in the early 1990s was supported by the TEMPUS (Trans-European Mobility Scheme for University Studies) programme. Starting in 1990, in response to the modernisation needs of the higher education sector in CEE countries, in sum, the major goals of the programme were:

- To promote the quality and support the development and renewal of the higher education systems in the countries of Central and Eastern Europe designated as eligible for economic aid;
- To contribute to and increase training, teaching, and learning in CEE countries with regard to those languages used in the EU;
- To encourage growing interaction and cooperation of the eligible countries with partners in the European Union through joint activities and relevant mobility (Council Decision, 1990; cf. Hüfner, 1995).

As Neave, commenting on the significance of the passage of the Higher Education Act No. 172/1990 Coll. of former Czechoslovakia, remarks, “the passing of this Act also enshrined a conscious symbolism that spread far beyond the groves of academe. Bringing freedom back to university was not simply a technical measure applied to academia alone. Its significance went further – both an earnest and a clear demonstration of freedom’s restoration to society at large” (2003a, p. 22).

As a part of the EU PHARE programme, aimed at providing aid to restructuring the economies of the CEE countries.


Strictly speaking, the description here concerns phases I and II of the TEMPUS programme, before the EU admission of 10 CEE countries in 2004, with Bulgaria and Romania accessing in 2007.
Although, as the major programme goals suggest, the project’s focus was mainly inter-institutional, TEMPUS funding in Poland also supported a pilot project to formulate the terms of reference for establishing the national higher education accreditation centre (Wnuk-Lipińska, Wójcicka, 1995a). Another supranational organization of renown – the OECD – established the Centre for Co-operation with the Economies in Transition in 1990, initiating the *Partners in Transition (PIT)* programme for all Visegrad countries (Poland, Hungary, Czech and Slovak Republics), aimed at assisting them in preparing for full OECD membership. Within this programme, the OECD review of higher education in the then Czech and Slovak Federal Republic was conducted. Undertaken between 1991-1992, it followed the general pattern of the OECD reviews of national policies, but with a sole focus on higher education. It was finalised by a report with six recommendations upholding three major policy principles: diversification, an increase in the country’s higher education funding levels, and promotion of the leading role of higher education in the country’s reform process (OECD, 1992). The report was relatively well received by the Czech and Slovak academic communities, though with some reservations on the part of the Czech Ministry of Education29 (Cerych, 2002). However, it paid only scant attention to quality assurance issues (cf. Pabian, 2007). This was much in contrast to Hungary, where, within the purview of the national education review, the examiners were strongly supportive of the newly formed Accreditation Committee, seeing its role as central to the establishment of high-quality and diversified higher education (OECD, 1995). Furthermore, following the activities of the World Bank in practically all CEE transition countries (Hüfner, 1995), Hungary was the first country to receive a loan in support of programmes which included to the development of new interdisciplinary fields of study and research and the expansion of foreign language training. The World Bank was also involved in creating the Hungarian Accreditation Committee30. The involvement of supranational bodies did not concern only Central Europe; we should also note UNESCO-CEPES participation in the restoration of higher education in Romania, and the assistance of the Danish Research Council in an assessment of scientific activities in Latvia (Tillett, 1995).

What can be made from such a rough sketch of policy activities with supranational involvement? It lends credence to the hypothesis that the overall picture of the time was full of diversity and, very probably, of ambiguity. As Woodhouse stated, “the countries of Eastern Europe, ... as having most power in the government’s hands, are changing rapidly, but not in a detectable overall pattern. Here, since the revolutions of 1989-90, everything is open to change, and changes depend somewhat on the nationality of the most recent visiting foreign adviser or consultant” (1996); with the statement upheld by

29 One of them concerning the expansion of higher education helped by system diversification, which reflected the inertia of the existing system. This inertia was very strong and difficult to overcome (Cerych, 2002).

30 Also with the involvement of the Rectors’ Conference, the College Directors’ Conference, the Chair of Art University Rectors, as well as policy makers and individual consultants (Rozsnyai, 2004b).
Brennan’s (1994) finding on the initial stage in the development of CEE quality assurance policies and procedures at system as well as institutional level, and by Tomusk’s (1995) reflection on no systematic quality assessment taking place in Estonian higher education, with the notion of quality following the traditions of the academic community. However, despite the interplay of the contentious elements (funding limitations, uncertainty of major actors, an inadequate legal framework), factoring into the politics of quality assurance in the early 1990s, by the mid-1990s, some consensus had been achieved in this policy domain. Described as a quality issue, it concerned the need to establish a regulatory mechanism of some kind due to the presumed drop in the quality of academic activities due to the swiftly rising student enrolments, and, with exceptions, the proliferation of private higher education provision. Augmented by the necessity to redesign higher education curricula, especially in the humanities and social sciences (cf. Kristoffersen et al., 1998), and the demands for cross-country recognition in view of “would-be” internationalisation (Teichler, 1999), these concerns, often voiced by senior members of academia from well-established, public institutions, gave rise to the adoption of a US-borrowed mechanism of accreditation. As Rozsnyai noted:

Quality assurance in CEE began with accreditation. There are a variety of reasons, common to most countries, which stem from the social and political context after the regime change in 1989–90. They include the need with the emergence of democracy to establish comparability with Western higher education; the need to re-evaluate curricula to rid them of politically distorted content; the urgency to modernise programme content and approach, to introduce more flexible programme structures; a steep rise in the number of private institutions in some countries (from six in 1990–91 to 221 in 2001–02 in Poland, but in Hungary only 11 by 2002–03); pressure to allow access for a large number of students to a previously élite sector; and a trade-off for the State to relinquish total control as existed prior to régime change for (partial) autonomy (a vision of ‘democracy’) (2003).

Therefore, with US accreditation serving as a policy template to learn from, accreditation became the major approach in forming the quality assurance policies of CEE countries.

The reasons for formulating accreditation-oriented quality assurance policies, instituting programme and/or institutional accreditation based on fulfilling threshold standards, can be summed up as increased autonomy of higher education institutions, expansion/diversification/control of private higher education institutions, resource constraints, and international comparability and student mobility (Temple, Billing, 2003). The task was to conceptualise and operationalize the borrowed accreditation measures for the specifics of post-1989 transformation in the CEE countries. Following

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31 See the argument of Temple and Billing (2003, p. 256) on the quick emergence of quality assurance agencies in the CEE region.
the retreat of the state from strict central control over higher education, in organizational terms the general pattern was to entrust the implementation of accreditation-oriented quality assurance policies to newly set up, non-profit, publicly funded agencies, acting as buffer bodies between state and academia. In procedural terms, accreditation has been carried out much like the sequence of stages of the general model, with the peer review element keeping potential direct state interference in the process at bay. However, the major extension in output was on a yes/no basis, and graded decisions with potentially grave implications for institutional funding in the case of accreditation were not granted. What distinguished the conceptualisation of quality assurance in higher education in CEE countries (evaluation for accreditation) from that in place in Western Europe (evaluation for improvement) in “pre-Bologna” days was the extension of the general model methodology (coordinating agency, self-evaluation, peer-review, reporting) by a summative output decision with funding implications (however, failure to grant accreditation, the ultimate measure, is generally made use of rather rarely due to the practice of granting conditional accreditation, including a “grace period”). As Kristoffersen et al. noted, “in Western Europe, evaluation agencies have generally been established, while in Central and Eastern Europe, there are often evaluation AND accreditation agencies” (1998).

With accreditation as the emerging CEE approach to quality assurance in the mid-1990s, the elaboration and fine-tuning of organizational practices and operational measures did not take place overnight, as evidenced e.g. by the twelve editions of the Hungarian accreditation guidebook between 1995-2000 (Rozsnyai, 2004a). As Šebková pointed out, “higher education systems in Central and Eastern Europe ... have been inspired by the American experience in establishing accreditation systems. As the process of developing accreditation systems in Central and Eastern European countries was quite rapid and filled with very important changes, many confusing measures and strategies were brought into existence” (2002).

Opportunities for CEE accreditation agencies to clarify and further elaborate their practices came up in 1997-1998 within the Phare Multi-Country Programme in Higher Education, with higher education quality assurance in focus32, as part of the assistance provided by the European Union to CEE countries in their preparation for accession to the European Union. With EU financial backing, the project’s activities entailed programme and institutional evaluations of higher education institutions, seminars and

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32 Apart from this project (Phare Multi-Country Programme in Higher Education: Quality Assurance in Higher Education), Phare support to CEE countries within the Multi-Country Programme in Higher Education, undertaken between 1998-2000, was also directed at open and distance learning (Strategic Study on Legislation, Accreditation, Recognition and Quality Assurance Applied to Open and Distance Learning), and quality management at institutional level (the European Dimension of Institutional Quality Management, with the Handbook on Institutional Approaches to Strategic Management as one of its outcomes) (Šebková, 2005).
training in quality assurance methodology to promote good practice, with more than 500 participants from twelve CEE countries\(^{33}\) (ETF, 1998b). The promotion and sharing of experience and good practice in quality assurance methodology was greatly facilitated by the elaboration of the *Manual of Quality Assurance Procedures and Practices* (Kristoffersen et al., 1998). Based on the assumption that despite the existence of general principles accepted worldwide, details as to their application are best left for each country and institution to decide on with respect to its specific national and academic contexts (ibid.), the Manual outlined the conceptual framework of quality (including terminology issues), and detailed the organizational procedures of evaluation, including the relevant guidelines. Another facilitating tool created within the project – *A Legislative Review and Needs Analysis of Developments in Central and Eastern Europe* – provided a comparative review of higher education quality assurance systems within national legislation in the twelve CEE countries, with the Needs Analysis specifying the measures necessary and the scope for common actions, within a multi-country context, to enhance the compatibility and sustainability of existing CEE quality assurance/accreditation systems (ETF, 1998a). Hinting at the tension between the first stage and the second stage of developing higher education legislation, with the former addressing the major deficiencies of the communist policy legacy, and the latter allowing for the elaboration of a more complex framework, the review identified the major difficulties as stemming from the lack of a coherent and comprehensive national legislative framework, well-structured data reporting systems, experience with planning and decision-making, funding, and trust of governmental bodies in higher education institutions (ibid.). Similarly, some of the findings of the Needs Analysis are very instructive and are worth quoting:

> the establishment of new systems and procedures will be secured more firmly if training is supplied. This is recognised in the project’s terms of reference. Training of institutional staff, academic and administrative, can assist both in the preparation of self-evaluations and in the preparation for external evaluations. Training is also essential for those academic staff who will perform the role of external experts in the evaluation process. There is a continuing need for training of staff in quality assurance agencies (ETF, 1998a).

The viewpoints and findings of the Manual and the Legislative Review and the Needs Analysis were reflected in the project’s final report, which lists twelve major recommendations for developing quality assurance practices. These include clarity about purposes and terms, realistic costs, external assistance and support to institutional quality management, inter-agency collaboration, agency staff training, and agency accountability (ETF, 1998b). Although the impact of the Phare quality assurance project should certainly not be overestimated, one thing is certain; at the outset of the Bologna

\(^{33}\) Albania, Bulgaria, the Czech Republic, Estonia, Hungary, Latvia, Lithuania, the Former Yugoslav Republic of Macedonia, Poland, Romania, the Slovak Republic, and Slovenia.
Process, it provided a much needed reference base for the CEE quality assurance policies that were forming. Some of its recommendations, namely on accountability of the agencies, were echoed by the supranational Bologna initiatives (ESG) that came much later.

It follows that at the time the Bologna Process got underway, the quality assurance policies in CEE countries were in a state of flux. Depending on the state of maturity towards accreditation as a gatekeeper of standards and a guarantee of accountability, the post-1999 developments, to name just a few examples, ranged from starting out with mandatory programme accreditation, as in the Czech Republic (1999) and Poland (2002), via making programme/institutional accreditation procedures more effective and efficient in Hungary (cf. Rozsnyai, 2001, 2004a), to designs for using accreditation more as external approval of the internal quality assurance procedures from 2002 onwards, as in the case of Latvia (Rauhvargers, 2004). Sharing the same principal policy approach (accreditation), inspired by cooperation in issues of quality assurance among the Baltic States since 1994, the CEE agencies responsible for quality assurance in higher education formed the Network of Central and Eastern European Quality Assurance Agencies in Higher Education (CEEN). Formally established in 2002, the network’s major goals have been to foster co-operation, exchange information, serve as a clearinghouse for CEE quality assurance issues, and assist CEE agencies in elaborating measures for harmonizing quality assurance activities within the European Higher Education Area (Campbell, Rozsnyai, 2002). The different pacing of implementation of mandatory accreditation in the CEE countries, along with the variations in methodology (see the well-known variations in the use of input-throughput-output data, the scope of site visits, publication of results), would themselves, irrespective of Western Europe, show that there was no common type of approach to accreditation in Europe (cf. Schwarz, Westerheijden, 2004a). Nevertheless, the 2000 survey among CEE agencies revealed a general trend towards stressing the importance of an improvement orientation and relying more on internal quality mechanisms in higher education institutions (Campbell, Rozsnyai, 2002). The 2003 survey found a high degree of convergence with respect to the conceptual interdependence of the evaluation and accreditation procedures, but still considerable diversity in concepts and practices (e.g.,

54 As the oldest in the region, with its establishment dating back to 1 September 1990, the developments of agency activities up to 1999 are subject to what I call the “accreditation paradox”. Despite being called the Accreditation Commission, within this period the Commission performed an external improvement-oriented evaluation of faculties in related fields of study, which earned it nationwide respect and a good name (Vinš, 2004; cf. Šebková, Svatov, 2003; Kohoutek et al., 2006).

55 The origins of CEEN are not without interest. While formally established on 19 October 2002 in Vienna, as Hofmann (2006) pointed out, CEEN had first come together on 19 November 2000 in Budapest, and dated its foundation to the meeting in Krakow, held on 13 October 2001.

56 Sent to agencies in 15 CEE countries.

57 Including 13 CEE agencies participating in 2003, with three more joining in the second stage (2004-2005) undertaken in view of modifications to ENQA regulations (Hofmann, 2006).
level of student involvement) due to differences in tradition and cultural background (Hofmann, 2006).38

What can be made of such a disparate picture? There is a plethora of quality assurance practices and measures at play, and data on them, subject to different interpretations due to notoriously problematic terminology coupled with national specifics even within the CEE region. It is therefore tempting to identify oneself with the standpoint that, because the boundaries between accreditation and evaluation practices are so blurred, it is almost impossible to say when “the same is really different” or when “different is really the same” (Schwarz, Westerheijden, 2004a)39. Apart from resorting to generalisations such as stating increasing convergence between CEE and West-European countries as a result of the increasing momentum of the accountability rationale – expressed as measuring against the pre-defined and re-defined standards – no complete picture can be drawn. Nevertheless, I believe that some Central and Eastern features can still be reconstructed. In retrospect, it can be seen, with little doubt, that in the search for a solution to the quality issue, the CEE politics of higher education quality assurance embraced US accreditation as an underlying approach – see the outcomes of the Phare Needs Analysis:

Developments in some countries show a strong influence of US models of accreditation, e.g. Hungary and Romania. In other countries, there is a clear influence by individual European countries, e.g. the Higher Education Funding Council for England has been training external experts within all three Baltic States. In all countries, developments are compatible with wider international experience insofar as they reflect a general model (ETF, 1998a).

While accreditation has been subject to policy borrowing, there have been important differences between the US policy template and its “translation” into accreditation practices in the context of post-1989 reforming CEE systems of higher education. First, unlike the US, where the central aspect in developing accreditation schemes has been to protect higher education from unwanted intrusion and regulation by public authorities (Stensaker, Harvey, 2006), CEE accreditation has been primarily a government initiative implemented by means of setting up publicly funded, non-profit buffer bodies. Second, accreditation became a mandatory instrument with direct funding consequences when not granted/withheld. Third, unlike general CEE practice, US professional accreditation places more attention on learning outcomes than on input and process criteria (Westerheijden, 2001; cf. Ewell, 2007). In this respect, it can be reasoned that Poland (especially pre-2002), with its voluntary, private “peer” accreditation scheme, and Estonia, with its accreditation that is voluntary but strongly recommended for obtaining state funding (Estonian Ministry of Education and Research, 2006), display the closest adherence to US accreditation principles. However, at the time of

38 For details see Chapter 3.

39 In other words, Pirsing’s dilemma of “going poof” rephrased.
conceptualising accreditation-based policies (mid-1990s), CEE countries were also subject to West European influence, placing improvement-oriented evaluation at the heart of its policy approach to higher education quality – witness the EU promotion of the general model not just in the member states but also in Central and Eastern Europe (Brennan, Shah, 2001), or the involvement of major Western scholars in the Phare quality assurance project40. The reason why accreditation, or – more precisely – evaluation for accreditation, rather than improvement-oriented evaluation, became the predominant CEE policy approach to assuring quality can most probably be explicated by the different stages of development of the CEE and West European higher education systems at the end of the 1980s. As Van der Wende and Westerheijden point out:

A main difference between Western and Central/Eastern Europe at the time of introducing evaluation systems was that in the West, state-supported higher education systems already had made the change from elite to mass systems, with a reasonable level of state funding. Minimum quality levels, therefore, were not at the forefront of the social problems to be solved by introducing evaluation. More often, problems centred on the lack of efficiency in performing the new tasks for an enlarged student population ... Assessment was an instrument fitted for this task. In Central and Eastern Europe, minimum levels were at stake, because they had to be redefined after the fall of communism, and had to be preserved in the face of “rogue providers” (private higher education was received with a good dose of scepticism), making accreditation a perfectly sensible option (2003).

In short, the post-1989 developments of higher education quality assurance policies in CEE countries point to a combination of US and West European influences, with modified US accreditation being “grafted” on to a western evaluation methodology, resulting in extension of the general model by summative output (evaluation for accreditation). The question whether or not such a combination of modified policy approaches can prove successful in navigating between the Scylla of improvement and the Charybdis of accountability (Vroeijenstijn, 1995) is open to interpretation. The following section may help to shed some light on this issue.

2.5. ACCREDITATION, EVALUATION, ACCOUNTABILITY IN CEE COUNTRIES … WHAT OF IT?

Throughout the chapter, references have been made to terms such as accreditation, evaluation/assessment41, accountability, and improvement without offering further elucidation of the terminology. Since the terminology has been subject to organised

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40 Such as Brennan, Westerheijden, Sursock, Thune, Frazer, Kristoffersen, to name but a few.

41 Given the potential misconceptions and misunderstandings due to the different national interpretations, these two terms (evaluation/assessment) are treated as synonyms.
efforts with glossaries as the output (Kristoffersen et al., 1998; Vlăsceanu et al., 2004; Crozier et al., 2007; Harvey, 2004-08), and since the same applies to conceptualisations of quality in the general sense (Harvey and Green, laying the ground in 1993; also Harvey, Askling, 2003; Harvey, Newton, 2004; Kis, 2005; more recently Harvey, Newton, 2007; El-Khawas, 2007; Tremblay, Kis, 2008), bearing in mind the impossibility of achieving standardisation of terminology usage (cf. Vroeijenstijn 1995; Westerheijden, 1995) or of reaching consensus on a general theory of quality (cf. Westerheijden, 1999), an overview of existing definitions, concepts, etc., is not attempted here. Attention will focus on two issues of special relevance to the CEE context: how to capitalise on accreditation experience gained so far and avoid further exacerbating the conflicting rationales of accountability and improvement, and how to make a cross-national comparison of quality assurance agencies to find out about the convergence/divergence of their accreditation-oriented practices. The body of research into higher education quality assurance has established that while internal institutional self-evaluation serves the improvement rationale, the externally imposed accountability rationale is fulfilled by accreditation measures. With this dichotomy in mind, we should look into the fundamentals of both rationales.

Internal evaluation by means of academic peer review has been a traditional way of passing judgement on the quality of the work of academics and also of students in higher education. Broadly speaking, evaluation has two dimensions: internal (self-evaluation) and external, conducted by external experts (Kristoffersen et al., 1998). With regard to its external dimension, evaluation fulfils the functions of appraisal of new knowledge, certification of students, legitimation of academics, ranking of students and academics, e.g. candidates for academic posts or for promotion, allocation of rewards, maintenance of common standards within a higher education system, and, importantly, scholastic improvement (Henkel, 1998). However, evaluation does not perform the function of accountability. Meaning literally the ability to present one’s account (Veselý, Kalous, 2007), accountability has been defined as the obligation to report to others, to explain, to justify, to answer questions about how resources have been used, and to what effect (Trow, 1996; cf. Huisman, Currie, 2004).

The accountability rationale is served by accreditation. As an externally imposed policy instrument checking the meeting of pre-defined, threshold standards, accreditation has been criticised (Harvey, 2004a; Stensaker, Harvey, 2006) for focusing only on minimum standards, using narrow and quite specific criteria while disregarding the overall educational context, impinging on academic freedom while imposing an extensive bureaucratic burden, being a restraint on innovation and running counter to improvement processes, as well as being self-serving or self-protective instead of serving the public good. Accreditation is primarily the summative outcome of evaluation, in the sense that accreditation decisions are based on some form of evaluation of the unit or

42 To frame the basic issues of quality assurance (accreditation, evaluation, etc.) dealt with in this book, Harvey’s Analytic Quality Glossary (2004-2008) has been chosen as a source of reference. Definitions from this glossary are available on <http://www.qualityresearchinternational.com/glossary/>.
programme to be accredited. It builds on the element of peer review to gain (some) legitimacy among the academic community. In CEE countries, the accreditation measures in operation from the mid-1990s onwards can be subsumed under the term “first generation accreditation” (Westerheijden, 2001). In his analysis of first-generation accreditation in CEE countries, Westerheijden states:

The type of accreditation that was chosen in most, though not all, cases was programme accreditation in the form of setting standards for inputs (facilities, staff, curriculum plans) for programmes in all fields of knowledge. The standards were defined *de facto* if not always *de jure* by the academic oligarchy. The control if accreditation standards were met was in the hands of accreditation bodies organised usually closer to the government, sometimes closer to the higher education community, but with evaluation committees invariably made up of (mostly national) members of the academic oligarchy ... However, these academics had less experience with, or vested interests in, achieving transformation of higher education beyond scrapping elements of communist ideology from study programmes. Autonomy and traditional academic values were preponderant over keeping criteria up-to-date with a view to the new societal role of higher education (2001).

While some may have reservations about such a statement, there is little denying that despite the attempts to orient quality assurance procedures more towards improvement, prevailing CEE practice has until now been bound to the analysis primarily of input data, with time-consuming and bureaucratic implications. Still, with the element of policy learning and the inherent dynamics present in the pursuit of quality assurance activities (institutional staff learning how to evaluate against the threshold criteria, and agency staff how to carry out accreditation as the accreditation procedures take effect in time), there is a potential to move forward. The problem, however, is that this theoretical proposition does not have much predictive power in the sense that (temporarily) bringing a more basic problem to closure would lead to another problem becoming dominant, so that a certain development path presented itself for external quality assessment in any state, with predictable changes in the methodology (Westerheijden, 2007). In other words, quality assurance practices do not evolve from checking basic quality through accreditation-like processes, through efficiency-enhancing measures, to quality improvement and quality culture enhancing schemes (Schwarz, Westerheijden, 2004a). The non-existence of a predictable pattern of development (sequence of stages) does not, however, preclude the move of CEE accreditation agencies towards a more open accreditation system, allowing for inter-agency recognition of accreditation decisions, which has also been termed “second-
generation accreditation” (Westerheijden, 2001). The likelihood of diminishing returns of a stage repeated over and again speaks in favour of such a move:

Once the easy wins have been made as a result of a successful first round of evaluations, a second, unchanged round of evaluations cannot add as much quality improvement and accountability as the first did. Routinisation, bureaucratisation, and window dressing are dangers lurking behind this (Jeliazkova, Westerheijden, 2002).

Indeed, with the threshold standards of degree programmes (rid of Marx-Leninist dogmas) established, with potentially fraudulent private providers kept out of operation, and developing internationalisation, CEE accreditation agencies do not have much to gain by only continuously checking on meeting threshold standards. By keeping to unchanged accreditation practices, CEE accreditation agencies run the risk of raising the operational costs and/or lowering effectiveness, in view of increasing programme diversity. In addition, taking into account Westerheijden’s argument that the boards of the accreditation agencies are occupied primarily by senior academics from public institutions, it is also possible that CEE accreditation measures applied to well established public higher education institutions started to become ineffective and inefficient soon after they were put in operation. The reasons for this are not only the potential for mutual back-scratching (as normative standpoints are difficult to prove), but also low consequentiality, i.e. no real danger of losing accreditation. Under such conditions, CEE well established public higher education institutions (universities) may have responded by creating intra-institutional accountability superstructures as units responsible for compliance with externally imposed standards and insulated from the daily institutional operations, thus protecting the key functions of the institutions from the effects of the measures applied externally (see Ewell’s (2007) moves in the quality game).

Whether CEE accreditation schemes will remain “first generation”, or if (and when) they will evolve towards a second-generation approach with mutual recognition of agencies’ practices that are up and running is hard to predict, given the absence of a generally valid pattern. Nonetheless, as the developments are taking place at supranational level (for the passage of ESG and the related implementation agenda, see Chapter 3), new developments in CEE accreditation agencies may be in the offing. To find out more about them, the reader is best directed to case studies in the individual countries (Chapters 4-8).

To make available a meaningful comparison between the case studies in the individual countries (Latvia, Hungary, Poland, the Slovak Republic, the Czech Republic), with the aim to achieve greater parsimony in view of an array of comparative

43 For details on the organization of open accreditation systems, see Van der Wende and Westerheijden, 2003; for inter-agency recognition, see Woodhouse, 2004.

44 Obviously, this move towards greater inter-agency recognition does not prove the validity of Jeliazkova and Westerheijden’s (2002) contingency table either, as it leaves the CEE quality practices still very much accountability-oriented, having little to offer for stimulating institutional quality culture as such.
criteria (independent variables) – for an overview, see e.g. Harman (1998) or Biling (2004) – we have chosen the comparative framework developed by Perellon (2005, 2007). Starting from the axiom that national policies for quality assurance are temporal and spatial actualisations of the fundamental policy choices, Perellon argues that these choices have to reflect intrinsic elements of the quality assurance policy domain, encompassing two dimensions: an ideational dimension (policy beliefs) and a material dimension (policy instruments). In these two dimensions, fundamental policy choices on quality assurance are made in terms of objectives (reflecting policy beliefs) and control, areas, procedures, uses (all corresponding to policy instruments). The following scheme of Perellon’s framework may help to elucidate its fundamentals.

Figure 1. Perellon’s conceptual framework for cross-national study of higher education quality assurance policies

<table>
<thead>
<tr>
<th>Quality Assurance Policy Domain</th>
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<tbody>
<tr>
<td>Ideational dimension</td>
</tr>
<tr>
<td>(policy beliefs)</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Material dimension</td>
</tr>
<tr>
<td>(policy instruments)</td>
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</tbody>
</table>


As Perellon further points out, answering five questions pertaining to the two dimensions offers a general overview of quality assurance as a policy domain, as these questions represent general issues that the actors involved in policy making in quality assurance cannot avoid. Hence, these five general issues, i.e. objectives, control, areas of action, procedures, information uses, are best thought of as “central variables”. The actors’ responses to them reflect power relationships among the stakeholders struggling to impose particular worldviews as to how quality assurance policies should be formulated (policy beliefs) and implemented (policy instruments). In addition, by systematically assessing the importance of certain factors in both the emergence of quality assurance as a political issue and the formulation of a particular policy in that domain, the conceptual framework can provide fruitful insights into the reasons for cross-national differences and/or similarities. The framework has been applied in a

45 That is to say, the elements that need to be addressed in any case, although the way this is achieved may vary across time and space.
comparison of the implementation of the accreditation procedures of the quality assurance agencies in the Netherlands, Spain, and Switzerland (Perellon, 2005), and is used in this volume to find differences/similarities among the CEE accreditation agencies with regard to the implementation of ESG.
3.1. INTRODUCTION

It has been commonly stated that the beginnings of implementation analysis date back to the early 1970s, when Pressman and Wildavsky’s seminal book *Implementation* (1973)\(^1\) was published, quickly followed by Hargrove’s search in the policy process for the *Missing Link* (1975). Though contested by some in reflection of the developments that implementation studies have undergone in time (O’Toole, 2000; Hill, Hupe, 2002), pointing to the existence of earlier public administration literature implicitly referring to the implementation stage of the policy process, it nevertheless remains that no explicit study of policy implementation was carried out until the emergence of concerns over the effectiveness of wide-ranging reform programs, undertaken in the United States during the 1970s (Pülzl, Treib, 2007). As O’Toole noted, referring to Pressman and Wildavsky’s inability to find relevant entries in their 1973 review of implementation literature (cf. DeLeon, 1999a) and ensuing efforts:

> Pressman and Wildavsky exaggerated mightily in asserting that, until their efforts, virtually no one had addressed the subject. But their claim was based in a real, and consequential, point: for all the attention to administration over the years, the nitty-gritty of implementation had been largely a background issue. Their work and the work of hundreds of others over the next several years ensured that the theme would be important for the foreseeable future. From nowhere, policy implementation moved to a position of prominence, perhaps even overemphasis. The proliferation of studies brought, in turn, an explosion in types of research designs, varieties of models, and – especially proposals for adding a bewildering array of variables as part of the explanation for the implementation process and its products. The cornucopia of investigations

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\(^1\) As Parsons (1995) points out, the direct precursor of Pressman and Wildavsky’s book was the study of US urban policy compiled by Martha Derthick in 1972.
catalysed, in turn, a set of sectarian disputes: qualitative and small-n versus quantitative and large-n investigations; top-down versus bottom-up frameworks; policy design versus policy implementation emphasis, and so forth (2000).

As suggested by O'Toole, following Pressman and Wildavsky's introduction of the idea of an implementation deficit (Hill, Hupe, 2002), the 1980s saw a spate of implementation studies running into hundreds of entries (O'Toole, 1986), gradually abating in time, as it became increasingly clear that the search for a universal theory of implementation would be a vain enterprise. In their review of the field, Goggin et al. (1990) noted three generations of implementation studies. The first generation consisted of single case studies dealing with the execution of a single authoritative decision, offering a minimum of prescription and rarely concerned with generalisations (DeLeon, 1999a). The second-generation scholars went on to employ either a deductive approach resulting in the application of a hierarchical top-down, “command and control” framework with emphasis on local unit compliance, or an induction-driven, bottom-up, adaptive framework building upon observations of the interpersonal behaviours of actors at the local level and aggregating these into a single observation of a more general policy network (Goggin et al., 1990). In their effort to reconcile the two conflicting second-generation theoretical approaches, Goggin et al. (ibid.) brought forward the third generation approach, based upon more rigorously scientific, quantitative hypothesis testing, resulting in the elaboration of a “communications model” with a very strong emphasis upon what affects the acceptance or rejection of messages between layers of government (Hill, Hupe, 2002). Given the booming scholarly interest in studies of policy implementation in the 1970s and 1980s, Goggin and his colleagues were not alone in their efforts; similarly, theoretical propositions were made on how to synthesise conceptually opposite top-down and bottom-up approaches, by, to name just few, Elmore (1980), Sabatier (1986), Winter (1990), and Matland (1995). Reviewing the scholarly efforts in policy implementation research at the beginning of the new millennium, O'Toole, one of the authors of the third generation approach, remarked:

In 1986, I reviewed virtually the entire scope of multiactor policy implementation research ... what, then, can be said by way of progress in the succeeding years? The explicit evidence is mixed. Virtually all analysts have moved past the rather sterile top-down/bottom-up dispute, and some helpful proposals for synthetic or contingent perspectives have been offered. But consensus is not close at hand, and there has been relatively little emphasis on parsimonious explanation. The dominance of the case study has receded, and a number of thoughtful larger-n empirical studies have been conducted – a point often missed by critics ... The context-dependent (and primarily American) feature of much earlier work has been exposed and theoretical efforts have become more self consciously general, but solid cross-national investigations are still rare. A so-
called third-generation approach to implementation research has been suggested, but relatively little such research has been stimulated by this call2 (2000).

We could continue describing the over 30-year history of implementation studies in a similar fashion, asking whether implementation studies have reached an intellectual dead-end (DeLeon, 1999a; cf. Lester, Goggin, 1998). However, that is not the aim in this chapter. For the sake of conceptual clarity and brevity, it will be bypassed by a recent summary of key contributions to the development of the field (including the year of publication) based on Pülzl and Treib (2007) (see Figure 2); for more detailed accounts, the reader is referred either to individual contributions, or to comprehensive scholarly works of the authors (Pülzl, Treib, 2007; Hill, Hupe, 2002; O'Toole, 2000).

Figure 2. Key contributions to implementation theory

<table>
<thead>
<tr>
<th>Key Contributions</th>
<th>Theory Focus</th>
</tr>
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<tbody>
<tr>
<td>Pressman and Wildavsky (1973)</td>
<td>Top-down</td>
</tr>
<tr>
<td>Van Meter and Van Horn (1975)</td>
<td>Top-down</td>
</tr>
<tr>
<td>Bardach (1977)</td>
<td>Top-down</td>
</tr>
<tr>
<td>Sabatier and Mazmanian (1979, 1980)</td>
<td>Top-down</td>
</tr>
<tr>
<td>Mazmanian and Sabatier (1983)</td>
<td>Top-down</td>
</tr>
<tr>
<td>Majone and Wildavsky (1978)</td>
<td>Hybrid</td>
</tr>
<tr>
<td>Ripley and Franklin (1982)</td>
<td>Hybrid</td>
</tr>
<tr>
<td>Elmore (1985)</td>
<td>Hybrid</td>
</tr>
<tr>
<td>Sabatier (1986)</td>
<td>Hybrid</td>
</tr>
<tr>
<td>Lane (1987)</td>
<td>Hybrid</td>
</tr>
<tr>
<td>Goggin et al. (1990)</td>
<td>Hybrid</td>
</tr>
<tr>
<td>Matland (1995)</td>
<td>Hybrid</td>
</tr>
<tr>
<td>Hill and Hupe (2002)</td>
<td>Hybrid</td>
</tr>
<tr>
<td>Lipsky (1971, 1980)</td>
<td>Bottom-up</td>
</tr>
<tr>
<td>Elmore (1980)</td>
<td>Bottom-up</td>
</tr>
</tbody>
</table>

Source: Based on Pülzl, Treib, 2007, p. 91.

There are comprehensive works on implementation analysis in public policy, despite the understandable lack of general consensus stemming from the diffusion of scholarly inquiries relevant to implementation studies but undertaken under different rubrics. In many respects, these point to a relatively mature state of development with top-down/bottom-up debates superseded by general recognition of the strengths of each (O'Toole, 2000). This contrasts with the state of implementation research in the policy field of higher education, which, since the publication of the Cerych and Sabatier's seminal study (1986), has shown little theoretical, methodological, and, until recently, empirical advancement. There are reasons for this (Gornitzka et al., 2002, see further), which can be primarily, though still rather narrowly, ascribed to the loose coupling of

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2 As he states later in the same article, due to the potentially intimidating design of this third-generation research, involving multi-variable and cluster investigations; multiple measurements across policy types; across states; done regularly (annually) over a decade or more, making such research a life-time undertaking (O'Toole, 2000).
(higher) education institutions in a system (Weick, 1976, 2000). Nevertheless, such a state of research begs more systematic attention. In response to the recent revival of interest in implementation studies in higher education (Gornitzka et al., 2005a), this chapter presents four predominantly synthesising conceptual approaches3 (Sabatier, Mazmaninan, 1980/Mazmaninan, Sabatier, 1983; Lane, 1987; Matland, 1995; Hill, Hupe, 2002), which are methodologically promising enough for use in higher education implementation research. In recognition of the absence of a solid research base, also showing itself through the dearth of comparative frameworks, this chapter sets itself modest aims. Reflecting the calls for a more systematic investigation of the role of supranational standards in the context of use and development of practices at the national level, particularly quality assurance agencies (Gornitzka et al., 2007) and for more solid cross-national investigations in general (O'Toole, 2000), this chapter aims to demonstrate the heuristic utility of selected conceptual approaches as meta-frameworks in studying the implementation of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), a Bologna Process policy initiative.

3.2. POLICY IMPLEMENTATION: DEFINITIONS, CONFLICTING PERSPECTIVES, AND SYNTHESISING APPROACHES

Before presenting selected conceptual frameworks and applying them to the study of higher education policy implementation, it is, however, vital to put them in context, i.e. to ask what phenomenon these frameworks refer to. In defining policy implementation, we should not omit the oft-quoted definition of Mazmanian and Sabatier:

Implementation is the carrying out of a basic policy decision, usually incorporated in a statute but which can also take the form of important executive orders or court decisions. Ideally, that decision identifies the problem(s) to be addressed, stipulates the objective(s) to be pursued, and, in a variety of ways, “structures” the implementation process. The process normally runs through a number of stages beginning with passage of the basic statute, followed by the policy outputs (decisions) of the implementing agencies, the compliance of the target groups with those decisions, the actual impacts – both intended and unintended – of those outputs, the perceived impacts of agency decisions, and, finally, important revisions (or attempted revisions) in the basic statute (1983).

Rather in contrast to such a complex definition, DeLeon (1999a), paraphrasing Ferman (1990), sees implementation simply as what happens between policy expectations and (perceived) policy outputs, whilst for O’Toole (2000) policy implementation is what develops between an apparent intention on the part of government to do something, or to stop doing something, and the ultimate impact in the world of action. Schofield and Sausman (2004) position implementation studies between either political science research or public administration and general

3 With the exception of Mazmanian and Sabatier’s framework.
management research, while Hill and Hupe (2002), attributing the dual character of implementation studies to the concern to explain and also to affect what happens, list legal acts symbolising the rule of law, the nature of representative government, institutional theory, and post-modern perspectives as feeding into the study of policy implementation. Though varying in length and phrasing, the definitions of policy implementation given here seem to have one thing in common; they attempt to capture the complexities of organising human social activities. It follows that issues of implementation were dealt with long before anyone wrote about implementation per se (Hill, Hupe, 2002).

The definition of implementation by Mazmanian and Sabatier quoted here was made around the time these scholars were developing and applying their influential top-down framework (1980, 1983). Taking the first generation of implementation studies as a point of departure, Mazmanian and Sabatier, borrowing the concept of veto points and causal theory from Pressman and Wildavsky, start from the proposition that the crucial role of implementation analysis is to identify the variables affecting the achievement of legal statutory objectives. Identifying first a number of legal, political and tractability variables affecting the consecutive stages of the policy process, they then sought to synthesise the large number of variables into a shorter list of six general conditions necessary for effective implementation. These were: clear and consistent objectives; adequate causal theory; legal structuring of the implementation process to enhance compliance by implementing officials and target groups; committed and skilful implementing officials; support of interest groups and sovereigns; and changes in socio-economic conditions which do not substantially undermine political support or causal theory. Thus, the key to understanding Mazmanian and Sabatier’s framework is the assumption that policies are likely to fail if they do not incorporate a valid causal theory that explains how policy objectives are to be attained, also accounting for target group behaviour (Winter, 1990).

In his overview of top-down and bottom-up approaches to implementation research, Sabatier (1986) made a critical appraisal of the top-down framework he had co-authored. Based on a review of twenty-four cases of empirical application of the framework, out of which seven were made in the arena of higher education, he (ibid.) went on to suggest the strengths of the framework as empirically verified importance which the framework attributes to the legal structuring of the implementation process; verification of the six conditions of effective implementation as a useful checklist of critical factors in understanding variations in programme performance and strategies of programme proponents over time; the framework’s relatively manageable list of variables and focus on formulation-implementation-reformulation as factoring into longer time-frame empirical investigations in turn leading towards the discovery of the

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4 For the second, revised University Press of America edition, see Mazmanian, Sabatier, 1989.
5 Sixteen or seventeen, depending on the “version” of the framework.
6 Bardach’s (1977) idea of a “fixer” comes to mind here.
importance of policy learning by programme proponents over time; the framework’s focus on legally-mandated objectives, particularly in cases of longer time-frame empirical investigations, helping to produce less pessimistic conclusions concerning the programme performance than in the first generation of implementation studies.

These strengths of Mazmanian and Sabatier’s framework reverberate in major contributions to top-down implementation theory, developing propositions on maximisation of success in implementation of a given policy from the standpoint of the centre. With the underlying assumptions of the top-down framework identified as clearly defined goals against which policy performance can be measured, clearly defined policy tools, existence of a single statute or other authoritative policy statement, existence of an “implementation chain”, or policy designers’ good knowledge of the capacity and commitment of the implementers (Birkland, 2001), O’Toole argues that in order to maximise the probability of successful top-down policy implementation, one should:

1. design policies to keep the degree of required behavioural change low (e.g., Mazmanian and Sabatier, 1981, 1983);
2. simplify the implementation structure and minimize the number of actors (e.g., Kelman, 1984; Pressman and Wildavsky, 1984);
3. seek more consideration of the problems of implementation during the initial stages of policy formation (e.g., Bryner, 1981; O’Toole and Montjoy, 1984; Pressman and Wildavsky, 1984); and
4. take care to leave the responsibilities for implementation among units sympathetic to the policy (e.g., F. Thompson, 1982; Van Horn and Van Meter, 1976) (1986).

It could be argued that these prescriptive, empirically verified propositions for achieving successful top-down implementation are what distinguish the second, top-down oriented generation of implementation studies from the primarily descriptively oriented first generation. Nevertheless, in their primary concern with a central level, a dominant piece of legislation, and clear, unambiguous programme objectives, the proponents of the top-down approach came in for criticism from scholars proposing the opposite, bottom-up approach. Sabatier later backed off from the position of a top-down approach advocate. In his 1986 overview of top-down and bottom-up approaches, he turned his attention, along with Jenkins-Smith, to a longitudinal study of policy change, and conceded that some of the points of criticism of the top-down approach are reasonably persuasive (i.e., clear and consistent policy objectives; inadequacy of the approach for use in cases where there is no dominant policy/actor in place; neglect of coping strategies on the local level). In Hill and Hupe’s view:

\[\text{For a discussion of limitations of the bottom-up approach, see e.g., Matland (1995, pp. 149-150) or Gornitzka et al. (2002, pp. 396-397, 401).}\]
Nevertheless, Sabatier’s essay hardly responds to the critique made by the bottom-uppers of his normative assumptions. He speaks of the latter as “free to see all sorts of unintended consequences of governmental ... programs”. He argues that bottom-uppers “overemphasise the ability of the Periphery to frustrate the Center”. What the bottom-up critique does, however, is precisely to question this language of intensions and consequences ... In more recent work Sabatier has shifted his attention to the development of his advocacy coalition approach ..., offering a more holistic view of the policy process. He rejects the “stages” heuristic within which much implementation work is embedded (2002).

The rejection of the “stages heuristic” referred to by Hill and Hupe (ibid.) concerns normative disagreement on the distinction between policy formulation, which is an explicit object of inquiry in studies of policy design (Sidney, 2007), and policy implementation as the separate stages of the policy process. The idea of separating policy design and implementation stemmed from Wilson’s tradition of a politics-administration dichotomy in which politicians, by making value choices, form premises for the more detailed decision processes to be carried out by officials (Potucek, Vass, 2003). However, such an ideal-type dichotomy stands as one of the most contentious notions in the theory of public administration. Strongly present in academic literature, it has been both highly praised and forcefully disputed (Rabrenović, 2001).

In studies of policy implementation, the separation of policy design from policy implementation factored into the first generation scholarly works, rectified in the generation to follow towards a more evolutionary concept of implementation (cf. Majone, Wildavky, 1984), was further decomposed into phases to enable continuous evaluation (Paterová et al., 2007). Palumbo and Calista, referring to Fox (1987) and Schwarz (1983), summarised the shift in generation perspective as follows:

By the late 1980s, more than fifteen years after the initial implementation studies, researchers discovered that these earlier views were wrong. They were wrong, first, because they assumed that policy implementation could be separated from formulation and design and the other parts of the policy cycle ... . There is no doubt that implementation research has finally laid to rest the politics-administration dichotomy. Early implementation research fostered this view when it assumed that implementers were supposed to simply carry out previously made policy directives. More recent research demonstrates that implementation is a legitimate part of the policymaking process – a part that can be neither diminished empirically nor de-legitimated normatively (1990).

More broadly, normative views on how to study policy design and implementation, taking account of the act of implementation as a presupposition of a further act, particularly the act of formulating what needs to be done (Hill, 2005), formed part of a wider debate on the degree of usefulness of disaggregating the policy process into more analytically manageable segments. With the arguments both in favour (DeLeon, 1999b) and against the conceptual utility of the stages heuristic (Sabatier, 1992, 1993, 1999), the debate seems to have reached a standstill, with disaggregation still favoured for its heuristic value. In implementation analysis, such a value lies in the possibility of
identifying a (clear) goal against which the success of implementation can be judged, thus enabling an analysis of the accountability and discretion of actors involved in the policy process (cf. Sabatier, 1986). Finally, writing of normative positions taken in the course of the top-down/bottom-up implementation debate, it is necessary to mention the important contribution by Jan Erik Lane. Lane is ranked as a scholar aiming at synthesis. His theoretical perspective, in which he introduced the issue of accountability into implementation analysis, will now be subjected to further analysis.

Lane (1987) sees implementation as a word having two meanings: to give practical effect to (execution), and to fulfil, standing for accomplishment of programme objectives. Because of these meanings, implementation entails two distinct notions, i.e. implementation as a process (policy execution) and implementation as an outcome (end state), with no a priori assumption of correspondence between the outcomes of the objectives, as policy that is executed need not necessarily result in achievement of the desired outcomes. Furthermore, these two distinct notions carry different qualities: accountability, which is central to the relationship between objectives and outcomes, and trust, which is characteristic of putting policies into practice (the implementation process). These qualities – accountability and trust – inherent to policy implementation are related to theoretical assumptions in the study of policy implementation, as follows:

Trust is basic to the implementation process, but this does not do away with the responsibility side of implementation. Top-down models overemphasize the responsibility side, trying to nail down the inherent uncertainties of implementation processes in accordance with a firm plan or an outlined structure of control. Bottom-up models underline the trust side to much too high an extent in an attempt to safeguard as many degrees of freedom as possible to the implementor as a tool for handling the uncertainties by flexibility and learning ... An implementation process is a combination of responsibility and trust both in the relation between citizens and the public sector in general and in the relation between politicians and officials. Without the notion of implementation as policy accomplishment there is no basis for evaluating policies and holding politicians, administrators and professionals accountable. On the other hand, implementation as policy execution rests upon trust or a certain amount of degrees of freedom for politicians and implementors to make choices about alternative means for the accomplishment of goals (Lane, 1987).

Hence, Lane’s main normative contribution to implementation theory seems to be that he draws attention to the fact that developing synthesising approaches to policy implementation also involves searching for the right mix of accountability and trust between the top and bottom level policy actors, achieving equilibrium in the ideal case.

In line with the argument put forward by Lane on the duality of policy implementation involving accountability and trust as two of its fundamental qualities, a set of further propositions can be made on the impact of multi-organizational settings on implementation processes and output/outcomes. In vertical multi-organizational settings, a policy promulgated at the central level gets implemented by a series of actor’s interactions in, depending on policy complexity, a varying number of implementing
agencies, finally arriving at the lowest level. This is where the concept of implementation levels, distinguishing between macro- and micro-level implementation, comes into play:

The organizational processes that deliver a programme can be further subdivided into the categories of macro- and micro-implementation. Macro-implementation refers to the variety of organizations involved in implementing a programme ... Micro-implementation refers to what goes on inside the local agency primarily responsible for programme implementation ... At the micro-implementation level the unfolding process is called adaptive implementation. This concept has grown largely out of the conflicts between the top-down versus bottom-up views of implementation (Palumbo, Calista, 1990).

Multi-level organizational settings may have a perverse impact on programme assessment. In assessing programme effectiveness, the first-generation of scholars assumed that, ceteris paribus, the probability of successful implementation of a reform is inversely related to the extent of envisaged departure from the status quo ante (Sabatier, 1986). Based upon the study of implementation of higher education reforms, the second generation showed that the relationship is not linear but rather curvilinear (ibid.)8. However, the multiplicity of organizational levels adds another complicating factor to programme assessment, especially in the case of implementation of supranational/federal policies. As Palumbo and Calista point out:

When considering macro-implementation processes, the major theme that emerges from the literature is that programme objectives are often interpreted differently by those at various levels of an implementation chain ... Implementation outcomes, then, represent a confluence of actions among parties that may only superficially agree about mutual objectives. Implementation research has helped to understand this process of macro-level programme implementation. But it also creates problems for evaluation. In a system in which there are multiple actors and voices, each claiming to have the legitimate interpretation of a policy, there are no criteria or standards against which to measure success or failure (1990).

Hence, in assessing a given policy programme, studies of macro- and micro-implementation in multi-level organizational settings should take account of the likelihood of different interpretations of its output/outcomes stemming from the different level or position of the actors in the implementation chain. However, this should not be simply taken to imply that, in multi-actor implementation, the likelihood of different interpretation automatically increases with every new actor/organization added to the chain. Since policy objectives are seldom clear and specific enough from the outset, the process of their implementation is also subject to ambiguity in meaning and thus potential conflict over interpretation among those at the top of the

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8 This argument is further developed in the section on implementation analysis in higher education.
implementation structure and the implementing agencies down the organizational chain and at the bottom of it. The implementing agencies, in performing adaptive and iterative implementation activities (cf. Yanow, 1990), exert their influence to the degree of their discretionary authority, thus (substantially) modifying programme theory, which often results in unintended policy outcomes. We can assume that while there is an inverse relationship between the clarity of statutory objectives and the degree of programme ambiguity, the degree of conflict between top- and bottom-level actors, rather than depending on the number of units involved, relates to the configuration (degree of looseness) of the inter and intra-organizational coupling of the agency within the implementation chain. For this reason, the configuration (typically tight versus loose coupling) of agencies in the implementation chain has implications for assessing programme effectiveness.

The issues of ambiguity and conflict in multi-actor implementation settings were looked into by Richard Matland. In his synthesis of top-down and bottom-up approaches (1995), he voices criticism of Sabatier’s study of policy change by means of advocacy coalitions. He argues that a “policy field followed over so many years can change so radically that it bears little resemblance to its initial form” (p. 152). He aims to bring a structure into the study of policy implementation, which is replete with a “prodigious number of variables” (p. 153), due to different top-down and bottom-up approaches. However, as both approaches to a significant extent failed to specify “the conditions under which these variables are important and the reasons why we should expect them to be important ... synthesis that merely combines the ten variables considered by the top-downers with the ten variables considered by the bottom-uppers, without exploring the theoretical relationship between them, is likely to exacerbate the problem” (ibid.). Reasoning that central to a workable synthesis is the definition of successful implementation, given the conflicting normative views on what constitutes successful implementation between the advocates of the two approaches, Matland sees it as embodied in whether or not policy goals have been explicitly stated, as it is “legitimate to measure implementation success in terms of its ability to execute faithfully the goals ... present in the statutory mandate” (p. 155). Based on this point, Matland argues that the conflicting normative views of top-downers and bottom-uppers on implementation success bear on the type of policies they study as follows:

In reviewing the implementation literature it becomes apparent that top-downers and bottom-uppers choose to study different types of policies. Top-downers tend to choose relatively clear policies. Bottom-uppers study policies with greater uncertainty inherent in the policy ... Top-down theorists desire to measure success in terms of specific objectives tied directly to the statutes that

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9 Matland is not alone in voicing criticism of the Advocacy Coalition Framework (ACF); Lane (1987, p. 527) argues that ACF lacks recognition between the implementation process and implementation assessment, while for Parsons (1995, p. 487), ACF does not confront the normative dimension of the bottom-up versus top-down argument, for “if the aim of policy analysis is (as Lasswell argued) to clarify values, then the synthesis advanced by Sabatier only serves to muddy the waters” (p. 488).
are the sources of a program. Bottom-up theorists prefer much broader evaluation (1995).

Taking into account the conflicting views on clarity of policy goals and policy evaluation, Matland brings forward two central variables – ambiguity and conflict – to explain successful implementation. Combining them into a two-by-two matrix, he gets the following configurations with the corresponding types of implementation attached to them: low ambiguity-low conflict (administrative implementation); low ambiguity-high conflict (political implementation); high ambiguity-low conflict (experimental implementation); and high ambiguity-high conflict (symbolic implementation). He further attributes a central principle to each of the implementation types that has the most significant influence on the implementation outcomes. Thus, with resources as central to the success of administrative implementation hinging on the availability of relevant technology, outcomes of political implementation are “decided by the power” (p. 163) of one actor, or of a coalition, enforcing a particular perspective on the other participants. However, this does not preclude bargaining in cases where enforcement is not possible, particularly because of high autonomy and independence of the actors. As Matland argues, when describing the process of political implementation:

The implementation programme consists of securing the compliance of actors whose resources are vital to policy success and ensuring that the process is not thwarted by opponents of the policy. Since some of the actors whose cooperation is required may disagree with policy goals, successful implementation depends on either having sufficient power to force one’s will on the other participants or having sufficient resources to be able to bargain an agreement on means. Coercive and remunerative mechanisms will predominate ... Agents, however, often are not in a direct line relationship with the implementer ... Many actors have independent bases of power and can refuse to participate ... Under these conditions, activities are directed towards reaching a negotiated agreement on actions. Agreement on goals is unnecessary, agreement on actions is sufficient. Many bargaining techniques commonly found in the legislative forum reappear. Disputes are resolved through side-payments, logrolling, oversight, or ambiguity. Questions that cannot be resolved can be buried in ambiguous text and left for later resolution (1995).

In high ambiguity-low conflict settings, the outcomes of the implementation process are dominated by contextual conditions, which suggest their dependence on resources and actors in the micro-level implementation environment. As a result of policy ambiguity, broad variations of implementation outcomes can be expected. With the process “more open to environmental influences than other forms of implementation, programme mutations arise as different organizations implement different policies in different environments. These mutations can be seen as natural experiments, and it is important for policy designers to actively use them to enhance their knowledge of change processes within the policy area” (p. 166). From the emphasis on the micro implementation level, it follows that the bottom-up approach to the study of policy
implementation is superior to the top-down approach in this case (p. 167). Finally, in
the high ambiguity-high conflict configuration, the central principle determining the
implementation outcome is that of coalitional strength\(^{10}\). Programs aimed at redistributing
power or goods are examples of policies falling under this category (p. 169).

Matland’s contingency concept, combining ambiguity and conflict as central
variables of the policy process, is an important contribution to the study of which of the
two approaches to implementation is more relevant in a certain configuration of the
policy implementation process. Typically a top-down approach is more suitable for low
ambiguity-low conflict settings, while a bottom-up approach is better for high
ambiguity-low conflict settings. Moreover, by defining a guiding principle central to a
given type of policy implementation, Matland’s concept has a predictive value for
studies of policy change in terms of determining possible inter-actor transactions that
have a bearing on policy outcomes in changing policy-setting configurations. To
illustrate this point more clearly: with the expected increase in clarity of programme
goals in time, i.e. reduction of ambiguity, micro-level actors are likely to yield their
discretion to top-level policy enforcers. Hence the shift from experimental to political
policy implementation typically, though not necessarily – see the point on actors’
autonomy – entails de-powering of actors on the periphery and empowering of central
actors and, therefore, much greater inter-actor conflict. Following the same logic,
increasing programme ambiguity in political implementation is likely only to “add fuel
to the fire” in already highly conflictual environments with the result of a much longer
and more intensive inter-actor struggle and a much lower likelihood of attaining
consensus on the course of programme implementation via bargaining. Commenting
on Matland’s contingency concept, Hill and Hupe point out:

Matland is pointing us towards an important issue for separating different
kinds of implementation studies. In particular, in treating ambiguity and conflict
as intrinsic features of policy rather than as phenomena that good policy
designers should try to eliminate, he gets away from the specific contradiction
embedded in top-down recommendations for those who design policy ... .
Matland also avoids seeing the level of policy discretion as something explicitly
chosen by policy formers, recognising how it may be a function of policy
conflict. The question about his argument is then: How easy is it to label policies
in the way he does? (2002)

It does not take too much fancy, rather just conventional wisdom, to attribute the
study of policy implementation in multi-level organizational settings to the way in which
the corresponding implementation processes are managed. Hill and Hupe (2002) raise
and elaborate on this point in their book *Implementing Public Policy*. In it, by linking
implementation with governance, they develop an analytical framework that enables an

\(^{10}\) An interesting point for those studying policy change processes by applying Sabatier and Jenkins-Smith’s
Advocacy Coalition Framework.
assessments of the context in which policy practitioners are expected to act (p. 182). Recognising the practitioners’ need for a set of principles to guide them in a concrete implementing activity situation (accountability orientation), they argue that as these principles follow situational logic, “varying not only between practitioners but also from case to case for the same practitioner” (p. 174), they take place within wider institutional environments, socio-economic developments, and reform ideologies. It follows that practice-relevant accountability principles on managing policy implementation are therefore context-bound. Developing this line of argument further, their proposition is:

[To] speak of constitutional, directive and operational “levels of action” and to link these with the “loci” in political-societal relations. These loci can be designated as, respectively, policy setting, institutional setting and micro-setting. In each locus different kinds of action can then be observed ... The institutional environments, socio-cultural and economic developments and reform ideologies as described above have consequences in the various loci of political-societal relations. They should be seen as “causal” rather than “manipulable” variables, however ... The configuration and relative importance of the variables that can be manipulated, in each of the distinct loci, will vary as to time and space. Coherent ways of structuring such “manipulation” can be provided by three modes of governance ... [which are] the authority, transaction, and persuasion modes (Hill, Hupe, 2002).

Aiming at achieving parsimony, due to the existence of a substantial variety of factors constituting a specific context of managing an implementation activity, Hill and Hupe attribute one summarising variable to each of the loci, i.e. the character of policy formation for policy setting, the character of inter-organizational arrangements for institutional settings, and operational management for micro-settings (cf. Hill, 2005). In their vertical groupings, these variables form loosely coupled logical constructions for each of the ideal-typical modes of governance, with the choice between them, from the perspective of a top-level actor, depending on his/her level of steering ambitions and degree of independence (p. 188).

Prescriptive perspectives on managing implementation can be derived from the combination of groupings of manipulable variables congruent with each of the modes of governance. Thus, the governance-by-authority mode entails the enforcement perspective on managing implementation via inputs with the vertical chain link between individual settings, while for the governance-by-transaction mode, with the looser though still vertical contacts between the settings resembling a vertical rope, the corresponding perspective, in line with managing outputs, is that of performance. Managing implementation via persuasion, with the focus on managing outcomes as shared results, is related to the co-production perspective. Understandably, managing implementation

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11 Drawing from the works of Etzioni, Linblom, Kiser, Ostrom, and others.
processes by means of co-production, characteristic of loose actor-couplings resembling a woven thread, entails leaving discretion to (empowering) micro-level actors, enhancing professionalisation, instituting peer review, and establishing complaint procedures (pp. 188-189). Finally, the combination of modes of governance and prescriptive perspectives gives way to a specific “image” of implementation, with the enforcement perspective being generally a matter of following standards,

[In the transaction/performance image the couplings, often with a contract character, are looser, though still vertical: the “agents” being contractually accountable to the “principals”. What drives implementation is meeting the targets they are committed to ... In this perspective implementation is a matter of achievement. In the persuasion/co-production image the relative autonomy of the implementers is acknowledged, as well as the joint framework within which they are fulfilling their tasks. Trust, among other things in their professionalism and expert judgement, is a driving force. Accountability is multiple, implementers are treated as partners, in relationships that are both vertical and horizontal. Accountability is co-produced in interaction. In this perspective, implementation is a matter of co-producing shared results (Hill, Hupe, 2002).

Roughly speaking, the third-generation, “implementation by governance” framework (Hill, Hupe, 2002; Hill, 2005), can be demonstrated in the following way:

Table 1. “Implementation by governance” framework

<table>
<thead>
<tr>
<th>Policy Formation</th>
<th>Distinct policy formation</th>
<th>Framework policy formation</th>
<th>Ongoing policy formation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Institutional Arrangements</td>
<td>System of command</td>
<td>Market place</td>
<td>Network</td>
</tr>
<tr>
<td>Operational Management</td>
<td>Rule application</td>
<td>Service</td>
<td>Consultation and consensus</td>
</tr>
<tr>
<td>Mode of Governance</td>
<td>Authority</td>
<td>Transaction</td>
<td>Persuasion</td>
</tr>
<tr>
<td>Perspective on Managing Implementation</td>
<td>Enforcement</td>
<td>Performance</td>
<td>Co-production</td>
</tr>
</tbody>
</table>

Source: Adapted from Hill, 2005, pp. 275-276.

The conceptual framework developed by Hill and Hupe offers a fresh perspective on combining issues of policy governance and implementation. However, some reservations may apply. Staying away from a certain arbitrariness of choice of summarizing variables, necessary though it is to achieve parsimony, the question is under which conditions the vertically non-congruent variable mixes occur, and how to deal with them. In this respect, Hill and Hupe suggest:

The constructions ... are designed to be helpful in a cognitive and analytical way, and may provide a heuristic that assists with the diagnosis of the specific context a practitioner has to deal with. In their pure form the presented constructions will rarely be observed. Instead, in many cases mixed (“hybrid”)
forms will occur. Knowing when to accept a non- or incongruent configuration of contextual factors and make the best of them, or when to change them, cannot be prescribed by any checklist (2002).

Clear as their standpoint is, it remains a pity that they do not have more to say on this topic by e.g. providing some empirical evidence on how such incongruent variable mixes are or should be “governed” in practice. Presumably leaving this point to be picked up by others, we cannot but apply their comment on Matland’s contingency concept – regarding the tenability of labeling policies – to their ideal-typical derivation of modes of governance.

Reviewing the four selected theoretical approaches to policy implementation, several observations can be made. First, despite their somewhat arbitrary choice, each of them presents an important contribution to developing theoretical propositions on the question central to implementation research, i.e. what happens between the establishment of policy and the world of action (O'Toole, 2000). In studying the expected versus the achieved (DeLeon, 1999a) from the top-down perspective, Mazmanian and Sabatier develop and empirically put to the test a conceptual framework, arriving at six conditions for effective top-down implementation. In the ensuing debate on the validity of these and similar other prescriptors, revolving around the degree of clarity and consistency of policy objectives, or the role and amount of discretion of the micro-level implementing actors, Lane takes a normative stance, postulating that the ambiguity inherent in notion implementation (policy execution not necessarily bringing about policy accomplishment) requires a reorientation of implementation theory “to inquire into how accountability is to be upheld in the implementation of policies and how much trust is in agreement with the requirement of accountability” (Lane, 1987). The notion of ambiguity of multi-actor implementation in multi-level organizational settings is further developed by Matland, adding the notion of conflict and combining these two as central variables in a matrix to get four distinct types of implementation. Partly in response to Matland’s justifiable demand for structure (Hill, Hupe, 2002), Hill and Hupe construct a third-generation conceptual framework, arriving at three prescriptive perspectives on managing implementation with corresponding modes of governance (authority, transaction, persuasion) that refer to “alternative approaches to accountability, but not in any very explicit way” (Hill, 2005).

Second, the contributions to implementation theory discussed here show a joint interest in moving away from the oppositeness of top-down and bottom-up approaches and the elaboration of myriad variables towards synthesis and much

12 Also applicable to Sabatier; witness his acceptance of criticism of clear and consistent policy objectives (1986), and his move towards a study of policy change by synthesis of the top-down and bottom-up approach (Advocacy Coalition Framework).

13 As Meier says of the generalisability of variables in implementation studies: “forty-seven variables ... completely explain seven case studies” (1999, p. 5), stipulating that, to start over, “any policy implementation scholar who adds a new variable or a new interaction should be required to eliminate two existing variables” (p. 6).
greater parsimony with the notions of accountability, trust, ambiguity, and conflict that factor into it. However, as the Matland’s matrix illustrates, the top-down framework developed by Mazmanian and Sabatier still retains its conceptual value in studying policy implementation processes characterized by a low degree of conflict and ambiguity. Third, and most importantly, the theoretical approaches under discussion, in their distinction between formulation-implementation-reformulation (Mazmanian, Sabatier); accountability-trust (Lane); ambiguity-conflict (Matland); respectively, authority-enforcement, transaction-performance, persuasion-co-production (Hill, Hupe), invite use for heuristic purposes. What these four “concepts heuristic” to policy implementation have to offer for the study of higher education policy, particularly quality assurance as a policy domain, is the subject of the following two sections.

3.3. IMPLEMENTATION ANALYSIS IN HIGHER EDUCATION: PROMISING BEGINNINGS, DARK AGE, REINVIGORATION OF INTEREST?

3.3.1. In the Beginning there were Cerych and Sabatier …

A wave of concern in the first generation of implementation research about the effectiveness and efficiency of the US “Great Society” programmes also found expression in the arena of higher education. This was due to the research project carried out by the Paris-based European Institute of Educational and Social Policy at the turn of the 1970s and 1980s. This project applied policy implementation analysis to the study of higher education reform processes in nine predominantly West European countries 8-10 years after their initiation, with the majority of the reforms addressing the issue of transition from elite to mass higher education (Trow, 1974; Cerych, Sabatier, 1986). Following such a rationale with the aim to examine the extent to which the official reform goals had been attained and to analyse reasons for it, thus pointing to a reform success or failure, the research activities were carried out from the top-down perspective, distinguishing between policy formulation, implementation, and reformulation as distinct stages in the policy process. In analysing the degree of attainment of the reform goals, the relationship between legally-mandated goals and reform outcomes as well as the impact of general factors affecting implementation were particularly looked into. These factors referred to: legal (official) objectives, including reform programme clarity and consistency, as well as the degree of system change envisaged, the adequacy of the programme’s causal theory, the adequacy of financial resources, the degree of commitment to programme objectives by actors within the


15 With the exception of Poland and its system-wide attempt at instituting a preferential point system aimed at easing access to higher education for students of working class origin. The investigation of US higher education policy implementation was made by Burton R. Clark and appears in the annex to the book (Cerych, Sabatier, 1986).
ministry and the affected higher education institutions, the degree of commitment to programme objectives by legislative and executive officials and affected stakeholders outside the implementing agencies, and changes in the socio-economic conditions affecting goal priorities or the programme’s causal assumptions (Cerych, Sabatier, 1986). After finalisation of the project, the corresponding research findings were presented in *Great Expectations and Mixed Performance: the Implementation of Higher Education Reforms in Europe*, co-authored by Cerych and Sabatier.

Nowadays considered seminal higher education reading, the book has in its conclusions the authors’ discussion of the project outcomes from a comparative perspective, leading towards generalisable conclusions that have a bearing on a study of public policy implementation. The authors’ major points applicable to the theory of policy implementation, based on the study of higher education reform processes, can be summarised as follows (Cerych, Sabatier, 1986; Gornitzka et al., 2002; Gornitzka et al., 2005b):

- Clearly formulated and consistent policy goals facilitate effective implementation, however, as it is often not the case, vague goals are frequently the price for consensus, with the formulation of objectives often occurring in several phases with priorities changing from one to the next;

- Ambiguity and conflict in policy goals are often unavoidable, requiring, in implementation analysis, the refocusing from clear and consistent objectives to an acceptable mix of outcomes;

- In many cases, implementation processes lead to unexpected/unintended outcomes;

- Centralisation or decentralisation does not usually seem to be a decisive implementation factor. Linked to other forces, however, it may be of strategic importance in terms of amplifying either favourable circumstances or obstacles;

- Reform success can be enhanced by an adequate system of rewards and sanctions\(^\text{16}\), as well as by persistent support and commitment of high-ranking officials\(^\text{17}\);

- Implementation of new policies not referring to basic traditions in corresponding national contexts that are clearly inconsistent with the new policy goals is extremely difficult if not impossible, with the policies implying far-reaching changes possibly successful if aiming only at one or few system or institutional policy domains;

\(^\text{16}\) Possibly including more subtle means such as promotion, recognition or, on the other hand, “naming and shaming”.

\(^\text{17}\) Referring, again, to Bardach’s idea of a “fixer”; cf. Mazmanian and Sabatier’s six conditions for effective implementation. For a discussion of the meaning of a “fixer” in the implementation context, see Hill and Hupe (2002, p. 48).
The relationship between the scope of policy change and implementation success is probably curvilinear;

The special facets of higher education policies bearing on implementation are the many highly autonomous actors and the diffusion of authority throughout the system. As higher education institutions are more bottom-heavy than most other social sub-systems, policy implementation becomes very interactive – a factor that implementation analysis must take account of. Therefore, policy implementation analysis can benefit from the study of implementation of higher education reform processes in that the latter represent the most complex implementation processes in a context of ambiguous and often conflicting policy goals and a multitude of highly autonomous actors participating in policy realisation.

While most of the points are, in the light of general literature on policy implementation, rather obvious, the last but one – i.e. the relationship between the scope of policy change and implementation success – merits closer attention. Cerych and Sabatier base this finding on a more complex conceptualisation of the scope of change, distinguishing between depth, functional breadth, and level of change, for which they find empirical evidence in the higher education reforms that they have studied. Combined into a three-dimensional framework, depth of change refers to the extent to which a new policy goal implies a departure from the status quo, i.e. existing values and practices, the functional breadth of change corresponds to the number of functional areas in which a given policy introduces modifications, while the level of change indicates that the target of the reform is the system, a system segment (group of institutions), a single institution or its sub-unit (Cerych, Sabatier, 1986). The curvilinear relationship between the scope of change and the achievement of programme goals (successful implementation) occurs because policies with a very wide functional breadth and extensive depth of change, as a rule, encounter enormous opposition, whereas those with a narrow functional breadth and a small depth of change do not galvanise sufficient energy to overcome system inertia. Hence, reforms aiming at a moderate scope of change are likely to be implemented more successfully than those with a very high or very low scope (p. 248).18

Several generalisable conclusions can be drawn from weighting the pros and cons of the Cerych and Sabatier study more than twenty years after its publication. The Cerych and Sabatier implementation study of higher education reform processes clearly falls into the first generation category of implementation, not only due to the time-period in which the research was carried out, or the study’s title referring back to the Pressman

18 This inference is not corroborated in some recent implementation studies, particularly due to the role of “heroic ministerial-fixers” (Gornitzka et al., 2005a).
and Wildavsky classic, but also due to its focus on clarity and consistency of policy objectives. It owes much to the original Mazmanian and Sabatier top-down framework – witness the utilisation of the policy process heuristic (formulation-implementation-reformulation), as well as general factors of successful implementation in the study’s research design. With its top-down approach to policy implementation analysis, the study displays the limitations characteristic of the first generation of implementation studies with the corresponding pieces of criticism questioning especially its conceptualisation of the implementation of higher education reforms as largely a top-down process. There is little attention to core academic values, the plausibility of the enumeration of the factors or variables associated with success in implementation, and also the assumptions on the likelihood of attaining reform goals decrease in the case of “high-scope-of-change” reforms (Kogan, 2005). The two other particularly glaring shortcomings, i.e. the omission of reforms dealing with the curriculum and with management and with decision-making structures, together with the geographical imbalance in the choice of the case studies, the latter presumably due to the existence of the Iron Curtain, are admitted by the authors themselves (Cerych, Sabatier, 1986). Indeed, the application of Matland’s contingency concept reveals that if higher education implementation processes are considered as displaying a large bottom-heavy orientation – a point made by Cerych and Sabatier themselves – and, due to their complexity, also a high degree of ambiguity, then the top-down approach is grossly inaccurate in most cases. Despite all these limitations, including the possible “misfit” between research design and the phenomena studied, Cerych and Sabatier’s central hypothesis on the success of higher education reform being critically dependent on clarity and consistency of the reform goals and the degree of change envisaged, as well as other corresponding propositions – i.e. the role of ambiguity and conflict, or rewards and sanctions in higher education implementation processes – offered enough potential for further empirical as well as theoretical advancement. This potential is enhanced by the formulation-implementation-reformulation research design of the study, which makes replication possible. Given the popularity of implementation studies in the 1980s, one might have expected that this mind-provoking piece of research would be followed up, particularly as the British Open University was considered, along with the California coastal commissions, to be an example of the most successful implementation of a policy programme to date (Sabatier, 1986).

3.3.2. Followed by Lane but few Others …

However, this was not to happen – at least not in terms of implementation analysis per se – until the late 1990s, which saw a renewal of interest in higher education

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19 Parsons (1995) rather jokingly attributes the significant impact of Pressman and Wildavsky’s study partly to “its holding a record for one of the longest subtitles of any book on policy, including government reports” (p. 463).
implementation analysis, albeit pursued under different rubrics. Looking back on the developments pertaining to policy implementation research, O’Toole notes:

More than a quarter century following that brave and promising opening to the systematic investigation of this topic\(^{20}\), assessments on the theory-practice question have become considerably more sobering. Theories about policy implementation have been almost embarrassingly plentiful, yet theoretical consensus is not on the horizon. The number of variables offered by researchers as plausible parts of the explanation for implementation results is large and growing. Disputes among proponents of different perspectives on the implementation question have filled volumes. Different investigators pursue explanations for different kinds of dependent variables, with relatively little dialogue regarding what might be the most appropriate explanandum. After hundreds of empirical studies, validated findings are relatively scarce. Few long-term longitudinal studies have been completed. And, most telling of all, those who have specialized in studying implementation questions systematically have had relatively little to say to practitioners (2004).

Though not free from the limitations to which O’Toole refers as the sheer variety of variables, lack of consensus on theory, little interdisciplinary dialogue, limited generalisability of outcomes, scarcity of validated findings, or limited practical applicability of implementation studies, all attesting to the slippery concept of implementation (Hill, 1997), policy implementation analysis is still in no way yesterday’s issue (ibid; cf. Hill, Hupe, 2002). This is due to the richness of the (often contrasting) empirical evidence that implementation studies have yielded, and for the rather self-evident reason of the continuity of policy implementation processes. On the other hand, the analysis of the state of higher education implementation research made Åse Gornitzka and her colleagues, Svein Kyvik and Bjørn Stensaker, at about the same time renders a different picture:

A search for comprehensive\(^{21}\) implementation studies in higher education using criteria originally launched by Pressman and Wildavsky is a rather disappointing affair. It is not an easy task to find studies that carry the word “implementation” or a reasonable synonym in the title. Even if one may find the word implementation in many higher education texts appearing since the Cerych and Sabatier study, the word is often not defined or analytically specified, indicating that the implementation process is not of main interest of the studies conducted (2002).

A comparison of the two perspectives prompts a rather obvious question: why, in comparison with the thrust of public policy implementation research generating some modest advancements in implementation theory\(^{22}\) as well as a large body of studies,

\(^{20}\) Obviously referring to the seminal study (1973) by Pressman and Wildavsky.

\(^{21}\) Emphasis added.

\(^{22}\) For an overview, see O’Toole’s article in Journal of Public Administration Research and Theory (2000).
plentiful as they were especially in the 1980s, were there almost no corresponding lines of inquiry into implementation of higher education policies that would capitalise on the findings and research design of Cerych and Sabatier’s study? To take but one example; the theoretical underpinnings of the large comparative research project undertaken under the heading “Policy Change in Higher Education: Intended and Unintended Outcomes” by Lyn Meek and other major scholars in the early 1990s makes no reference to Cerych and Sabatier’s study (Meek et al., 1992). In their analysis, Gornitzka, Kyvik, and Stensaker propose several possible reasons for such a development:

- The complexity of the research task due to its significant “bottom heaviness”, stemming from a large degree of autonomy of the actors, i.e. members of academia within implementing institutions of higher education;
- The lack of an agreed perspective due to the bottom-up vs. top-down oppositeness;
- The relative scarcity of US-based higher education implementation studies – and therefore the missing contribution of leading US scholars – observable in comparison with the European context23;
- The change in public policy in higher education has led to increased interest in programme evaluations and research-based evaluations;
- Increased interest in the self-regulation model of public steering of universities and colleges has led to increased attention for the adaptive and innovative higher education institution;
- The ideological shift in policy towards customers and consumers, market and deregulation has led to an increased interest in studying new forms of policy formation and implementation acknowledging the blurring boundaries between higher education and industry, employment and the economy (2002).

Due to the book’s focus on higher education quality assurance, the last three of these reasons deserve further attention. Given their clear interrelatedness (Gornitzka et al., 2002), they can be condensed into a single, oft-made argument that the universal trend towards massification of higher education, observable from the 1980s onwards,

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23 The geographical imbalance in the Cerych and Sabatier study pertains not only to the CEE region but also to the US states. In the annex to the study, Clark (1986) explains this by different system governance structures, with the US reforms not initiated and enacted from the federal level but typically from the state level. However, this imbalance further gives rise to speculation on the reasons leading Cerych and Sabatier to choose a top-down approach to the study of European higher education reforms between 1979-1981, given the fact that the leading European perspective on studying implementation processes of the time was clearly the bottom-up approach, due to the research undertaken by Swedish scholar Benny Hjern and his colleagues with relevant major bottom-up publications just round the corner (1981, 1982). The self-evident, though not necessarily correct, answer might be that one of the authors of the 1986 study was, at the time of the project, a leading proponent of the top-down approach and had the corresponding sophisticated conceptual framework available to borrow from.
required more complex institutional strategies and solutions than the centre (typically the national/federal ministry of education) could meaningfully handle by strict, central regulatory measures. Institutions of higher education on the implementation periphery are therefore given more leeway (autonomy), including the formation of institutional strategies, financial operations and staffing in return for accounting for their activities to the centre representing the state’s interests24. Importantly, this “steering from a distance approach” to the sector’s governance by the centre, owing much to New Public Management and neo-institutionalism, resulting in greater system decentralisation and also in greater institutional accountability, has had profound implications for ways of assuring quality of institutional activities. Higher education was by no means the only policy arena affected. From the broader public policy perspective, Hill and Hupe remark:

After 1973, when Pressman and Wildavsky discovered and explained the possibility and gap between the intensions and outcomes of a policy, a major part of the research agenda was filled by the study of implementation. Therefore, one may speak more specifically of a policy implementation paradigm ... At the beginning of the eighties – the Thacher-Reagan era – this paradigm, which had been so closely connected to large-scale policy programmes of an interventionist central government, was replaced ... Implementation was defined away; it was management that mattered instead. More precisely, with the contractualism embodied in what can be called the new public management (NPM) paradigm the ins and outs of implementation were left to the managing “agent” with whom the “principal” makes a contact specifying expected outputs ... It may, however, be said that another aspect of the implementation issue emerged with this: the implementation of effective regulatory policy. Though the vertical orientation inherent in the policy-implementation distinction remained intact, the “stiff chain” became a “rope” ... Yet, in the 1990s the traditional relevance of the central political institutions began to be relativized ... Thus one can speak of a governance paradigm emerging in the 1990s. Its differences from the previous paradigms are, first, the greater attention to relations of dependency, implying that (central) government is not expected to do everything always on its own (2002).

As suggested, in the arena of higher education, embracing the “steering from a distance” governance approach by the top-level implementation structures (ministries of education) led to the development of quality assurance mechanisms, generally getting increasingly “heavy in touch” due to rising requirements for institutional accountability. Corresponding to this major shift in underlying assumptions on higher education governance bearing on the implementation of policies – see the argument put forward by Hill and Hupe (2002) on the relationship between modes of governance and implementation management styles – in individual higher education policy domains,

24 Obviously, the line of this argument applies to the tradition of continental Europe not the British tradition, which, in fact, witnessed opposite developments – see the studies of Maurice Kogan and his colleagues (2000, 2006).
quality assurance of higher education becomes an increasingly research-intensive topic. This took place roughly from the mid-1980s onwards, a time when quality assurance policies were being initiated in the “pioneer countries”, i.e. the United Kingdom, France, and Netherlands (Van der Wende, Westerheijden, 2003; Schwarz, Westerheijden, 2004a). This was particularly the case after the construction of the four-element, general model of quality assurance (Van Vught, Westerheijden, 1994).

After the introduction of the model, which identified four basic elements of a quality process – a coordinating agency, institutional self-evaluation, external peer review, and reporting of the results – to the research community in the 1994 Higher Education article, the following years, or rather the decade, were marked by an overwhelming number of studies exploring the applicability of the model in various system and institutional settings. Not least because of the Bologna Process associated harmonisation pressures, the focus shifted in time to exploring the accreditation-like extension of the model’s output. This gave rise to the accountability-improvement debate, due to the oppositeness of the corresponding policy instruments: accreditation and evaluation. As evaluation and accreditation-related issues, and also findings on the model’s applicability, were dealt with in detail in Chapter 2, they will not concern us here (for relevant overviews, see e.g. Frazer, 1997; Brennan and Shah, 1997, 2001; Billing, 2004). Instead, two important points should be made. First, the general model introduced the “stagist approach” to the study of quality assurance processes by means of four “dependent” variables. Second, the multiplicity of research studies assessing the applicability of the model in different settings attests to the blurring boundary between implementation and evaluation research – a point made by Gornitzka, Kyvik and Stensaker in their 2002 analysis (pp. 403-405).

There may have been several reasons for the lack of follow-up on the Cerych and Sabatier implementation study. There was a major shift in the system governance philosophy of the top-level actors that had brought the quality assurance related agenda to prominence. Three other, less obvious reasons also come particularly to mind. The first refers to the blurring boundaries between researchers and practitioners in higher education, with the practitioners often, as practicing professionals in a given discipline, showing only tepid interest in and reluctance toward the propositions and findings of the researchers. As Teichler noted:

“the highly educated and reflective practitioners in higher education are more inclined than the actors in other fields (although we note a somewhat similar notion among various professionals) to believe that research on higher education is unnecessary. The practitioners’ reflection is seen as sufficient to understand reality. This assumption is often reinforced by the fact that the practitioners know that they have greater field knowledge. Researchers note that scholarly insight is often treated by practitioners as just another opinion. Paradoxically, the academic profession trying to persuade society that systematic scholarship and research is superior to the practitioners’ experience and is essential for progress,
is most sceptical about the value of scholarship, if it comes to their practical turf, i.e. higher education” (2000).

This scepticism of higher education practitioners toward the propositions and findings of higher education oriented policy research/analysis thus may have factored into the lack of utilisation of Cerych and Sabatier's findings. The second, somewhat related reason concerns what Olsen and Maassen (2007) term the “strong sector-isolatedness” of higher education research from other research fields, including public policy and implementation analysis, leading to little cross-fertilisation. This again, particularly in combination with growing disillusionment of policy implementation scholars with hundreds of independent variables that have little value for forming an implementation theory, may have contributed to “calling it quits” as far as higher education policy implementation was concerned. A third factor may have been that no systematic attention was given to developing propositions on the subject of studying the implementation of higher education reforms in reflection of the 1986 findings by Sabatier, turning to the study of policy change within the Advocacy Coalition Framework, with Cerych, in the early 1990s, becoming a consultant to the then Czechoslovak Ministry of Education, Youth, and Sports and being involved in establishing the Charles University-based education policy centre25.

Nevertheless, despite all the reasons working against implementation analysis carried out along the lines of Cerych and Sabatier's original research, there is one important piece of work that can be considered to have drawn from it. It is the book Institutional Reform. A Public Policy Perspective, by Jan Erik Lane, author of the 1987 synthesising approach to policy implementation studies, as well as the case study of the University of Umeå within the research project to which Cerych and Sabatier made such a lasting reference with their Great Expectations and Mixed Performance. Published in 1990, the book gives “a theoretical review of general policy models available for analysing policy implementation, and at the same time it provides the reader with an overview of models of the policy sector in focus: higher education” (Gornitzka et al., 2002). In assessing the book's impact on studying higher education policy implementation, Gornitzka, Kyvik, and Stensaker point out:

Even if the book contains a broad theoretical overview and interesting empirical data, it is still the methodological aspects of carrying out implementation studies that are of particular interest to the reader. The provision of a set of conceptual distinctions, both with respect to the applicability of various organizational models to higher education decision-making and the evaluation of reform outcomes, is a tool that will offer much to the student of various implementation processes in higher education. Not least, the book gives a careful treatment of questions with respect to the criteria for determining

25 Strictly speaking, the Education Policy Centre attached to the Faculty of Education of Charles University in Prague.
“policy success” versus “policy failure”. What is successful implementation to one group may be policy failure to another group26 ... Lane’s distinction between the feasibility and desirability of a given policy is, therefore, a useful reminder for everyone doing implementation studies (2002).

3.3.3. With the Missing Link Revisited by Gornitzka and Other Scholars

Implementation analysis of higher education policy reforms made under a different rubric, as when Goedegebuure in 1992 applied resource-dependence theory to the study of college mergers in Australia and the Netherlands, was continued from the late 1990s onwards. The important contributions were studies carried out by the team led by Gornitzka within the TSER-HEINE project, with the conceptual framework built around two perspectives on organizational change, i.e. resource dependency and neo-institutional theory, and the comparative study by Kogan and his colleagues looking into policy change processes in the UK, Norway and Sweden using the actor-context model of higher education change. Since these research undertakings as well as the concept of the implementation staircase (Trowler, 2002) are treated in detail elsewhere (Gornitzka, 1999; Maassen, Gornitzka, 1999; Gornitzka, Maassen, 2000; Kogan et al., 2000; Kogan et al., 2006), we can proceed directly to the work which explicitly refers back to Cerych and Sabatier’s 1986 seminal study. This work, published as a monograph Reform and Change in Higher Education: Analysing Policy Implementation in 2005, co-edited by Gornitzka, Kogan and Amaral, is the outcome of the 2003 conference of the Consortium of Higher Education Researchers27, which “had as its main theme change in higher education and took as its starting point a critical appraisal of the seminal work by Ladislav Cerych and Paul Sabatier Great Expectations and Mixed Performance: The Implementation of Higher Education Reforms in Europe (1986)” (Amaral, Enders, 2005, Preface, XV). The monograph opens with three general chapters on policy implementation in the higher education context, followed by 16 national case studies. Based on the analysis of individual case studies as well as, to some extent, a review of theoretical advancements on developing the two major approaches to implementation, top-down and bottom-up, the monograph draws attention to issues bearing on the success or failure of processes for implementing higher education policies. These issues, in short, are: changes in the policy context of implementation, or in the political climate; rising complexity of the policy-making processes due to the multiplicity of layers and actors involved; the discrepancy between the initially high government expectations and the reform outcomes giving rise, in some cases, to a change in the character of such expectations in the long-term perspective as a result of policy learning; the role of government reforms

26 A clear reference to the point made by Palumbo and Calista (1990) on the different way of perceiving implementation success/failure depending on the actor’s positional hierarchy in the implementation chain.

27 About 100 scholars from 21 countries attended this conference.
in change processes\textsuperscript{28}; and the role of “heroic ministers” vs. the obstinacy of implementing institutions (Gornitzka et al., 2005a). Having in mind these generalisations which can, in a way, be read as an update on the Cerych and Sabatier’s 1986 findings through the eyes of twenty-first century scholars as they look into the implementation of policy reforms, in several cases spanning over 20-30 years, Gornitzka, Kogan and Amaral arrive at the following pointers for future research:

An issue which applies to all study areas that rest on policy problems and where domains rather than disciplines are the appropriate approach is the extent to which empirical case studies feed into or rest on theoretical approaches. The richness of materials presented here invites the thought that whilst many studies in our field make use of theories and concepts from the social sciences, not enough is done to make sure that they themselves feed into the developing and testing of theory ... Central on the agenda will then be to renew our interest in the public policies of higher education ... There remain the conflicting perspectives of top-downers and bottom-uppers. There is a case, to judge by our empirical examples, for taking an eclectic and case by case approach on this question. It would thus be difficult to construct a combined model, unless one could specify those areas of policy that are likely to be top-down (e.g., those deriving from broader social and economic policies) and those deriving from the substantives of higher education activity (e.g., learning and teaching) which would be bottom-up (2005a).

The 2005 monograph, which draws directly on Cerych and Sabatier's 1986 findings, revisits the topic of implementation analysis in higher education by providing an up-to-date empirical resource base upon which domain-specific frameworks and models can be tested. The editors point to the potentiality of identifying higher education policy areas that are predominantly top-down or bottom-up oriented, with a corresponding choice of the approach for studying them, thus opening a window of opportunity for constructing a combined model/framework. This is certainly a challenging and contestable approach for forming relevant hypotheses whose verification/falsification could bring some modest contributions to the theory of policy implementation. Paradoxically, the greatest drawback of the monograph is in its empirical basis, which does not include any case study from the post-communist CEE countries (the Austrian case comes closest), thus repeating the geographical bias of Cerych and Sabatier’s study. Those wishing to study policy recommendations to perform successful implementation also in view of the review of CEE higher education systems are best directed to the outcomes of the OECD “Thematic Review of Tertiary Education” project, generally aimed at providing policy makers with an analysis that can be utilised in the process of formulating and implementing higher/tertiary education policies in line with achieving

\textsuperscript{28} As Gornitzka, Kogan, and Amaral point out, “government reforms can be seen as integrated parts of ongoing processes of change, where policies of governments can be as much a response to change as a source of change” (2005a, p. 9).
national social and economic objectives. The final chapter of the synthesis report (Tremblay, 2008) provides another set of generalisable conclusions on effective policy implementation that should be of interest to anyone practising or analysing policy implementation in higher education.

In tracing back the developments pertaining to higher education implementation analysis in the time since the publication of Cerych and Sabatier’s seminal work, several observations apply. First, due to the lack of follow-up studies reflecting and building on Cerych and Sabatier’s hypotheses and findings, coming no later than in 2005, it can be argued that implementation analysis in higher education is an under-researched topic. Only time will tell whether the follow-up monograph by Gornitzka, Kogan and Amaral, published in one of the major series on higher education, will find a greater response amongst the research community than Cerych and Sabatier’s classic did. This leads me to the second argument that, in retrospect, although the scepticism of higher education practitioners and the sector-isolatedness of higher education research both factored into the lack of utilisation of Cerych and Sabatier’s work, by far the most significant reason for such a state was the changing mode of system governance of higher education adopted by top-level actors. This ranged from central regulation to steering from a distance, bringing with it the “overnight popularity” of the quality assurance agenda, with a corresponding shift in themes subjected to intense research. Attesting to the rather haphazard nature of research inquiry, the multitude of investigations into the applicability of the general model29 of quality assurance in higher education by Van Vught and Westerheijden in different contexts in the 1990s, continuing in a somewhat more sophisticated manner till the present day – witness the accountability-improvement debate – lead to the third argument. This is that higher education implementation research per se has been superseded by quality assurance research, which assesses the extent of the model’s applicability in various configurations of settings, thus attesting to the blurring boundary between policy implementation and evaluation research, in line with the argument made by Browne and Wildavky (1984). However, Browne and Wildavky caution us that, despite such a blurring boundary, “the conceptual distinction between implementation and evaluation is important to maintain, however much the two overlap in practice, because they protect against the absorption of analysis into action to the detriment of both” (1984). Thus, taken with a pinch of salt, the argument can be made that any higher education quality assurance study assessing the extent to which the purposive action(s) attains the corresponding objectives by producing (un)expected outcomes, can be considered as containing an element of policy implementation research. Finally, two more points of a comparative nature should be made here. The first concerns the parallelism between the study of quality assurance

29 In reflection of the distinctions between a framework, theory and model, made by Sabatier, defining a “model” as a “representation of a specific situation ... usually much narrower in scope and more precise in its assumptions” (1999, p. 6), I am not at all sure that the construction of Van Vught and Westerheijden fulfils the definition criteria of the model, but, in order not to cause further terminological confusion, I have kept to the term as used in the majority of scholarly literature on the subject.
processes and the policymaking process in general, both decomposed into the individual “stages heuristic”. In public policy, such a decomposition – typically agenda setting, policy formulation (design), implementation, evaluation, reformulation (or possibly termination) – has sparked an intense debate between the critics (Sabatier) and the advocates (DeLeon) of such an approach. In the case of the general model of quality assurance, the model introduced a four-stage distinction between the coordinating agency, institutional self-evaluation, external peer review, and the reporting of the results. Though not uncontested by some, e.g. Brennan (1999), with references in Stensaker (2007) and Westerheijden (2007), it seems safe to assume that the model at least partly owes the widespread attention paid to it by the higher education community to its introduction of the “stagist approach” to the study of quality assurance, with the corresponding heuristic value. Correspondingly, the dozens of independent variables used by researchers in assessing the model’s applicability in different contexts (for an overview, see Harman, 1998) invites a comparison with the similar development in public policy implementation studies, especially throughout the 1980s, accompanied by the mounting dissatisfaction with the rather limited value of these independent-variable propositions for forming generalisable conclusions. It remains to be seen whether research within the quality assurance policy domain will also face such a challenge; it is not unreasonable to assume that, sooner rather than later, it will.

3.4. IMPLEMENTING ESG: AN EASY UNDERTAKING?

The adoption of the Standards and Guidelines for the European Higher Education Area (ESG) at the ministerial meeting in Bergen 2005, elaborated by ENQA in cooperation with the other members of the E4 group, following the Berlin ministers’ call “to develop an agreed set of standards, procedures and guidelines on quality assurance, to explore ways of ensuring an adequate peer review system for quality assurance and/or accreditation agencies or bodies, and to report back through the Follow-up Group to Ministers in 2005” (Berlin Communiqué, 2003), has subsequently been the subject of a wide range of discussions. These have produced an equally wide range of viewpoints on the clarity of the ESG purpose, content (checklist or more), terminology (again), implications for institutions of higher education and quality assurance agencies given the variety of contexts, as well as conditions for successful implementation. In their variety, the viewpoints seem to converge on stressing the need for continued discussions concerning the ESG-related implementation agenda, as quality assurance purposes and quality culture are not fixed for all time (Newton, 2007; Harvey, 2008). In line with the focus of the chapter, this section aims at contributing to such a discussion by providing an overview of the ESG implementation process and, somewhat more generally, by

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30 For both arguments in one volume, see Theories of the Policy Process, edited by Sabatier (1999).

31 As Harvey puts it, “In discussions of quality and standards there is often confusion over the use of the terms. Quality is not the same as quality assurance, nor are standards and quality the same. Furthermore, quality and standards are both distinct from quality standards” (2008, p. 80).
pointing out the heuristic potential of selected synthesising public policy concepts for analysing the implementation of ESG.

In order to get a better insight into the ESG-related implementation agenda, it is necessary to clarify the context in which the ESG guidelines were worked out, as well as the formulation of individual standards. As suggested, the ESG guidelines were worked out over a period of two years by the joint efforts of the E-4 group, with the official mandate delegated to ENQA in the wake of the ministerial call for a set of agreed-upon standards and guidelines on quality assurance within the Bologna signatory countries. However, as Williams recounts, the mandating was not free of ambiguity:

This [mandate] came as a surprise to ENQA, which had not been consulted about the proposal. The [Berlin] communiqué gave no indication on the intended purpose of such standards, procedures and guidelines, how they were to be used, or, indeed, what was meant by the phrase itself. Nevertheless, over the next eighteen months ENQA, EUA, ESIB\(^{32}\) and EURASHE came together to form the so-called “E-4 Group” and worked hard to devise a European dimension to quality assurance which would meet the ministers’ call ... Two working groups were set up by ENQA. One worked on the peer-review system for agencies ... The second working group set about devising standards and guidelines for institutions’ and agencies’ quality assurance processes (2007).

Although there were no in-advance consultations with ENQA on its mandate, the choice of ENQA as the agency responsible for ESG implementation does not seem to have been accidental. Established in March 2000 with the aim of promoting European cooperation and networking in higher education quality assurance, building on the 1998 Council recommendation (EC, 1998) and, somewhat more distantly, the EU 1994-1995 pilot project (cf. Van der Wende, Westerheijden, 2001), the scope of ENQA activities was in line with what was called upon and, moreover, the association had the means for the task, as the Commission had provided grant support for ENQA since the very beginning (ENQA, History). With respect to ESG, the efforts of the two working groups led towards drafting a single report which, after endorsement by the E-4 Group, was approved by the ministers and “turned into” ESG at the Bergen meeting. The ESG guidelines comprise twenty-three standards, each with the corresponding guidelines, broken down into three sections (ENQA, 2005)\(^{33}\) as follows:

- section one with seven standards for internal quality assurance within higher education institutions (1.1 policy and procedures; 1.2 approval, monitoring and periodic review of programmes and awards; 1.3 assessment of students; 1.4 quality assurance of teaching staff; 1.5 learning resources and student support; 1.6 information systems; 1.7 public information);

\(^{32}\) From 2007, ESIB changed its name to ESU (European Students’ Union).

\(^{33}\) Given the easy accessibility of the ESG on the website of ENQA, the standards are not given in full with the corresponding guidelines.
— section two with eight standards for external quality assurance in higher education (2.1 use of internal quality assurance procedures; 2.2 development of external quality assurance processes; 2.3 criteria for decisions; 2.4 processes fit for purpose; 2.5 reporting; 2.6 follow-up procedures; 2.7 periodic reviews; 2.8 system-wide analyses);

— section three with eight standards for external quality assurance agencies (3.1 use of external quality assurance procedures in higher education; 3.2 official status; 3.3 activities; 3.4 resources; 3.5 mission statement; 3.6 independence; 3.7 external quality assurance criteria and processes; 3.8 accountability procedures).

However, a mere enumeration of the standards suggests little about the fundamental assumptions that ESG is based on. Given the “wickedness” of the quality assurance policy domain, ESG follows a generic, non-prescriptive approach to quality, taking as its starting point the 2003 Graz Declaration, which states that “the purpose of a European dimension to quality assurance is to promote mutual trust and improve transparency while respecting the diversity of national contexts and subject areas” (ENQA, 2005). Furthermore, as Williams explains, “underpinning the standards and guidelines there are three fundamental principles: the interests of students, employers, and society more generally, in good quality higher education; the central importance of institutional autonomy, tempered by a recognition that this brings with it heavy responsibilities; and the need for a “fitness for purpose” test for external quality assurance, which ensures that the burden it places on institutions is no greater than is absolutely necessary” (2007). As regards the ESG contents as such, it has to be pointed out that, apart from the quality assurance standards and guidelines, ESG also includes a proposal to establish a register of quality assurance agencies operating in Europe and the European platform for consultations, exchange of experience and exchange of good practice in quality assurance. The proposal of these two policy instruments gave rise to the European Quality Assurance Register for Higher Education (EQAR), established by the E-4 Group in March 2008 with the function of registering those quality assurance agencies that substantially comply with ESG, and to the European Quality Assurance Forum held annually since 2006.

The adoption in 2005 of the ESG as the supranational quality assurance policy programme to be implemented nationwide or institutionwide can also be said to have implications both for Bologna policy agendas and for Bologna politics. The latter relates to a rather obvious strengthening of the Commission’s influence, due to its funding support, in a process that “can be seen as, at least initially, an attempt to recover a national and educational sector initiative as a countermove to the power of the Commission” (Olsen, Maassen, 2007). Observable from 2000, marking the ENQA foundation (Witte, 2006), the strengthening the Commission’s influence takes place not least due to the lack of a permanent secretariat for the Bologna Process, an institutionalised administrative executive support structure, and independent resources (Olsen, Maassen, ibid). As to the implications of ESG for Bologna agenda-setting, the guidelines are associated with the rising importance of the quality assurance policy domain within EHEA-building. With a two-line reference in the Bologna Declaration
(1999), the situation changes in Prague, where the ministers “called upon the universities and other higher educations [sic] institutions, national agencies and ... ENQA, in cooperation with corresponding bodies from countries which are not members of ENQA, to collaborate in establishing a common framework of reference and to disseminate best practice” (Prague Communiqué, 2001), with the ESG proposal coming high on the ministerial agenda in Berlin and Bergen. Given the existence of accounts mapping the Bologna Process developments pertaining to quality assurance (Witte, 2006) particularly in the context of the Trends Reports (Šebková, Kohoutek, 2007), no such analysis is aimed at here. The aim here is to suggest that there had been a breeding ground for adoption of the ESG adoption since 2001. There had been repeated ministerial calls to “frame” the issues of quality assurance as well as the converging mechanisms of quality assurance of the Bologna signatories driven by the accountability rationale prevailing upon improvement. The importance of the quality assurance agenda on the ministerial, top-level, high speed track (see further) is likely to have peaked in 2005, the year of the adoption of the ESG policy programme, with subsequent day-to-day implementation management left to the mandated supranational agency, i.e. ENQA (particularly the ENQA board and secretariat).

The ESG implementation process, then, goes through three basic levels. At the top-level, ENQA, as the supranational agency with the delegated ministerial mandate, oversees the implementation of ESG at national level by national quality assurance agencies whose ESG-based external operational practices (ESG 3.1, 3.3, 3.7) to some extent, via institutional policy (ESG 1.1), factor into the internal quality assurance arrangements of individual higher education institutions (institutional level). However, because no explicit statement is in place on the consequences of institutional ESG compatibility for the corresponding national quality assurance system, such a top-down structuring of the ESG implementation process still does not rule out the potentiality of an implementation misfit between an ESG-compatible institution of higher education and the respective national quality assurance agency, also declared ESG compatible. The institution of higher education has no guarantee that its ESG compatibility can prevent e.g. the withholding/withdrawal of accreditation of some of its degree programmes by the national agency. A possible explanation is that, due to well-known national sensitivities, the underlying ESG assumptions fully respect the subsidiarity principle, as “the EHEA operates on the basis of individual national responsibility for higher education and this implies autonomy in matters of external quality assurance” (ENQA, 2005). Nonetheless, the potentiality of an institutional and national ESG implementation misfit is certainly worthy of further empirical investigation.

However, dealing with the structuring of the ESG implementation process, we should not lose sight of the wider context, particularly of the dynamics of the Bologna Process itself. The studies of the dynamics of the Bologna Process (Neave, 2002, 2003b;}

34 Though her PhD thesis aims primarily at analysing the implementation of a three-cycle degree structure.

35 Including, in fact, all ESG Section 2 standards for external quality assurance processes.
Neave, Maassen, 2007) have been recently complemented by an analysis of the implementation of Bologna-initiated national reforms (Tomusk, 2006), which suggests, by and large, that from the perspective of the periphery the reform implementation processes take on their own context-bound dynamics. This is, obviously, not least because of the bottom-heavy orientation of higher education systems, often quite different from the situation assumed by the centre36. Hence, if implementation analysis of any Bologna-associated policy programme (ESG) is to minimise the danger of overlooking the potentiality of the implementation gap by sticking to a top-down, “communiqué” perspective, it must take into account the dynamics of the Bologna Process in consideration of the levels down the implementation chain. The conceptualisation of the Bologna Process dynamics by Neave and Maassen (2007) fulfils such a requirement. In their conceptualising of the Bologna Process, Neave and Maassen make a distinction between the ministerial, high-profile perspective, characterised by rapidly evolving agendas set upon updating and adding new objectives at two-year intervals, and the grounded perspective of units charged with implementing these objectives. The difference between the two perspectives, then, implies:

that the Bologna Process advances at various speeds ... There is a “high speed track,” represented by the statements of intent and the continuous adding of new items by each succeeding Ministerial Conference. However, one gets a less complacent vision of progress achieved when attention turns to implementation, which moves at a very different pace, as most of the progress reports admit, albeit reluctantly (Neave, Maassen, 2007).

With this conceptualisation applied to the ESG implementation agenda, a difference can be drawn between the high-speed track (communiqué track) and the implementation track encompassing quality assurance agencies and higher education institutions of the Bologna signatories (implementation agency track), possibly losing out in speed to the “communiqué track”. The results of implementation of the Bologna agendas (typically quality assurance, three-cycle study structure, etc.) by the Bologna signatories have recently been translated into communiqués through the stocktaking reports and, in the case of higher education institutions, through the EUA Trends Reports. In the case of ESG programme implementation, the Trends V give a rather contradictory view, stating that “much work has been done to develop internal quality processes in institutions ... [b]ut relatively few institutions seem to take a holistic approach to quality improvement” (Crosier et al., 2007). At system level, the results reported in the May 2007 stocktaking report37 show discrepancies between what is declared to have been achieved and what has actually been achieved. To take but one example, the Bologna stocktaking report from May 2007 classifies the quality assurance system of one European country with three quality assurance agencies altogether as

36 Set by the contents of the Bologna declarations, communiqués, and progress reports.
37 With the deadline for submission of national reports of the Bologna signatories set to 15 December 2006.
being in line with ESG and fully operational (dark green category) (BP Stocktaking, 2007). However, if in line refers to the agency successful undergoing a review against ESG, the reviews of the country’s respective quality assurance agencies were not completed until September-November 2007 (ENQA, Review Reports and Decisions). However, we should not make too much out of this, as the construction of the corresponding indicator, strangely enough, enables a claim that the system ESG implementation has been started without setting the procedural plans and deadlines for it. This attests to the grossly inadequate methodology of the Bologna progress reports (Neave, Maassen, 2007). Despite the ESG-related methodological distortions, however, the available evidence still gives ground to a difference between the high-speed “communiqué” track and the implementation agency track – in other words, to the existence of an ESG implementation gap between the centre, which considers ESG “a powerful driver of change in relation to quality assurance” (London Communiqué, 2007), and the reality on the implementation periphery represented by the quality assurance agencies and the institutions of higher education.

In view of the interconnection between the implementation process and its governance, some theoretical assumptions should be made on the way the Bologna Process is coordinated, and on the ESG as its quality assurance programme. The overarching approach used within the EU for coordinating politically more sensitive policy arenas – i.e. those more difficult to legislate – traditionally within the domain of the member states such as employment, social policy, migration, criminal prosecution, and education (Gornitzka, 2005), is the Open Method of Coordination (OMC). Officially adopted at the Lisbon summit as an alternative to the Community Method (CM), the “hard-law” mode of governance, which delegates considerable power to the Commission (Schäfer, 2004), OMC, which makes use of periodic monitoring, indicators, benchmarks, evaluation, and peer review, relies on inter-agency learning as its basic coordinating force (Gornitzka, 2005). OMCs low degree of legalization thus makes it a soft law approach, relying, in the absence of legal or economic sanctions, largely on reputation mechanisms. As Gornitzka points out:

The normative pressure stemming from a desire to look good or fear of being embarrassed may be a strong mechanism for converging with the European definition of good policies and striving for performing well on the indicators in cases where it is considered important to keep up with the “European Jones’s”. OMC processes would represent, in addition to a site of learning, a podium where badges of honour and shame are awarded through the presentation of national performance data in league tables and scoreboards (2005).

Seen in relation to the Bologna Process, the procedural activities, i.e. the drafting and adopting of communiqués, trends reports, and stocktaking reports with performance criteria and indicators, as well as the underlying characteristic of the policy arena itself (the subsidiarity principle due to the states’ vested interests, loose couplings due to institutional autonomy), attest to the application of OMC. The use of OMC as the method for coordinating the Bologna Process agendas has not, however, come unopposed. Veiga and Amaral (2006) question the appropriateness of applying OMC as
a mode of governance. They see it as modelled on a hierarchical, top-down implementation approach to the Bologna agendas, whose implementation fit or misfit hinges on the actors on the implementation periphery. Their argument, drawn from higher education policy implementation literature case study and document analysis, as well as the concept of competitive emulation (Neave, 2005), is that in the process the Bologna signatories “adopt competitive emulation postures and the European Commission presents guidelines, defines implementation indicators, organises follow-ups and makes recommendations. However policy implementation in HE is non-linear, which works against the basic assumptions of OMC and the implementation of the Bologna Process” (Veiga, Amaral, 2006). Such criticism of OMC questions the degree of linearity that OMC entails as a governance instrument for implementation of the Bologna Process agendas.

The conceptual framework developed by Hill and Hupe on managing implementation processes may help to throw some light on this issue. Application of the framework’s basic attributes, i.e. the character of policy formation, institutional arrangements, and operational management in conjunction with the corresponding groupings of manipulable variables to CM and OMC suggests38 that each of the methods falls into a different category with a distinct mode of governance. The character of CM, as a “hard-law” method, makes it primarily an authority-based mode of governance, due to its hierarchical structuring, rule application, and legally enforceable resolutions. On the other hand, OMC, which is applied to politically sensitive arenas where consensus is harder to reach because of the actors’ vested interests and looser inter-agency couplings (typically networks), makes use of subtler means such as consultation, monitoring, and evaluation, which are typical for the persuasion-based mode of governance. The differences between the two classifications – CM as the governance by authority mode, relying on enforcement, and OMC as the governance by persuasion mode, relying on “naming, honouring, or shaming” in co-production of outputs – stand out even more sharply when one considers the corresponding drivers of implementation. In the case of CM compliance, binding legal resolutions are the driving force, whereas OMC, as the persuasion-oriented mode, is driven by trust in the expert judgement of largely autonomous actors, with accountability as the product of actors’ networking interactions. Following this line of argument, a difference can thus be made between the degree of linearity of the implementation processes governed by CM and OMC. CM pertains to far more hierarchical structures (an implementation chain) than OMC which, to keep the metaphor, can be compared to a woven thread in the way of managing implementation. Hence, a comparison of CM and OMC made on the basis of the Hupe and Hill’s framework shows OMC as the least linear of all three modes of governance (authority, transaction, persuasion) identified by Hupe and Hill. This makes OMC suitable for managing implementation processes in decentralised, issue-sensitive arenas such as

38 In acceptance of the ideal-typical classification.
higher education. The argument on the inappropriateness of OMC as an instrument for managing supranational higher education agendas would thus be tenable only if one were able to suggest a better alternative. Rather than criticising the linearity of OMC as such, the question is whether OMC has enough potential in the higher education policy arena to coordinate processes driven by increasingly competing academic vs. market rationales (Veiga, Amaral, 2006), given OMCs co-productive “image”, which enables each of the actors involved to claim success and push the blame on to others (cf. Schäfer, 2004). When we apply Hill and Hupe’s framework, this means dealing with non-congruent configurations of variable groupings including those typical both for the transaction mode and the persuasion mode of governance.

In case of ESG, the implementation of this supranational quality assurance programme does not seem to encounter significant difficulties, largely because of the basic assumptions of the programme itself and the deployment of OMC. As regards the basic assumptions, careful wording of the standards and the corresponding guidelines, based on current existing agency and institutional practice nationwide, makes ESG essentially descriptive, not prescriptive. The largely descriptive nature of ESG thus made many of the implementing units concerned (agencies, institutions) at least partially, and in many cases often substantially or fully ESG compatible when ESG was being adopted. Official reviews of national agencies against ESG, aimed at gaining full ENQA membership, would follow later. As the national agencies potentially had much to lose when undergoing external reviews, the overall success of the implementation process depended considerably on the strictness of the coordinating method. The application of OMC, relying on soft law, light touch procedures – witness the guidelines for national agency reviews (ENQA, 2006) with the element of peer review in place – as an alternative to CM limiting agency losses (Schäfer, 2004), contributed significantly to the successful implementation of ESG as a policy programme. Indeed, to date, the ENQA website lists eighteen out of forty-five ENQA registered national quality assurance agencies that have successfully undergone an ESG review and thus been granted full ENQA membership. The Hungarian Accreditation Committee is the only one from the CEE countries. The success of ESG implementation so far, with 40 per cent of agencies positively reviewed, thus lies in the fairly broad terms of the programme’s reference and the non-intrusive way in which it is coordinated (OMC), leaving room for the specifics and the discretion of the implementing agencies.

Obviously, a counterargument may be made that ESG implementation at national agency level would not present such a “success story” if the guidelines and evaluation

39 Possibly with the exception of standards 2.6 (follow-up procedures), 2.8 (system-wide analyses), 3.4 (resources), 3.6 (independence), and 3.8 (accountability procedures), which may prove to be, in theory as well as practice, more difficult to implement successfully than the rest.

40 September 2008.

41 Not including EUA.

42 For further details on the ESG implementation by the Hungarian Accreditation Committee, see Chapter 5.
criteria were made more specific. The need for more detailed clarification and interpretation of ESG was identified by Jørgensen and Hansen, and also by Rozsnyai. Examining and comparing quality assurance practices across the network of Nordic agencies (NOQA) in a joint project, Jørgensen and Hansen, seeking “to interpret and clarify the ESG within the Nordic regional context” (2006), came up with a number of dilemmas related to ESG implementation. These were, in brief: the national quality assurance specifics, consistency of the ESG review procedures, differing interpretation of central concepts, impact of non-compliance with specific standards, and the degree of thoroughness of the review process as such (pp. 7-9). Similarly, Rozsnyai, in her 2007 exploration of ESG in the context of Central and East-European quality assurance agencies, found that full compliance with ESG required the details of the standards and guidelines to be worked out by each implementing agency (p. 11). Requiring greater clarification and greater interpretation, the Nordic and CEE methodological stances on ESG implementation differ in the sense that whilst the Nordic representatives call for the “questions which in the view of the Nordic agencies should be dealt with at a European level” (Jørgensen, Hansen, 2006), the CEE suggests that clarification and interpretation should take place at agency (implementing unit) level.

Understandable as both these calls for greater ESG context-bound clarification and interpretation are, it is very likely that, in view of the overall, supranational perspective on implementation of the ESG programme, the CEE stance will prevail. The official standpoint of the Council of the European Union on ESG implementation is as follows:

[To] encourage all quality assurance or accreditation agencies active within their territory to be independent in their assessments ... and to apply the common set of general standards and guidelines adopted in Bergen, for assessment purposes. These standards should be further developed in cooperation with representatives of the higher education sector. They should be applied in such a way as to protect and promote diversity and innovation (Recommendation of the EP and of the Council of 15 February 2006).

The Council’s standpoint may be seen as somewhat ambiguous, in the sense that it urges further development of ESG, particularly so with the involvement of representatives of higher education institutions, but at the same time, presumably to minimise any potentially damaging conflict over the officially acknowledged ESG interpretation, it stresses the notion of plurality of implementation approaches. To explain this ESG implementation ambiguity, the implementation matrix developed by Richard Matland for clarification of ambiguity-conflict relationships in implementation processes can be of particular use. Application of the matrix to the ESG case shows that due to the non-prescriptive character and the non-conflicting method of implementation of ESG, ESG implementation presently pertains to the high ambiguity-low conflict setting. It can therefore be classified as an experimental implementation favouring bottom-level positioned implementing actors, i.e. national QA agencies and institutions of higher education. An officially codified clarification and interpretation of ESG-related implementation issues by top-level actors (particularly the Council or the Commission) – identified and called for in the Nordic study – would, however almost certainly result in a
change in the configuration of the implementation settings, because it would reduce the
currently high level of programme ambiguity. Reducing the ambiguity of the ESG
programme, turning it into a prescriptive programme, would thus put ESG
implementation into the low ambiguity-high conflict setting characteristic of political
implementation. In Matland’s argument, however, the outcomes of political
implementation are decided by the power of one actor, or of a coalition of actors enforcing a
particular perspective on the other participants down the implementation chain. It is
therefore not unreasonable to assume that the corresponding low ambiguity-high conflict
configuration would turn ESG implementation into a case-by-case bargaining game. It is
hoped that such an ESG implementation “gamble”, putting ESG implementation into
jeopardy, will be in nobody’s interest. If so, clarification and interpretation of the ESG
implementation dilemmas should remain confined to the implementing unit level.

The ESG implementation potential of the quality assurance agencies in Central and
Eastern Europe was foreshadowed by Hofmann. Based on two questionnaire surveys
among the CEEN member agencies with the aim “to identify, on the one hand, common denominators, and, on the other, differences and diversity ... to get a picture of
quality assurance practices in the member agencies of the CEE Network” (Hofmann,
2006) in relation to meeting the ENQA membership criteria, the study was published in
2006. The study presents an overview of the quality assurance practices of the CEEN
agencies, arguing that

[the CEEN agencies show a high degree of convergence with respect to the
conceptual interdependence of the evaluation and accreditation procedure. In
comparison, the diversity in concepts and practices indicates differences in
tradition and cultural background. For example, the level of involvement of
students varies significantly between agencies; this may be a result of the range of
understandings of the role of young people in different societies. Both
differences and similarities need to be understood in context (Hofmann, 2006).

The empirical evidence of Hofmann’s study points to convergence in overarching
approaches to and procedures for quality assurance and divergence when it comes to
the “nitty-gritty” of their practical application. With the diversity of approaches to
student involvement already noted, to take another example, CEEN accreditation is
primarily the outcome of evaluation procedures, with programme accreditation as a rule
awarded for five years, but some agencies place greater emphasis on approval schemes
than others (pp. 18–19). Similarly, all agencies believe they are independent, but some note
tensions with the governmental authority or institutions (p. 24). All agencies make use
of experts and trust their judgements, but there is no clear-cut definition what an
“expert” is (p. 34), and a wide range of practices also exist for the reporting and
publication of results (p. 47). The necessity for contextualising agencies’ specifics thus

43 With the first questionnaire sent out in November 2003, Hofmann does not give the dispatch date of the
second, revised questionnaire, only mentioning that it was sent to the CEEN members in reaction to the
modified ENQA regulations dated 4 November 2004.
emerges as central to understanding the potential of the CEEN agencies to implement the ENQA membership criteria. This point also applies to ESG implementation, much in line with Rozsnyai’s way of reasoning. Interestingly but expectedly, regardless the degree of divergence, according to Hofmann’s study, the CEEN agencies converge on not having complex internal accountability procedures in place, with individual measures applied more or less (in)formally (pp. 48-49).

3.5. IMPLEMENTATION ANALYSIS, HIGHER EDUCATION AND ESG

The analysis of ESG implementation by national agencies has generated a number of findings suggesting, among others, that the coordination of the ESG implementation process limits the agency losses by leaving the ESG implementation dilemmas unspecified. Nevertheless, despite their descriptive orientation, in requiring the implementation of the agency’s internal accountability procedures, ESG contains one standard (and the corresponding guidelines) that may in particular prove conducive to agency loss in relation to the other actors/stakeholders in the higher education policy arena – especially to the state and higher education institutions. Lane’s normative distinction between accountability and trust in their role in policy implementation helps to explain why. With some degree of generalisation, it can be argued that up to the time of ESG adoption, there was little prodding for national quality assurance agencies to devise and implement procedures of accountability, as the agencies were, in time, tasked to carry out increasingly accreditation-oriented quality assurance policies without being held accountable for their outcomes. In Lane’s terms, accountability is characteristic of the relationship between the objectives the top-level actor sets and the outcomes (policy accomplishment), while trust characterises the process of policy execution by the implementing agency. Because it entails the elements of both policy execution and accomplishment, the implementation of any policy must combine accountability and trust. Therefore, the point is that the notion of accountability as well as trust is inextricable from any policy implementation, and that both top- and bottom-level actors must adhere to it. Applied to implementation of quality assurance policies by the respective national agencies, this suggests a significant imbalance between the missing accountability for policy accomplishments and trust in policy execution. This leads to the intriguing question whether national quality assurance agencies, in instituting accountability-oriented accreditation measures, were trusted by the institutional actors, bearing the consequences of agencies’ measures, and by the state-level actors (the Ministries), funding these agencies, so much not to be held themselves accountable. The answer, in the CEE context, may well be “it depends”. The high level of trust from the Ministries can be seen in relation to the need to have the system regulated inexpensively. This made itself particularly felt in the early and mid-1990s (see Chapter 2), with consequences still in effect nowadays (see e.g. the Hungarian and Latvian cases in this volume). On the other hand, the high level of trust by higher education institutions in top-down implementation of national regulatory policies has much to do with the application of two “softening instruments” – peer review and the phenomenon that Blackmur (2007) terms agency capture. While the logic of the former is widely known, the
principles of agency capture deserve a brief comment. Blackmur sees it as “the form of capture by external interests which are able to pressure the agency to adopt their preferred objectives and/or methods, and/or by dominant coalitions within the agency’s staff” (2007). The capture itself, then, may:

- involve the trading of favours (e.g., high-profile public support for the agency, promises of future employment for agency staff, financial and/or other rewards) for desired policies. Existing universities may, for example, use various means to convince a higher education regulatory authority to adopt measures which increase the compliance costs of potential new entrants to a greater degree than they increase the incumbents’ costs. This may have the effect of deterring new entry and maintaining current structural characteristics which confer a range of advantages on the existing institutions (ibid.)

Put into the CEE context, agency capture refers to the composition of accreditation commissions where the great majority of seats are taken by representatives of academia from public institutions44 (cf. Hofmann, 2006), and only a few seats are filled by representatives of other higher education stakeholders (employers, students, representatives of professional/private HEIs). This imbalanced composition of CEE quality assurance agencies (see national agency cases in Chapters 4-8) then helps to explain why the implementation of top-down quality assurance measures (accreditation) has met with little resistance from academics coming from public higher education institutions.

In containing the requirement for accountability procedures for national quality assurance agencies, the process of ESG implementation can thus be seen as contributing towards making the agencies institute such procedures. Such prodding might be seen, by some (agency staff), as losing out on trust in agency-performed activities. However, some other higher education stakeholders may welcome it as a much needed contribution to the balancing of accountability and trust issues – particularly among the agencies and higher education institutions – in implementing quality assurance policies. However, although ESG helped to redress this accountability-trust imbalance by the inclusion of Standard 3.8, it should not be forgotten that the question of accountability of national quality assurance agencies is hardly a new topic. It was raised repeatedly by Ryan as early as 1993 and 1994, followed by Frazer in 1997. Policy development takes time.

As suggested, ESG implementation takes place at two levels – national quality assurance agencies and higher education institutions. However, when reading this chapter through, one cannot but notice the absence of implementation analysis of ESG related to the level of higher education institutions. This fact has a simple explanation. There is a considerable lack of works (empirically-oriented case studies) on ESG implementation in an institutional context. As Harvey points out, summarising the outcomes of the second European Quality Assurance Forum, “[t]here was some general

44 Including the nominations by the rectors’ conference, the council of HEIs, the academy of science, etc.
agreement that, as of 2007, ESG was much more likely to be used at level 2 and 3 (external evaluation or evaluation of the agency) than level 1 (internal to the institution)” (2008). The major reason for this may lie in the lack of incentives for higher education institutions to undergo the ESG review process. The reason is that, under present circumstances and due to the potentiality of implementation misfit, they cannot rely on successful ESG implementation providing safeguards against possibly restrictive measures by national quality assurance agencies in terms of e.g. withholding accreditation. In such a situation, the costs incurred during and after the process might well outweigh the benefits. Obviously, the absence of a supranational agency mandated to coordinate, supervise and make available the results of ESG implementation at institutional level – as ENQA is in the case of implementation of ESG Part 2 and 3 – also makes the situation no easier. Another explanation for the lack of empirical knowledge on ESG implementation at institutional level may well be that, due to the descriptiveness and breadth of the ESG Part 1 standards, their successful implementation is taken for granted. However, this may be a misguided assumption, as the thoroughness of the review-pertaining guidelines can be set on a case-by-case basis depending on the context (overall institutional maturity in quality assurance of its activities), as in the case of the quality assurance agencies. The two possible explanations for the lack of empirical evidence on implementation of the ESG by institutions thus form a vicious circle – one will not try it without sufficient incentives, and one cannot go around declaring oneself an “ESG success” without giving it a trial.

Pointing to the unclear policy objectives of implementation of the ESG Part 1 standards, the question may be asked “What is successful implementation of the ESG Part 1 standards for, and who can authoritatively decide on it”. The answer “Mostly for promotional reasons to be awarded “the ESG label”, and you can go through the review within e.g. the EUA institutional evaluation programme⁴⁵”. Given the lack of empirical evidence on implementation of the ESG Part 1 standards leading to hypotheses on a lack of incentives for institutions – either because success is assumed not to be sufficiently recognised externally, or because it is too obvious internally – leaves us wondering whether ESG implementation by higher education institutions really has so little potential for holding oneself accountable to the external environment, and whether it in reality does not offer much in terms of internal quality enhancement. For this reason, a case study of implementation of the ESG Part 1 standards at the University of West Bohemia in Pilsen (UWB), one of the Czech universities with the most developed internal quality assurance system, is presented in Chapter 9. This is supplemented in Chapter 10 by an analysis of the extent to which the participation of UWB in supranational quality enhancement projects may facilitate the process of ESG institutional implementation.

⁴⁵ Or within the evaluation/review process by any other established (ESG compatible) supranational agency.
3.6. CONCLUSION

Finally, some concluding points should be made. In line with the aims stated, the chapter demonstrated the utility and the heuristic potential of the selected public policy synthesising approaches to implementation analysis for studying higher education policy implementation processes – particularly in relation to ESG. With Mazmanian and Sabatier’s top-down framework, used in the seminal study in 1986 on implementation in higher education, the chapter argues that, in reaction to the shift in higher policy governance from the centralised mode to the decentralised mode, higher education implementation research was superseded by quality assurance research looking into the context-bound applicability of the 1994 general model of quality assurance. However, in their rush away from Mazmanian and Sabatier’s top-down framework – rediscovered twenty-years after its original application – higher education scholars, not least because of the sector-isolatedness of higher education research, may have overlooked the existence and potential of less well-known but promising approaches to policy implementation. These synthesising approaches made by Lane (1987), Matland (1995), and Hill and Hupe (2002) show their heuristic potential in clarifying issues related to the implementation of ESG within the quality assurance agenda of the Bologna Process, suggesting, in essence, that:

– the open method of coordination as a persuasion mode of governance is particularly suitable for coordinating ESG implementation, unless a better alternative is found;

– the generic, non-prescriptive approach to ESG implementation, characteristic of the highly ambiguous setting with a low level of conflict which makes the ESG implementation process open to local-level interpretation and modification by empowering bottom-level actors, is essential for successful ESG implementation;

– given the indivisibility of accountability and trust in implementation processes – as there cannot be policy accomplishment without policy execution – ESG implementation, like any policy implementation, should entail a demonstration of the accountability procedures by any agency implementing the programme (practising policy execution).

In assessing the contextual applicability of the general model of quality assurance by developing dozens of independent variables, the proponents of quality assurance research may have fallen victim to the same fallacy as the second generation of implementation scholars. This is where the limitations of heuristics show up. Despite being useful in explicating the ESG implementation issues in a general sense, the selected synthesising approaches to the study of implementation suggest little about the successes and difficulties that individual agencies encounter when implementing ESG. For this reason, in order to keep the number of selected independent variables under control and to make the study replicable, Perellon’s comparative framework (for an explanation, see Chapter 2) is applied to make an inter-agency comparison.
Now that the general issues pertaining to ESG implementation have been addressed, we can move on to a study of how national policy beliefs and instruments of quality assurance relate to and impact upon implementation of ESG. This will be the subject matter of Chapters 4 to 8.
CHAPTER 4

IMPLEMENTATION OF THE EUROPEAN STANDARDS AND GUIDELINES IN EXTERNAL QUALITY ASSURANCE OF HIGHER EDUCATION INSTITUTIONS AND PROGRAMMES IN LATVIA

Agnese RUSAKOVA, Andris RAUHVÄRGERS

4.1. INTRODUCTION

The higher education system in Latvia experienced major alterations in the early 1990s, after Latvia regained independence based on the entry of private capital into higher education financing, an increase in student numbers without a significant increase in public financing, a change from the former unitary one-tier higher education system to a binary higher education system with academic and professional programmes, and a two-tier degree structure in the academic part of the higher education system. These trends and reforms resulted in a distinct need to establish a quality assurance system, due to the following reasoning: First, a need was felt to review the whole system after the switch from one-tier (mostly five-year) programmes to the bachelor/master/doctoral structure; second, there was a need to evaluate the programmes in the private higher education sector that started developing after adoption of the Education Act of 1991, in order to establish which of them were of sufficient quality to be granted the right to issue state-recognized diplomas/degree certificates. The public universities also experienced an increase in their own autonomy, e.g. liberation in terms of the programmes taught at higher education institutions; third, as regards the state sector, under tight state budget conditions both state and society wished to assure themselves that the budget allocated to public higher education institutions was being used for programmes of sufficient quality; finally, a very important factor was the opinion shared by all stakeholders that with Latvia’s re-integration into European and wider international cooperation and with the prospect of joining the European Union, Latvia had to work toward ensuring that Latvian degrees/diplomas would be recognized and accepted in other European countries, for both academic and professional purposes.

4.2. OBJECTIVES OF THE NATIONAL POLICY ON HIGHER EDUCATION QUALITY ASSURANCE

The development trends experienced in the early 1990s, i.e. the switch to a three-cycle structure, the emergence of a private higher education sector, and the increase in the
autonomy of the public universities, tight state budget conditions, and Latvia’s re-integration into the world required the establishment of a system that would inspect the quality of higher education in Latvia. To respond to this need, an international seminar on higher education quality assurance was organized in Riga on October 24-25, 1994 by the Council of Europe with the aim of creating a higher education quality assurance system in Latvia. This seminar resulted in the signing of a protocol on Baltic cooperation in higher education quality assurance by the Ministers of all three Baltic states (Lithuania, Latvia, Estonia).

For further coordination of actions in establishing quality assurance systems and recognition of foreign qualifications, the ministers also decided to establish the Baltic Higher Education Coordination Committee (BHECC). Cooperation through the BHECC helped to establish comparable higher education quality assurance systems in the Baltic States. In addition, BHECC drafted a Baltic Recognition Agreement to complement the Lisbon Convention.

The current quality assurance scheme in Latvia already started functioning in 1996. It defines accreditation as a part of the higher education quality assurance system, which, together with self-assessment and assessment by external experts, forms the main stages of a continuous quality assurance process. Accreditation, according to the Law on Higher Education Institutions (as of 1995), is the quality assessment of the activities and resources of a higher education institution, as a result of which the state provides the accreditation subject with the status of a state-recognized higher education institution.

As to the organization of the accreditation scheme, the higher education institution first has to become registered. This decision is carried out by the civil servants of the Ministry of Education and Science (MoES) in consideration of formally rather similar criteria to those assessed during the accreditation process (such as available funding, facilities, staff), and is partly policy driven. Once the higher education institution has been registered, it may apply for accreditation of the institution, and degree programmes. Only those higher education establishments that have been accredited and offer accredited programmes have the right to issue state-recognized higher education certificates.

Accreditation of higher education institutions takes place according to the Law on Higher Education Establishments (LHE), adopted by Parliament (Saeima) on November 2, 1995; article 9 of which stipulates the general accreditation principles of higher education institutions, which comprise university-type higher education institutions and non-university type higher education institutions, including colleges. Colleges are higher education institutions that offer first-level higher professional education. The procedure and the sequence of measures relevant to accreditation and external assessment are defined by the Regulations of the Cabinet of Ministers as of October 3, 2006 Nr. 821: “Accreditation Regulation of Higher Education Institutions, Colleges and Programmes in Higher Education”. This Regulation also covers institutional internal assessment. The regulation lists the necessary content of the self-assessment report of the higher education institution, stating that the following information, among others, should be provided within the self-assessment: “a long term
development concept that includes information on planned changes in the higher education institution’s structure, development possibilities, amount of funding, reasoning and sources, as well as an impact analysis of the internal and external factors of its activities” (Regulations, 2006, Nr. 821, § 2.1) and immediately specifying this paragraph by adding an explanation (a quality assurance system of the whole higher education institution’s activities has to be created). Paragraph 3.3 requires the addition of information on the internal quality mechanisms and their information systems, as well as information on possible information exchange in local and international information networks, with paragraph 6.1 adding documents on the administrative structure and on internal control of study quality, and the immatriculation criteria for the students. The accreditation scheme was aimed to be a threshold scheme – it was designed to evaluate whether the institution or programme meets the minimum quality standards so that recognized diplomas/degree certificates can be issued. The work done at higher education institutions at the self-assessment stage also gave institutions a much better understanding of how to improve their own quality, and thus initiated the emergence of an internal quality culture within the institutions.

4.3. CONTROL OVER NATIONAL QUALITY ASSURANCE PROCESSES

The main stakeholders in the accreditation scheme are the state (in the person of the Ministry of Education and Science) and the higher education institutions themselves (through their shares in HEQEC ownership and their representation on the HEQEC board, HEC, and AC). Employers and trade unions are involved through their representation in HEC and TCCPE1 and in the elaboration of professional standards, whilst students’ involvement comes through their representation in HEC and AC. While more decision making power remains on the state side, ownership by higher education institutions is embodied both through shares in the capital and participation in the board of HEQEC, and through participation in all decision-making bodies upon accreditation. Details on the major actors holding a stake in the accreditation scheme are given below.

MoES – the Ministry of Education and Science. Since accreditation leads to state recognition of degrees/qualifications that are conferred, and since it is the Minister of Education and Science who signs the accreditation papers for programmes and institutions upon successful accreditation, the MoES takes the leading position in the administration of the accreditation scheme.

HEQEC – the body coordinating and organizing the accreditation process is the Latvian Higher Education Quality Evaluation Centre (HEQEC). HEQEC is a non-profit organization. The founders of HEQEC in 1994 were the Ministry of Education and Science, and (in accordance with a decision made by the Council of Rectors) five

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1 Tripartite Cooperation Council for professional education and employment, a sub-council of the State-Level Tripartite Cooperation Council established specifically to coordinate the opinions of the state, employers, and trade unions on the development of professional education in Latvia.
higher education institutions: the University of Latvia, Riga Technical University, Riga Stradiņš University, Daugavpils University, and the Turība Business Institute. Four of these institutions are public and one is private; four are located in Riga, and one is located regionally, in Daugavpils. In essence, HEQEC itself is not a decision-maker, as it supports, by its activities, the process of assessment decision-making within the accreditation scheme.

**AC** – the Accreditation Commission for degree programmes is the body which takes decisions on the accreditation of programmes. Members of the Accreditation Commission are approved by the Minister of Education and Science. The Commission comprises: three members from the MoES; one member each from HEC, LCS², LSU³, the Tripartite Sub-Council on Professional Education and Employment, the Employers' Confederation of Latvia, and two representatives from LRC⁴ (one from a public and one from a private higher education institution). In addition, for the accreditation of a particular programme, one representative of the MoES supervising the particular professional field and, if necessary, experts from the professional field in question are added to the members of the Accreditation Commission.

**HEC** – the Higher Education Council is a body, which, among other responsibilities in higher education, has the mandate to take decisions on institutional accreditation. HEC membership comprises one member from each Latvian Academy of Sciences, LCS, the Association of Art Higher Education Institutions, the Council of College Directors, the Latvian Student Union, the Latvian Association of Education Managers, the Chamber of Trade and Industry, the Latvian Employers' Confederation, the Trade Union of Education and Science Employees, and a representative of higher education institutions established by local authorities and other legal entities, i.e. 12 members in total. The Minister of Education and Science is a member of HEC ex officio. The head of the MoES Higher Education Department participates in all HEC meetings but does not have a voting right. Representatives from the Latvian Lawyers' Association, the Association of Latvian Medical Doctors, and other similar professional organizations may participate on the basis of counsellors' rights in cases when issues are under consideration that fall under the competence of these organizations.

**ET** – the Expert Team is an ad-hoc team of experts appointed to assess a higher education institution or a programme. Each assessment team should consist of at least three experts. Only one of the experts can be from Latvia, the other two should be from abroad. Foreign experts are sought upon recommendation by the body responsible for higher education quality assurance in the respective foreign country. In practice, most assessment teams comprise one expert from Latvia, one from Estonia or Lithuania, and one from Western Europe or North America. In addition, there is at least one independent observer delegated by the Latvian Students’ Union.

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² Latvian Council of Science.
³ Latvian Students’ Union.
⁴ Latvian Rectors’ Council.
From the overview of major Latvian actors in higher education quality assurance given above, it follows that HEQEC is not a decision-maker, as it supports the process of assessment decision-making by its activities. The Expert Team is an ad-hoc team appointed to assess a higher education institution or a programme, AC reaches a decision on the accreditation of programmes, while HEC, among other responsibilities in higher education, has the mandate to take decisions on institutional accreditation. MoES, in the person of the Minister of Education and Science, signs the accreditation papers for programmes and institutions after successful accreditation.

4.4. DOMAINS COVERED BY QUALITY ASSURANCE PROCEDURES

According to the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), the main domains covered by quality assurance procedures are the internal and the external quality assurance procedures of a higher education institution, and external assessment of the quality assuring agencies. As mentioned above, Latvian law requires the creation of the internal quality assurance system of a higher education institution. The main issues still to be considered in Latvia in this connection are the following: defining the learning outcomes in competences and applying them in assessing quality, publications of a higher education institution’s internal quality statements, and the participation of society. The new draft Law on Higher Education will contain many of the points referred to in ESG, representing, in general, a more up-to-date piece of legislation than the Law on Higher Education Institutions currently in force.

Once the outline of the quality assurance system of a given higher education institution is to be made, several terms have to be considered. When a new institution is being established, it has to be registered with the MoES (formerly obtaining a licence) as a higher education institution. The registration process for a higher education institution contains formal aspects such as teaching resources (number of persons with a doctoral degree on the academic staff), financial resources, and infrastructural resources (square meters of facilities per student), etc. The requirements for registering a university are higher than those for registering a higher education institution in general, e.g. 50 per cent of elected academic personnel have to have a doctoral degree. Registration means the “right to legally exist”, while accreditation means recognition of degrees/qualifications within the national system and is more closely related to quality considerations. Therefore, this chapter will contain more references to the accreditation process than to licensing/registering, which is to be considered as a formality check in combination with a political decision by the MoES. The overlapping of the two procedures has often been discussed within the academic community, as opening a new programme in an existing institution requires a licence and subsequent accreditation.

In Latvia, the higher education institutions are classified as state university type (6) and non-university type higher education institutions (56), including institutions founded by both public and legal entities, colleges (26), and branches of foreign higher education institutions (2). The accreditation scheme applies to all these types of higher education institutions, geographically unlimited in Latvia. This means that all higher education institutions acting within borders of Latvia after being registered should go through the
institution’s accreditation process in order to gain the right to issue a state-recognized diploma. If they are just registered, they will be able to use only the coat of arms of the higher education institution on the diploma, but not the coat of arms of the Republic of Latvia. The main quality aspects that have to be assessed by the experts when assessing an institution include: aims and tasks, study content and organization, academic personnel, management and provisions, quality assurance, and warranty. The self-assessment documents of the higher education institution should include information about: aims and tasks, current activities and perspectives, conformity of the study information basis of the higher education institution for the conducted programmes and study-relevant research activities within the following six-year period, and quantitative indicators on the last three years.

Another domain covered by the quality assurance procedures in Latvia is the accreditation of programmes. There is a single accreditation framework and similar procedures are foreseen, irrespective of discipline and subject, professional or academic disposition of the programme. The subject of specificity is modified with the help of expert selection, and the criteria for application depend on the subject/discipline to be assessed. The main quality aspects that have to be assessed by the experts when evaluating a programme include: aims and tasks, study content and organization, teaching and student assessment, study environment and management, research by students and staff, quality assurance, and warranty. The self-assessment documents of the programmes should include information about: aims and tasks, expected learning outcomes, organization of the programme, a description of the study courses and other planned activities, assessment system, practical teaching methods and research activities, an evaluation of the programme’s perspectives, students, academic personnel, and funding. Each of the criteria is explained in more detail in the corresponding documents.

In the case of both self-assessment and expert assessment, programmes are assessed against the standard of academic higher education or the standard of professional higher education, plus the standard of the profession in question. A comparison with at least two similar programmes in the EU member states is required. Currently, both programme and institution should be accredited in order to award state-recognized diplomas. If the higher education institution is only registered, it may conduct lectures, but cannot issue state-recognized diplomas. The stages of the assessment procedure are as follows:

The higher education institution prepares a self-assessment report. At this stage, a steering group at the higher education institution in question should be set up, in which the administration, academic staff, and students should be represented. Documents describing the premises and facilities of the institution, its long-term development plans, financial documents, as well as documents certifying the property relations and


explaining the governance of the institution must be appended to the self-assessment report. In case there are no such documents attached, it is recommended to attach at least a list with information where such documents can be found. The CVs of the academic staff and at least a short description of all study courses must be appended.

The Expert Team is set up. Expert Team members are selected according to the specifics of the object of assessment, taking into account the geographical factor, with the choice, as a rule, of one expert from Latvia and at least two experts preferably from the EU, Estonia, Lithuania, or another foreign country, for example, the USA. The foreign members of the Expert Team consider the self-assessment report and visit the higher education institution in question. Public discussion of the preliminary findings of the Expert Team to appear in the final report must be organized at the end of the peer visit. The updated final report of the Expert Team, and also all individual reports of experts, are submitted to the Higher Education Council or to the Accreditation Commission, depending on the object of assessment.

The decision on accreditation is made by the Council for Higher Education (in the case of institutional accreditation) or by the Accreditation Commission set up by the Ministry for Education and Science (in the case of programme accreditation) after hearing the recommendations of the Expert Team. The decision is submitted to the MoES. Afterwards, the Minister of Education and Science issues an accreditation paper.

Publication of results. HEQEC itself does not participate in the decision-making, but it consults with higher education institutions at the stage of drafting the self-assessment report and it organizes the assessment process as such.

4.5. USES OF INFORMATION CONCERNING HIGHER EDUCATION QUALITY ASSURANCE

The final assessment report is published in Izglitiba un Kultura newspaper. Information on the quality assurance status of a higher education institution and programmes in Latvia is available on the website of HEQEC. Furthermore, all self-assessment reports and the Expert Team’s final reports are freely available for public consideration, and are thus expected to increase public awareness of the status quo and current tendencies pertaining to higher education quality assurance in Latvia. The information database compiled by HEQEC is also used as the information source for recognition of individual credentials from Latvia by the stakeholders concerned (ENIC/NARIC, higher education institutions, employers, individuals).

4.6. AGENCY MISSION

Taking into account the central role of the Higher Education Quality Evaluation Centre (HEQEC) in supporting the system-level quality assurance procedures in Latvia, the following analysis will mainly center on this agency’s activities. HEQEC’s mission in a
general sense is currently neither formulated nor published. The Statutes of HEQEC state the following as the main aims of HEQEC’s foundation:

- to promote the development of higher education in the Republic of Latvia;
- to organize the quality assessment and expert examination of higher education institutions and their programmes, by applying the methodology approved by the EU states containing self-assessment made by a higher education institution, an external assessment made by independent experts, publishing the assessment results, continuous implementation of the quality improvement process;
- to provide consultations on quality assessment issues;
- to summarize, maintain, publish, and distribute information on quality, licensing and accreditation of higher education institutions and their programmes.

On the HEQEC web page, the agency’s main task is specified as to organize the assessment necessary for the accreditation of higher education institutions or programmes. In addition, HEQEC represents Latvia in various international quality assurance associations such as INQAAHE, ENQA, CEEN, and in associations dealing with quality issues in Latvia. In its everyday work, HEQEC holds to the Standards and Guidelines for Quality Assurance in the European Higher Education Area and the Framework for Qualification in the European Higher Education Area. According to the statutes, the HEQEC board consists of seven members elected for a period of three years by the shareholders’ meeting. The shareholders of HEQEC are the Ministry of Education and Science and – in accordance with a decision made by the Council of Rectors – five higher education establishments: the University of Latvia, Riga Technical University, Riga Stradins University, Daugavpils University and the Turiba Business Institute. The University of Latvia and Riga Technical University are the largest universities in Latvia in terms of student numbers, Riga Stradins University is a large, specialized university offering mostly medicine-related programmes, Daugavpils University represents the regional universities, and the Turiba Business Institute represents the private higher education institutions. The day-to-day activities of HEQEC are entrusted to the executive director elected by the shareholders’ meeting. The HEQEC employees are appointed by the order of the director. At the present time, the personnel of HEQEC consist of three full-time employees, including the director, and two part-time employees – the deputy director and the accountant. The role of the shareholders of HEQEC is further discussed throughout the chapter.

4.7. SCOPE OF ACTIVITIES OF HEQEC

HEQEC performs its activities in accordance with the Statutes and decisions of the shareholders. The activities of HEQEC are regulated by several laws and regulations.

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The activities of HEQEC in Latvia can be mainly regarded as including both accountability and improvement-oriented elements. According to the statutes, HEQEC has to fulfil the following objectives:

- to work out and co-ordinate the procedures aimed at quality assessment of higher education institutions and programmes, and at preparing peer visits in compliance with the Law on Education of the Republic of Latvia and the Law on Higher Education Institutions. The activities are in compliance with the existing Law and thus serve accountability purposes, but also feature an improvement element, as HEQEC is left quite autonomous in choosing its working methods;

- to organize the quality assessment of higher education institutions and programmes on behalf of the Ministry for Education and Science. External quality assessment undertaken in Latvia is in its essence an accountability instrument, serving as an improvement instrument only in its ideal form;

- to set up commissions and working groups responsible for solving problems related to quality assessment and accreditation. This objective refers to an improvement that serves the accountability rationale;

- to invite foreign experts for peer visits to higher education institutions as an objective which contains an accountability element that in an ideal case also serves as an improvement tool;

- to sum up and to make public the experience obtained as the system of a higher education institution and programme quality assessment is being set up and implemented as an objective referring both to the accountability and improvement rationales, with an emphasis on the former.

As can be seen from the analysis of the activities that HEQEC performs, these activities are predominantly accountability-driven. In several cases, as suggested in the following sections, the activities lack a functioning mechanism to verify that the improvement has been real and has not just been formally declared.

With respect to the activities of HEQEC, it must be pointed out that they are regulated. The agreement concluded in 1998 defines the cooperation between HEQEC and the Ministry of Education and Science. Based on this agreement and the Statutes of

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7 By selection, these main laws and regulations are: the Law on Associations and Foundations; HEQEC’s Agreement with the MoES as of April 7, 1998; the Law on Higher Education Institutions as of November 17, 1995; Regulations by the Cabinet of Ministers as of October 3, 2006 No. 821: “Accreditation Regulation of the Higher Education Institutions, Colleges and Study Programmes in Higher Education”; Regulations by the Cabinet of Ministers as of October 16, 2001 No. 442: “Accreditation Terms of the of the Higher Education Institutions and Study Programmes”; “Standards and Guidelines for Quality Assurance in the Higher Education Area”; “Framework for Qualification in the European Higher Education Area”.

HEQEC, there is also ongoing cooperation between AC and HEC. AC and HEC confirm the experts and the observers recommended by HEQEC for assessment of programmes and higher education institutions, and take decisions on accreditation and changes in programmes by using the results from an assessment organized by HEQEC. HEQEC prepares the accreditation papers and submits them to the Ministry of Education and Science, and conducts the registration of authorized accreditation papers. In addition, HEQEC provides statements to the Study Funds on the study opportunities in Latvia in comparison with opportunities abroad. These statements are necessary for students, in the event that they are interested in the allocation of a state-guaranteed loan for their studies abroad.

Within the quality assessment activities, HEQEC cooperates with the Latvian Rectors’ Council, the Latvian Students’ Union, the Higher Education Department of the MoES, the State Inspection of Education, the Academic Information Centre, the Academic Programme Agency, the Professional Education Administration, and the State Agency for General Education Quality Evaluation. HEQEC participates in international organizations and networks that are involved in assuring higher education quality, such as ENQA, INQAAHE, CEEN, and the Eurasian Quality Assurance Network (EAQAN). HEQEC also participates in dealing with quality issues in Latvian organizations such as the Quality Association of Latvia and the Latvian National Project Management Association. HEQEC is a full member of all these organizations. However, HEQEC’s cooperation with ENQA is regarded as most significant, as ENQA has been accepted as the official organization at European level responsible for solving issues of higher education quality assurance.

In performing their activities, the HEQEC representatives participate in conferences and conduct relevant research. The HEQEC representatives also provide information on quality assurance issues during information days organized by the MoES, participate in the activities of HEC, the Latvian Rectors’ Council, engage in cooperation with LSU, talk directly to prospective students at schools, etc. An overview of the activities of HEQEC, together with its major achievements, is given on its website9.

HEQEC is the main source of information for various study opportunities databases created in Latvia, and keeps information on accreditation of higher education institutions and programmes. The National Education Opportunities Database (NIID.LV), maintained by the State Agency for Education Development, was initially created with the use of information provided by the HEQEC database. Information from the database is disseminated at Skola, the main annual education exhibition in Latvia, and is included in various informative publications, especially shortly before the start of the academic year in September. The results of the accreditation of a programme or an institution are published in the official government newspaper. HEQEC prevents the exposure of incorrect information on the accreditation and licences of a higher education institution and on programmes through the internet and other media.

9 <http://www.aiknc.lv>.
In conformity with the requirements of the ESG accountability procedures (3.8 Standard), and in order to gain feedback on HEQEC activities, anonymous questionnaires are available on the agency homepage. These are designed to reflect the needs of each target group: students, academic staff, employers, and experts. The data obtained in this way is regularly analysed by the HEQEC staff. The analysis shows that the range of problems and issues addressed in the questionnaires is vast. The recommendations range from a proposal to introduce a quality assurance system that would allow the observers to be trained as future experts to discussions on practical problems such as student involvement. These two proposals originating from anonymous questionnaires are currently under consideration by HEQEC. With respect to institutionalisation of quality improvement schemes, HEQEC wishes to give support to the application of more individually-tailored improvement-oriented instruments, but currently this is often not possible.

4.8. OPERATIONAL PRACTICES OF HEQEC

Accreditation is embedded into the legislation as a planned process – after the first accreditation round, completed in 2002, each programme and institution has to be accredited anew every six years. It is likely that, in future, more emphasis will be placed on internal quality culture in the institutions, i.e. those institutions/programmes which have successfully gone through the first accreditation round and further submit yearly self-assessment reports will in future undergo a simplified accreditation procedure. Accreditation can be initiated at other times in cases when, for example, the programme or the institution does not perform according to standards and expectations. In these cases, according to the Accreditation Regulations, the Higher Education Council has the right to propose an extraordinary accreditation and the Minister of Education and Science decides whether to initiate an extraordinary accreditation.

The preparation of an application and a self-assessment report usually takes 3-6 months. It is recommended that a Steering Committee (and, if need be, sub-committees) be established for the self-assessment of a higher education institution or a programme. The following procedures are held after an application for accreditation is submitted:

Within thirty days after receipt of an application, HEQEC checks whether the information in the application complies with the requirements set in the Accreditation Regulation (AR). Should some of the information listed in the AR be missing, HEQEC requests that this information be supplied, and the higher education institution should supply it within one week. Once all the necessary information has been supplied, the application is accepted for further stages of the procedure, and the higher education institution is informed about this.

An Expert Team is formed and approved by HEC (institutional accreditation) or by AC (programme accreditation). The expert team includes not less than three experts –
one from Latvia, and the rest from abroad. Usually one of the foreign experts is chosen from an EU country or, more seldom, from North America, and one from Estonia or Lithuania. Such a composition of the expert team enables the following goals to be pursued:

- assessment of Latvian programmes and institutions in a broader European context (particularly by the “Western” expert);
- looking at Latvian programmes/institutions from the outside, but with good knowledge of the Latvian system and with experience of similar developments and problems at home (particularly the Baltic expert);
- ensuring that assessment is made against Latvian standards and regulations (the Latvian expert).

The Expert Team studies the self-assessment report and other submitted information.

A two-day expert assessment visit is organized to the higher education institution/programme in question to enable the experts to assess the real situation at the higher education institution. In some cases, AC or HEC can decide to include additional participants in the team visiting the institution, approving each of them individually.

The experts submit their individual assessment reports and compile an overall assessment report in the name of the Expert Team.

The overall assessment report is discussed at an open conference with representatives of the staff and students of the higher education institution in question, employers and representatives of the MoES, AC, and HEC, as well as other parties concerned.

After the conference, the expert team finalizes the assessment report and submits it to AC or HEC, as appropriate.

After considering the information submitted in the application and the report of the Expert Team and the individual experts, HEC or AC reaches a decision on accreditation of the higher education institution or programme, as appropriate, and submits its decision to the MoES.

The Minister of Education and Science issues an accreditation paper to the institution as a whole and one to each accredited programme.

Checking the application for accreditation and whether all the necessary information is provided takes not more than thirty days. This is carried out in parallel with checking

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10 With the exception of accreditation of first-level (short-cycle) professional higher education programmes and colleges entitled to provide these programmes only. In this case, the participation of foreign experts is not mandatory.

11 And line ministries, if necessary.

12 In principle, the decision making body – HEC or AC – can visit the higher education institution to clarify additional issues in situ.
whether the documentation provided complies with the data available at the State Enterprises Register and other state institutions. This takes not more than two weeks altogether. According to paragraph 20 of the Accreditation Regulation, a decision on accreditation should be taken within six months after receipt of the application, but the period for checking the compliance of information with the requirements of the Accreditation Regulations and for receiving missing information from a higher education institution is not included in this six-month period. In exceptional cases, the Minister of Education and Science may issue a motivated ordinance to prolong a particular accreditation case, but not longer than for another six months.

4.9. SUMMARY OF ACTIVITIES OF HEQEC IN 2004-2008

Year 2007 completed the second accreditation cycle of the programmes of higher education institutions. HEQEC continued to organize the assessment of all documents submitted for the accreditation of higher education institutions and programmes, supported the activities of the Accreditation Commission, and maintained necessary cooperation with the Higher Education Council and the Ministry of Education and Science. The number of programmes submitted for accreditation increased quite substantially in 2007, due to the completion of the second accreditation cycle in Latvia. More detailed statistics pertaining to HEQEC’s activities between 2004-2008 are given below.

Graph 1. Degree programmes, HEIs and colleges applying for accreditation (2004-2007)

Source: HEQEC’s database.
Graph 2. Peer visits for degree programmes, HEIs and colleges (2004-2007)

Source: HEQEC's database.

Graph 3. Total number of peer visits (2004-2007)

Source: HEQEC's database.

Graph 4. Degree programmes, HEIs and colleges accredited (2004-2007)

Source: HEQEC's database.
In 2007, there was a decrease in the number of programmes accredited for two years (meaning that the programme meets the threshold standard, but that major alternations are needed for good quality at the point of accreditation). The forecast average number of programmes to be accredited in the following years is 160, and it is not planned to increase the number of staff employed at HEQEC in the nearest future.

4.10. ANALYSIS OF STRENGTHS AND WEAKNESSES OF HEQEC

4.10.1. Accountability procedures of HEQEC

According to the Bologna Stocktaking results presented in the national seminar held in Latvia under the title *Bologna Stocktaking 2005-2007. Perspectives of Latvia*, the Latvian external quality assurance system in general complies with the *Standards and Guidelines for Quality Assurance in the Higher Education Area* (ESG). In accordance with the ESG 3.8 Standard and the responsibilities entrusted to Latvia by its official involvement in the Bologna Process, it is necessary to conduct an external assessment of HEQEC based on self-assessment. The external assessment is to be organized by the Higher Education Council. The Higher Education Council has already confirmed this decision by issuing a resolution, but currently the process has not yet been started. In order to achieve the aim of proving its own accountability, HEQEC plans to self-evaluate its procedures. Many of the elements of the self-assessment are already considered annually in the HEQEC annual reports. These reports are written in order to account for the activities undertaken on the basis of funding provided by the shareholders. In conformity with

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The abridged version of the analysis of strengths and weaknesses of the current higher education quality assurance system in Latvia can be found in the annex.
the ESG 3.8 Standard, the self-assessment will be published on the website of the HEQEC.

4.10.2. Change in legal status

In 2004, HEQEC changed its legal status from the non-profit HEQEC Ltd, established jointly by the MoES and certain higher education institutions, to the HEQEC Foundation. This was due to a formal change in the law, which annulled non-profit Ltd as a legal status type. Among the changes resulting from the new legal status was the decision on distribution of power within the institution. By amending the statutes, it became possible to restore functionalities – e.g. under the former legal status, the director of HEQEC had the executive power and the board was the decision maker. Under the present legal status, shareholders have to re-elect the board if it fails to follow the aims set by the shareholders. Another change introduced by the change of status was that, at present, the seven board members are legal entities responsible with their own property for the activities conducted.

4.10.3. HEQEC board and stakeholders.

The HEQEC shareholders set the aims and strategies for quality assurance in Latvia. According to the statutes, the HEQEC board consists of seven members, elected by the shareholders. It is of course a challenge to balance the representation of the shareholders on the board, as the representative does not need to be attached to the shareholder’s institution, as long as the shareholder entrusts the person with the right to represent it. If we consider the higher education institutions as the providers of education, it would be necessary to represent all higher education stakeholders on the board, which is not the case, as academics from higher education institutions are prevalent on the board. However, this ensures compliance with one of the basic principles of the ESG – that the providers of higher education have primary responsibility for the quality of their provision and its assurance. Society (the taxpayer) is currently represented on the HEQEC board by the MoES. Employers, another important stakeholder that has recently demonstrated more and more interest in assuring the quality of higher education, are not represented. Another problem is connected with the recent policy of the MoES, which, after reorganizing the Higher Education and Science Department into two separate departments, has delegated the representative from the MoES’s Department of Law. The professional background of the MoES’s representative impacts on the policy applied to resolving the tasks of the board, making it rather centered on legal issues and therefore less on quality issues. If we consider the higher education institutions as the market players, a different emphasis should be set. Students have various motivations when applying to study. Not all of them are looking for a high quality education. There are students in Latvia that are literally forced into studying under fear of losing their job. This fear is not always baseless; in individual cases it is even strengthened by a legal requirement. Such student stakeholders create pressure on the higher education institutions to reduce the quality of education. However, since there is also ongoing competition among the higher education institutions, the higher
education institutions themselves are primarily not interested in reducing the level of quality. The indirect influence of “students by force” in their stakeholding role (no direct allocation of funding from the students) reduces the impact of their needs. However the higher education institutions may be seduced into lowering the quality of tuition, as the effects of a diminished quality threshold are noticed only in the long term. It follows that the interests of the higher education institutions and the public stakeholders have to be balanced. The higher education institutions seek a higher level of autonomy and, on the whole, are ready for improvements; nevertheless, they also try to minimise the presentation of any unfavourable information to the public on their own institutional assessment, both internally and externally. This runs counter to the needs of public representatives, who desire more transparency and greater public accountability from higher education institutions.

International credibility of awards is probably the most important point that has enabled a consensus to be reached between higher education institutions, state, and other stakeholders on establishing quality assurance in Latvia. After the opening up for European and wider cooperation in the early 1990s, and the switch to the three-cycle system and the curricular reform following the 1991 Education Act, as well as the liberation in terms of institutional choice of programmes taught (which can now also be private), all Latvian stakeholders were in favour of measures that would support the international credibility of the not-so-well-known Latvia credentials abroad, and, first of all, in Europe. This common goal has resulted in quite well functioning cooperation among the stakeholders and HEQEC, leading to the mutual provision of support when needed.

4.10.4. Staff of HEQEC and knowledge accumulation

The staff currently employed at HEQEC is professionally highly qualified. The chair of the board of HEQEC is the same person who stood at the cradle of the agency in 1994. The competences of the staff members are continuously developed through participation in local and international seminars, conferences and work groups of the respective areas. Active and regular participation in international networks dealing with quality assurance issues, as well as close cooperation with the academic community in Latvia, has led to a rather elaborate and actively functioning higher education quality assurance system in Latvia. The database of HEQEC contains about 800 local and foreign experts that deal with quality assessment, about 500 of whom are involved in quality assurance on a regular basis.

4.10.5. Formal self-assessment

The current system is not able to ensure that the higher education institutions conduct a high quality genuine self-assessment, and not a formal self-assessment, undertaken just to comply with the requirements set by HEQEC.
4.10.6. Foreign experts

The argument of international credibility was the main reason why the higher education institutions that had initially considered the introduction of a quality assurance scheme as limiting their autonomy agreed rather easily on the establishment of an accreditation scheme with the involvement of foreign experts in each assessment team. In this sense, the introduction of the scheme has been successful. However, there are some drawbacks as well as advantages of having assessment by international experts. The benefits of using international experts are evident, and they are the reason why Latvia decided to pay the costs and overcome the difficulties, and is still ready to do so. The benefits alluded to include: an “outside view”; international credibility of Latvian accreditation; the “European dimension”; strong arguments for the national debate with employers, parents, other stakeholders, and society at large; and, finally, a reduction in the “small country effect”, referring to a higher education system with strongly interrelated personal connections in which, therefore, finding a competent yet independent expert free from pre-assumptions for each field of study is quite an issue. There are, however, some possible constraints as well. Although in most cases the experience has been positive in Latvia, it might be interesting to other countries thinking of introducing assessment with regular participation of foreign experts to see, on the basis of Latvia’s experience, what difficulties in this respect are to be foreseen and, possibly, overcome.

4.10.7. Knowledge of the Latvian system

It is quite clear that each country has its own balance covering the educational, employment and administrative system which is based upon a long tradition, and where the peculiarities in the relationship between labour market and education system are known quite well and have (more or less) been kept in balance. In the Latvian context, it is not easy for a foreigner to immediately grasp the intrinsic features of the national higher education system, such as the role of research in studies, the balance between academic and professional studies, kinds of institutions, types of qualifications awarded, etc. In this respect, it has to be admitted that there has been a lot of positive experience when the same experts have been invited repeatedly.

4.10.8. Measuring against national standards and legal regulations

This issue is partly related to the previous one. It is essential that the Expert Team have good knowledge of the requirements laid down in Latvian legislation and educational standards – something that is again not easy if the foreign expert is coming for the first time. In practice, this sometimes means that the Latvian expert on the team has alone to verify compliance with Latvian standards and regulations. So far, so good, but, unfortunately, this can also lead either to diverging views inside the Expert Team or, in extreme cases, to a mismatch between the expert assessment report and the decision taken by AC or HEC.
4.10.9. Language issue

Due to the usage of foreign experts, it is required that all the main documents submitted with the application for accreditation must also be translated into English – a requirement which adds to the workload and costs for the institution. The need to speak in a foreign language during the assessment visit and at the subsequent conference presents difficulties, as not all staff members can be assumed to speak English even if they may be fluent in another foreign language. Quite clearly, the usage of a foreign language when being assessed increases the probability of misunderstandings. However, several exceptions are foreseen. For example, documents for accreditation of programmes in particular study fields such as linguistics can be submitted in the respective language. The documents for programmes that have once been accredited may be submitted in Latvian language for repeated accreditation.

4.10.10. High costs of accreditation/assessment procedures

Even if enthusiastic foreign colleagues are ready to work as experts in return for fees that they consider symbolic, paying the travel and subsistence costs plus expert fees is a heavy burden on the higher education institutions, regardless of their type (state or private institutions). Another weak point in the chosen accreditation system is that it is comparatively expensive to conduct programme accreditation; e.g. the accreditation costs are the same for programmes that will be attended by 10 students or by 3,000 students. HEQEC has calculated that the minimum number of students should be 1,000 in order for the accreditation costs not to be burdensome. This is often not the case in reality. In the everyday work of HEQEC, extremes have been encountered, for example, a college having only 27 students per year. HEQEC's readiness to consider cases individually and make a decision within the existing rules may be regarded as its strength. Correspondingly, the fact that the breakdown of costs for each accreditation case is based on a known methodology and tariffs and thus can be planned in advance helps, to some extent, to offset high accreditation costs.

4.10.11. Judgments by foreign experts

This point is admittedly very subjective, yet interesting. In some individual cases, the judgments of foreign experts can be over-forgiving or over-demanding, in both cases led by good intentions. The over-forgiving case has been observed more frequently, and needs a comment. It basically follows the concept that “the programme/higher education institution is on the right path, let’s accredit it”, ignoring that it does not yet comply with the requirements and standards. In these cases, sometimes, the final decision taken by AC has been the opposite one. Cultural differences also have to be taken into account. Foreign experts, wishing to be polite, may not insist clearly on changes to be made, leaving the local community to believe that the changes to be made are to be regarded as optional. Many of the difficulties related to the strategy of using foreign experts in the accreditation process will be consigned to the past in upcoming
cases of re-accreditation. The future re-accreditation procedures will place more emphasis on the internal quality culture of the higher education institution, e.g. during the re-accreditation procedure only one expert will consider all the self-assessment reports of the higher education institution. This may be done by an expert coming from Latvia.

4.11. IMPLEMENTATION OF ESG IN LATVIA

Latvia is involved in the Bologna Process, which aims at creating a European Higher Education Area. The Bologna Process official documents, such as the 2003 Berlin Communiqué of Ministers, state as one of the main tasks aimed at the creation of EHEA the establishment of a coherent higher education quality assurance system, made more precise in 2005 by adopting the Standards and Guidelines for Quality Assurance in the Higher Education Area (ESG), elaborated by ENQA and its partners. In general, it can be said that HEQEC acts in accordance with ESG for internal quality assurance within higher education institutions, as required by the ESG 3.1 Standard.

The quality assurance procedure as ensured by HEQEC complies with the ESG 2.1 Standard and takes into account input-oriented quality criteria such as teaching staff, learning resources, etc., which are basically considered during the registration process of the higher education institutions, thus forming a basis for building up quality. In compliance with the ESG 2.2 Standard, the aims and objectives of quality assurance processes are determined and known in advance; in this regard, the homepage of the HEQEC contains a vast range of relevant information, also on the consistently applied criteria for the decision, as stated in the ESG 2.3 Standard. The external quality assurance processes are constantly improved in accordance with the aims and objectives set for them, as expected by the ESG 2.4 Standard, but to an extent limited by the available resources, financial, human and within available legal, social and other frameworks. Thus, for example, the participation of students as observers is an element of the external review process. Some financial remuneration might improve the results of student observation activities, but in the current financial situation this would be difficult to provide. The current system applies the generally known model of review, i.e. self-assessment/site visit/draft report/published report/follow-up, but is unable to ensure that, in all cases, the higher education institutions indeed improve their own performance as a result of the self-assessment. The reports are published in accordance with the requirements of the ESG 2.5 Standard. They are published in Latvian language and are accessible to the Latvian-speaking higher education community. The corresponding English translations are not always available.

The ESG 2.6 Standard considers follow-up procedures. Currently, if a programme submitted for accreditation in general conforms to the quality requirements but contains essential problematic issues, the programme is accredited for a period of two years only (instead of the usual six-year cycle), within which the problems should be dealt with or otherwise the programme is not re-accredited. If a programme submitted for accreditation in general conforms to the quality requirements but contains minor problems, HEQEC follows up by referring to them after successful accreditation. This
happens irregularly, on a case-to-case basis, often through phone conversations, and is subject to available resources (e.g., time).

In the current quality assurance system of Latvia, external quality assurance of institutions and/or programmes is undertaken on a cyclical basis, as required by the *ESG 2.7 Standard*. After the first accreditation round, completed in 2002, each programme and institution has to be accredited anew every six years. Year 2007 completed the second accreditation cycle of higher education institutions’ programmes. The length of the cycle and the review procedures to be used had been clearly defined and were known in advance, thus making it possible to maintain ongoing quality assurance. Progress is taken into account — institutions/programmes that have already been accredited undergo a simplified accreditation procedure. If the higher education institution so wishes, a single expert checks the self-assessment reports for all years. This may be done in Latvian language. The process is clearly defined by the external quality assurance agency and the demands of HEQEC on institutions are not excessive.

As stipulated by the *ESG 2.8 Standard*, HEQEC is also an important source of knowledge in the field of higher education quality in Latvia. HEQEC regularly publishes the results of its own activities. The homepage of the agency contains a vast database on accredited higher education institutions and programmes. The information is classified and arranged in a clear order, thus facilitating a structured analysis. It is possible to see all accredited programmes ordered chronologically. The following information is available on each accredited programme: whether the programme is professional or academic, the general field of studies, the qualification or degree to be awarded, the required entrance level, the type and duration of studies, professional standard (if applicable), accreditation valid till, etc. The site also contains a link to the self-assessment report of the programme and to the report of the Expert Team (containing a student member(s) as one of the direct stakeholders). The information displayed on the higher education institution at the HEQEC homepage is: contacts, information on accreditation, date of official publication of the accreditation information, a link to the self-assessment report of the higher education institution, a link to the report of the Expert Team (containing a student member(s)), the Rector and his/her approval date by the Cabinet of Ministers, the approval date of the constitution of the higher education institution by the Cabinet of Ministers or the Parliament. The site also contains useful information on the methodology and recommendations for dealing with quality assurance, European and world guidelines on the issue (both in the original language and translated into Latvian), Latvian laws and regulations that concern the quality assurance system, instructions by the MoES, reports on higher education, projects conducted by HEQEC, and the press releases of the agency. Thus the processes, criteria and procedures applied by HEQEC are pre-defined and are publicly available, both on the webpage and in person during consultations.

HEQEC is currently a full member of ENQA, and is formally recognized in EHEA as the agency responsible for external quality assurance in Latvia. With respect to the *ESG 3.2 Standard*, however, HEQEC is currently experiencing some legal issues (see below). These are related to the changing legal framework — e.g. a new Higher Education Act will be introduced shortly.
The *ESG 3.3 Standard* defines the activities of the agency. HEQEC complies with this ESG standard to a great extent. HEQEC ensures that external quality assurance activities (accreditation at both institutional and programme level) are conducted on a regular basis.

HEQEC regularly considers its own performance. The human and financial resources available to HEQEC (see the *ESG 3.4 Standard*) for organising and running the external quality assurance process(es) in an effective and efficient manner can be considered at the moment to be quite adequate and proportional. For example, the agency has an extensive database of available experts for external assessment of subjects for accreditation. The only problem within the context of the current economic slowdown is the increasing pressure from the side of the stakeholders to decrease the costs connected with accreditation. Nevertheless, the stakeholders are aware of risks to quality if the accreditation costs were to be decreased, and do not exert great pressure. The provision for developing the processes and procedures might have been higher to allow for the implementation of more improvement-oriented measures.

HEQEC has not yet published a policy for quality assurance of the agency itself, as the *ESG 3.5 Standard* implies, but the website contains detailed information on the international and local law and guideline framework that HEQEC declares to work within, combined with a detailed description of the methodology that is applied. The statements within the HEQEC Statutes clearly show that the external quality assurance process is the main activity of the agency. Last but not least, HEQEC analyses issues of the application of theory in real life, and seeks for ways of improvement. Thus, for example, HEQEC has made available on its website both its own principles for selecting members of Expert Teams, the assessment principles applied by the experts when evaluating higher education institutions and programmes, information about observer’s activities in the Expert Team and during peer visits, a feedback questionnaire for experts and for other stakeholders, and has conducted research in the field of ensuring best practice in external assessment.

The *ESG 3.6 Standard* insists that the agencies be independent. Financially, HEQEC relies completely on funding from the higher education institutions. Nevertheless, it is sought at all times that the conclusions and recommendations not be influenced by third parties.

In conformity with the *ESG 3.7 Standard*, HEQEC has pre-defined and publicly available processes, criteria, and procedures that the agency uses. The accreditation procedure consists of a self-assessment of the higher education institution/an external assessment by a group of experts, including, (a) student member(s) in the role of observers, and peer visits/publication of a report, including outcomes/a follow-up procedure according to the drawbacks that have been detected. No appeals procedure has been introduced, due to the additional costs that it would incur.

HEQEC has not yet published a policy for assuring the quality of the agency itself, as the *ESG 3.8 Standard* implies. HEQEC currently does not subcontract or outsource anybody for activities foreseen in the Statutes, e.g. organizing the assessment process. HEQEC maintains an internal feedback mechanism; an internal reflection mechanism in the way of regular meetings; and an external feedback mechanism. In order to obtain
external feedback, HEQEC has placed anonymous questionnaires on its homepage, tailored according to the needs of the separate target groups: students, academic staff, employers and experts, and routinely invites readers to fill them in. The results are regularly analysed by staff members. It is planned to introduce an international external assessment of HEQEC, to be run by the Higher Education Council not less than once every six years. Thus the guidelines are only partly met – the agency activities will be reviewed, but in a slightly broader cycle lasting six years rather than five.

4.12. CHALLENGES AND AGENDA AHEAD

In the nearest future HEQEC plans to update the documents defining the cooperation of HEQEC with the MoES. Two main issues, i.e. the legal basis and the funding of HEQEC, will be reconsidered more profoundly.

4.12.1. Legal basis

The agreement concluded with the MoES as of April 7, 1998 stipulates the activities of HEQEC when conducting the assessment necessary for accreditation of higher education institutions and programmes. According to paragraph 4.1 of this agreement, the main task of HEQEC is “in due time to submit to HEC and/or AC the statement on the accreditation of the higher education institution and/or programmes in question”. When organizing the assessment, HEQEC is first of all guided by the Law on Higher Education Institutions. The procedure and the sequence of measures relevant to the accreditation and external assessment is defined by the Regulations of the Cabinet of Ministers as of October 3, 2006 No. 821: “Accreditation Regulation of Higher Education Institutions, Colleges and Programmes in Higher Education”. Understanding the significance of the Bologna Process and the creation of EHEA as a result of it, HEQEC considers one of its important tasks in the nearest future to be its own involvement in elaborating and implementing the new Higher Education Act, which should be consistent with the requirements of the modern higher education environment and current trends in EHEA. The new Higher Education Act also stipulates the quality assurance system for higher education in Latvia.

4.12.2. Funding

As an example, in 2007 the source of income of HEQEC was based on contracts with higher education institutions on quality assessment. HEQEC has never benefited financially from the public budget. This makes it independent from the Ministry, but rather dependent on higher education institutions. Taking into account the public good that is the outcome of the HEQEC activities, some funding from the MoES to cover at least maintenance costs could bring the advantage of diminished dependency on higher education institutions. However, the present system makes higher education institutions approach accreditation documentation and the accreditation process in a responsible way and introduce a new programme only in cases when the higher education institution is sure that there is demand from the market. At the same time, this threatens
the development of innovative programmes. The costs for the assessment of higher education institutions and programmes are covered by the higher education institutions themselves. Basically, the accreditation costs include the costs for expert assessment, costs for the publication of accreditation results, as well as the maintenance costs for HEQEC\textsuperscript{14} itself.

The MoES usually argues that the costs for accreditation in public institutions are funded from the state budget allocated to the institutions. However, the funding that is provided does not anticipate accreditation costs, and is earmarked for other needs. In fact, using the state budget for aims other than they are provided for might theoretically result in legal consequences. Thus in the end the public higher education institutions have to allocate resources from other sources of their own income, e.g. tuition fees. In case of private institutions, the costs of accreditation are in any case covered from tuition fees paid by the students.

In conditions of overall underfunding of the higher education system in Latvia, the funding used for quality enhancement could have been used for other purposes. Especially now, this problem aggravates and creates virulent discussions in the academic community, as Latvia is experiencing an economic slowdown and funding is decreasing in all areas, including higher education and science, in next year’s budget.

Shortage of funding may lead to a decreased quality of assessment and threatens a lower quality threshold in the future. At the same time, an economic slowdown usually means higher unemployment rates and more interest from society in its own re-education and re-qualification. This may lead to increased numbers of students within the current situation, again a threat to quality. However, demographic factors suggest an overall decrease in student numbers in the future. Based on this reflection, the academic community is considering abandoning the many different Bachelor programmes and introducing a general and common Bachelor programme within a study field. This would be of special interest, since models of the future composition of the student body within different study cycles show that the number of students within the first cycle will decrease and the number of students in subsequent cycles will steadily increase. Thus, instead of accrediting many separate Bachelor programmes, it will be possible to save accreditation costs by accrediting a single Bachelor programme aimed at the same Bachelor degree, e.g. in Economics. The significance of specialization decreases with the shortened three-year Bachelor programmes (as anticipated by the Bologna Process). This model would require accreditation of the separate Master programmes, which would then be the carriers of the main specialization. Such a development would threaten HEQEC with a decreased workload, but would provide an opportunity to reconsider its own efficiency. This would probably provide more time for improvement-oriented activities.

\textsuperscript{14}HEQEC is a non-profit organization. It is funded only through fees for accreditation, and no state funds are directly allocated for its maintenance.
It would be advisable to revise the legal basis and funding of HEQEC by reconciling all essential issues with the MoES. Such reconciliation would alleviate the clarification of many currently unclear issues concerning tasks and responsibilities, and would provide an opportunity to strengthen the rights and the fields of competences of HEQEC. For example, it is hard for HEQEC to counsel a higher education institution on possible future developments, when the priorities of the MoES are unclear.

The importance of quality assurance in higher education in Latvia is growing as the mobility of staff and students increases, and Latvia’s higher education institutions become integrated into the international higher education market. The average age of academic staff in Latvia is another important factor that increases the significance of quality assurance activities in the future. Though the average age structure of academic personnel has stabilised in recent years, on an average, one in nine of the academic staff is below the age of 30, but one in four is 60 or above. This leads to cases where one third or even more of the staff at a higher education institution is aged 60 or more. The number of doctoral students is unsatisfactory. The laboratories and other study infrastructure are morally and physically depreciating. It is planned to attract EU Structural Funds to address these issues. This all supplements the significance of the activities run by HEQEC, and points to clear opportunities for ongoing development within quality assurance of higher education in Latvia.

Some formal requirements of the existing accreditation framework also need to be reconsidered; e.g. the academic community is considering the idea to introduce the accreditation of a department, rather than of personalities. This would alleviate the conflict that arises if study courses are given by other lecturers from the same department than those indicated in the CVs presented during accreditation of the programme.

The good cooperation with stakeholders provides many opportunities to detect the problematic aspects of the existing quality assurance system, and may lead to ongoing improvement of the agency’s activities. As an example, one such future challenge concerns conceptual questions, e.g. the assessment of different, less traditional study types, such as distance, part time, partial full-time, and partial-intensity studies. An important issue is the recognition of life long learning and its proper inclusion in the existing study system. It is also necessary to substantially improve the assessment of results obtained after studying in a professional programme with labour market requirements.

Sometimes, in cases where there is no direct interest in the results, it is difficult to involve all stakeholders in due time. In the future, when closer cooperation of a shareholder is desirable, it is necessary to create rules in a way to motivate all involved parties. For example, since 2000 Latvian legislation has required that when professional higher education programmes are being accredited, their compliance with profession standards is sought. In their turn, these profession standards had first to be elaborated by the labour market side – the employers and labour unions (in cooperation with educationalists). Since it was the higher education institutions that actually needed these standards, it was difficult to motivate the labour market to participate in the development process. It is self-evident that such a situation was an additional burden to
higher education institutions, and that it also caused delays in accreditation. At the same
time, society faced the danger that a professional standard might be created that would
suit the needs of the higher education institutions better than the labour market-
associated stakeholders.

In fact, by applying ESG within the quality assurance system, Latvia has introduced
a framework created to support quality improvement. Now it is up to the stakeholders
to apply the quality issues not just formally, but in the spirit of the philosophy behind
them. With regard to the planned completion of EHEA in 2010, there are obviously
still quite a number of challenges that have to be addressed in order to create a more
homogeneous and transparent higher education area in Europe. Though ESG has
apparently been introduced, research on the real situation reveals many mismatches of
ESG within the existing social, legal and other framework in which ESG is being
implemented.

The two main challenges that HEQEC faces in Latvia at the moment are its legal
status and its funding. These and other discrepancies need to be resolved on the basis of
a constructive and ongoing dialogue with stakeholders. A coordinated solution of these
and other issues would ensure improved cooperation between higher education
institutions and society, and would assist the higher education institutions in providing
education consistent with the demands of the labour market and oriented at future
requirements.
CHAPTER 5

THE EUROPEAN STANDARDS AND GUIDELINES IN QUALITY ASSURANCE MECHANISMS IN HUNGARY

Christina ROZSNYAI

5.1. INTRODUCTION

Quality Assurance is not a static practice; in fact it has undergone fundamental changes in both Europe and Hungary, in particular since the Hungarian Accreditation Committee (HAC) came into existence in 1992. The European and Hungarian developments have periodically diverged and converged. To name just one such trend that appeared in much of the literature at the time (e.g., Tomusk, 2000), accreditation was considered an Eastern-European, control-oriented approach while improvement-oriented evaluation was the Western European way. Arguably, while most of Western Europe has come around to doing accreditation, the local philosophy and day-to-day practice continue to vary within the countries of the European Higher Education Area, not only between east and west but also between north and south. The Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) must thus take into consideration the historical and cultural differences in the countries in which they are applied. Hence, this chapter aims at ascertaining the extent to which such country specifics factor into implementation of the ESG by HAC.

HAC has undergone two external evaluations, in 2000 and in spring 2008. The latter was conducted by a mixed foreign and Hungarian panel of experts with the primary aim to establish compliance with ESG. This chapter will thus also discuss some of the key outcomes of the 2008 evaluation in light of the local context.

HAC is the national-level body responsible for higher education accreditation in Hungary. It was established de jure with the country’s first higher education act in 1993. A new higher education act, passed in 2005, defines HAC’s function, stating that The Hungarian Accreditation Committee of Higher Education is an independent national body of experts assessing quality in education, research, and artistic activities in higher education.

1 Unconnected to HAC, there are three other educational accreditation bodies in Hungary: for adult education, for foreign language examinations, and for higher-level vocational programmes. The latter are connected to higher education in that a precondition for higher-level vocational programmes is that at least 30 of their credits must be acceptable in a Bachelor programme in the same general field (the Act of 2005, Section 32 (4)).
education, and examining the operation of the institutional quality development scheme (the Act of 2005, Section 109 (1)).

HAC’s quality approach is based on three premises,

– that HAC must evaluate the quality assurance (QA) mechanisms at higher education institutions to ensure that these are suitable for assuring the quality of the institution’s activities and services;

– that HAC conducts quality evaluation and accreditation in accordance with ESG, and that higher education institutions observe ESG in their internal QA schemes;

– that HAC applies criteria and procedures it has developed over the course of its fifteen-year history and continues to develop further in line with international trends and requirements.

– The last premise rests on the conviction that QA in higher education must evolve in the historical and cultural environment in which it is embedded. Just as important, however, is the international character of QA.

5.2. NATIONAL QUALITY ASSURANCE POLICY AND SCOPES OF AUTHORITY IN QUALITY DECISIONS

Control of QA in Hungary is exercised by three main actors: higher education institutions, HAC, and, less directly, the Hungarian Ministry of Education and Culture. The 2005 Act was issued in response to the changed conditions in higher education in Europe resulting from the Bologna Process and under consideration of the ESG guidelines that were being issued at the time. The last clause in the cited section of the Act reflects the recognition that higher education institutions bear responsibility for their own quality, as set down in the Berlin Communiqué in 2003. Since completing its first eight-year cycle of institutional accreditation, HAC has redesigned its accreditation process to place more emphasis on evaluating the internal QA structures at higher education institutions. It should be noted, however, that while various QA elements have long existed at Hungarian higher education institutions, few had complete, institutional-level QA schemes prior to the 2005 Act. Establishing a comprehensive QA system in Hungarian higher education is, therefore, a joint venture between the institutions and HAC.

The Hungarian Ministry of Education and Culture contributes to higher education—including QA—policy and provides oversight with regard to the legality of the operations of all entities involved in higher education, including HAC. Additional bodies involved to some degree in QA are the Higher Education and Scientific Council and the Hungarian Rectors’ Conference, which provide opinions and advice to the minister on higher education issues. The Rectors’ Conference also contributes to working out the content of qualification requirements for new degree programmes, which are also accredited by HAC. In this sense, the Rectors’ Conference contributes to
final decisions on higher education programmes in which HAC participates with regard to quality judgements.

Higher education institutions have responded to the new law by designing QA systems based on their own preferences and needs. The higher education act only requires institutions to prepare a quality development programme, which shall specify the process of operation of the higher education institution, as part thereof the execution of management, planning, control, measurement, assessment, and consumer protection related tasks. The institutional quality development programme shall also regulate the rules pertaining to the evaluation of lecturer performance by the students. The higher education institution shall annually revise the implementation of the institutional quality development programme, and shall publish its findings on the website of the institution as well as in customary manners (the Act of 2005, Section 21 (6)).

Further, in Section 27 Paragraphs (6 b) and (9 d), the act declares that the institutional senates are responsible for accepting and assessing their institutions’ quality development programmes. Many institutions based their QA schemes on the EFQM model, but there are also several ISO 9000-based models and others, including amalgamations of different models. HAC’s responsibility is not to evaluate the validity of any model but to check whether an institution’s QA scheme leads to the high quality of its education and research activities and services. HAC’s examination of an institution’s QA approach takes place on three levels. Firstly, HAC’s Accreditation Guidebook for institutional accreditation contains indicators for an internal quality assurance scheme, which should be covered irrespective of the type of scheme the institution chooses. Secondly, each external review team includes a QA expert, delegated by HAC’s quality development sub-committee, a body required by law. Finally, a member of this sub-committee checks the external review team report section dealing with an institution’s QA scheme and may modify the report prior to its final accreditation approval in the HAC plenary meeting.

The new higher education act, adopted in 2005, brought about other major changes in the Hungarian higher education accreditation system, and indeed, in the higher education structure. The 2005 Act legislated the transformation of higher education programmes from three to four-year college and four to six-year university streams to Bachelor and Master programmes that can be launched at either type of institution. HAC, which conducts both ex ante and ex post accreditation, evaluated all the new programmes that were being launched. Around the same time, HAC substantially changed its approach by separating ex post institutional and programme accreditation

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2 For an overview in English of Hungarian higher education past, present and future by the Minister of Education and Culture, see Ministry of Education and Culture (2008a).

3 For a chart on the higher education structure, see Ministry of Education and Culture (2008b) Annexes, p. 42.
procedures. Where in its first eight-year cycle, institutional accreditation had focused on all the degree programmes at the evaluated institution, the second cycle, which began in 2004, looks at institutional-level features such as management, governance and an institution’s QA scheme. Disciplinary accreditation was introduced, whereby all programmes – Bachelor, Master and doctoral – in one discipline of knowledge are evaluated and accredited in a single procedure and by a single team of experts.

HAC is a body of 29 experts from various fields of higher education and a range of professions. Its published quality policy declares that

The membership and staff of the Hungarian Accreditation Committee … declare their commitment toward the rigorous development of higher education. To accomplish it, HAC engages its members, the staff of its secretariat and the pool of experts contributing to the achievement of its tasks (HAC Resolution 2007/10/VI, Section 1.2. No.1).

HAC has several bodies to ensure its proper operations and that its judgements are fair and unbiased. A Financial Board of Supervisors oversees financial matters and regularly reports to the HAC assembly. An Ethics Committee hears and decides on cases of conflict of interest and other ethical concerns, and external experts sign no-conflict-of-interest statements.

The legal obligations resulting from HAC’s decisions are defined by law, pertaining to all areas covered by quality assurance. Higher education institutions or their programmes may operate only if they have been successfully accredited. However, an important novelty in the 2005 Act is HAC’s Board of Appeals, which reviews appeals by institutions against HAC’s decisions. HAC’s accreditation decisions are technically expert opinions, with licensing authority given to the Educational Authority under the Ministry of Education and Culture. However, the process is legally circumscribed to guarantee both HAC’s independence in its operations and quality judgements, and by a legislated appeals procedure against HAC’s decisions that defines the scope of authority of both HAC and the Education Authority, and in certain cases the minister. The Educational Authority, set up under the 2005 Act, is tasked with registering new institutions and programmes following HAC’s accreditation process and its consequent decision. A negative decision on an application for a new institution or programme may be appealed. With new institutions, if HAC’s Board of Appeals supports the original resolution, the Educational Authority is bound by HAC’s decision. With new programmes, a second appeal may be lodged with the minister, who may decide to overrule HAC’s original decision. HAC has a full decision-making authority with regard to doctoral schools, where a negative decision by HAC’s Board of Appeals is final. (In Hungary, doctoral schools are the organizational units at universities that offer doctoral training and award doctoral degrees in one area or interdisciplinary fields of science).

There are two external bodies reflecting on HAC’s work. A Hungarian Advisory Board, made up of leading personalities from business and other external stakeholders, acts as a sounding board for HAC on employers’ needs and problems regarding higher education quality. An International Advisory Board of renowned higher education and QA experts debates HAC’s work and makes recommendations on how to improve it.
5.3. OBJECTIVES, PROCEDURES, AND SCOPE OF QUALITY ASSURANCE POLICY

On the basis of the 2005 Higher Education Act, the Ministry of Education and Culture formulated a broad national higher education policy, whose aim is to support Hungarian higher education institutions so that they can fulfill the needs and expectations of their primary partners, the students, and external partners – the actors in the labour market – on the highest possible level of quality, and to win and retain their satisfaction (Ministry of Education and Culture, 2007).

Since its establishment in 1992, HAC’s objective has been to ensure the quality of Hungarian higher education through external evaluation and accreditation with an improvement orientation. Similar to the sectoral government, HAC also derives its mission from the higher education act. Formulated as part of its cited quality policy and based on its mandate set down in the higher education act, HAC’s mission is to contribute to advancing the quality of the social commitments of the Republic of Hungary as a member of the European Union and of the institutions of higher education and intellectual training that promote the welfare of its citizens, and to enhance the quality of their organizations, operation, expert groups, and workshops. The general aim of HAC is to safeguard the quality of Hungarian higher education, to ensure its functioning in compliance with the requirements proclaimed in laws and legislative provisions, and to support the quality development of higher education (HAC Resolution 2007/10/VII). Beyond these general principles, the mission statement goes on to establish HAC’s place as an independent organization that respects the autonomy of its partners, and as a player in Hungarian higher education together with higher education institutions, the government and other stakeholders.

HAC’s scope of authority is to evaluate and accredit new higher education institutions and degree programmes and to audit their QA schemes, as well as to reaccredit operating institutions and programmes every eight years. These and additional areas covered by the quality assurance procedures that are carried out on a case by case basis are listed in the 2005 Higher Education Act as follows:

1) The Hungarian Accreditation Committee of Higher Education shall:

- contribute to the formulation of principles for sectoral quality policy and the monitoring of its implementation, (deleted with amendment effective September 1, 2007),
- carry out accreditation in connection with the establishment and operation of institutions,
- propose requirements for attaining the position of university professor,
- monitor the convergence of the sectoral quality development system with the higher education systems of the European Economic Area,
- express, upon request of the higher education institution, an opinion on education, research and artistic activities,
— deliver expert opinions on the introduction of undergraduate and graduate courses, the establishment of doctoral schools, the introduction of doctorate courses and on doctoral regulations,

— express, upon request of the higher education institution, an opinion in respect of awarding the title of university professor,

— prepare and publish the National List of Higher Education Experts.

2) The Hungarian Accreditation Committee of Higher Education shall express an opinion on the Higher Education Bill and its draft implementing decrees, as well as on the draft ministerial decrees regulating higher education.

3) The Hungarian Accreditation Committee of Higher Education shall cooperate in

— the evaluation of the education, research, and artistic activities of higher education,

— the preparation of plans aiming at higher education development (the Act of 2005, Section 109 (1)).

The large number of areas evaluated by HAC is a recurring concern, also raised by the external panels that have reviewed HAC’s activities, and will be discussed later on. The legal requirements are a burden on HAC’s human and financial resources, and may even infringe on the quality of its decision-making. Nevertheless, several of these areas can be grouped together into ex ante and ex post accreditation, which relate directly to the operations of higher education institutions. The other tasks listed (Section 1 a, e, d, and Section 2) are sporadic, while allowing HAC to have a say in the full spectrum of quality issues in the country. Table 2 summarises HAC’s activities that constitute the gist of HAC’s work, namely ex ante and ex post evaluations of institutions, programmes and doctoral schools and professorial awards.

Table 2. HAC’s main areas of activity

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<th>ex ante</th>
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<tr>
<td>institutional</td>
<td>new institutions</td>
</tr>
<tr>
<td>new faculties</td>
<td></td>
</tr>
<tr>
<td>programme</td>
<td></td>
</tr>
<tr>
<td>- education and outcome requirements (national level)</td>
<td>bachelor, master</td>
</tr>
<tr>
<td>- new programmes at institutions</td>
<td>bachelor, master</td>
</tr>
<tr>
<td>other</td>
<td>doctoral schools</td>
</tr>
<tr>
<td></td>
<td>at universities, professorial positions</td>
</tr>
</tbody>
</table>

*Source: HAC.*
New higher education institutions are approved by parliament and are listed in the higher education act. The establishment of faculties is an internal institutional decision, but subject to quality evaluation. The procedure for ex post evaluation and accreditation is carried out in the manner commonly accepted in Europe, namely with the applying institution submitting a self-evaluation report, with a site visit by HAC’s visiting team, and with an accreditation report.

HAC assigns separate visiting teams to each faculty that is being evaluated in the framework of an institutional accreditation procedure, with a co-ordinating team chair responsible for the whole institutional procedure. A QA expert and a student are part of the team. For ex post evaluations of disciplines, the visiting team consists of a pool of experts in the relevant field or group of fields. Actual visits and evaluations are carried out by members of the larger pool to avoid conflicts of interest. Ex post evaluation and accreditation proceeds as follows:

Notification of eminent procedure (annually) ➔ consultation session with institutional representatives ➔ submission of self-evaluation report ➔ formal check by secretariat ➔ HAC appoints visiting team ➔ visiting team briefing session ➔ site visit ➔ team formulates report ➔ (disciplinary evaluation only: respective committee(s) discuss(es) the case and make(s) proposal for decision) ➔ presidium discusses if necessary ➔ respective college(s) discuss(es) the case, accept(s) or revise(s) disciplinary committee proposal, and make(s) proposal for accreditation decision ➔ (with institutional accreditation the rector receives the preliminary report and decision and adds comments) ➔ HAC plenary discusses and makes the accreditation decision ➔ secretariat prepares letter to higher education institution and to Education Authority ➔ HAC president checks and signs letter, issues “Accreditation Certificate” to institution.

While the procedures are basically the same for institutional and disciplinary quality assurance, there are differences in the guidelines and HAC’s committees reviewing the team reports. Institutional evaluation and accreditation focuses first of all on governance and management, and an institution’s QA scheme. For this procedure, HAC has a published guidebook delineating the criteria and procedure, and the “respective college” that discusses the report of the visiting team is an ad hoc one, set up for the particular evaluation. For disciplinary evaluation and accreditation, where all programmes in one field are evaluated in a single procedure, the visiting team of disciplinary experts works out its own guidelines and procedure based on HAC’s core guidelines, but the decision-making procedure ensues through the regular standing committee structure.

New degree programmes are created on two levels. So-called education and outcome requirements are qualification requirements, which are issued as ministerial

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5 Variously also referred to as “programme and graduation requirements” and “programme completion and exit requirements” on the ministry web page.
degrees. They describe the basic content, purpose of the programme, examinations, and expected skills and competences of graduates. New degree programmes launched at institutions are based on existing education and outcome requirements but describe institutional provisions such as curriculum and teaching staff.

Ex ante evaluation and accreditation procedures are carried out as paper-based exercises. Institutions submit applications, which are processed as follows:

1. Filing ➔ formal check by secretariat ➔ chair(s) of respective HAC committee(s) appoint(s) 2-3 external evaluators ➔ committee formulates report based on evaluators’ reports, and make(s) proposal for accreditation decision ➔ presidium discusses if necessary ➔ respective college(s) discuss(es) the case, accept(s) or revise(s) committee proposal(s), and make(s) proposal for accreditation decision ➔ HAC plenary discusses and makes the accreditation decision ➔ secretariat prepares letter to higher education institution and to Education Authority ➔ HAC president checks and signs letter.

In ex ante accreditation, the process is the same for all types of applications, whether for new institutions or faculties, education and outcome requirements or degree programmes, doctoral schools or professorial appointments. The difference in the procedure is in the expert committee that evaluates the submission.

There are separate expert committees for groups of disciplines, which are grouped into three “colleges”: for Social Sciences, Humanities, Theology and Religion (9 committees); for Life Sciences (4 committees); and for Technical and Natural Sciences (6 committees). In addition, there are eleven special committees.

The following illustration provides an overview of the HAC’s internal organization.

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6 1. for university professorships, 2. doctoral schools, 3. distance education programmes, 4. teacher training, 5. religion and theology programmes, 6. military programmes, 7. ethical issues, 8. quality development, 9. strategy, 10. external stakeholders’ relations, 11. international issues.
The 29 HAC members are delegated by the Rectors’ Conference (15 members), the Hungarian Academy of Sciences (3), research institutes (5), the National Public Education Council (1), the National Committee for Minorities (1), professional organizations and chambers (4). They receive their letters of appointment from the Prime Minister. Two student delegates, from the National Student Union and the Union of Doctoral Students, participate in the meetings without voting rights. Additional non-voting members are invited by HAC to cover disciplines that are not covered by the original delegates; in the 2007-2009 term there were six of them. Appointments are for once-renewable three-year terms.

HAC’s decision-making follows a hierarchical set-up, with the plenary casting the ultimate vote. External evaluators – in the case of paper-based reviews – or visiting teams examine issues and present reports with proposed decisions. These then pass through the standing expert committees in the fields related to the subject of the application, which are chaired by a full or non-voting HAC member. The matter goes on to one of the three colleges, whose members include the chairs of the standing committees, and whose purpose is to provide professional consistency. The plenary considers the lower-level proposals and reports that incorporate the comments of the various levels, as presented by the chair of each college. On this level, the members’ concern is for consistency in outcomes and procedures in the long term. On the college level and especially the plenary level, members may not have proficiency in the
field they are voting on, but sound judgment is ensured with HAC’s declared principle that it operates on the basis of mutual trust in the expertise and integrity of its individual members.

The ultimate outcome of HAC’s decisions is the accreditation or non-accreditation of the areas covered by its procedures. The use of the information collected in the course of its procedures is thus to provide evidence for accreditation decisions. Ex post accreditation is valid for eight years, unless important weaknesses are found that require institutions to devise an improvement plan which HAC follows up on in a specified period of time. All accreditation decisions – in fact, all of HAC’s resolutions – are publicly available on its website. Ex post accreditation reports are extensive, while ex ante accreditation decisions are published together with their justification and evidence. There is an exception in the case of decisions on professorial positions. Professoral applications concern individuals seeking positions announced by universities. Given that the personal qualifications of individuals are evaluated, only the accreditation decisions are published, but not the evaluation.

In summary, the objective of the national higher education policy is to advance the quality development of higher education and thus to support the country’s economic and social development, which is reflected in HAC’s mission. The objective of HAC is, in concrete terms, the accreditation of higher education areas covered by its procedures in order to advance the aims set down in its mission. The actors controlling Hungarian QA are the higher education institutions, which are primarily responsible for their quality; HAC, which ensures that the higher education institutions fulfil their responsibility for providing quality education, research and artistic activity; and, less directly, the Hungarian Ministry of Education and Culture, which sets quality policy and ensures the legality of operations. The areas covered by quality assurance are all higher education institutions and higher education programmes in Hungary, which are evaluated and accredited by means of ex ante and ex post procedures. The accreditation decisions determine whether an institution or programme may operate or not, with two exceptions: one is degree programmes, where the minister may grant permission to launch a programme even if HAC’s decision at the end of the appeals procedure was negative. The other is with university professorial positions, where the minister may, again, override HAC’s decision. QA involves accreditation based on evaluation, the outcome of which is a detailed report on the strengths and weaknesses of an institution, which is an important instrument for implementing HAC’s improvement orientation.

5.4. HAC’S ACTIVITIES 2004-2008

As noted, the period 2004-2008 saw fundamental changes in Hungarian higher education. The transition to Bachelor/Master programmes from single-stream, three to four-year college and five or six-year university degree programmes affected HAC’s activities. While the old programmes were being phased out, institutions continued to submit applications before the law went into force, both for what were then “national qualification requirements” and for launching new degree programmes. At the same
time, Bachelor and Master programmes were being worked out and required the redesigning of accreditation criteria and procedures. Parallel to that, HAC was developing its disciplinary accreditation methodology and transforming its institutional accreditation procedure. The latter changed both with respect to the increasing emphasis on institutional-level aspects of evaluation – while the evaluation of programmes within the institutional procedure was gradually discontinued – and the need to evaluate the institutions’ internal QA schemes. The figures on HAC’s activities, therefore, show overlapping areas over the examined time-span, from 2004 to the first half of 2008. Furthermore, they reveal the enormous burden on the committee and staff members that these changes demanded.

The following tables show the number of ex post and ex ante procedures for the (re-) accreditation of institutions, faculties, programmes, doctoral schools, professorial applications, and place of excellence awards. A summary statistic for the period 2005-2007 revealed that the number of ex ante decisions on new programmes exceeded 1,500. Not all types of decisions are reflected in the following tables, since they include many second and sometimes third submissions for the same programme or, for example, changes in the leadership of a doctoral school that were evaluated on the basis of abridged applications. Another, larger set of programmes were post-graduate courses that HAC evaluated until 2005. In total, more than 2,400 accreditation decisions were passed between 2005 and 2007.

5.4.1. Ex Post Procedures

5.4.1.1. Ex Post Institutional Accreditation

Following the completion of the first cycle and prior to the initiation of the second, eight-year cycle of institutional accreditation there was a lull in the proceedings while HAC worked out its new procedures. The second cycle began in 2006. Re-accreditation of institutions includes all their existing faculties.

<table>
<thead>
<tr>
<th>2004</th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
<th>2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universities/colleges</td>
<td>0</td>
<td>0</td>
<td>13</td>
<td>14</td>
</tr>
</tbody>
</table>

Table 3. Re-accredited higher education institutions

Source: HAC’s database.

5.4.1.2. Ex Post Accreditation of Programmes

Until the introduction of disciplinary accreditation in 2005, the ex post accreditation of all degree programmes was conducted on an institution by institution basis, rather than by disciplinary fields. The changeover resulted in a gap for some programmes, while others underwent the procedure sooner than the expiry date of their accreditation term. For the examined period 2004-2008, however, the earlier type programmes were
no longer reviewed, since the first cycle of institutional accreditation was already completed. At the same time, the new Bachelor and Master programmes were not yet at the stage where ex post accreditation was possible. The evaluated disciplines until the cut-off date of July 2008 were psychology and history in 2004; medicine, dentistry and pharmaceutics in 2006, and law also in 2006. The evaluation procedure for all fields of art began in 2007 but was not finished by mid-2008 and is, therefore, not included in the statistic. In Table 4, “disciplines” refers to the number of disciplinary fields reviewed nationwide, while “programmes” indicates the total number of programmes where the disciplines are taught. The number of doctoral schools shows those in all enumerated disciplines.

Table 4. Evaluated disciplines and programmes

<table>
<thead>
<tr>
<th></th>
<th>2004</th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
<th>2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>Disciplines</td>
<td>2</td>
<td>-</td>
<td>4</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Programmes</td>
<td>16</td>
<td>-</td>
<td>20</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Doctoral schools</td>
<td>10</td>
<td>-</td>
<td>28</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

Source: HAC’s database.

5.4.1.3. Place of Excellence Awards

HAC initiated place of excellence awards for teaching and research in each disciplinary field in 2005, when the parallel evaluation of disciplines made comparisons possible. Place of excellence awards are applied for in the course of disciplinary accreditation by faculties or departments under review. HAC grants places of excellence awards based on a predefined set of criteria to faculties, departments, or doctoral schools which its experts consider of outstanding quality in the given field. The awards are given for the duration of an accreditation – that is for eight years.

Table 5. Awarded places of excellence

<table>
<thead>
<tr>
<th></th>
<th>2004</th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
<th>2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>Faculties, departments, doctoral schools</td>
<td>–</td>
<td>7</td>
<td>14</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

Source: HAC’s database.

5.4.2. Ex Ante Procedures

5.4.2.1. Ex Ante Institutional Accreditation

New institutions seeking a license to operate must receive accreditation. This applies to Hungarian as well as foreign institutions. With the latter, HAC evaluates not only their quality per se but also in how far it is in compliance with Hungarian qualifications, which is rarely the case. In such instances the institutions may receive a license to operate, but their degrees are not considered equivalent to Hungarian degrees.
Faculties, while within the scope of institutions’ internal decision-making, still have to obtain HAC’s approval before they can be established. The law is not unambiguous in this regard, however.

Table 6. Applications for new institutions

<table>
<thead>
<tr>
<th></th>
<th>2004</th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
<th>2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>Supported</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>9</td>
</tr>
<tr>
<td>Rejected</td>
<td>3</td>
<td>1</td>
<td>2</td>
<td>5</td>
<td>0</td>
</tr>
</tbody>
</table>

Source: HAC’s database.

Table 7. Applications for new faculties

<table>
<thead>
<tr>
<th></th>
<th>2004</th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
<th>2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>Supported</td>
<td>2</td>
<td>4</td>
<td>6</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Rejected</td>
<td>1</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

Source: HAC’s database.

Table 8. Applications for foreign institutions to operate in Hungary

<table>
<thead>
<tr>
<th></th>
<th>2004</th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
<th>2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>Supported</td>
<td>1</td>
<td>0</td>
<td>4</td>
<td>2</td>
<td>0</td>
</tr>
<tr>
<td>Rejected</td>
<td>1</td>
<td>4</td>
<td>0</td>
<td>1</td>
<td>2</td>
</tr>
</tbody>
</table>

Source: HAC’s database.

5.4.2.2. Ex Ante Accreditation of Programmes

Prior to the introduction of Bachelor and Master programmes, HAC evaluated single-stream either college-type or university-type degree programmes. In the transition period, both types of evaluations were running. There were a high number of rejected programmes at this time, since HAC discouraged the introduction of new programmes of the old type just before these types of programmes were discontinued by law. The structure of the new Bachelor and Master programmes was set down in a government decree (Government Decree, 2005), which lists 160 different Bachelor programmes. A provision was that the Bachelor structure would not be changed until a first set of graduates finishes the given programme. This resulted in an initial surge of applications and a subsequent sharp drop. Master programme applications have risen exponentially since the education and outcome requirements were worked out and accredited. A levelling off is expected after 2008.
Table 9. Applications for new programmes (Yes–accredited, No–not accredited)

<table>
<thead>
<tr>
<th></th>
<th>2004</th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
<th>2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>National qualifi.</td>
<td>Yes</td>
<td>13</td>
<td>Yes</td>
<td>–</td>
<td>Yes</td>
</tr>
<tr>
<td>requirements</td>
<td>No</td>
<td>18</td>
<td>No</td>
<td>12</td>
<td>No</td>
</tr>
<tr>
<td>Univ., college degree progrs.</td>
<td>Yes</td>
<td>18</td>
<td>Yes</td>
<td>34</td>
<td>Yes</td>
</tr>
<tr>
<td>No</td>
<td>55</td>
<td>No</td>
<td>10</td>
<td>No</td>
<td>–</td>
</tr>
<tr>
<td>Ba ed-outcome requirements</td>
<td>Yes</td>
<td>85</td>
<td>Yes</td>
<td>42</td>
<td>Yes</td>
</tr>
<tr>
<td>No</td>
<td>1</td>
<td>No</td>
<td>2</td>
<td>No</td>
<td>1</td>
</tr>
<tr>
<td>Ma ed-outcome</td>
<td>Yes</td>
<td>–</td>
<td>Yes</td>
<td>31</td>
<td>Yes</td>
</tr>
<tr>
<td>requirements</td>
<td>No</td>
<td>–</td>
<td>No</td>
<td>2</td>
<td>No</td>
</tr>
<tr>
<td>New bachelor programmes</td>
<td>Yes</td>
<td>96</td>
<td>Yes</td>
<td>515</td>
<td>Yes</td>
</tr>
<tr>
<td>No</td>
<td>25</td>
<td>No</td>
<td>126</td>
<td>No</td>
<td>31</td>
</tr>
<tr>
<td>New master programmes</td>
<td>Yes</td>
<td>–</td>
<td>Yes</td>
<td>–</td>
<td>Yes</td>
</tr>
<tr>
<td>No</td>
<td>–</td>
<td>No</td>
<td>5</td>
<td>No</td>
<td>39</td>
</tr>
</tbody>
</table>

Source: HAC’s database.

5.4.2.3. **EX ANTE APPLICATIONS FOR NEW DOCTORAL SCHOOLS**

With the introduction of disciplinary accreditation, already operating doctoral schools are evaluated and accredited within the framework of that procedure. The procedure was separate until 2005. In 2008 HAC also reviewed all 159 existing doctoral schools in the country to check in how far they comply with the effective regulations. This was necessary since the new law also requires universities to revise their doctoral regulations to comply with the law. In addition HAC evaluates applications for new doctoral schools, indicated in the table.

Table 10. Applications for new doctoral schools

<table>
<thead>
<tr>
<th></th>
<th>2004</th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
<th>2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accredited</td>
<td>2</td>
<td>6</td>
<td>5</td>
<td>0</td>
<td>4</td>
</tr>
<tr>
<td>Not accredited</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>1</td>
<td>-</td>
</tr>
</tbody>
</table>

Source: HAC’s database.

5.4.2.4. **PROFESSORIAL APPOINTMENTS**

Since 2000, HAC has been charged with evaluating appointments for full professors at higher education institutions. With the 2005 Higher Education Act, only university professorships are evaluated by HAC, whereas earlier, also posts for college professors were reviewed, and are included in the 2004 statistics below.

Table 11. Applications for professorial positions

<table>
<thead>
<tr>
<th></th>
<th>2004</th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
<th>2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>Supported</td>
<td>144</td>
<td>177</td>
<td>117</td>
<td>86</td>
<td>93</td>
</tr>
<tr>
<td>Not supported</td>
<td>43</td>
<td>60</td>
<td>34</td>
<td>80</td>
<td>42</td>
</tr>
</tbody>
</table>

Source: HAC’s database.
5.5. ANALYSIS OF HAC’S STRENGTHS AND WEAKNESSES

HAC was among the first European QA agencies in 2000 to undergo an external evaluation by an international panel. In spring 2008, a second review was conducted to comply with ESG and for continued ENQA membership. Part of the remit of the second evaluation was to establish in how far HAC had complied with the recommendations of the earlier review team. The 2008 panel summed up its conclusions in this regard as follows, “In the opinion of the panel, most of the recommendations from 2000 have been addressed. However, there are still a number of recommendations where HAC has acknowledged clearly that that further work remains to be done. These include, for example, producing analyses of HAC’s overall evaluations and operations, creating a system of internal QA for HAC, continuing to diversify the profile of HAC evaluation experts, and reducing the number of HAC committees” (HAC External Evaluation, 2000). Many of the 2000 recommendations have either been acted upon or the addressed issues have resolved themselves over time. Still, the panel's summary pinpoints HAC’s main trouble spots, as will be seen in the discussion on HAC’s compliance with ESG. The discussion on HAC’s strengths and weaknesses reflects back on the same issues.

HAC conducted a self-evaluation for its external review in the spring of 2008. The following is taken from the SWOT Analysis as endorsed by the committee membership.

Figure 4. SWOT Analysis of HAC, Part 1

<table>
<thead>
<tr>
<th>Strengths</th>
<th>Weaknesses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Commitment on the part of the HAC membership to ensure the quality of</td>
<td>Too many tasks for given resources, which may hamper quality work</td>
</tr>
<tr>
<td>higher education</td>
<td></td>
</tr>
<tr>
<td>Dynamic and competent leadership</td>
<td>Consistency of decisions varies occasionally, both between the decision-making levels and over</td>
</tr>
<tr>
<td></td>
<td>time</td>
</tr>
<tr>
<td>Experience from active international presence of some members and staff</td>
<td>Given the hierarchical decision-making structure there is not always enough time to consider</td>
</tr>
<tr>
<td>feeds back into HAC process</td>
<td>middle- and upper-level decisions thoroughly enough</td>
</tr>
<tr>
<td>In spite of occasional criticism the HAC is a generally respected player</td>
<td>Internal QA is not sufficiently comprehensive, quality loop and emphasis on feedback and action</td>
</tr>
<tr>
<td>in Hungarian higher education</td>
<td>on established weaknesses are not adequately integrated into the system</td>
</tr>
<tr>
<td>Activities embedded in structured legal framework, in this sense</td>
<td>Lack of willingness of external experts to be thoroughly trained</td>
</tr>
<tr>
<td>transparency and acceptance in higher education community</td>
<td>No research on effectiveness of processes</td>
</tr>
<tr>
<td>Experience, proficiency and work ethic of staff members</td>
<td>No adequate dissemination of information about the HAC and accreditation to the wider public</td>
</tr>
<tr>
<td>International embeddedness and up-to-date knowledge of trends</td>
<td>beyond posting on website</td>
</tr>
</tbody>
</table>


7 The HAC has been an ENQA member since 2002.
The strengths and weaknesses discussed in the following partly cover those identified by HAC itself, but include some other issues that this author considers important.

The expertise and commitment on the part of the HAC members and staff are undoubtedly the committee’s greatest assets. In line with that is its fifteen-year experience in QA, including considerable international involvement (including high-level positions in international organizations such as the International Network of Quality Assurance Agencies in Higher Education /INQAAHE/, the European Association for Quality Assurance in Higher Education /ENQA/ and the Central and Eastern European Network of Quality Assurance Agencies in Higher Education /CEE Network/), which is reflected in its approach. At the same time, it has been willing to accept differences with some international trends where it has believed that the Hungarian environment required it; the decision to practice evaluation with an accreditation outcome rather than evaluation only has already been alluded to. Respect for the given environment cannot be stressed enough, since no agency operates in a model setting but has to consider both the mind-set of its own members and the attitude of the stakeholders who are affected by its work. HAC is at times in the crosshairs of higher education stakeholders and the media for this or the other decision. At the same time, it is an accepted constituent of the higher education landscape, owing to the fact that it is careful to involve the major sectoral representatives in its work. The Hungarian Rectors’ Conference, the Ministry, the Hungarian Education and Scientific Council (an advisory body to the minister), and the National Doctoral Council (consisting of the chairs of institutional doctoral councils), are permanently invited to send a representative to sit in on the public part of HAC’s plenary meetings. HAC regularly holds consultation meetings with higher education institution delegates, in particular those whose evaluations are upcoming. Its media presence is sporadic but recurring, even if being newsworthy may not always be positive. The legal environment that has developed over time, and in which not only HAC but all of higher education operates, lend the committee’s work transparency and make its processes accessible to the interested public.

Some of HAC’s weaknesses are related to the aspects considered among its strengths: the legal environment has been changing too frequently and has overburdened the decision-making process. HAC could be more proactive – rather than reactive – in the media. Its members at large, rather than just a handful of them, could participate in international QA events.

The first of these weaknesses is the most serious concern, and one which has to do both with the country’s historical development: emerging from regime change in the early 1990s and developing a new higher education structure that, however, is embedded in its past. There is also the Bologna Process, which has required a switch to a new programme structure; and the ESG guidelines, which affect not just HAC but also higher education institutions.

HAC members are renowned representatives of, and for the most part still active in, their respective fields of work, and as such are not QA professionals. While this is
also the case in other accreditation committees, the negative implication is that their primary occupation may influence their decision-making in QA matters. To balance this risk, HAC has various procedures and documents that propel applications through various locks in the stream of decision-making and involve several decision-makers. A Code of Ethics is intended to raise the awareness of HAC members and external experts in addition to contributing to the transparency of its work. External experts sign no-conflict-of-interest commitments with their evaluation contracts. A standing HAC Ethics Committee reviews cases where conflicts of interest have surfaced. What is difficult to rule out by administrative measures is an inconsistency in the decisions. This is often a personal question, where an individual member’s commitment may not be constant on all issues. More often, though, it is the sheer magnitude of the tasks at hand, when dozens of decisions need to be passed at a single meeting. With the vast majority of new Bachelor and Master programme applications concluded, HAC should be able to concentrate on individual issues more completely in the near future.

In the same vein, it is difficult in a country like Hungary to overcome the “small country effect”. Members of a profession know each other more or less well, and it is not in the culture to separate familiarity from decisions to be made in another sphere. The accelerated employment of foreign experts, practised in some other countries, such as Estonia, could overcome this hurdle, but in this country it is neither readily accepted nor financially feasible on a large scale at this time.

A related issue looming on the horizon is the growing drive by foreign institutions to offer their higher education services in Hungary. While the law legislates that foreign institutions that are recognised in their home state may operate in Hungary, it is vague as to the QA provisions. HAC should draft an expert opinion to authorise the operation of foreign institutions in Hungary, but the Act states that a “license for operation may be denied if the degree of qualification certified by the diploma cannot be recognised in Hungary” (the Act of 2005, Sections 106 (7) and 116 (2) respectively). Given that Hungarian degree programmes are set down in education and outcome requirements, it is extremely difficult for a foreign programme to match the set requirements, since although they are partly outcome requirements, they are very specific as to the curriculum. Nevertheless, this is what HAC has to consider in its evaluation. HAC has recently issued guidelines for its expert committees on how to deal with joint programmes, made possible under the 2005 Act, including those in Hungarian-foreign collaboration. The guidelines state that all parts of the programme seen together have to constitute a degree programme that is equivalent to a Hungarian programme, though the Hungarian partner does not necessarily have the capacity to teach a full programme of this kind. However, HAC experts often believe that many of the submitted applications for foreign programmes do not meet HAC standards. Their decisions are consequently overwhelmingly that while HAC supports the establishment of the foreign institution as a foreign entity, the degrees are not to be considered equivalent to Hungarian degrees. This problem also reveals another issue, namely that the concept of outcomes in the new “education and outcome requirements” is still difficult to grasp,
as acknowledged also by the minister when he said that in higher education only the very initial steps have been made toward the development and introduction of output driven training programmes (Ministry Education and Culture, 2008a).

HAC has been accused in the media and informally of being an elite organization, especially in the initial years. Half its members are delegated by all Hungarian higher education institutions via the Rectors’ Conference. While a delegating mechanism is necessary, and this is set into law, it is a valid question to what extent the Rectors’ Conference represents all internal stakeholders in higher education institutions. In addition, the Hungarian Academy of Sciences delegates nearly a third of the members, either through its central administration or through its research institutes. The Academy is a powerful institution in Hungarian higher education and research and represents the scientific elite, as in many other Central and Eastern European countries. Many university and college professors are also “Doctors of Science”, “Corresponding Members” or “Full Members” of the Academy. The remaining six of HAC’s twenty-nine members represent stakeholders external to higher education; their delegates most commonly also hold scientific titles. The current challenge, also in light of the newly introduced Bachelor education, is to ensure that Hungarian higher education and its evaluation can meet the demand for employment-oriented, skills and competences-driven education that meets the needs of future mass education.

In the 2007-2009 term, three of the twenty-nine HAC members and two of the six non-voting members were women. HAC’s International Advisory Board has repeatedly noted the gender imbalance, but the legislated delegating structure leaves little flexibility for HAC, except to ask the delegating bodies to consider gender among its conditions for deputation. Moreover, it tries to do the issue justice by selecting women among its non-voting members.

Due to the task overload, as much as to the financial constraints stemming from a depleted public budget, which is the major source of HAC’s funding, HAC has not been able to evaluate the effects of its work as much as it should. Internal quality assurance has been ongoing in parts for several years, extending to satisfaction surveys among evaluated institutions, participating visiting team members, and HAC staff members on an annual basis. A website menu indicates the outcomes of these instruments and the two external reviews by international panels in 2000 and 2008.

There are aspects of HAC’s operation that deserve to be cited as examples of good practice. The evaluation of doctoral schools is a special task of HAC, since they may be launched only with the consent of HAC and are prevented from doing so if HAC does not approve them following a due appeals procedure. In the first half of 2008, HAC changed its expert evaluation of doctoral schools using a new database established in conjunction with the National Doctoral Council. The database contains the entire Hungarian doctoral training and degree-awarding system with publicly accessible data on the doctoral schools and the expert evaluations. The voting procedure and committee structure has remained unchanged.

Another best-practice example is HAC’s approach to evaluating professorship applications. To counteract charges of subjectivity in its decisions on such
applications, which, due to their personal level, are understandably sensitive issues, HAC uses an evaluation approach that includes a point system to cover such questions as the applicant’s teaching and research experience and professional achievements. The declared aim is, in words of the HAC President, that the various levels where opinions are formulated and decisions are made – from the experts to the committees to the plenary to the minister – should reinforce or alter lower-level opinions or judgements on the basis of more objective reasoning, and to establish a value system between current and future applications and the evaluators that is more harmonious and congruent than has existed until now (Bazsa, 2008).

The drawback of an overly formula-based approach rather than an evidence-based approach is that judgements on quality, an anyway intangible concept – which as such must be based on subjectivity – are relegated to the objective level. No formula can be fool-proof, and there will always be loopholes, diverting energies from quality performance to complying with numerical standards on the part of the evaluated subject. While formula-based evaluations are justified in the case of professorship applications, building trust in subjective judgements rather than numerical criteria could be enhanced.

On the other hand – and this may establish such trust in the long term – HAC’s revised Accreditation Guidebook for institutional accreditation, and perhaps even more so its discipline accreditation procedure, may hold up as models. As opposed to the initial formula-based versions of the Accreditation Guidebook, HAC has progressively attained a guide that promotes quality culture at the evaluated institution. The Guidebook describes the expectations for an internal QA system in what is effectively an adapted version of ESG, Part 1,

- policy, strategy and procedures for quality assurance;
- the launching, monitoring and periodic internal review of study programmes;
- the assessment of student progress and achievements;
- the quality assurance of teaching staff;
- learning support, learning resources and student services;
- the internal information system;
- publicity and public information (HAC External Evaluation, 2008).

That the latest version of the Guidebook (the 16 October 2007 edition) is the third to appear within the second institutional accreditation cycle, has to do with both the successive changes in the external conditions (such as the new higher education act, the adoption of ESG) and, internally, the only gradual abandonment of programme evaluation within the institutional accreditation procedure. The idea that quality judgement should be based on observations about institutional leadership and management initially seemed intangible for all players, internal and external. At the same time, the successive changes in the guidelines had resulted in
confusion for many actors in the evaluations. With at most minor changes to the guide foreseen in the near future, it may now be easier to expand HAC’s consistency.

Along with relinquishing the evaluation of programmes within the institutional accreditation procedure, HAC adopted disciplinary accreditation as its sole ex post programme accreditation approach. The experiences with this model have been very positive. A pool of experts in the field is selected by HAC based on recommendations of the relevant standing committee(s). Given the small size of the country, the pool necessarily involves experts also from the institutions that are to be evaluated. Therefore, the teams for the specific visits are selected from members of the pool to avoid conflicts of interest. Based on core guidelines provided by HAC, the pool itself works out the procedures and a detailed methodology together with accreditation criteria for the particular field, typically in consultation with a range of external stakeholders. In addition to accreditation decisions and detailed evaluations of the assessed programmes, the outcome of a disciplinary accreditation procedure is a comprehensive analysis of the state of the field, published in book form.

5.6. IMPLEMENTATION OF ESG

As noted, in spring 2008, HAC underwent an external review, whose main focus was its compliance with ESG for the purpose of continuing its membership in ENQA. In its report, the external panel of experts found HAC substantially compliant with ESG. The experts considered HAC fully compliant in five of the eight standards in Part 2 and in six of the eight standards in Part 3 of ESG. Their concerns were with ESG 2.3, 2.4 and 2.8 and 3.4 and 3.6, the latter being given both a fully compliant and a partially compliant mark for different aspects.

The following section will discuss the standards in correlation with the panel’s judgment of compliance and in which HAC has encountered difficulties, as described in HAC’s self-evaluation report and also reflected in the external panel’s report8. A comment is added on Standard 3.8, where no problems were encountered.

ESG 2.3. Criteria for decision: any formal decisions made as a result of an external quality assurance activity should be based on explicit published criteria that are applied consistently

While HAC’s criteria are explicit and published, the consistency of application is a challenging question. It is difficult to guarantee constancy of decisions on similar issues over time, but also between issues within a standing committee and hence the plenary.

Disciplinary accreditation has proven to be helpful for overcoming inconsistent decisions over time. With eight-yearly accreditation cycles, the findings regarding programmes in a particular field were incomparable. Moreover, the visiting team

8 The self-evaluation report, the review panel report, and HAC’s comments on it are accessible on the HAC website <www.mab.hu>.
consisted of different individuals and the educational environment had also changed. Tackling these evaluations in a short period with the same pool of experts not just guarantees consistency of decisions but also allows for an in-depth analysis of the state of the art. With other types of issues the solution is less clear-cut.

The descriptions of criteria for accreditation are developed along core guidelines to ensure consistency but they vary for the various types of evaluations. The set of criteria for establishing new institutions, for example, simply lists the aspects for which compliance is expected. However, they need to be considered together with the more detailed criteria for new programmes, given that having accepted programmes is a precondition for launching a new institution. For new Bachelor or Master programmes and for professorships, the criteria are relatively elaborate. Given the set core criteria, the standard of quality is not compromised but the varying complexity in presentation may hamper consistency in interpretation.

The hierarchical decision-making structure, or more precisely, the many levels of decision-making within HAC, is another impasse. The intention in setting up such a system was to ensure consistency, the idea being that expert committees evaluate their particular fields, the colleges as the next level have an overview of the broader knowledge area and the applications pertaining to them, while the final vote in the plenary ensures consistency in the core quality standards. In practice, however, the lowest-level evaluators produce the report, which then goes up each level. There the report may or may not be changed, though more often, simply the accreditation decision changes and a gap ensues between it and the reasoning behind it set down in the report. The severe time constraints under which HAC has worked in recent years, when hundreds of new Bachelor and Master education and outcome requirements and programmes were to be launched at institutions, have left their mark on the thoroughness with which individual issues could be elaborated. In response to the external review panel’s observations on this point, HAC is now inviting the chair of each visiting team to report directly to the plenary when an ex post accreditation decision is on the table.

Another concern voiced by the panel was that in professorial appointments and launching new programmes at institutions the minister has the right to grant an appointment or programme license even when, after the due appeals procedure, HAC passed a negative decision. While ministers in many countries have decision-making powers of this sort, on the grounds that policy and strategic considerations may sometimes need to qualify quality judgements, there is still the lingering question what result such a step will have on the quality of education in the long term.

ESG 2.4. Processes fit for purpose: All external quality assurance processes should be designed specifically to ensure their fitness to achieve the aims and objectives set for them

The panel noted the need to separate evaluation and accreditation processes in order to substantiate its improvement orientation. HAC has been in disagreement with the panel on this point, which seemed to stem from the differing concept of the term “evaluation”. While the panel envisioned this approach from the point of view of its
outcome, HAC considers it a process that nevertheless leads to an “accreditation” decision. In HAC’s view, the evaluation produces a detailed report, which elaborates the strengths and weaknesses of the evaluated institution or programme, and thus points to possibilities for improvement. It does not believe that the “threat” of accreditation stands in the way of its improvement orientation.

The difference in cultural and historical backgrounds between the panel members and HAC’s environment seems to surface on the issue of evaluation vs. accreditation. This seems to be the case even if half of the panel were Hungarians, which indicates that the concept that evaluation and accreditation should be irreconcilable procedures in QA may have been more dominant with the foreign members.

**ESG 2.6. Follow-up procedures: Quality assurance processes which contain recommendations for action or which require a subsequent action plan should have a predetermined follow-up procedure which is implemented consistently**

With the overload of tasks in recent years, follow-up procedures to check the implementation of HAC recommendations have been neglected. Sensing the need for such procedures, HAC has passed several resolutions to tackle the problem. In the first cycle, institutional accreditation was sometimes granted for a shorter than eight-year term with provisions for the institution to mend specified shortfalls by a given deadline, when a monitoring procedure would certify compliance. A subsequent concept was to check all institutions after four years in an abridged review. Later, institutions were asked to send in progress reports annually. These latter were useful for the upcoming accreditation of an institution, when visiting teams reviewed these reports. With the second cycle, less than the regular eight-year accreditation may be granted when weaknesses are identified.

**ESG 2.8. System-wide analyses: Quality assurance agencies should produce from time to time summary reports describing and analysing the general findings of their reviews, evaluations, assessments, etc.**

HAC publishes all its resolutions and reports on its website. Additionally these are included in a triennial gazette and yearbooks also in printed form. It intermittently issues analyses on specific aspects of higher education quality. An in-depth study was produced on doctoral education. Moreover, the analyses of disciplinary fields provided with the disciplinary accreditation reports are exhaustive studies of the state of the field at the time of the review and by the country’s leading experts. However, there are no system-wide analyses of higher education quality or the effects of HAC’s activities on the quality of higher education. While this deficit is attributable to the lack of adequate resources, it is a problem that was also addressed by the external review panel.

**ESG 3.4. Resources: Agencies should have adequate and proportional resources, both human and financial, to enable them to organise and run their external quality assurance process(es)**
in an effective and efficient manner, with appropriate provision for the development of their processes and procedures

The lack of adequate resources, already mentioned several times, has been a genuine obstacle for HAC to fulfil its tasks adequately. While the 2005 Act sets down a formula according to which HAC should receive its annual financing from the public budget, the Ministry, which channels the funding, has not complied with this regulation. This may be explained in part by the general poor state of economic affairs in Hungary, where the annual budgets of the ministries themselves are curbed in the course of the fiscal year. HAC found recourse in the fees that institutions paid for processing applications for Bachelor and Master programmes and doctoral schools. While the fees themselves are not high, as regulated by law, the sheer number of applications produced revenue that allowed HAC to continue, though with a reduction in staff in 2007. However, after completion of the external review, HAC received due funds in mid-2008, and it is hoped that the future finances will arrive with dependable regularity.

The situation has prevented HAC from conducting analytical work, as noted, and from conducting systematic staff development. The external panel remarks on the negative effects of uncertain income on the planning of activities, and on the legal restrictions placed on HAC generating own income. At the same time, it recommends exploring additional possibilities for income generation.

ESG 3.6. Independence: Agencies should be independent to the extent both that they have autonomous responsibility for their operations and that the conclusions and recommendations made in their reports cannot be influenced by third parties such as higher education institutions ministries or other stakeholders

While acknowledging that HAC’s independence is ensured in its decision-making, if not financially, and remarking that it found no evidence to the contrary, the external review panel notes that the delegating channels should be opened to allow for a wide pool of delegating entities. Currently, as mentioned, the higher education act outlines the delegating bodies and the numbers of delegates from each of them. Twenty-three of the 29 members are from higher education and research, but these delegations are channelled through the Rectors’ Conference and the Academy of Sciences. The panel recommends reducing the academic members in favour of students, stakeholders, and foreign members.

ESG 3.8. Accountability procedures: Agencies should have in place procedures for their own accountability

With regard to this standard, HAC is not encountering any difficulties. The review panel found that the QA instruments for HAC’s effective operation are in place. The regular feedback in the form of surveys to evaluated institutions, visiting team members, and staff are accumulated and analysed. They are on a plenary meeting agenda each year, and action plans are produced in response to the survey findings.
Criteria, standards and procedures are published in advance. An appeals procedure is legislated in the higher education act, and a Board of Appeals regularly reviews requests on a case-by-case basis. Procedures for avoiding conflicts of interest are instituted.

As suggested, HAC has twice undergone evaluations of its work by international panels. The documents, procedures and outcomes of the two external evaluations of HAC are publicly accessible.

External advisors review and reflect on HAC and its work. The recommendations of the International Advisory Board are not only discussed and acted on at plenary meetings and published. They are also sent to the Ministry of Education and Culture, as a form of accountability toward HAC’s stakeholders.

5.7. CHALLENGES AHEAD: OPPORTUNITIES AND THREATS

The opportunities set down in the second part of HAC’s 2008 SWOT analysis are mostly derived from those weaknesses that HAC believes it can overcome on its own. On the other hand, the threats are issues that require changes in the external environment, primarily legislation.

Figure 5. SWOT Analysis of HAC, part 2

<table>
<thead>
<tr>
<th>Opportunities</th>
<th>Threats</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Strengthening output evaluation (more consistent consideration of employers’ views)</td>
<td>• Overly rigid legal framework inhibits flexibility to change</td>
</tr>
<tr>
<td>• Improvement of transparency and consistency in decision-making</td>
<td>• Too many areas require either ex post or ex ante accreditation (or both), resulting in accreditation “overkill”</td>
</tr>
<tr>
<td>• More steady workload once the tasks following from the implementation of the Bologna process are accomplished</td>
<td>• Underfinancing of HAC</td>
</tr>
<tr>
<td>• Exploitation of database and Internet possibilities in every-day work and reduction of paper-based work</td>
<td>• Rushed transformation of the higher education environment leads to inconsistencies in regulations and content</td>
</tr>
<tr>
<td>• Increase in public awareness of the HAC’s work and implementation of public feedback</td>
<td>• Contradictions and loopholes in legislation</td>
</tr>
<tr>
<td>• Competition from (international) QA organizations</td>
<td>• Hurried decisions in HAC that lead to inconsistencies that are hard to remedy</td>
</tr>
</tbody>
</table>

These opportunities and challenges for HAC cluster around three main issues: an over-regulation of higher education and HAC; an unstable legal environment; and, HAC’s resources. Many of these concerns, and many aspects related to them, are common to many countries at this stage of the Bologna Process. Some, such as over-regulation, may be a problem that lingers predominantly in Central and Eastern European systems.

The new higher education act, while progressive in many respects such as its aim to establish Hungarian higher education in the European Higher Education Area, appears to this author to be overly detailed and intrusive into the daily functioning of higher education institutions. The same is true in relation to HAC, especially considering not just the Act itself but the government decrees and other regulations derived from it. To name one example concerning the degree of autonomy of institutions that changed during the legislative process are the regulations governing Master programmes. While Bachelor programmes were to be required to comply with education and outcome requirements (adhering to the previous regulatory setting of qualification requirements), Master programmes were initially intended to fall within the scope of autonomous higher education institutions. It is unclear where the decision to subject these programmes to the same regulatory structure originated, but the fact is that they now follow the same developmental course as Bachelor programmes. Institutions must submit first the general requirements, which need to be accredited and registered by the Educational Authority before they become national-level standards, according to which institutions can design their individual programmes (which need to be accredited). Education and outcome requirements are issued as ministerial decrees, based on a government decree that established the structure of Bachelor and Master programmes. The concern noted in HAC’s SWOT analysis as the “threat of fragmentation of Master programmes and specialities” is, in effect, a direct consequence of over-regulation. If universities and colleges were less confined in designing their degree programmes, and, in fact, the development of special profiles between institutions were supported via deregulation in this area, supply and demand – to say nothing of quality awareness among the public – would reach an equilibrium. The other noted concerns, “inability to restrain burgeoning of ever new degree programmes” and “the strong motivation, due mostly to financing rules, by higher education institutions to put quantity above quality” are directly related to this over-regulatory setting.

Over-regulation, arguably, affects HAC as well. A government decree derived from the law regulates its operations, setting down, for example, how many meetings should be held each year, or who can substitute for the president at the meetings, provisions that should typically be contained in an organization’s own by-laws (which, incidentally, in the case of HAC are subject to the minister’s approval). It may also be questioned whether it is necessary to conduct ex post and ex ante accreditation, and in as many areas as is currently the case. Not only does it overburden HAC, but it curtails the autonomy of higher education institutions. For years, HAC has been discussing switching to quality audit at higher education institutions in an upcoming institutional accreditation cycle. The change is gradually taking place, with emphasis in the evaluation on the institutions’ QA schemes having been implemented, and with having detached...
disciplinary accreditation from the institutional accreditation process. For now, however, the spectrum of ex ante evaluations is planned to be retained, based on the rationale that quality oversight cannot yet be relaxed since internal QA systems have just recently been introduced at most institutions.

The second bullet-point concerns the need for a stable legal environment. The recent switch to the Bachelor/Master structure in a three-year time span, and many other changes initiated under the 2005 Act, left no room for analysis of the effects of the changes or actions taken. This is something that will need to take place, sector-wise and within HAC, in the near future. An analysis of its actions is an ESG requirement that HAC must meet. At the same time, inconsistencies in its decisions that resulted from the overtaxed schedule will need to be ironed out.

Just as importantly, however, the entire higher education structure needs to be reconsidered. With the passing of the new act, an opportunity for this has been missed. Higher education financing has not yet reached its ideal state. Higher education institutions receive normative financing along quantitative formulas, which has led to a burgeoning of degree programmes and, indeed, institutions. The Ministry acknowledges the disincentive financing structure when it states, “In higher education efforts [are] to be made toward the diversification of the financing of higher education and to take measures aimed at the reinforcement of these institutions’ financial autonomy, as well as of enhancing the demand driven nature of the sector” (Ministry of Education and Culture, 2008a). There are currently 71 higher education institutions in Hungary (Ministry of Education and Culture 2008b), not counting foreign institutions, generally considered to be too many in a population of 10 million. An OECD analysis shows that tertiary participation has expanded sharply in this country, having more than doubled between 1995 and 2004 with the graduation rate jumping from 29 per cent to 36 per cent between 2004 and 2005, though the increase is still below the OECD average (OECD, 2007). Nevertheless, the higher education enrolment of 2.30 thousand full-time students in 2006/07 (Ministry of Education and Culture, 2008a) should not necessitate the high number of institutions that are currently operating. This has contributed to a drop in higher education quality concurrently with expansion, which HAC’s efforts have not been able to counterbalance. Initiatives such as the sectoral quality policy issued by the Ministry in agreement with HAC recognise the drop in quality and try to tackle it (Ministry of Education and Culture, 2007).

The third group of issues concerns HAC’s resources. A result of HAC’s over-regulation on the one hand, and its underfinancing on the other, is that HAC has been burdened with a surge of tasks without possessing the matching resources. This, in turn, compromises the thoroughness of HAC’s work, which it has been able to counter only with considerable effort. At the same time, it is possible that a fundamental reconsideration of its tasks, the prioritising of issues, and a long-term rolling activity plan could ease this threat, and such a reconsideration, in fact, appears as an opportunity in the SWOT analysis.

The environment in which the ESG guidelines are applied thus cannot be discounted. While the Bologna Process has already influenced a degree of convergence in the higher education systems of the European Higher Education Area, differences
remain. The differences are not only those that are desirable for the sake of cultural
diversity and national or regional identity, but can be due to the actual interpretation of
the same terminology. This is true not only for Central and Eastern Europe; a Nordic
study has come to the same conclusion (Jørgensen, Hansen, 2006). The issue of trust
between higher education stakeholders, for example, is something that needs to be
viewed in perspective. The commitment of all higher education stakeholders to ESG is
manifest, as demonstrated in the new higher education act and the gradual adoption of
ESG by higher education institutions. HAC’s external review report testifies to the
operation of this organization in accordance with the European Standards, most of
which have been HAC’s guiding principles for much of its history.

The main opportunity for Hungarian higher education and for HAC at this point in
their history is that the ground has been set for a stable development to build on: the
changes that were necessary to keep up with the European Higher Education Area and
the Bologna Process have been initiated, and the initial tasks undertaken to implement
the changed system are more or less accomplished. It is hoped that the time and
conditions are now ripe for consolidation, analysis, and adjustments where necessary.
CHAPTER 6

NATIONAL EXTERNAL QUALITY ASSURANCE SYSTEM IN POLAND AND IMPLEMENTATION OF THE EUROPEAN STANDARDS AND GUIDELINES:

Ewa CHMIELECKA

6.1. OVERVIEW OF THE NATIONAL QUALITY ASSURANCE POLICY IN HIGHER EDUCATION

The fundamental reason for creating and developing the external quality assurance system in Poland was a concern about quality of education, which was threatened, among other things, by the fact that in the period from 1990 to 2008 higher education in Poland had rapidly evolved into a mass-scale phenomenon. During those years, more than 300 non-state higher education institutions were established and, in a parallel development, the state academic institutions greatly increased enrolment to all levels and forms of study. The total number of students increased almost fivefold, but this growth was not accompanied by a corresponding increase in state budget outlays on higher education or by a matching growth in the numbers of teaching staff: as the number of students increased fivefold, the ranks of academic teachers increased by just 40-45 per cent. The looming threats to education quality prompted the academic community and state administration bodies in the mid-1990s to start developing quality protection systems and control mechanisms to be imposed on the burgeoning education services market.

There are two principal accreditation schemes in Poland: the national (state-owned) scheme, represented by the State Accreditation Committee (Państwowa Komisja Akredytacyjna – PKA), which commenced operations in January 2002, and the “academic” scheme, represented by accreditation committees established by academic communities wishing to see in place accreditation schemes for certain groups of

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1 This chapter on the national quality assurance system is based on data and interpretations from generally available documents published by the accreditation agencies (annual and end-of-term reports) and from the author’s interviews with members of the agencies’ governing bodies.

programmes (fields of study), usually of a specific type, offered by higher education institutions. The academic accreditation committees of universities represented in the Conference of Rectors of Academic Schools in Poland (CRASP) cooperate as members of the Accreditation Committee of CRASP. Most of these committees were set up before the State Accreditation Committee was created.

Since the two schemes are of very different character, we will discuss them separately. For the sake of brevity, we will describe the academic scheme using the example of the CRASP Accreditation Committee (CRASP) and just one accreditation agency: the Foundation for the Promotion and Accreditation of Economic Studies (FPAKE). The accreditation agencies are expected to achieve the following: enforce at least the minimum quality requirements for higher education, removing from the market those units which fail to meet them; this is done mainly by the PKA; indicate the higher education institutions distinguished by a high quality of education; this is mainly the work of academic accreditation agencies; and, implement quality-enhancing mechanisms in universities and change the teaching staff’s attitude toward a greater focus on quality – the domain of both schemes.

6.1.1. The State Accreditation Committee (PKA)

The State Accreditation Committee was established in virtue of an amendment of the Act on Higher Education which set forth the PKA’s fundamental obligations, powers and procedures. From January 1, 2002, the State Accreditation Committee is offering programme-oriented accreditation which is compulsory for all degree programmes (fields of study) at national level in the two basic cycles of study, namely the Bachelor cycle (licencjat/inżynier) and the Master cycle (magister)\(^2\), offered by any higher education institution, whether public or private. The PKA evaluation covers all aspects of the teaching process and also scientific research, with these issues accounting for the bulk of the PKA’s accreditation standards. All of the fields of study offered by higher education institutions are subject to a compulsory evaluation. The Committee comprises the following fields-of-study teams: human science, biology, geography, geology, mathematics/physics/chemistry, agriculture, forestry and veterinary science, medical sciences, physical education, technical sciences, economics, social, law issues, and art.

The PKA is a state institution and its office forms a part of the Ministry of Science and Higher Education. The Ministry established the PKA and is the main recipient of its findings. The PKA submits to the Ministry its opinions and conclusions regarding: (1) the creation of universities, (2) awarding universities the right to offer higher education studies in specific fields of study and levels of education, (3) the establishment by higher education institutions of branches and faculties in other locations, (4) evaluation of the quality of programmes offered in given fields of study, (5) evaluation of the quality of the teacher training system, (6) compliance with higher education requirements.

\(^2\) Work is ongoing to include also third-cycle (doctoral) studies in the accreditation scheme.
PKA accreditation is free and the operations of this body are financed by the state. The formal accreditation procedure begins with the appointment of a panel for evaluating fields of study at a specific university unit. The procedure itself involves self-evaluation by the unit in question, an on-site visit by the evaluation panel, preparation of the panel's report, a review of the accreditation application and the resolution of the PKA Presidium granting the unit one of four assessment grades: excellent, positive, conditional, negative. The excellent and positive grades are granted for five- or six-year periods. The resolution granting the conditional grade includes recommendations for remedies to be applied by the evaluated unit and a time limit for completing the recommended remedial actions (usually one academic year). If the unit receives a negative grade, the Minister of Science and Higher Education, having considered the kind and extent of the discovered irregularities, either withdraws or suspends the unit's right to offer courses in the given field of study at the given level of education.

6.1.2. The Academic Accreditation Scheme

The participants in the academic accreditation scheme are as follows:

- the Association of Management Education SEM FORUM “Forum”;
- the CRASP Accreditation Committee comprising:
  - the University Accreditation Committee (UKA),
  - the Accreditation Committee for Medical Universities (KAUM),
  - the Accreditation Committee for Technical Universities (KAUT),
  - the Foundation for the Promotion and Accreditation of Economic Studies (FPAKE),
  - the Accreditation Committee for Universities of Fine Arts,
  - the Accreditation Committee for Agricultural Universities,
  - the Accreditation Committee for Higher Schools of Pedagogy,
  - the Accreditation Committee for Universities of Physical Education.

The latter three of the above bodies are still in their planning and pilot activities stages. The listed accreditation committees were established (UKA in 1998, KAUM in 1997, KAUT in 2001 and FPAKE in 2000) by the conferences of rectors of the respective universities, mainly in response to resolutions of universities calling for efforts to enhance the quality of education. The committees represent all public universities of the various types currently operating in Poland. The SEM FORUM was established in 1993 by the group representatives of non-public business schools. In 1994 twelve SEM Forum members signed the Business Schools Agreement on Quality of Education and implemented an accreditation system for educational programmes and managerial staff training, the first of its kind in Poland.
The Conference of Rectors of Academic Schools in Poland (CRASP) sees quality assurance in higher education as one of the core areas of its activity. In August 2000 CRASP pledged its the support for the activities of the academic accreditation committees. The CRASP Accreditation Committee was established by the resolution of the CRASP Plenary Assembly of June 7, 2001 which made it a forum for co-operation of the accreditation committees appointed by the conferences of rectors of the various university types comprising CRASP. The CRASP Accreditation Committee does not undertake any accreditation activities itself, leaving this task to the mentioned academic committees. The tasks of the CRASP Accreditation Committee include: the monitoring of the accreditation standards and procedures applied by the academic accreditation committees; and the coordination of the activities of academic accreditation committees; especially adjusting the accreditation principles and procedures to the fields of study offered in different types of universities.

All the academic accreditation schemes listed above offer national-level accreditation for programmes at both levels: the Bachelor (licencjat/inżynier) and the Master (magister). Their evaluation standards are generally more demanding than those of the PKA. Academic accreditation is voluntary, periodical (granted for periods of three to five years), and paid (ca. EUR 2,500–5,000). The accreditation procedures adopted by all the committees are very similar, although they can differ in some details, and involve the following steps:

- appointment of expert groups to develop specific standards and criteria for assessing the quality of education for specific fields of studies (on the basis of general standards adopted earlier);

- application of an HEI unit offering course in a given field of studies for accreditation of this field;

- a self-assessment by the HEI;

- establishment of an evaluation panel to conduct a comprehensive review and assessment of a field of studies offered at a specific institution of higher education (the evaluation is to be conducted with respect to predefined general and specific standards and must include an on-site visit to the school); to prepare a written report on the review and the conducted assessment and to present it to the committee together with its recommendation to either award or refuse the accreditation;

- a review of the report at a plenary session of the Committee and the taking of the accreditation decision.

The above description is true of all academic accreditation committees. We will now take a brief look at the FPAKE bodies and procedures to characterize the accreditation process in greater detail and point out the specific aspects of this particular process.
6.1.3. The Foundation for the Promotion and Accreditation of Economic Studies

This foundation was established in 2000 by the conference of rectors of five public economic higher education institutions. The founders started off the accreditation process by evaluating themselves. The accreditation committee members are all representatives of the Polish academic community. The accreditation process covers all degree programmes in economics on offer in Poland and is available to all kinds of higher education institutions, both public and non-public. The procedure involves a free-of-charge preliminary assessment of the main accreditation criteria based on quantitative data provided by the institution concerned. If these criteria are satisfied, the accreditation procedure proper can commence; if not, the institution is encouraged to improve its operations and reapply for accreditation at a later date. The entire procedure takes between six and ten months. For the FPAKE, the key areas for evaluation and education quality criteria are as follows:

Figure 6. Key areas of evaluation and quality criteria of FPAKE

The areas and criteria were developed by expert teams comprising the most respected academic teachers. Each module – an area to be evaluated and in which education quality is to be enhanced – consists of: a general quality standard indicating the desired level of satisfaction of requirements for the analyzed evaluation area (see above), twenty-seven key criteria, and ninety elementary criteria for the key criterial evaluation. The Evaluating Panel’s decision to grant, refuse, or postpone accreditation is based on the criterial evaluation outcome. The motion to grant accreditation is proposed if the field of study being evaluated satisfies at least two-thirds, or sixty, of all the criteria, including all the criteria meriting a satisfactory assessment grade. The repeat accreditation criteria are slightly modified, and the excellent assessment grade can now

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5 The example, based on the Module “Students”, is as follows: Module 2: Students. Key criteria: 2a. Graduates profile, 2b. Criteria and procedures of candidates enrolment, 2c. Monitoring and supporting students progress, 2d. Assistance in planning and launching future employment, 2e. Conditions for personal development. Elementary criteria for 2d: Assistance in planning and launching future employment: Monitoring of graduates’ carriers, Conditions for development of practical skills and experiences during education, Role and scope of activities of the graduates’ carrier center.
be awarded. Evaluating Panel members fill in their own Auditor’s Sheets, which are then used by the Panel’s Chairman to prepare a master sheet which is attached to the accreditation application.

The Foundation’s mission, in addition to accreditation, includes a broad range of activities aimed at improving the quality of education in economic sciences. The most important initiatives in this last area include:

- specialised conferences: national conferences are organized twice every year devoted to education quality and standards sensu largo, the organization of the didactic process, knowledge management and modern technologies in teaching and learning. These conferences serve to integrate the community of economic higher education institutions around issues of quality;
- publications dealing with subject matters discussed at the conferences;
- Entrepreneurship Olympiads for general education upper secondary school (liceum) students, attracting around 15,000 participants every year, and intended to stimulate entrepreneurial behaviours of young people, develop a teaching and learning model for economics teachers, and encourage secondary school students to enrol at economic higher education institutions;
- GiMGAME, a competition modelled on the Olympiad intended for lower secondary school (gimnazjum) students (still in its pilot stage);
- The “New Trends in Economic and Management Sciences” competition for the best doctoral dissertations in economic and management sciences;
- the “e-mentor” bimonthly magazine (available online and in a printed version) focusing on e-education, knowledge management, e-business, and lifelong learning.

6.2. BRIEF SUMMARY OF MAJOR ACTORS AND SCHEMES WITHIN EXTERNAL QUALITY ASSURANCE

The PKA and academic accreditation committees, although all focusing on quality assurance in higher education institutions, differ slightly in character due to the differences in their respective missions. This becomes clear if we look at the respective scope, character, and scale of activities of the PKA and FPAKE. The PKA is a state “giant” whose basic task is to apply a uniform mechanism of education quality assessment to all higher education institutions/fields of study in Poland and to monitor compliance with the requirements for institutions offering higher education, with these requirements being based on centrally adopted standards equally applicable to all fields of study. The procedure and manner of evaluations employed by the PKA indicate that what we have here is a typical accreditation serving to confirm the accountability of a higher education institution/faculty offering higher education degree programmes. This accreditation has consequences of administrative nature and may lead to the elimination of a programme or closing down of a higher education institution.
The FPAKE on the other hand is a small public benefit organization whose principal goal is the furtherance of higher-level economic and managerial education in Poland and whose task is to improve the quality of this education in Polish higher education institutions while promoting and supporting the best education standards. The Foundation is focused solely on the good of higher education institutions, concentrating on the development and dissemination of high standards of quality in economic and management sciences teaching. It can hope to exist only insofar as the academic community deems it to be useful. The accreditation offered by the Foundation's Accreditation Committee is more akin to evaluation considered as an improvement-oriented instrument. This is evident in light of the evolution of evaluation standards which are constantly being adapted to the various quality assurance needs signalled by the community concerned. Such an approach is also discernible in the Foundation's other quality-oriented activities.

The frequencies of accreditation procedures and the consequences of the various assessment grades are as follows:

**PKA–Consequences of Grades:**
- **Excellent Grade:** the next accreditation is required after six years; the grade recipient becomes eligible for a subsidy from the Ministry of Science and Higher Education;
- **Positive Grade:** the next accreditation is required after six years;
- **Conditional Grade:** the HEI has one year to remedy its deficiencies;
- **Negative Grade:** the field of study is shut down.

**FPAKE–Consequences of Grades:**
- **First accreditation:**
  - the Excellent Grade is not available;
  - **Positive Grade:** the next accreditation is required after three years;
  - **Conditional Grade:** the HEI has one year to remedy its deficiencies;
  - **Negative Grade:** accreditation is denied.
- **Repeat (second and subsequent) accreditation:**
  - **Excellent Grade:** the next accreditation is required after six years; the grade is displayed on the accreditation certificate;
  - **Positive Grade:** the next accreditation is required after five years;
  - **Conditional Grade:** the HEI has one year to remedy its deficiencies;
  - **Negative Grade:** accreditation is denied.
The bodies of both the Accreditation Committees discussed here are composed exclusively of academics, although they cooperate with diverse groups of stakeholders outside the accreditation activities. The Accreditation Committee for Technical Universities is the only committee from the academic scheme to have industry representatives in its evaluating panels. The PKA and the UKA also include students in their decision-making bodies and evaluating panels, but the other committees rely exclusively on employees of higher education institutions.

The main bodies of the PKA comprise eighty Committee members: seventy-nine academic staff and the President of the Students’ Parliament of the Republic of Poland. The Committee is divided into eleven Sections for Fields of Study, which play the role of accreditation subcommittees. Almost 800 experts recruited from various higher education institutions and sixty student experts take part in the work of the PKA, which also avails itself of the expertise of forty-seven legal experts who monitor the observance of formal requirements in the provisions of education services and verify documentation at the assessed institutions. So far almost forty foreign experts have taken part in on-site inspections.

The FPAKE Accreditation Committee consists of sixteen persons: the vice-rectors charged with overseeing the teaching process at each of the founder higher education institutions, the senate-appointed representatives of the higher education institutions (two from each institution), and one representative of the economic faculties at universities appointed by the University Accreditation Committee (UKA). Representatives of KAUT, KAUR, and other academic accreditation committees also take part in the FPAKE Committee meetings but in a non-voting capacity. The term of the Committee members coincides with the rectors’ term of office and new members are appointed every four years. The Committee’s decision may be appealed against to the Founders’ Council. Some 150 experts cooperate with the Committee on a regular basis as evaluators. They are selected by means of a questionnaire distributed to all economic higher education institutions in the country.

All persons involved in the accreditation proceedings conducted by the FPAKE and the PKA undergo training in evaluation procedures. Initially, this training was provided mainly by foreign experts.

All the agencies apply procedures serving to prevent conflicts of interest in the course of accreditation. The evaluation panels (peer-review teams) cannot include representatives of the institution being evaluated or (as is the case with the PKA) cannot involve representatives of higher education institutions competing with the evaluated institution in the primary labour market. All evaluators appointed to evaluation panels who are aware of a conflict of interest must inform the Committee of this fact and withdraw from the evaluation process. The evaluation panels usually consist of four or five persons who spend two or three days visiting the institution being evaluated. A detailed scenario of these inspections is published in the accreditation information materials (available online and in printed versions).

The briefest way to sum up the existence of two accreditation schemes in Poland would be to say that their respective tasks and operations are mutually complementary. The academic committees which preceded the establishment of the PKA laid the
ground for state accreditation and can be credited with developing a community of highly qualified accreditation experts. In the first years of parallel operations, the academic committees insisted on treating their accreditation as interchangeable with that provided by the PKA. Now the different character and complementary nature of the two kinds of accreditations is starting to be appreciated. Both schemes were developed taking into account the ENQA recommendations which, however, were slightly differently interpreted in both cases.

6.3. SUMMARY OF ACCREDITATION AGENCY ACTIVITIES BASED ON EMPIRICAL DATA FOR 2002-2008

The figures in Table 12 illustrate the activities of both accreditation agencies to date.

Table 12. Overview of activities of PKA and FPAKE–basic data

<table>
<thead>
<tr>
<th>Name of the accredited agency</th>
<th>Number of HEIs involved in the accreditation process</th>
<th>Number of study programmes covered by the accreditation process</th>
<th>Positive outcomes of the accreditation process</th>
<th>No. of negative and conditional grades in the accreditation process</th>
</tr>
</thead>
<tbody>
<tr>
<td>PKA</td>
<td>370</td>
<td>2,321</td>
<td>1,888</td>
<td>433</td>
</tr>
<tr>
<td>FPAKE</td>
<td>11</td>
<td>35</td>
<td>34</td>
<td>1</td>
</tr>
</tbody>
</table>

* (out of ca.4,460)

Source: PKA’s and FPAKE’s database.

6.3.1. Numbers of fields of study and degree programmes subjected to accreditation:

PKA

There are 118 officially recognized fields of study in Poland (listed by the Ministry of Science and Higher Education). The PKA evaluated 100 fields of study, subjecting the degree programmes offered by higher education institutions in these fields to assessment at least once. A total of 2,321 evaluations of programme quality were performed with:

– the evaluation of 52 per cent of the programmes offered in those fields being already completed, and

4 The data covers two full terms of operation of the PKA (2002-2004 and 2005-2007) and the entire period of FPAKE’s operation (2002-2008). The period considered in this report (2004-2008) does not coincide with the terms covered by the synthetic reports of the PKA. In the case of an institution as small as the FPAKE, the figures for the last four years of operation would reflect neither the scale nor the specific nature of its work.

5 Field of study refers to a distinct area of education entered in a Ministry-approved list together with the so-called framework programme contents, specifying the mandatory subject matter to be included in degree programmes in the given field of study. Degree programmes are developed by each HEI/faculty in compliance with these framework programme contents.
the evaluation of 23 per cent of the programmes being still ongoing.

Of the 2,321 evaluations made,

- 1,649 (or 71 per cent) concerned programmes offered by public higher education institutions, and
- 672 (or 29 per cent) concerned programmes at non-public higher education institutions.

Synthetic analyses were prepared describing the quality of programmes in separate groups of fields of study, and, late in 2007, an overall analysis of the assessments of these groups of fields of study covering both terms of the PKA was published.

**FPAKE**

There are eight officially recognized economic fields of study in Poland (entered in the list of the Ministry of Science and Higher Education) and all of them were covered by FPAKE accreditation. Degree programmes in the various fields of study were evaluated at least once. Thirty-five programme quality evaluations were performed including:

- Twenty-nine in public higher education institutions, and
- Six in non-public higher education institutions,
- with a further six still ongoing, including:
- Four in public higher education institutions, and
- Two in non-public higher education institutions.

### 6.3.2. Number of Higher Education Institutions Involved in the Accreditation Schemes:

<table>
<thead>
<tr>
<th></th>
<th>Evaluation complete</th>
<th>Evaluation ongoing</th>
<th>Not evaluated</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public HEIs</td>
<td>118</td>
<td>8</td>
<td>4</td>
</tr>
<tr>
<td>(total: 130)</td>
<td>91%</td>
<td>6%</td>
<td>3%</td>
</tr>
<tr>
<td>Non-public HEIs</td>
<td>233</td>
<td>11</td>
<td>62</td>
</tr>
<tr>
<td>(total: 306)</td>
<td>76%</td>
<td>4%</td>
<td>20%</td>
</tr>
</tbody>
</table>

*Source: PKA’s database.*

A total of 71 per cent of the public higher education institutions and 29 per cent of the non-public public higher education institutions have already been evaluated.
Table 14. HEIs in accreditation scheme of FPAKE

<table>
<thead>
<tr>
<th></th>
<th>Evaluation complete</th>
<th>Evaluation ongoing</th>
<th>Not evaluated</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public economic HEIs (total: 5)</td>
<td>5</td>
<td>4</td>
<td>0</td>
</tr>
<tr>
<td>Non-public economic HEIs*</td>
<td>6</td>
<td>2</td>
<td>??</td>
</tr>
</tbody>
</table>

* Given the varied profile of non-public HEIs, it is hard to say just how many of them ought to be classified as economic HEIs. The majority of them offer economic or management science programmes of one kind or another.

Source: FPAKE’s database.

6.3.2.1. Evaluation Grades:

Table 15. Evaluation grades awarded by PKA

<table>
<thead>
<tr>
<th>Grade</th>
<th>Public HEIs</th>
<th>Non-public HEIs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Excellent</td>
<td>2.3</td>
<td>0.3</td>
</tr>
<tr>
<td>Positive</td>
<td>82.5</td>
<td>69.7</td>
</tr>
<tr>
<td>Conditional</td>
<td>13.2</td>
<td>22.0</td>
</tr>
<tr>
<td>Negative</td>
<td>2.0</td>
<td>8.0</td>
</tr>
</tbody>
</table>

Source: PKA’s database.

Table 16. Evaluation grades awarded by FPAKE

<table>
<thead>
<tr>
<th>Grade</th>
<th>Number of grades</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Public HEIs</td>
</tr>
<tr>
<td>Excellent</td>
<td>2*</td>
</tr>
<tr>
<td>Positive</td>
<td>27</td>
</tr>
<tr>
<td>Conditional</td>
<td>0</td>
</tr>
<tr>
<td>Negative</td>
<td>0</td>
</tr>
</tbody>
</table>

* In the case of repeat accreditations only.

** Conditional grade in 2004 converted to a positive grade in 2005.

Source: FPAKE’s database.

6.3.2.2. Main Reasons for Conditional and Negative Evaluation Grades:

Table 17. Reasons for conditional and negative grades awarded by PKA

<table>
<thead>
<tr>
<th>Reasons for Grades (percentage figures)</th>
<th>conditional</th>
<th>negative</th>
</tr>
</thead>
<tbody>
<tr>
<td>Failure to meet minimum staffing requirements</td>
<td>37</td>
<td>24</td>
</tr>
<tr>
<td>Irregularities in study plans, programmes and syllabi</td>
<td>36</td>
<td>15</td>
</tr>
<tr>
<td>Irregularities in classes staffing</td>
<td>20</td>
<td>11</td>
</tr>
<tr>
<td>Negative assessment of the quality of diploma theses</td>
<td>17</td>
<td>7</td>
</tr>
<tr>
<td>Insufficient library resources</td>
<td>13</td>
<td>7</td>
</tr>
<tr>
<td>Insufficient didactic facilities/premises</td>
<td>9</td>
<td>4</td>
</tr>
</tbody>
</table>

Source: PKA’s database.
The only conditional grade awarded by the FPAKE was mainly due to irregularities in study plans and programmes, and in staffing of classes. No negative grades were awarded by the FPAKE, but this is because the accreditation procedure involves a free-of-charge preliminary evaluation based on basic data, which prevents higher education institutions that might fail to meet the minimum required standards from applying for accreditation. There were three such negative preliminary assessments during the five years of the FPAKE’s operations, all concerning non-public higher education institutions.

6.4. ANALYSIS OF AGENCY STRENGTHS AND WEAKNESSES

PKA

Strengths:

— autonomy in the setting of standards and criteria for quality assurance, appointment and selection of experts, establishing the procedures and methods for decision taking;
— creation of a public image of PKA as an independent institution assessing the quality of education in an objective manner. Development of friendly relations with rectors of higher education institutions and organizations thereof;
— high professional and organizational efficiency;
— inclusion of students in the accreditation process;
— ongoing improvement of quality assessment criteria and procedures;
— establishment of the Quality Forum as a platform for national discussion among all stakeholders on the shape and future changes in the external quality assurance system; improved cooperation with academic accreditation committees;
— participation in the establishment of a system for mutual recognition of accreditation decisions in Europe;
— successful financial management.

Weaknesses:

— insufficient number of Committee members, out of proportion to the tasks put before them;
— insufficient participation of foreign experts in the assessment of education quality and unsatisfactory activity of the PKA in the international arena;
— insufficiently advanced cooperation with employers in the development of quality assurance standards and the education quality assessment process;
– day-to-day activities relating to immediate tasks leave insufficient time and resources for in-depth analytical and research activity;

– a measure of overlapping between activities related to the assessment and accreditation of different fields of study within a single institution;

– delays in the external review of the PKA;

– inadequate methods and intensity of public communication, especially with the academic accreditation committees.

FPAKE

Strengths:

– autonomy in all aspects of operations and the freedom and flexibility that goes with it;

– constant refining of accreditation procedures and standards; stringent requirements approved by the academic community;

– support provided by rectors of the founding higher education institutions;

– confidence of public and non-public higher education institutions in the value of accreditation – the number of institutions applying for the voluntary and demanding accreditation and repeat accreditation remains undiminished;

– the established prestige of FPAKE accreditation, which is seen as a certificate confirming high quality of education awarded to only the best fields of study; the narrow scope and high quality of FPAKE’s operations lends an “elite” character to the agency’s accreditation;

– the popularity and effectiveness of educational and integrating activities conducive to quality enhancement in the economic higher education community.

Weaknesses

– the currently applied criteria are too input-oriented, and need to become more outcome-oriented and adapted to the National Qualification Framework that is being developed;

– too few institutions seeking accreditation outside the group of founding higher education institutions (although their number is going up). The elite character of this accreditation may be too restrictive;

– highly unsatisfactory international dimension of the Accreditation Committee’s operations. Its certificates are recognized only in the Polish higher education system;
— unsuccessful attempts to involve students and representatives of corporate environments in the bodies and in the evaluation procedures of the Accreditation Committee;

— Modest support received from the CRASP Accreditation Committee.

This list of strengths and weaknesses of the FPAKE is not typical for all academic accreditation committees. The University Accreditation Committee (UKA) and the Accreditation Committee for Universities of Fine Arts are developing their operations successfully, but the KAUT and KAUM are seeing that institutions which have already received PKA accreditation are less willing to seek also voluntary and paid accreditations. The rectors of institutions being accredited by these agencies are seriously thinking about suspending their operations, and CRASP appointed a team in October 2008 to review and modify the principles governing the operation of the CRASP Accreditation Committee.

6.5. IMPLEMENTATION OF EUROPEAN STANDARDS AND GUIDELINES (ESG)

Excerpt from: ENQA European Standards and Guidelines for External Quality Assurance Agencies (Part 2)

Point 2.1. Use of internal quality assurance procedures

Standard: External quality assurance procedures should take into account the effectiveness of the internal quality assurance processes described in Part 1 of the European Standards and Guidelines

The Higher Education Law of 2005 and the relevant ordinances of the Ministry of Science and Higher Education require higher education institutions to develop internal quality assurance systems, an essential element of which is the gathering of student opinions on education quality.

PKA

The standards and procedures applied by the PKA fully comply with elements of internal quality assurance systems at higher education institutions. The PKA requires that self-evaluation reports of the units include information on the following elements of the internal systems, among others: the quality assurance policy and procedures in place, periodical reviews of degree programmes and curricula (with the participation of students and employers), student evaluation, measures adopted to ensure the quality of teaching staff, forms of support for students in their studies, the applied IT system, publication of information on the available courses of study, and the planned learning outcomes.
A higher education institution/faculty must have an internal quality assurance system in place as a precondition for accreditation. A brief description of the system must be included in the preliminary evaluation form. The evaluation standards and criteria include elements combining to form a typical internal quality assurance system. For example, the “Position and Strategic Goals” standard includes the following criteria: “Effectiveness of Internal Organization and Decision Procedures” and “Quality Management System at the Faculty and Higher Education Institution”. The remaining key elements of the evaluation system include similar elements.

**Point 2.2. Development of External Quality Assurance Processes**

**Standard:** The aims and objectives of quality assurance processes should be determined before the processes themselves are developed, by all those responsible (including higher education institutions) and should be published with a description of the procedures to be used.

**PKA**

The State Accreditation Committee formulates its own operation standards and guidelines for use in the external education quality assurance processes. Detailed goals and tasks – for a given year as well as for the long term – and also procedures are set by the Presidium of the PKA. Decisions of the PKA on standards and procedures are preceded by analyses conducted by specially appointed working groups.

**FPAKE**

The FPAKE devoted a year (2000-2001) to developing and publishing an accreditation information manual describing all evaluation standards and criteria, the accreditation procedures, a self-evaluation guide for higher education institutions, and other important information. New editions of the information manual are published on a regular basis (printed and online versions are available) to reflect the changes taking place.

**Point 2.3. Criteria for Decisions**

**Standard:** Any formal decisions made as a result of an external quality assurance activity should be based on explicit published criteria that are applied consistently.

**PKA**

All the applied criteria, specimen self-evaluation and assessment reports, etc., being a base for making decisions, are published on the agency’s website.

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6 <http://www.pka.edu.pl>.
The information manual, containing all elements necessary for making decisions, is published on a regular basis (printed and online versions are available), and its content is modified to reflect the changes taking place\textsuperscript{7}.

**Point 2.4. Processes Fit for Purpose**

**Standard:** All external quality assurance processes should be designed specifically to ensure their fitness to achieve the aims and objectives set for them

**PKA**

The whole procedure of evaluation as well as its standards are well developed due to the fact that all higher education institutions award state diplomas. The quality assurance processes include detailed descriptions of learning outcomes and guidelines for teaching contents, degree programmes, their organization, staff requirements, etc., which are included in the legal educational standards developed by the Ministry of Science and Higher Education for 118 fields of study. The specificity of individual fields of study is also reflected in the organizational structure of the PKA; i.e. the operations of 11 Sections for Fields of Study and allocation of individual fields of study to Sections for Fields of Study. The participation of student experts in the external quality assurance and decision-making processes gives emphasis to the learners’ perspective in evaluation.

**FPAKE**

The FPAKE assembles a database of experts and eligible evaluation panel members using a questionnaire distributed to economic higher education institutions throughout the country. The database lists persons enjoying the highest respect and trust in the community. The procedures and standards of quality assurance were developed by teams of experts selected from the database to make them representative of the broadest possible range of higher education institutions. Candidates for membership in the evaluation panels are trained in accreditation procedures and the Committee appoints them to the various panels based on their scientific profile and/or functions performed in academic centres. The FPAKE employed foreign experts to conduct the first training courses for members of the evaluation panels and to review the standards and procedures that were developed.

\textsuperscript{7} Cf. [www.fundacja.edu.pl](http://www.fundacja.edu.pl).
Point 2.5. Reporting

Standard: Reports should be published and should be written in a style which is clear and readily accessible to its intended readership. Any decisions, commendations or recommendations contained in reports should be easy for a reader to find.

PKA

All decisions taken by the PKA are published on the Committee’s website, including the name and type of degree programmes, units offering particular programmes, higher education institution type, location, etc. This kind of information is useful for prospective students selecting the type of studies and higher education institutions they would like to attend, and also for higher education institutions conducting comparative analyses. The PKA’s assessment reports are not published because of constraints imposed by the personal data protection regulations in place. The PKA publishes annual operations reports which include synthetic information on the results of its operations and detailed reports on its evaluations of particular fields of study.

FPAKE

A list and descriptions of the Foundation’s activities can be found on its website. The results of accreditation proceedings are confidential and can be made public only if the higher education institution concerned agrees to such disclosure. The Foundation’s annual activity reports and information materials list the issued accreditation certificates. The detailed assessment reports are not published unless the higher education institutions concerned agree to their use for training purposes.

Point 2.6. Follow-up Procedures

Standard: Quality assurance processes which contain recommendations for action or which require a subsequent action plan should have a predetermined follow-up procedure which is implemented consistently.

PKA

When granting a conditional assessment (grade), the PKA formulates recommendations to be implemented over one year. The reassessment rules are published on the Committee’s website and will be applied in the future.

FPAKE

Every assessment report includes recommendations for quality improvement which have to be acted upon within one year in the case of conditional grades or within three years in the case of repeat accreditation. The repeat accreditation rules provide for verification of progress in areas found to be in need of improvement. Upon request by the higher education institution community concerned, the Committee organises a seminar to discuss the assessment findings and indicate possible ways of improvement. The option to introduce brief quality reviews midway through the five-year accreditation period is being considered.
Point 2.7. Periodic Reviews

**Standard:** External quality assurance of institutions and/or programmes should be undertaken on a cyclical basis. The length of the cycle and the review procedures to be used should be clearly defined and published in advance.

**PKA**

All the PKA’s assessment remains valid for specific periods. Accreditations based on positive or excellent grades are granted for six years while conditional grades are granted subject to the requirement that the indicated deficiencies be remedied within one year. These rules are set forth in the PKA’s basic documents.

**FPAKE**

Cyclicity is a fundamental feature of the FPAKE accreditation, clearly spelled out in the Foundation’s regulations. The first accreditation is granted for three years and subsequent accreditations for five years, provided the assessment grades remain good.

Point 2.8. System-wide Analyses

**Standard:** Quality assurance agencies should produce from time to time summary reports describing and analysing the general findings of their reviews, evaluations, assessments etc.

**PKA**

The PKA delivers a detailed results report every year. The latest report sums up the second term of operation (2005-2007) and compares it with the first (2002-2004). PKA representatives present synthetic assessment conclusions at meetings and conferences attended by rectors, at sessions of the General Council for Higher Education, and at other stakeholder forums.

**FPAKE**

Given the small number of accreditations granted by the Foundation’s Accreditation Committee, summary reports would not serve any useful purpose. The assessment procedures, standards, and criteria are constantly being modernized to better adapt them to the needs signalled by higher education institutions in self-assessment reports and during discussions organized by the Foundation as part of its community consolidation initiatives.

Excerpt from: **ENQA European Standards and Guidelines for External Quality Assurance Agencies (Part 3)**

Point 3.2. Official Status

**Standard:** Agencies should be formally recognized by competent public authorities in the European Higher Education Area as agencies with responsibilities for external quality assurance.
and should have an established legal basis. They should comply with any requirements of the legislative jurisdictions within which they operate.

**PKA**


**FPAKE**

The Foundation was established by the Conference of Rectors of Economic Universities, which serves also at its five-person Founders Council. The FPAKE is part of the Accreditation Committee of the Conference of Rectors of Academic Schools in Poland. The Foundation is a public benefit institution operating pursuant to the applicable law and, formally speaking, remains under the control of the Ministry of Science and Higher Education.

**Point 3.3. Activities**

**Standard:** Agencies should undertake external quality assurance activities (at institutional or programme level) on a regular basis.

**PKA and FPAKE**

External quality assurance in higher education is the main task and form of activity of both accreditation agencies, as described elsewhere in this chapter.

**Point 3.4. Resources**

**Standard:** Agencies should have adequate and proportional resources, both human and financial, to enable them to organise and run their external quality assurance process(es) in an effective and efficient manner, with appropriate provision for the development of their processes and procedures.

**PKA**

The Agency’s human resources comprise eighty Committee members (seventy-nine academic teachers and the President of the Students’ Parliament of the Republic of Poland). The Committee is divided into eleven Sections for Fields of Study and comprises almost 800 experts from various higher education institutions, sixty student experts, and forty-seven legal experts. The PKA’s office employs twenty-six persons. The PKA’s operations are fully financed from the state budget. This is thought to be the insufficient state of human resources – see the PKA weaknesses.

**FPAKE**

The Accreditation Committee consists of thirteen representatives of higher education institutions (eleven vice-rectors charged with overseeing the teaching process and two senate-appointed persons) and it cooperates with some 120 evaluators. The
Committee’s office, fully equipped, is provided by one of the founder higher education institutions. The office operations are supervised by the Foundation’s managing director, and the accreditation proceedings are coordinated by the Committee Secretary and one of the office employees. The Committee members are remunerated by the higher education institutions which employ them. The accreditation fee covers only the cost of the evaluation, while the Foundation’s other activities are funded with donations and proceeds from its business operations. This is thought to be the sufficient state of resources for FPAKE tasks.

Point 3.5. Mission Statement.

Standard: Agencies should have clear and explicit goals and objectives for their work, contained in a publicly available statement

PKA and FPAKE

Both agencies published their mission statements and regularly publish their goals and tasks in basic documents and promotion materials (online and in printed form).

Point 3.6. Independence

Standard: Agencies should be independent to the extent both that they have autonomous responsibility for their operations and that the conclusions and recommendations made in their reports cannot be influenced by third parties such as higher education institutions, ministries or other stakeholders

PKA

The State Accreditation Committee is fully independent. Although PKA members are appointed by the minister responsible for higher education, a Committee member may be dismissed only with the approval of the PKA Presidium. The Act on Higher Education determines the organizational structure and methods of operation for the PKA. No external institution has any powers to affect the composition of expert panels or the list of experts.

FPAKE

The Accreditation Committee enjoys full independence. It is a creation of the interested academic community and exists thanks to the will of public economic higher education institutions. The founder higher education institutions are prevented from promoting their own interests by the proportional composition of the Committee (three representatives of each higher education institution), an analogous composition of the evaluation panels, and the rule whereby representatives of the higher education institution being evaluated or from the higher education institution’s locality are excluded from the evaluation proceedings. Also, representatives of the evaluated higher education institutions are required to abstain when the accreditation decision is being voted. Other institutions have no powers to influence the FPAKE operations.
Point 3.7.  External quality assurance criteria and processes used by the agencies

**Standard:** The process, criteria and procedures used by agencies should be pre-defined and publicly available. These processes will normally be expected to include:

- a self-evaluation or equivalent procedure by the subject of the quality assurance process;
- an external assessment by a group of experts, including, as appropriate, (a) student member(s), and site-visits as decided by the agency;
- publication of a report, including any decisions, recommendations or other formal outcomes;
- a follow-up procedure to review actions taken by the subject of the quality assurance process in the light of any recommendations contained in the report.

**PKA**

The assessment procedures and criteria applied by the PKA include, in principle, all elements of the education quality assurance processes recommended in the ESG, including the preparation of self-evaluation reports, site-visits and assessment by panels of experts, appeal procedures, publication of assessment results, and additional procedures for monitoring the implementation of recommended corrective measures. Student experts take an active part in assessment and accreditation processes.

**FPAKE**

The FPAKE’s accreditation procedure includes all the elements listed in this ESG Standard, and the additional element of preliminary assessment based on data provided in the accreditation application. So far there has been no success in involving students in the accreditation granting process. The Foundation has the student participation structure in place and has offered training to prospective student evaluators, but, for the time being, the student community has shown no interest in the scheme. Efforts to get the students involved will continue.

Point 3.8.  Accountability procedures

**Standard:** Agencies should have in place procedures for their own accountability.

**PKA**

The PKA has a multi-level operations quality management mechanism in place, as described in its Statute and other documents. It includes, among other things, rules and procedures of external quality assurance, mechanisms preventing conflicts of interests, and an internal information system. The results of the PKA’s work are described in annual reports submitted to the Parliamentary Committee for Education, Science and Youth which analyses various aspects of the PKA’s operations. Also bodies like the Supreme Chamber of Control, the Conference of Rectors of Academic Schools in Poland, and the Office for Academic Recognition and International Exchange were
allowed to conduct comprehensive audits/external quality assurance evaluations of the PKA in the 2004-2008 period.

FPAKE

The best accountability mechanism is the will of the community of economic higher education institutions to support, at its own expense, the pro-quality efforts of the Foundation. Documentation confirming the credibility of the Foundation is available from its authorities. As in the case of all non-government organisations, such documentation has to be provided to potential auditors. Given the small scale of the FPAKE's operations, there is no need for separate internal systems of information gathering – official records of the Committee sessions and other standard documentation suffice as sources of the required information. The Foundation submits annual reports to the supervising authority (the Ministry of Science and Higher Education) and presents them for acceptance to the Founders Council, which is its own supervisory body. The Founders Council also reviews appeals against decisions taken by the Accreditation Committee. In keeping with the FPAKE’s regulations, the Accreditation Committee is required to perform cyclic reviews of its procedures, which undergo constant refinement.

6.6. CHALLENGES AND AGENDA AHEAD

From the very first days, the Polish accreditation agencies discussed here have taken into account the European quality assessment standards and procedures. The PKA patterned its rules of operation after those of the ENQA, while the FPAKE modelled its standards after those of the EFMD/EQUIS. The academics who took it upon themselves to establish these institutions attended international training courses, seminars and conferences dealing with education quality issues and organized by, among others, by INQAAHE, ENQA (and the regional networks thereof), ECA, CEEMAN, EFMD, OECD. They have also participated in numerous European projects dealing with this subject matter. These people were thus well prepared to implement the ESG adopted in Bergen. The challenges and agenda we are facing today have to do, first and foremost, with two issues: efforts to play an active part in international accreditation activity, and changes in Poland’s accreditation model necessitated by the implementation of the National Qualifications Framework (NQF), which is intended to bring about significant changes in the way the higher education system is organized.

PKA

PKA is seeking to be entered in the European Register and the relevant preparations have been going on for several years now. Some 50 international experts are involved in the accreditation procedure. The Agency is taking part in the TEAM II programme for mutual recognition of accreditation decisions of members of the European Consortium of Accreditation in Higher Education (ECA). As part of this initiative, the PKA has signed mutual recognition agreements with Dutch, Flemish (NVAO), Austrian (ÖAR),
and Swiss (OAO) accreditation agencies. In October 2008, a team of international experts carried out a comprehensive assessment of the PKA from the point of view of the agency’s compliance with standards set forth in ENQA’s ESG and ECA’s Code of Good Practice, following a self-assessment report prepared in August 2008.

The implementation of the NQF aims at increasing the autonomy of higher education institutions in designing degree programmes and at providing education outcome descriptors that can be used in designing them. The list of fields of study compiled by the central authorities and the respective framework programme contents assigned to them are to be abolished. These changes require the development of suitable tools for external assessment of the quality of programmes. The future assessment of fields of study/degree programmes ought to focus on:

- proper identification and measurement of learning results and of the competences of graduates in all the dimensions referred to in the descriptors of the qualifications structure, namely knowledge, skills, and attitudes;
- the correct relationship between the qualifications description and programme structure;
- the correct assignment of ECTS credits to the various elements and effects of degree programmes;
- justifications for profiling programmes (as either research or vocational, for example).

Assessment on the level of an HEI/unit responsible for education ought to be focused on:

- demonstration by the given unit of its internal quality assurance system;
- demonstration of evidence confirming the attainment of intended study results;
- adequacy of the assessment of the graduates' competences and teaching effectiveness.

On the level of accreditation agencies, the standards and criteria in education quality assessment ought to be “fit for purpose”, which means that the following must be assessed:

- the strategies of the HEI/unit and fields of study in the “academic market”;
- the functioning of the internal quality assurance system;
- only those elements of the education process which are relevant to the pursuit of the declared and final effects of learning.

Some elements of the proposed system have already been incorporated into the accreditation process. The PKA made it very clear in its self-assessment report that it intends to develop a system of quality assessment and accreditation which fully complies with the National Qualifications Structure and the fit-for-purpose principle. The PKA has modernized its standards and criteria in education quality assessment, as
well as its procedures, and some accreditation tools to give more prominence to education effects. In its Resolution No. 219 of 10 April 2008, the PKA undertook to investigate the manner in which higher education institutions define and measure the effects of the education process and monitor its utilization in the jobs market. In the near future, the evaluation panels visiting higher education institutions will also include representatives of employers.

FPAKE

The Foundation will continue developing all of its activities aimed at enhancing the quality of economic education in Poland. It is considering membership in the European Register of Accreditation Agencies. The greatest challenges and difficulties to overcome in this context include adding an international dimension to the evaluating panels, transparency (the publication of accreditation reports, including those with negative verdicts), and the involvement of students and representatives of the higher education institutions’ social and business environments in the assessment process. The transparency requirement will put the FPAKE on a collision course with the personal data protection law and the deeply ingrained tradition within the Polish academic community whereby the assessment results should remain confidential. Involving employers in the Committee’s activities will be no easy task, given that they are only moderately impressed by the significance of accreditation. To begin with, the Committee hopes to work with the Foundation’s benefactors from the business community. In the 2008/09 academic year, the Committee is making another attempt to involve students in the assessment work by offering them suitable training courses. The decision to involve students was taken already in 2006, but the initiative met with little interest and fell through. The Committee is thus preparing itself to commence the European register application process in two or three years from now.

The Committee’s biggest and most important challenge in the coming years will be the adaptation of accreditation standards to the National Qualifications Framework (NQF) which is being developed in Poland. Given that the design of degree programmes using NQF tools (learning outcomes, generic and subject-specific
descriptors, and the three dimensions – knowledge, skills, and attitudes) is still a novelty, the FPAKE’s accreditation will acquire an even stronger character of evaluation coupled with advice. A team of experts appointed by the FPAKE is working on a new set of assessment standards for NQF-compatible degree programmes, but the on-site evaluation visits over the coming three years will consist of (i) education quality evaluation according to the currently used standards, and (ii) a seminar helping higher education institutions develop and implement programmes in line with the NQF. Assessments of just such programmes can begin only after the higher education institutions are well prepared to make the transition. As an institution serving a particular community, the FPAKE must perform a twofold role. On the one hand, it must set new standards and boost education quality to new levels, and, on the other, it must pose requirements which higher education institutions can understand and which they can be reasonably expected to meet – and all this without losing sight of the realities of academic life. The FPAKE’s Accreditation Committee will take an active part in the NQF consultations and intends to volunteer to interpret the economic sciences generic descriptors as part of consultations being conducted under the aegis of the Conference of Rectors of Academic Schools in Poland. All these are tasks for the coming two academic years (2008/2009 and 2009/2010).

It is worth noting that representatives of both agencies described here are discussing changes in the accreditation process that will be brought about by the implementation of the NQF at the Quality Forum, a cyclic seminar created jointly by the PKA and the CRASP Accreditation Committee, bringing together all stakeholders involved in issues relating to quality in higher education. Representatives of both institutions are also active in bodies developing and implementing the National Qualifications Framework.
7.1. INTRODUCTION

In recent decades, there have been two significant milestones for the higher education institutions in the Slovak Republic. The first was the transformation of the political regime in 1990, which restored academic rights and freedoms to higher education institutions, including the introduction of a system of academic self-government without political decision-making. The second, in 2002, was the adoption of a new higher education act which enforced the autonomy of higher education institutions in the economic area and legally embedded the principles of the Bologna Declaration (three-cycle study system, ECTS, mobility, and, later, joint degree programmes). Higher education policy in the second half of the 1990s aimed at greater accessibility. The fulfilment of this aim was backed by increasing the impact of student numbers on the funding of public higher education institutions. From the very beginning, the quality of the education was taken into consideration. It was a matter not only of increasing the numbers of students but also of consistently providing education at a level comparable with international standards. Education accessibility can be assessed relatively easily in terms of student numbers (in 1997 there were over 107,000 students studying in the Slovak higher education institutions, as against almost 225,000 in 2007). However, defining the indicators of education quality and including them in the methods for providing funding was not a trivial task, and the search for a proper solution is still continuing. The pressure to increase student numbers under relatively stable expenditures on higher education has made it increasingly important to ensure the functionality of the system for quality assurance in higher education, and to reveal potential risks. This chapter deals with issues of the quality assurance system, from the viewpoint of the implementation of ESG in the Slovak Republic.
7.2. THE SYSTEM OF QUALITY ASSURANCE IN THE SLOVAK REPUBLIC

7.2.1. Policy Objectives and Legal Basis

Higher education can be obtained in the Slovak Republic only by pursuing an accredited degree programme at a higher education institution. Accreditation of the degree programme is defined by the Higher Education Act as a process in the context of which the Accreditation Commission (AC), at the request of an higher education institution, assesses its capacity to implement a degree programme (Act of 2002). Based on the standpoint of the AC, the Minister makes a decision on granting to the higher education institution the right to award the respective academic degree to graduates of a degree programme. The programme for which the higher education institution has been granted the right to award the academic degree is an accredited degree programme. In the accreditation of the degree programme, an assessment is carried out of the curriculum, student profile, applicant requirements, selection of students, graduation requirements, personnel, material, technical and information provision for the programme, and the educational level of graduates and students of the programme. The proposal for the assessment is prepared by a working group established for the purpose by the AC. In the assessment, there is an investigation of the compliance of the higher education institution with the criteria for its capacity to implement a programme giving the right to award an academic degree to its graduates (Criteria for Accreditation and Assessment). The criteria were proposed by the AC; upon the standpoint of the representative bodies of the higher education institutions\(^1\), the criteria were submitted for approval by the Ministry of Education of the Slovak Republic. On the basis of an amendment to the Higher Education Act operative as from September 2007, the competence to propose these criteria was given to the Ministry of Education of the Slovak Republic, and the Accreditation Commission gives its standpoint on the proposal.

Another object of accreditation, besides degree programmes, is the right to award scientific-teaching degrees of docent and professor\(^2\). The AC assesses the capacity of

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\(^1\) The representative bodies of the higher education institutions are: the Slovak Rectors' Conference (association of university rectors), the Higher Education Council (its bodies are elected by the academic senates of higher education institutions and faculties), and the Student Higher Education Council (members are elected by the student parts of the academic senates of higher education institutions and by the student part of the academic community of the higher education institution).

\(^2\) In the Slovak Republic, there is a system of posts of university teaching staff who may act in the positions of professor, docent, assistant lecturer, assistant, and lector. Posts of docent and professor may be filled only by persons with the respective scientific-teaching degree of professor or docent. The decision on awarding the degree is made by the Scientific Council of the higher education institution or the faculty. On the basis of the decision of the Scientific Council of the higher education institution, the degree of professor is conferred by the President of the Slovak Republic; the degree of docent is conferred by the rector of the higher education institution.
the higher education institution to execute the habilitation procedures and the procedures for the appointment of professors on the basis of an assessment of the scientific or artistic profile of the higher education institution, including the international significance of achieved results, the criteria for being awarded the degree of docent, and the criteria for being awarded the degree of professor⁴, adherence to the criteria, staff considerations, including the composition of the Scientific Council of the higher education institution (or faculty) are also taken into account. In the case of the appointment of professors, the Accreditation Commission also proceeds according to criteria approved by the Ministry of Education of the Slovak Republic. The decision on granting the right to execute the habilitation procedures and the procedures for the appointment of professors is made by the Minister of Education, based on a prior standpoint of the AC.

The Act on Higher Education stipulates that the higher education institutions shall also be concerned with quality of teaching as well as their research and creative activities. The students have the right to give their standpoint on the quality of teaching and on individual teaching staff members in the form of anonymous questionnaires at least once a year. The Scientific Council of the higher education institution has the responsibility at least once a year to evaluate the level of the educational activities and activities in the field of science, technology or art at the higher education institution (the Act of 2002).

From 2006 to 2008, all public higher education institutions, all state higher education institutions, and one of the private higher education institutions underwent an evaluation provided for by the European University Association. In contrast to the evaluation carried out by the Scientific Councils and the questionnaires filled out by students, all higher education institutions prepared self-evaluation reports according to the same standards, and subsequently underwent a peer review by the EUA working group. The final reports by the individual higher education institutions identified strengths and weaknesses of the institutions and recommended actions to be taken. The project was initiated by the higher education institutions and financed by the Ministry of Education of the Slovak Republic, under the condition that the higher education institutions should publicise their final reports. At the same time, a Sectoral Report was developed, which gives an analysis of the strengths and weaknesses of the higher education system in the Slovak Republic as a whole (Jensen et al., 2008).

7.2.2. Control and Domains

The Slovak higher education institutions are autonomous and self-governing institutions. The Act on Higher Education defines the area of competence of various self-governing bodies of the higher education institution, as well as the central state administration, in relation to the higher education institutions.

⁴ The Scientific Council of the higher education institution or the faculty agrees to the criteria according to which the applicants for the habilitation procedure or for nomination as professors are assessed.
From the viewpoint of quality assurance of research and teaching in a higher education institution, the Scientific Council of the higher education institution, headed by its rector, has a prior position (within the faculty, the Scientific Council of the faculty). The Scientific Council approves the degree programmes and then the higher education institution asks the AC for the programme to be accredited. In addition, the Scientific Council is accountable for awarding the scientific-teaching degrees of professor and docent, and approves the criteria for their award, the criteria for filling posts of professor and docent within the framework of the higher education institution, for posts of supervisors for doctoral candidates, and for the committees for final examinations of students. Prior to approval by the Scientific Council for the design of the degree programme, the Academic Senate of the higher education institution (faculty), at least three quarters of the members of which are students, gives its standpoint. During the introduction of a new degree programme, student representatives of the higher education institution are invited to participate in the discussions of the Scientific Council of the higher education institution (faculty).

While the Act assigns to the Scientific Council the duty to evaluate at least once a year the level of the higher education institution’s educational activities and its activities in the field of science, technology or art, this area has not been regulated in greater detail, and there are no uniform rules for it, or recommendations that would enable mutual comparison of the quality that is achieved. No standards have been introduced for the structure of such an evaluation, or for methods to be used. Professionalism of the Scientific Council members is implicitly envisaged by the law as a condition of Scientific Council membership.

There is a similar situation concerning the anonymous questionnaires through which students have the right to give their opinion on education quality and on individual teachers at least once a year. No procedure is recommended for compiling and evaluating the questionnaires, for verifying the results, adopting measures in this connection, or verifying and correcting the situation.

Beyond the framework of the Act, some higher education institutions have been awarded quality certificates according to the ISO quality norms (e.g., University of Technology in Košice), or they implement/introduce the Common Assessment Framework (CAF) system within the framework of the higher education institution or its departments. In 2008, the Ministry of Education of the Slovak Republic mediated the opportunity for individual higher education institutions to provide training for some of their employees on the application of CAF. In addition, higher education institutions, and in particular some of their faculties, take advantage of opportunities to be accredited by institutions abroad. This facilitates subsequent employment of their graduates abroad. However, as regards the right to award degrees to graduates of degree programmes, accreditation of the degree programme is essential according to the Act.

An exception is applied in the case of foreign higher education institutions from member states of the European Community. In this case, authorization is obligatorily granted by the Ministry of Education of the Slovak Republic. The Accreditation Commission does not give its standpoint on this; it is the respective body of the state
in which the higher education institution has its seat that gives its standpoint. The granting of authorization is conditional on the diplomas and certificates on education completed in the Slovak Republic being equivalent to those issued in the member state where the higher education institution has its seat. The Accreditation Commission (AC) only subsequently evaluates their area of competence in the territory of the Slovak Republic, and the Ministry of Education of the Slovak Republic verifies at least once in six years whether the conditions for granting such authorization have been fulfilled.

An external assessment of the capacity of a higher education institution to implement the degree programme and to execute the habilitation procedures and the procedures for the appointment of professors is provided for by the AC. Besides the higher education institutions, there are also external educational institutions (such as the Slovak Academy of Sciences) which take part in the provision of doctoral programmes. The right to participate in providing a doctoral programme is granted by the Minister of Education upon a prior statement by the AC, which assesses compliance with the criteria for external educational institutions. The formal aspects of providing education, or the habilitation procedures, or the procedures for the appointment of professors concerning adherence to the generally binding regulations, may be subject to control by the Ministry of Education.

7.2.3. Procedures

A higher education institution wishing to offer a new degree programme or to gain the right to hold habilitation procedures or the procedures for the appointment of professors must present an application. Details of the application form are defined by an Ordinance of the Slovak Republic Government (Regulation No. 104). For example, in the case of degree programmes, it is necessary to provide information on student profile, programme units, recommended curricula, staffing and material-technical provision, requirements for applicants, requirements for final theses, etc.

The completeness of the application of the higher education institution is assessed, and is further handled by a working group of the AC established for that purpose. If the application is incomplete, the institution is invited to supplement it. The working group of the Commission elaborates an assessment report showing the degree to which the higher education institution fulfils the criteria and their attributes to be assessed in the given application. The assessment report is sent for additional comments/clarification to the higher education institution, and is subsequently submitted, along with the higher education institution’s standpoint, to the AC for its statement.

Higher education institutions may apply repeatedly for accreditation of a new degree programme, and also for granting the right to hold habilitation procedures and the procedures for the appointment of professors. The granting of accreditation is periodically reconsidered within the framework of a comprehensive accreditation of the activities of a higher education institution (“complex accreditation”). Complex accreditation takes place every six years according to a schedule agreed by the AC. The
Minister of Education may ask for complex accreditation to be performed even prior to expiry of the six-year period. If the higher education institution does not reapply for the right that had been granted to it until then, under the complex accreditation scheme, the Ministry withdraws the right on termination of the complex accreditation (i.e. the right to award academic degrees to graduates of the programme, and the right to perform habilitation procedures and procedures for the appointment of professors). Within the framework of complex accreditation, additional documents are submitted to enable preparation of the procedures for complex accreditation. These include, e.g. an evaluation by the higher education institution of its own activities, including the results of anonymous questionnaires through which students may express their opinions, and information on the most significant publication outputs of the higher education institution during the period under survey, etc.

For complex accreditation, in addition to the self-assessment reports prepared by the higher education institution, an assessment report is prepared, which shows how the higher education institution’s mission has been fulfilled, based on an analysis of its activities. This is elaborated by a working group of the AC, and contains recommendations on how the higher education institution can improve its work. Site-visits by members of the Commission’s working groups and consultations of the findings with the staff and students of the higher education institution form part of the review. The criteria stipulate that, during the complex accreditation, there is also an assessment of research, development, artistic and other creative activities of the higher education institution, and this forms a substantial basis for the decision on the classification of the higher education institution. In this case, too, a draft assessment report is submitted on which the higher education institution can express its standpoint.

In Slovakia, higher education institutions are divided into public, state, private and foreign institutions, depending on their origin and ownership. Higher education institutions may also be divided into professional-type HEIs and university-type HEIs. The classification of a higher education institution is carried out on the basis of fulfilment of the criteria set for its integration. At the present time, the criteria are set to reflect the achievement of above-average results in research in a majority of the institution’s departments and in the majority of scientific fields in which the institution acts. However, in the case of professional higher education institutions the requirements are lower. The classification need not, then, correspond to the mission that the higher education institution had set for itself, or to complexity of the education provided. The classification of higher education institutions has an impact on the possibility of admission to study, and, in the future, it will also influence the financing of public higher education institutions. Professional higher education institutions are limited to offering Bachelor programmes only. University higher education institutions are intended to be leaders in research, and in education they will be oriented mainly on second and third cycle degree programmes. Professional higher education institutions will cooperate closely with employers on the preparation of graduates. At present, all public higher education institutions are listed among the university-type HEIs. The ongoing complex accreditation is expected to change this situation. In the case of private higher education institutions, it is the Government of the Slovak Republic that decides on a change in their listing in agreement with the standpoint of the AC. In the case of public and state higher education institutions, a change in the listing the higher education institution will be made by legal measures (the Act of 2002).
The background materials supplied with the standpoint of the higher education institution are submitted to the AC to be discussed and agreed. Invited members of the representative bodies of higher education institutions, as well as a representative of the Ministry take part in the meetings. However, this has no effect on decision taken by the AC.

In the accreditation of degree programmes in medical fields of study, a constituent part of the accreditation is the standpoint of the Ministry of Health of the Slovak Republic concerning the fulfilment of requirements for performing the respective medical profession by graduates of the proposed programme. The requirements are set out in special regulations which fall under the management of the Ministry of Health of the Slovak Republic. They refer not only to medical occupations regulated by European Community guidelines (nurse, general physician, dentist, obstetrician), but to all medical professions regulated in the Slovak Republic.

The Accreditation Commission gives its standpoint on individual requests and, on the basis of its standpoint, the Minister of Education decides whether to grant, suspend or withhold/withdraw the right to award academic degrees to graduates of the degree programme, or the right to execute habilitation procedures, or the procedures for the appointment of professors.

As concerns appeal procedures, the higher education institution has the possibility, within eight days from the day of the announcement of the AC’s standpoint, to express disagreement with it. In such a case, the Minister of Education makes a decision in accordance with the standpoint of the AC, or asks the AC to confirm his standpoint. The Act permits the Minister of Education to override the standpoint of the AC. In that event, he must publish his decision and give reasons for it.

7.2.4. Uses of Results of the Accreditation Commission’s Activities

The higher education institutions in the Slovak Republic may provide higher education in accredited programmes only. The programme becomes accredited after the Minister of Education grants the right to a higher education institution to award academic degrees based on the AC’s statement on the capacity of the higher education institution to deliver the programme.

The AC likewise gives its statement on the capacity of a higher education institution to execute the habilitation procedures and the procedures for the appointment of professors. On the basis of the Commission’s standpoint, the Minister grants to the higher education institution the right to execute these procedures.

The statements of the AC are recorded in the minutes of its meetings, which are delivered to the Minister of Education as background material for his decisions. The minutes are publicised on the AC’s website. The assessment reports prepared by working groups of the AC on individual requests do not form a part of the published record. The assessment reports are delivered to the Ministry. The statements by the AC shown in the minutes are justified in brief, e.g. “the higher education institution is competent until the next complex accreditation” or “it is not competent, unfulfilled
criteria A1 and A6” (Minutes No. 38). All the outputs and recommendations emanating from the accreditation procedures are published on the website of the AC.

Importantly, within the framework of complex accreditation of a higher education institution, the AC makes a separate assessment of the higher education institution’s educational and research activities. The corresponding recommendations are designed for the higher education institution itself and are also made available to the public. At present, the system of complex accreditation is at a starting stage, and the first higher education institutions are now undergoing it. It is therefore not yet possible to make a proper assessment of how applicable for the higher education institutions, or how comprehensible for the public at large, the recommendations will be. Currently, there is no linkage between the recommendations of the AC and the process of financing higher education institutions. The AC regularly prepares its annual progress report, which includes its evaluation of the system of higher education and recommendations for the Government of the Slovak Republic for measures which might improve the higher education environment from the viewpoint of the AC.

7.2.5. Mission and Composition of the Accreditation Commission

The position and activity of the Accreditation Commission is regulated to a great extent by the Act on Higher Education. The AC has the position of an advisory body to the Government of the Slovak Republic. According to the Act, the AC monitors, assesses, and independently evaluates the quality of teaching, research, development, artistic and other creative activities of higher education institutions, and helps to improve their performance. It gives a comprehensive assessment of the conditions under which these activities are carried out, and prepares recommendations to improve the work of higher education institutions. It may inform the public about its findings (the Act of 2002). The number of members of the Commission – there are twenty-one members – is defined by the Act on Higher Education, and the members are appointed by the Government of the Slovak Republic on the proposal of the Minister of Education. Viewpoints on individual members are given by the State administration bodies (ministries) and the representative bodies of the higher education institutions prior to submitting the proposal for Government deliberation. These entities also make proposals for members of the AC. Membership in the AC is for a period of six years, with one third of members being changed every two years. A member of the Commission can be stripped of membership only on grounds of failing to fulfil the duties resulting from membership in the AC. The Chairman of the AC is appointed by the Government of the Slovak Republic.

A major proportion of the members of the AC and its working groups come from the academic community. The Act sets out that at most one third of the members come from non-higher education establishments. The latest progress report of the AC of September 2007 shows that, besides the members of the AC, over 200 people were active in the working groups. As regards the composition of the AC, five members come from institutions outside the higher education institutions, while three members are from abroad.
2.6. Scope of the Accreditation Commission’s Activities

The AC carries out peer reviews to assess the capacity of a higher education institution to deliver a degree programme, and, on the basis of its statement, the Minister of Education also grants to a higher education institution the right to award an academic degree to graduates of the programme. The AC assesses the capacity of a higher education institution to execute the habilitation procedures and the procedures for the appointment of professors, and gives its standpoint on external educational institutions (mainly institutes/workplaces of the Slovak Academy of Sciences), respectively, on their involvement in the execution of doctoral programmes. The AC also gives its standpoint on changes concerning providers of higher education – establishment, change of their seat, name, merger or split (also as regards faculties); before a higher education institution makes a decision to establish, split, or merge a faculty, the standpoint of the AC must be received.

The AC also performs tasks related to the approval of new higher education institutions. In this case, the AC assesses the submitted project to establish a higher education institution, and gives its standpoint on the proposed degree programmes. The establishment of a private higher education institution requires the consent of the Government of the Slovak Republic, on the basis of which a legal entity may act as a higher education institution, and thus provide higher education. The Slovak Government does not give such consent if the standpoint of the AC on all the proposed degree programmes is negative.

In the complex accreditation performed the AC, the activities of higher education institutions are assessed comprehensively. The assessment covers the level of research, development, artistic and other creative activities of the higher education institutions. This is one of the factors affecting the classification of the higher education institution (Statute of the AC). Thus the capacity of the higher education institutions to deliver a programme(s) and to execute the habilitation procedures and the procedures for the appointment of professors is repeatedly assessed within the framework of complex accreditation. For this, the AC assesses the fulfilment the mission and tasks of the higher education institution on the basis of analysis of the higher education institution’s activities, including recommendations for improvements, an evaluation of the research, development, artistic and other creative activities of the higher education institution, as well as a proposal for the classification of the higher education institution.

The AC also gives its standpoint on incentives and proposals presented to it by the Minister of Education, including proposals for changes in the system of fields of study required for the accreditation of degree programmes.

7.2.6. Operational Practices of the Accreditation Commission

The AC gives its standpoint on the accreditation of a programme at the request of a higher education institution, since higher education institutions may offer admission only to accredited programmes. The AC may, on its own initiative, initiate a reassessment of whether a higher education institution continues to fulfill the conditions
for delivering a programme, or for executing the habilitation procedures and the procedures for the appointment of professors. This occurs especially as an external initiative.

The higher education institutions continuously inform the AC on an ongoing basis about changes that might affect the rights that have been granted (to provide accredited degree programmes, etc.). For example, when assessing the capacity of a higher education institution to deliver a degree programme, the responsible person for the programme is a key consideration. If the responsible person terminates her/his employment contract with the higher education institution, the institution must provide information for the AC about the new person responsible for the degree programme. For the purposes of data processing on university teaching staff members, a register of employees of higher education institutions will be developed as a central information system. The AC will keep a survey on the staffing of higher education institution activities in real time. The legal conditions are now being put in place prior to implementation of this system.

Higher education institutions are periodically assessed under complex accreditation, which takes place every six years. The date for complex accreditation is given in a published schedule. The higher education institution is informed that the accreditation will take place at least one year in advance. In exceptional cases, the Minister of Education may also initiate a complex accreditation outside the plan, in which case the respective period is shortened at the Minister’s request. This right has been accorded to the Minister since September 2007.

A degree programme may be accredited for an indefinite period. It is repeatedly reassessed within the framework of complex accreditation or on the decision of the AC. Alternatively, it may be accredited for a fixed period. For example, in case that the higher education institution has not previously offered a given degree programme, the programme is normally accredited for the standard period of the degree programme, and the capacity of the higher education institution is thus reassessed after a period of a few years.

If during the re-assessment of the capacity of the higher education institution to deliver a degree programme the AC finds that the higher education institution does not meet the appropriate criteria, and that it will not meet them in the future, the Ministry suspends the validity of the accreditation of the degree programme. The higher education institution may therefore not admit new entrants, and is invited to remove the identified shortcomings within one year, or the validity of the granted right is suspended for a limited time. After one year, the AC again assesses the capacity of the higher education institution to deliver the degree programme. On the basis of the AC’s standpoint, the Minister either cancels the restriction or strips the higher education institution of the right to award academic degrees to graduates of the programme. The re-assessment of the capacity of the higher education institution takes place during a complex accreditation, or within an external initiative, identifying measures taken, changes to be made, improvements to be achieved, or shortcomings still to be addressed. A similar situation may occur in the case of habilitation procedures and the procedures for the appointment of professors.
7.3. SUMMARY OF THE ACCREDITATION COMMISSION’S ACTIVITIES

At two-year intervals, the AC submits a report on its activities for the past period to the Government of the Slovak Republic. This section is based on data and information given in the report of AC activities for the period from September 2002 to April 2005, and in the report on activities from April 2005 to September 2007.

Table 18. Summary of activities of the Accreditation Commission between 2002-2007

<table>
<thead>
<tr>
<th>Time-period of study-programme accreditation</th>
<th>HEI competent</th>
<th>Discontinued procedure</th>
<th>HEI not competent</th>
</tr>
</thead>
<tbody>
<tr>
<td>2002 – April 2005</td>
<td>2,126</td>
<td>339</td>
<td>71</td>
</tr>
<tr>
<td>April 2005 – Sept. 2007</td>
<td>863</td>
<td>74</td>
<td>44</td>
</tr>
<tr>
<td>Total</td>
<td>2,989</td>
<td>413</td>
<td>115</td>
</tr>
</tbody>
</table>

*Source:* The Accreditation Commission’s database.

The activities of the AC in the period 2002-2007 should be perceived in the following context. In 2002, a new Act on Higher Education was adopted to introduce a three-cycle system of higher education. At the same time, it allowed higher education institutions to admit students for accredited degree programmes only, while decisions on granting the right to award academic degrees to graduates of a programme were made by the Minister of Education on the basis of a prior statement by the AC. In the transition period of the 2002/2003 and 2003/2004 academic years and, based on a further amendment to the Act in the 2004/2005 academic year, higher education institutions could also admit the students to degree programmes accredited under the previous Act. In connection with the other amendments, criteria were prepared, discussed, and approved for use by the AC in the assessment of individual requests of the higher education institutions. At the same time, higher education institutions were required to prepare their requests for accreditation of their individual activities, i.e. full information on the degree programmes and on background materials for habilitation and for the appointment of professors. This was followed by further steps that the AC was required to take, i.e. issue a decree on the study credit system\(^5\), decide on a system of fields of study, and work out descriptions of individual fields of study. This was necessary, since completion of a degree programme results in the award of the corresponding qualification, and the accreditation scheme assesses whether the appropriate programme comes from the field of study and fulfils its requirements as regards curriculum content. The correspondence between the profile of the graduate and her/his employment in the respective field is also assessed.

Obviously, the AC was obliged within a short period of time to handle a great number of requests from higher education institutions for accreditation of their degree programs.

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\(^5\) The credit system of study is obligatory by law.
programmes, and, subsequently, for accreditation of the habilitation procedures and the procedures for the appointment of professors. By September 2007, the AC had handled 3,517\( ^6 \) applications of higher education institutions for accreditation of their degree programmes. In addition, it had assessed twenty-nine applications for State approval to act as a private higher education institution, applications for execution of habilitation and inauguration procedures, giving its standpoint on internal changes in higher education institutions (change of faculty names, mergers and establishment of new faculties) (Report on Activity 2002-2005, Report on Activity 2005-2007).

Another task to be carried out after the adoption of the Act on Higher Education was to determine the criteria needed for execution of complex accreditation, i.e. the criteria for classifying higher education institutions and the criteria for assessing the research, development, artistic and other creative activities of higher education institutions. The latter were approved in February 2006, but after they had been approved the AC was required to develop detailed criteria for the assessment of individual attributes\(^7 \) within the framework for assessing the research activities of higher education institutions. The research activities of higher education institutions are assessed within twenty-four research areas into which the various fields of study have been divided. The AC worked out detailed rules for assessing research, development, artistic and other creative activities for individual scientific areas in which the rules for appraisal of individual attributes and an indication of the level of the higher education institution in individual attributes were set. The rules for appraisal are usually set at four levels: the activities at a higher education institution are assessed to be at a level comparable to the international environment, above-average fulfilment in the Slovak Republic, average fulfilment in the Slovak Republic, and below-average fulfilment. From September 2007, the submission of proposals for individual criteria and changes to them was shifted from the AC to the Ministry. The AC, however, still gives its viewpoint on the proposed criteria and on changes to them.

After the criteria for complex accreditation were issued, rules were prepared for use by the AC within this scheme. However, the work of the AC has been marked by a change in the legislation when, in September 2007, the Act on Higher Education was amended, and the terms of classification of higher education institutions were changed.

\(^6\) Special granting of the right for full-time and part-time forms of study in the degree programme is not considered in the number of applications.

\(^7\) Within the framework of criteria for assessment of the research, artistic and other creative activities of a higher education institution, the level of the higher education institutions is assessed according to several attributes – the output attribute testifies especially to the level of publications produced by the staff in the period under review, the environment attribute refers to the level of the HEI’s environment, material-technical equipment, etc., the appraisal attribute testifies to status-acceptance of the higher education institution and its staff, for example, through invited lectures, participation in various boards, etc. The assessment is carried out independently for individual scientific fields in which the higher education institution is active, and for individual departments of the institution (faculties). The outcome is the higher education institution (faculty’s) rating in the respective research area, which is attributed a value from A to D, depending on the assessment of the individual attributes. Overall, the design of the assessment has been derived from the British Research Assessment Exercise.
which resulted in a partial change of the process of submitting the applications, content of the background materials, etc., regulated by the Ordinance of the Government of the Slovak Republic on the Accreditation Commission (Regulation No. 104). In 2008, there was a change in the Statute of the AC, which regulates the activities of the AC and its working groups. These changes are subject to approval by the Government of the Slovak Republic on the basis of a prior statement by representative bodies of the higher education institutions.

The Act stipulates that the individual higher education institutions be classified on the basis of a standpoint issued by the AC not later than September 2009. This means that the AC must carry out complex accreditation, particularly in 2008 and in the first half of 2009 at all higher education institutions (twenty public HEIs, ten private HEIs, and three state HEIs). It must assess the capacity of the institutions to deliver all degree programmes (almost 9,000 in total\(^8\), to execute the habilitation procedures and the procedures for the appointment of professors. It must also prepare an assessment of the activities of the higher education institution, and give its standpoint on the classification of the institution. In September 2008, more than one third of the members of the AC were changed due to expiry of their term of office. The newly appointed Commission members have thus got on to a train running at full steam.

The AC is active in a number of international organizations. It is a member of the European Association for Quality Assurance in Higher Education (ENQA), the Central and Eastern European Network of Quality Assurance Agencies in Higher Education (CEEN), and the International Network for Quality Assurance Agencies in Higher Education (INQAAHE). In cooperation with the AC of the Czech Republic, the AC has agreed to participate in a joint project to set up a pilot internal and external evaluation of the system of quality assurance in higher education in the Czech Republic and in the Slovak Republic. Based on this project, in 2007 and in 2008 the AC elaborated a self-evaluation report in an agreed structure, covering an evaluation of internal processes, the functioning of the AC, process quality, an evaluation of the outcomes of its activities, etc. In the second half of 2008, the two commissions prepared for an external evaluation in accordance with ENQA rules, while discussing the requirements for the composition and establishment of peer reviewers, as the originally intended mutual evaluation by the members of the two commissions would not satisfy the ENQA requirements.

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\(^8\) The great number of degree programmes is due to the fact that there are degree programmes at three levels, in both full-time and part-time forms. There is a separate degree programme for each of the forms of study and for each level. In addition, in the case of teacher education programmes, the teachers are usually prepared for two approbation subjects, while various combinations are considered as independent programmes. There are, for example, combinations of approbation subjects (languages – Slovak, Hungarian, English, German, etc., education – Art, Physical Education, Music, Ethics, Religion, etc., sciences – Physics, Chemistry, Biology, the humanities – History, Civics, etc.). These degree programmes are interconnected and contain common components. The number of degree programmes with unique curricula content is much lower.
7.4. ANALYSIS OF AGENCY STRENGTHS AND WEAKNESSES

7.4.1. The system of accreditation in the Slovak Republic has a history of more than fifteen years (a strength)

The activities of the AC and accreditation of the fields of study were regulated by law as early as the 1990s. The element of programme accreditation is considered to fit the higher education system naturally, and there are no discussions on whether it should have been introduced, but only on how to improve and upgrade it, as it is aimed primarily at an external assessment of the fulfilment of minimum requirements.

7.4.2. The AC has a strong position in quality assurance and evaluation of the activities of the higher education institutions (a strength)

The legitimacy of the AC is given by law, and the higher education institutions must, by law, be assessed by the AC if they wish to provide a degree programme or the habilitation procedures, or the procedures for the appointment of professors.

7.4.3. Members of the AC are appointed by the Government of the Slovak Republic (both a strength and a weakness)

Since the AC is an advisory body of the Slovak Government, though a rather specific type of advisory body, it is justified that its members are appointed by the Government on the proposal of the Minister. The negative aspect is that this linkage may also weaken the independence of the AC. However, the independence of members of the AC is secured by the conditions under which their membership may be terminated. Moreover, nominations to the AC are dependent on statements from the representative bodies of the higher education institutions, whose activities form the subject of accreditation. In this process, there is sometimes an interest in pushing through the nomination of experts from one’s own higher education institution, or in increasing the number of experts from one field at the expense of others, etc. However, impartiality is secured by the fact that, every two years, the term of office of one third of the members of the AC expires. It is therefore essential to provide a uniform procedure and unambiguous rules when there are changes in the AC membership, in order to maintain impartiality.

7.4.4. The Accreditation Commission uses uniform criteria (both a strength and a weakness)

Uniform, well-known, predictable criteria according to which the higher education institutions are to be assessed, contribute positively to the preparation of higher education institutions for the accreditation procedure. They also provide transparency of execution, as there is no space for enforcing individual views, introducing diverse specificities, etc. The individual procedures are, to a great extent, transparent and impartial. However, this philosophy brings together the missions of higher education institutions and graduates’ profiles and pushes them in a uniform direction, since a higher education institution that is primarily oriented at training researchers is assessed
according to the same criteria as a higher education institution that considers as its primary mission the preparation of Bachelor graduates for professional employment. Within the framework of assessment of the level of research activity at the higher education institution and fulfilment of the corresponding attributes, an essential part of assessment is based on an expert assessment by members of the working group, while the details of the rules of assessment are diverse (for example, in defining the requirements for material-technical provision of the degree programme or requirements for publication outputs). Neither the content of the higher education institution’s assessment (including recommendations given to an institution) nor the form (including rules for visits to the higher education institution during a complex accreditation) is uniform. The AC has prepared a recommended structure of the accreditation document of higher education institutions, as well as recommendations for some aspects of the self-evaluation report to be presented by the higher education institution (Recommended Structure of Accreditation Document, Annex to Resolution No. 31.9.4).

7.4.5. Broad scope of decisions (a weakness)

Members of the AC give their viewpoints on applications concerning all groups of degree programmes. Thus, a member of the AC is able to assess most requests formally, rather than professionally. This deficiency is, to some extent, compensated by the working groups which specialise in individual study fields, or in groups of related study fields. The breadth of the decisions also has to do with the scope of activities carried out by the AC. On the one hand, there is accreditation, aimed at assessing the fulfilment of minimum standards and showing whether the higher education institution is capable of pursuing the given activity. On the other hand, the Commission makes recommendations to higher education institutions on possible improvements in the context of complex accreditation.

7.4.6. Clear rules (a strength)

Since a substantial portion of the work performed by the AC is regulated by legal rules, the rules are transparent and generally known. On the other hand, there is a diminished possibility of flexible reactions to unexpected problems arising, and corrections are made only slowly.

7.4.7. Financial provision (a weakness)

The AC’s work is financed from the state budget. Since development opportunities and activities of the AC are dependent on its allocated budget, extra activities can, in effect, be carried out only on an unpaid basis. Nowadays, the financing of the Commission depends on the AC members having another (full-time) job and their AC work is performed outside their main jobs. The members of the Commission’s working groups generally devote their time, knowledge and experience to providing the system of accreditation on a voluntary basis. However, the original AC administrative staff (two
members) has more than doubled in the recent years, providing a strengthened administrative background. This may be assessed positively.

7.4.8. Information sources (a weakness)

The background materials used by the AC for its activities are prepared by the higher education institutions. On the one hand, there are appropriate formal, rather detailed rules on what is to be submitted within the framework of the accreditation. However, the procedures require time-consuming provision of information, some of which is not relevant to the conclusions reached by the AC. If the applicant provides more information than required, there can be a further loss of transparency in the background materials, which is often evident from the way they are prepared. A project is now being undertaken to establish central information sources to simplify the work of the AC and minimise the burden on institutions. However, there is no agreed schedule for setting up the central database. The planned register of the employees of higher education institutions may serve as an example of what might be achieved. The register is intended to show when an HEI teaching staff member is no longer employed at a given higher education institution, and this will automatically activates a check-up on whether the higher education institution is able to find a satisfactory substitute and, consequently, whether the accreditation conditions are fulfilled until the next complex accreditation. After a year of discussion, no date has yet been fixed for this register to come into operation.

7.4.9. The Accreditation Commission gives its standpoint (mainly a weakness)

The AC gives its standpoint, on the basis of which the Minister of Education decides to grant a right to a higher education institution. The AC is not directly responsible, as the final decision is taken by the Minister. The same is true for the accreditation criteria that are used, since, under present legislation, the criteria are proposed by the Ministry of Education. The aims and mission of the Accreditation Commission are established by law, and the AC has no influence over them and no opportunity to adapt or modify them. From the point of view of the AC, these factors may be considered as a weakness. At the present time, however, taking into account the financial and social situation in the higher education system, the position is acceptable.

7.4.10. Conflict of interests (a weakness)

The AC has only partially elaborated rules on avoiding conflicts of interests. When a complex accreditation is being carried out, a member of the Commission who works at the higher education institution may not be involved in preparing the background materials for the AC to give its statements. However, there is a different type of conflict of interests, when a majority of members of the AC and its working groups are attached to certain higher education institutions. Although the Act itself stipulates that the function of a member of the AC is incompatible with the post of rector, vice-rector, dean, or vice-dean, a member of the AC or of a working group who is a staff member
of a higher education institution is subordinate to these officials. Similarly, if the higher education institutions are competing for the same students and for funding from the same grant schemes, there is a risk that the prevailing interest of one higher education institution and its staff (and potentially the members of the AC and members of its working groups) could prevent other higher education institutions receiving, e.g. the right to provide programmes in a certain field of study. Although the Ministry has recorded no official complaints or statements about the partiality of accreditation-related procedures, such a risk does exist, and there is no mechanism for preventing such conflicts of interest. Some higher education institutions see a possible solution in parity representation in the working groups and in the AC as a whole. However, as mentioned in the self-evaluation report of the Accreditation Commission (Virčíková et al., 2007), such a solution might lower the requirements for higher education institutions, as the individual members might set about adapting the criteria and conditions to the situation at their own workplace. In the self-evaluation activities of the AC, neither the members of the AC nor the members of its working groups have felt a need to develop an internal code of ethics (some have expressed the view that its creation would be useless) that would help to avoid potential conflicts of interest or would establish further procedures if conflicts of interest were to occur.

7.4.11. Highlighting the importance of guarantors of degree programmes at the expense of other criteria (a weakness)

The capacity of a higher education institution to provide a given degree programme is assessed according to a set of criteria and their attributes. Recently, the criterion of the programme guarantor has been highlighted, especially by the Ministry, e.g. by creating the environment for an information system registering the guarantors of programmes. The other criteria assessed by the AC (e.g., library quality, access to the internet, curriculum of the programme) lack such instruments and are not given such importance. While the guarantor of a programme is a significant actor in providing the programme, there is no justification for accentuating this criterion more than other criteria. The importance attached to guarantors is connected with the fact that at higher education institutions in the 1990s, individual university teaching staff members started working at more than one institution, and this is considered today as a weakness of the higher education system. It is argued that university teaching staff should also be involved in research, and only limited time is available for this when they are active in the teaching process in more than one higher education institution.

7.4.12. The internal system of control (a weakness)

In higher education, quality of provision of educational activities, and also of research activities, can be expressed through various attributes. Even in the case of a single attribute, various levels of fulfilment are needed in order to be able to provide educational activities (e.g., the material-technical equipment for providing a programme in nuclear physics will differ substantially from the equipment needed for the study of law). Most attributes are therefore expressed in terms of general statements (it would
not be purposeful to express them in more precise detail). As a result, no concrete indicators are determined, and no precise values are set to represent the minimum requirement for fulfilling the standard. It is necessary to provide for an agreement on the cases being assessed, and this is only possible by means of establishing control mechanisms. Under the present mechanisms, the applicant institution can give its standpoint on the assessment report of the working group of the AC. The applicant’s disagreement may indicate to the AC that it should deal with the case in greater detail. There was formerly no remedy against the decision of the Accreditation Commission, which was final. The Act on Higher Education has now given the Minister of Education the possibility to overrule the AC. However, such a decision would be politically sensitive, and the Minister has not yet given a positive standpoint in reaction to a negative statement of the AC. Since March 2008, there has been mechanism by which the Minister may ask the AC to confirm his standpoint. If the AC confirms the Minister’s standpoint, and the applicant institution still does not agree, the Minister may set up a committee to discuss the statements of the AC with the participation of a representative or a delegate from the applicant. The final resolution is based on the recommendation of this committee (Statute of the AC). Such a resolution would contain several non-system elements, and threatens to reduce the transparency of the whole accreditation process.

7.4.13. International activities (a strength)

Membership of the AC in international organizations, and also in a joint pilot self-evaluation project with Czech colleagues and a subsequent external review against the ENQA standards are activities which provide for a flow of new information, views and needs that can be used in the work of the AC.

7.4.14. Requirements for selection of members and their position (mainly a weakness)

A requirement for proposals of members of the AC is that candidates for membership may be from among distinguished personalities at higher education institutions, or at the Slovak Academy of Sciences, or other scientific and professional establishments, including also foreign establishments. This kind of selection greatly limits the possibility to propose a member who represents the employers and who might bring different viewpoints on graduate profiles, or on the contents of degree programmes. Representatives of employers on the AC could also stimulate cooperation between higher education institutions and companies in designing degree programmes. Under current conditions, the AC members are selected primarily on the basis of their professionalism and their knowledge of the state of the art in their field of specialisation, including research achievements. This way of selecting members of the AC and its working groups, without any regard for appropriate training, fails to ensure that members of the AC are acquainted with the operational regulations, the rules for the AC’s activities, and the systems for quality assurance and management of the processes providing for the quality of higher education institution activities.
7.4.15. Regular verification (a strength)

The system of complex accreditations, within the framework of which higher education institutions are assessed once in six years, is an instrument that has been introduced to assure that higher education institutions continue to fulfill the required attributes and maintain the required standards.

7.4.16. Inconsistent rules for inquiries, evaluations of Scientific Councils (a weakness)

The students’ views manifested in anonymous questionnaires, or in evaluations elaborated by the Scientific Councils of the faculties of higher education institutions, are constituent parts of the background materials submitted in the course of complex accreditation of a higher education institution. The rules themselves, and the criteria used for complex accreditation, do not specify how the materials for such procedures should be considered in the process. As a rule, these materials serve mainly as additional information. The questionnaires used in student inquiries and in the evaluations conducted by the Scientific Council do not have a uniform form. It should be pointed out, however, that the AC has prepared a recommended structure for internal evaluations of higher education institutions. There is no interconnection between this recommended structure and the internal evaluation performed by the Scientific Councils. Similarly, information on the employment of graduates is presented in the context of complex accreditation, but there is no uniform, generally accepted methodology for use by the higher education institutions (including presentation of information). The information is therefore used only for the needs of the AC in the process of assessing the activities of the higher education institution.

7.4.17. The position of the guarantor of a programme (a weakness)

In the course of the accreditation of a degree programme, there is an assessment of its personnel provision, and of the real impact of the guarantor on quality assurance of the programme (Criteria for Accreditation and Assessment). However, there are no instruments for measuring this impact. The position of the guarantor within the structure of the higher education institution itself, does not, for example, enable her/him to select those staff members who would be the most eligible for giving the lectures or for performing other educational activities, since the terms of employment contracts are concluded by the rector or dean (the Act of 2002). As a rule, the guarantor also has no influence over the financial assessment of staff members of the higher education institution, as financial matters are usually dealt with on the basis of workplace (departmental) affiliation.

7.5. IMPLEMENTATION OF THE ESG

This section provides an analysis of the degree of implementation of ESG Part 2 and 3 in the Slovak Republic. The analysis relates to the corresponding standards and guidelines (ENQA, 2005), which are described elsewhere in this publication (Chapter 3), and are therefore not described again here.
7.5.1. Use of Internal Quality Assurance Procedures

Within the framework of complex accreditation, higher education institutions also submit an evaluation of their own activities to the AC. This evaluation includes the findings from student questionnaires. However, the further process of estimating and evaluating the capacity of a higher education institution to be granted rights (to offer degree programmes, to carry out habilitation procedures, etc.) does not take into account the results of this evaluation. At the moment, it is only possible to assume that, in the process of preparing the external assessment report on fulfilling the mission and tasks of the higher education institution, the recommendations given may also cover the issue of internal quality assurance and evaluation. Since these internal procedures are not uniform, the background materials required by the AC in order to give its viewpoints within the complex accreditation of the higher education institution are not standardised (i.e. the internal rules of the higher education institution, the information sheets for the study units of the degree programmes, information on the staff of the higher education institution and their work, information on the material-technical provision of the higher education institution, etc.). At present time, it is not the primary aim of the AC’s work to improve or assess the internal system of quality assurance of higher education institutions.

7.5.2. Development of External Quality Assurance Processes

The AC monitors, evaluates and independently assesses the quality of the teaching, research, developmental, artistic and other creative activities of the higher education institutions, and helps to improve them. The Commission assesses the conditions under which the higher education institutions carry out these activities, and makes recommendations for improving their activities (the Act of 2002). The conditions of the higher education institution for performing a particular activity (provision of a degree programme, habilitation procedures, procedures for the appointment of professors) is assessed in accordance with approved criteria, which are publicly available and which are commented on by the representative bodies of the higher education institutions. The Act on Higher Education defines the purpose for which this external assessment is carried out as an assessment of the fulfillment of minimal standards for being granted the respective right. In addition, a complex assessment of activities of a higher education institution is carried out (complex accreditation), with the aim of re-evaluating the fulfillment of the required conditions, and making recommendations to improve the performance of these activities in the following period. When they enter the complex accreditation scheme, the higher education institutions have to set up working teams and coordinate the preparation of background materials for complex accreditation. In future, the purpose may be not only to provide the externally requested background materials, but to gather and analyse them systematically and regularly within internal processes. In practice, some documents have to be prepared anew, or updated, taking into account changes and shifts in comparison with the applications for the accreditation of individual activities in the previous period. This indicates that the higher education institutions do not continuously update their data on the provision of degree
programmes. This is partially due to the fact that the Ministry modified some requirements for granting degree programme accreditation in 2007.

The quality of higher education institutions’ activities is assessed externally by the AC. At the moment, however, there is no interconnection between the internal quality assurance instruments of the institution and the external assessment of quality by the AC. It is not the basic task of external assessment to assess the instruments used for internal quality assurance and improvement. It is to verify fulfilment of the required minimum standards. For some aspects of external assessment, there are no clear standards or recommended procedures, particularly as regards the recommendations of the AC for a higher education institution prepared in the context of the complex accreditation scheme or the procedures for processing and evaluating the background materials submitted by the higher education institution.

7.5.3. **Criteria for Decisions**

The criteria, and also modifications to them, are discussed by the representative bodies of higher education institutions. The criteria are subject to approval by the Ministry, and at the present time the Ministry is also responsible for updating them by submitting a proposal for new criteria. Strictly speaking, it is thus not possible to speak of the Commission’s criteria, as the AC de facto uses criteria that are set externally. These criteria are publicly available, and the background materials submitted by higher education institutions serve as a basis for the AC’s standpoints. Some of the criteria have objectively fixed levels, while others are based on an expert assessment by a group of evaluators within the working groups of the AC. Considering that the standpoint of the AC is primarily used for decision-making by the Ministry, such an approach is acceptable.

7.5.4. **Processes Fit for Purpose**

The rules for the accreditation-related procedures applied by members of the AC and its working groups, as the key actors in external quality assurance, are fixed and publicly available. The standpoints are adopted by the AC on the basis of a vote, and the proposals are submitted by working groups whose members are usually university teaching or research staff from the respective field of study. At present, there is no system for in-service training of the Commission’s members. The precondition for the appointment of a member of the Commission is her/his professionalism and position in the academic community, which is understood as assuring her/his acquaintance with the environment and with the state of research and teaching in the given field of study and science. As already mentioned, the present work of the AC is not oriented at improving internal institutional quality assurance mechanisms. The lack of proper qualification of the members of the AC is, some argue, therefore acceptable.
7.5.5. Reporting

The standpoints of the AC form a part of the minutes of its meetings, which are published on the Commission’s website. The assessment outcomes elaborated by the AC within the framework of complex accreditation are channelled through the Ministry to the higher education institution. The assessment reports prepared under the complex accreditation scheme until now contain a summary of recommendations for the higher education institution, which are aimed, as the AC argues, at improving the operation of the institution. While assessing the applications for recognition of the institution’s rights (in practice most often by awarding programme accreditation), special attention is given to meeting individual criteria. When the Commission finds that the criteria are not fulfilled to the required level, reasons are given. The background materials submitted by the higher education institution within the self-evaluation report, on the basis of which the AC gives its viewpoints, are not made available for the public. One of the reasons or this is that they contain personal data on the institution’s staff members that it is not permitted by law to publish.

7.5.6. Follow-up Procedures

The present system of external quality assurance does not presuppose that the recommendations of the AC or its assessment performed under complex accreditation will primarily result in the development of an action plan for improvements in the given area at a given higher education institution. Implementation of the recommendations is rather an internal affair of the higher education institution, and the purpose of the recommendations is to sustain the results achieved in research and educational activities until to the next complex accreditation, or to suggest improvements.

If the higher education institution has been granted the respective rights, and the re-assessment of the criteria reveals (not necessarily under the complex accreditation scheme) that the institution is no longer capable of meeting the requirements, the right is not withdrawn immediately after the standpoint of the AC is announced. The higher education institution is given a grace period of one year to take measures to deal with the shortcomings that have been identified. After the one-year period, the higher education institution prepares a progress report, and the AC verifies on the spot that the conditions are now fulfilled. However, it should be pointed out that such a procedure has not yet been applied.

7.5.7. Periodic Reviews

The Act on Higher Education stipulates that higher education institutions undergo a complex accreditation at intervals of six years. Within the complex accreditation scheme, there is a re-assessment of the rights granted to the higher education institution (provision of a degree programme, habilitation procedures, procedures for the appointment of professors), as well as an evaluation of the research, developmental, artistic and other creative activities of the higher education institution, and the classification of the institution. For the external assessment, an institutional self-
7.5.8. System-wide Analyses

The AC submits a report on its work at two-year intervals to the Government of the Slovak Republic. In addition to the data on its activities and on the use of finances allotted to the AC, the report also contains the Commission’s findings and recommendations for the development of higher education (Regulation No. 104).

In its 2005 report (Report on Activity 2002-2005), the AC pointed especially at five system-wide problems, and made eleven recommendations. Of these five problems, four related to the current state of higher education (involvement of the AC in international networks, duplication of degree programmes, the state of preparedness of the AC for complex accreditation, financing of higher education institutions irrespective of the number of degree programmes9). Several of the Commission’s recommendations in 2005 were dealt with in subsequent proposals for legal amendments made by the Ministry, aimed at simplifying the structure of academic degrees10, adjusting the functioning of foreign higher education providers, adapting joint degree programmes, the status of honorary professors within the accreditation process, and improving the administrative support for the AC.

In its 2007 report (Report on Activity 2005-2007), the AC pointed out six problems, which were very similar in content, or even identical, to those identified in the report presented in 2005 (Report on Activity 2002-2005). In addition, the 2007 report makes ten recommendations that are, except for one, linked to those in the 2005 report. Overall, the AC stated that some progress had been made in the areas identified as problematic in 2005, but pointed to the need to take action on the amendments that had been accepted.

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9 In its report, the AC dealt with the reasons why higher education institutions submit applications for accreditation of degree programmes that are similar in content, and the numbers of applications submitted. Within the framework of the recommendations it pointed out that the number of degree programmes had no effect on the finances of higher education institutions. A higher education institution may accredit degree programmes that are similar in content in order to attract more students by the attractive names of the study programmes, rather than offering greater freedom of choice, e.g., in the form of optional courses. Such an approach increases the number of applications that the AC must handle, without ensuring that the higher education institution will enrol more students for the two degree programmes than it would have admitted, if there had been one degree programme accredited in the respective field of study. Since funding is not related to the number of degree programmes or their guarantors, there are no limits on the number of applicants admitted to a degree programme. It is not clear that the higher education institutions have a clear or worthy motivation for such a strategy.

10 A proposal was put forward to abolish the procedure for Rigorosa degrees (such as RNDr., PhDr.); however, this proposal was not approved in the further legislative process.
7.6. USE OF EXTERNAL QUALITY ASSURANCE PROCEDURES FOR HIGHER EDUCATION

System level higher education quality assurance in the Slovak Republic is to a great extent based on external assessment. Generally speaking, the present setting of the rules on external quality assurance is compatible with ESG Standards 2.1-2.8. However, some of the arrangements, including those pertaining to the work of the AC, have a special setting for historical reasons, and are not fully compatible with the ESG. These will be mentioned in the section on implementation of the ESG Part 3 standards (see below).

7.6.1. Official Status

The AC in the Slovak Republic is established by law. It lacks the status of a legal entity. Its standpoints are addressed first of all to the Ministry, which is the central body of state administration under which higher education and research policy fall. At the present time, the AC itself does not make decisions, but has the position of an independent professional body that issues standpoints and recommendations.

7.6.2. Activities

Characteristic activities of higher education institutions such as the provision of higher education in accredited degree programmes, habilitation procedures, and procedures for the appointment of professors are subjected at six-year intervals to an assessment by the AC. Accreditation is subsequently awarded by the Ministry. Within the complex accreditation scheme, the research/artistic activities of higher education institutions are also assessed. These are the main activities of the AC.

7.6.3. Resources

The number of members of the AC is given by law. The AC may establish its own working groups, the number of which and the number of members in the groups is at the discretion of the Commission. Funding of the Accreditation Commission, which is an advisory body of the Government of the Slovak Republic, is linked to the budget of the Ministry, and there are no specific rules to determine the funds allocated for the activities of the AC. The administrative support for the AC is also funded by the Ministry and the administrative staff are civil servants. Thus the AC has no direct influence on the number or on the selection of administrative support staff. In its self-evaluation report, the AC stated that there are insufficient resources for its work, especially in relation to members of the working groups of the AC. The provisions for administration support are considered satisfactory. Nevertheless, there is space for improvement in administrative staff career development. The Commission’s organizational structure (including working groups) and the number of Commission members are considered good or satisfactory (Virčíková et al., 2007).
7.6.4. Mission Statement

The activities and tasks of the AC are set by the Act on Higher Education. The AC monitors, evaluates and independently assesses the quality of teaching, research, development, artistic and other creative activities of higher education institutions and helps to improve the quality of these activities. In accordance with its mission statement, the AC also gives its standpoint on applications submitted by individual higher education institutions or by the Minister of Education.

7.6.5. Independence

The conditions for independence of the AC are laid down by the Act on Higher Education, which stipulates that the AC evaluates quality independently. However, in the context of the implementation of ESG, it will be necessary to re-evaluate some elements in the status of the AC and the terms of its formulation. The independence of members of the AC in giving their viewpoints is guaranteed by the Act. There are provisions for membership of the Commission to be terminated prior to expiry of the member's term of office on a proposal of the Chairman of the AC only on grounds of failure to fulfill duties ensuing from membership. It should be admitted that in the present composition of the AC and its working groups, the majority of members are from the academic community, and this is a risk factor for the independence of the AC. An overall re-evaluation of the AC's status, together with the creation of a system of internal rules of the Commission might be helpful to prevent potential conflicts of interest. At the present time, a system to prevent conflicts of interest has been applied only within the complex accreditation scheme.

7.6.6. External Quality Assurance Criteria and Processes Used

The procedures used by the AC and the criteria that are applied are accessible to the public. Under the complex accreditation scheme, higher education institutions submit their own evaluations, which include the views of students on the institution's activities, expressed in the form of anonymous questionnaires. After receiving the self-evaluation documents, the Commission’s working group carries out the required number of site visits to the higher education institution, within the framework of which it holds discussions with students and staff members, and finds out additional information for the AC's report. Based on an analysis of the self-evaluation documents, the site visit(s) and the information collected, the members of the AC's working group elaborate an assessment report, which contains recommendations for the higher education institution. Before finalisation, the report is discussed with representatives of the higher education institution. However, some of the external quality assurance processes lack clear rules. For example, the statements of the AC on changes recommended for the degree programme(s) to be accredited are completely a matter of the personal judgements of members of the AC. Similarly, there are no clear and published standards and guidelines on giving recommendations, or on organising site visits. With regard to
student participation in external quality assurance, no students have yet been members of the working groups of the AC, as the requirements for membership do not allow for it, stipulating high professionalism and authority (the Act of 2002). A student delegate from one of the representative bodies of the higher education institutions is invited to the meetings of the AC, but is assigned a non-voting status.

7.6.7. Accountability Procedures

All outcomes of the AC’s activities are publicly available on its website. Most of the assessment criteria and attributes are assigned the minimum level, i.e. fulfilment by higher education institutions may be verified through information accessible to the public. Information on the AC, its mission, tasks and procedures are set by law or by other legal norms which are also publicly accessible. Within the complex accreditation scheme for higher education institutions, a code of ethics is applied, together with rules to prevent conflicts of interest for members of the AC involved in the assessment of a given higher education institution. In 2007, a self-evaluation of the quality of some activities of the AC was carried out, within the framework of which the Commission’s members, and members of individual working groups, gave their standpoints. There is at present a joint project with the AC of the Czech Republic, which includes cooperation in preparing for an external review against ESG standards.

7.7. CHALLENGES AND AGENDA AHEAD

No action plan or document to purposefully implement ESG in the higher education environment in the Slovak Republic has yet been adopted. External higher education quality assurance through the work of the AC has already been a part of the higher education environment for almost two decades. During that period, a well-functioning system has been developed. The associated risks, shortcomings and the underlying principles have been described above.

Within the framework of external quality assurance of the activities of individual higher education institutions, some clear, readable, and formalised rules have been established for providing, monitoring, and assessing quality. The higher education institutions and their faculties are obliged by law to carry out an evaluation of their activities, giving students an opportunity to express their opinions at least once a year on the quality of educational activities and on individual teaching staff members, in the form of anonymous questionnaires. Higher education institutions and their departments make use of self-evaluation for development purposes and in order to identify threats. They are concerned, to various degrees, with further developing self-evaluation instruments, particularly, on the basis of formalised rules, the fulfilment of which would be an official policy of the institution as a whole. The results of these evaluations and institutional formulations of quality assurance policy, specifying the approaches to quality, the aims that the higher education institution wishes to achieve, and the processes for use in achieving these aims, are not usually published.

Improving the internal mechanisms of quality assurance within higher education institutions is a key task for further development of the whole system of higher
Lack of formalisation, objectivation and evaluation of the efficiency of individual instruments of internal quality assurance are the greatest shortcomings in terms of ESG implementation, though it should be added that the situation varies to a remarkable extent from institution to institution and even from faculty to faculty.

External assessment of quality is the task of the AC, which was established by the Law on Higher Education. The AC assesses the capacity of the higher education institutions to provide degree programmes, to execute habilitation procedures and procedures for the appointment of professors. On the basis of a standpoint issued by the AC, the Minister of Education grants to a higher education institution the right to award an academic degree to graduates of a degree programme, or the right to execute habilitation procedures, or procedures for the appointment of professors. The fulfilment of conditions for awarding such a right is regularly re-assessed within the framework of the complex accreditation scheme at six-year intervals or, if deemed necessary, earlier. Another, related, objective of complex accreditation is to carry out an assessment of the quality of the activities of higher education institutions. The background material used for this assessment is a self-evaluation report written by the higher education institution. The AC has defined a recommended structure and content for this report. In the process of external assessment, the representative bodies of the higher education institutions give their viewpoints; the assessment criteria are approved and, since September 2007, also proposed by the Ministry.

The criteria used by the AC for assessing the capacity of higher education institutions to provide degree programmes are complex. They deal with the conditions for provision of the degree programme, i.e. the material-technical provision, personnel provision, and also the requirements for applicants for study and for completing the programme. While some criteria are expressed exactly — for example, the requirements for the guarantor of the programme — other criteria concerned with internal mechanisms of quality assurance by the higher education institutions are left more general (e.g., organizational arrangements, verification of functionality), as they presuppose the existence of a system of internal quality assurance, which includes the quality level of the educational process and the final examinations. The standpoints issued by the Accreditation Commission are published on its website. The assessment reports prepared for the AC by its working groups are made available only to the higher education institution concerned and to the Ministry of Education.

With respect to ESG Part 2, standards concerning external quality assurance, six out of the eight standards may be considered as fully implemented, while two of the standards (development of external quality assurance processes and reporting) have been only partially implemented. Full implementation of the ESG 2.2 standard is mainly hindered by the lack of an interconnection between internal evaluation of the institution and the external assessment procedures. Concerning the reporting of results, although the final outputs of the external assessment are published, the published standpoints appear in an abridged form so that it is not always possible to find out which aspect the respective criterion was or was not fulfilled. The criteria for the decisions themselves are elaborated in varying degrees of detail, which is convenient from the point of their use
for different fields of study with diverse needs. However, such diverse criteria formulations incur the risk of inconsistent application.

The assessment of quality in higher education institutions in the Slovak Republic is within the responsibility the AC, the status of which is set in sections of Act on Higher Education dealing with the Commission’s competencies, operation, and independence. For its financing and administrative support, the AC is linked to the Ministry of Education, which limits the Commission’s flexibility. The complex accreditation performed by the Commission makes a provision for self-evaluation by the higher education institution. Based on the background materials and on site visits, together with other relevant information, the working group of the AC prepares an assessment report on the relevant activities of the higher education institution, including recommendations for improvements. After agreement from the AC, the Commission’s standpoint is published. Recently, the AC has started performing an internal evaluation of itself, and is preparing for an external assessment of its own activities and procedures.

The ESG Part 3 standards concerning quality assurance agencies have been implemented, in principle, in the Slovak Republic. However, several obstacles preventing full implementation of the ESG Part 3 standards have been discussed above. These obstacles concern above all the way in which members of the AC and its working groups are selected, and the preparation of certain rules and criteria in a way that will minimise their diverse application in practice. Similarly, the Commission’s recommendations are not systematically linked to an assessment of their fulfilment in the follow-up procedures.

In future, it will be necessary to address especially the question of developing internal quality assurance mechanisms for higher education institutions, and a system for monitoring and improving them in the context of the external system for quality assurance. Concerning the external assessment of higher education institutions, it is necessary to re-evaluate the present conditions in order to respond better to the missions and tasks of institutions, especially in the case of professionally-oriented higher education institutions. A judgement should be made on whether a system with a single AC, with members predominantly from the academic community, is still applicable for the diversifying system of Slovak higher education. It is also necessary to consider re-focusing the assessment criteria, which are at present aimed at fulfilment of minimum standards, to account for continual improvement of institutional quality processes, monitoring student progress, and harmony between the aims of degree programmes and student achievements. This might be undertaken from the viewpoint of the profile of a graduate, employment, and the knowledge and skills achieved. Finally, the status of the AC and its financing should be given further consideration, as should be the relation between the AC and the higher education institutions, and between the AC and the Ministry, especially as concerns potential conflicts of interest of the Commission’s members impacting on the independence of the Commission’s procedures.
CHAPTER 8

THE EUROPEAN STANDARDS AND GUIDELINES IN QUALITY ASSURANCE MECHANISMS IN THE CZECH REPUBLIC

Helena ŠEBKOVÁ

8.1. INTRODUCTION

The Bologna Process is approaching the closing year of its first stage, and the debate about developments beyond 2010 has become of high importance in setting national as well as international higher education agendas. For this reason, it is now appropriate to assess what has been done in the framework of the Bologna Process, to learn from successes, and also to recognise the problems and weaknesses. Quality assurance has been high on the Bologna agenda roughly since 2001, not least due to the visible and indisputable achievements of ENQA and its partners’ (E-4 Group) activities, primarily in elaborating the European Standards and Guidelines, the implementation of which by the national quality assurance agency in the Czech Republic is the subject of this chapter.

8.2. OVERVIEW OF NATIONAL HIGHER EDUCATION POLICY ON QUALITY ASSURANCE

8.2.1. Policy Documents and Setting

The main objectives of the national policy on higher education are formulated in the strategic policy document titled the Long-Term Plan for Educational, Scientific, Research, Development, Artistic and Other Creative Activities of Higher Education Institutions for 2006-2010 (the Long-Term Plan). The Ministry of Education, Youth and Sports (the Ministry) is obliged to develop the Long-Term Plan for a five-year period, to update it annually, and make it public, as required by Act No. 111/1998 Coll. on Higher Education Institutions (the Act). The Long-Term Plan follows a number of
national education policy documents\textsuperscript{1}, and it also reflects international developments, especially in the European context (Bologna Process) but also in the global context\textsuperscript{2}.

The annual updates of the Long-Term Plan enable a response to the dynamics of agenda setting, reflecting changes within the higher education area at national as well international level. At national level, these are primarily the reform principles set in the 2008 White Paper, the first draft of which is currently being submitted for wider discussion, and the new assessment rules for research and development recently approved by the Czech Government. From the international point of view, the Czech Republic’s presidency of the European Commission, the academic convent hosted by Charles University in Prague before the meeting of the Bologna ministers in April 2009, as well as the vision of the European Higher Education Area (EHEA) building beyond 2010 represent the most important issues influencing the Long-Term Plan for the next five years (starting from 2011). Last but not least, it is necessary to mention the activities of OECD, especially in consideration of the “Thematic Review of Tertiary Education” project. The OECD recommendations submitted through the so-called “Country Note” to the Czech Government will also play a significant role.

The Long-Term Plan requires that the Czech higher education system should be highly diversified and that it should “develop and make full use of the potential of individuals, prepare young people for entering the labour market and provide for their employability over the long term, educate active citizens who strive to build a democratic society, encourage graduates to pursue continuing education and learn throughout their lives, and further develop knowledge in a wide variety of disciplines” (Ministry, 2005). Similarly, high ambitions are also expressed both in the area of research and in the third mission of higher education, specifically as concerns cooperation with the business sector, the implementation of innovations, and the role of higher education institutions in promoting regional development as such.

8.2.2. Policy Objectives Regarding Quality in Higher Education

The objectives of the national policy on higher education quality assurance are formulated in the Long-Term Plan, stating, in a general sense, that successful implementation of policy priorities is conditioned by high quality of all academic

\textsuperscript{1} The National Programme for the Development of Education in the Czech Republic (the White Paper, 2001), the Strategy for the Development of Tertiary Education (2000-2006), the Outline of Higher Education Reform (2004) and its updated version (2005), as well as the Strategy for Economic Growth in the CR and National Research and Development Policy in the CR for 2004-2008. Recently, the Operational Programmes of the European Commission; the Operational Programmes Education for Competitiveness and Research and Development for Innovations are the most important tools supporting development of the national higher education policy.

\textsuperscript{2} Declarations, communiqués and other documents of the Bologna Process, documents of the EU policies (Lisbon Strategy), documents elaborated by the European Commission (e.g. the Role of Universities in the Europe of Knowledge (2003) and Mobilising the Brainpower of Europe: Enabling Universities to Make their Full Contribution to the Lisbon Strategy (2005)), as well as the OECD documents (e.g., Education at a Glance, and the outcomes of the multinational project Thematic Review of Tertiary Education).
activities contingent upon the development of a quality assurance system and a quality culture within higher education institutions. In the section entitled *Quality and Excellence of Academic Activities*, the Long-Term Plan conceptualises higher education quality more specifically as follows:

Evaluation of the quality of higher education institutions in line with international developments will facilitate the identification and promotion of the strengths of higher education institutions and their units. This will allow them to pursue excellence and competitiveness at European level, possibly, excellence at national level, which will guarantee progress in the relevant area, or contribute, in a considerable manner, to the development of the economy or other areas of national importance. The Ministry will support this development and dissemination of good practices. Support may be directed towards major research and development centres, implementation of successful degree programmes of all types as well as activities leading to the institution’s excellence at regional (national, international) level, important co-operation with clients interested in the results of higher education institutions, etc. The principle objective is to support all higher education institutions so that they may pursue top quality in activities where the future lies for them and where they are capable of achieving excellence. This relates to another objective, which is the maximum possible use of all capacities and resources, and no institution should be excluded from this development. This approach will make it possible for higher education institutions/faculties to shape their profiles and excel in the areas where they show major strengths (Ministry, 2005).

Taking institutional self-evaluation as a point of departure, the underlying assumption of the Long-Term Plan is that such improvement-oriented self-evaluation of institutional activities helps in attaining institutional excellence along the lines set in the mission statement (statute) and further elaborated in the institutional long-term plan. Promoting institutional diversification in this way, the Long-Term Plan also emphasises the importance of assuring the quality of studies by external evaluation processes, complemented by internal evaluations at institutional level, stating that, “in order to ensure the quality of studies a system of comprehensive external evaluation will be gradually built in addition to systematic support for internal evaluation of institutions. The system will expand the evaluation carried out by the Accreditation Commission” (Ministry, 2005). Overall, the Long-Term Plan states that the internal quality evaluation system of individual higher education institutions as a “generally acknowledged prerequisite for external quality evaluation, which is an integral part of quality assurance systems and may be carried out by various institutions including international ones (e.g., EUA, professional associations)” (Ministry, 2005), is an important instrument for improving the quality of the whole higher education system, and is also essential for institutional governance and for the development of an institutional quality culture.

As regards external quality evaluation processes, the Long-Term Plan only briefly states that they serve the purposes of both accreditation and ongoing improvement of all activities provided by higher education institutions. To that end, it mentions explicitly the responsibilities of the Accreditation Commission, as the agency legally responsible for external quality assurance, in conjunction with the outcomes of the project “Evaluation of Quality of Higher Education Institutions”, which was undertaken by the
Centre for Higher Education Studies with the aim to clarify methodological issues regarding internal quality assurance and pilot testing of external evaluation, leading to improvements in institutional activities. International developments within the quality assurance domain are reflected in the obligation that the Ministry support the implementation the European Standards and Guidelines (ESG) elaborated by the European Network for Quality Assurance in Higher Education (ENQA) and its partners (see further).

As the statement of priorities and goals in the Long-Term plan comes with the corresponding system-level tools, in the field of quality assurance the Long-Term Plan refers to support for quality assurance activities by the development programmes of the Ministry, and emphasises that the Ministry will disseminate examples of good practice in this field achieved by higher education institutions. The content of the Long-Term Plan as a major strategic policy document thus suggests that, unlike internal evaluation procedures, implementation of the system-level quality assurance policy in Czech higher education is the legal responsibility of the Accreditation Commission (the AC), with the Act stipulating obligatory regulations in quality assurance, including the stipulation of the AC’s rights and responsibilities (the AC’s policy mandate). The organizational rules of the AC’s activities are detailed in the AC’s Statute.

8.2.3. Control of Quality Assurance Processes

As suggested, the most important actor in the field of external quality assurance is the AC. Its basic mandate is given by the Act, as “the Accreditation Commission takes heed to the quality of higher education and performs a comprehensive evaluation of educational, scholarly, research, developmental, artistic or other creative activities of higher education institutions” (the Act, 1998, §84). The competencies and responsibilities of the AC include both basic rationales of quality assurance, i.e. accountability (accreditation, state permission) and quality improvement (evaluation of higher education institutions/faculties). In accordance with §84 of the Act, the activities of the AC can be grouped as follows:

a) To care for the quality of higher education in general, i.e. to evaluate all activities carried out by higher education institutions, give recommendation for improvements, and publish the evaluation results. In response to the request of the Minister, to assess issues concerning higher education and to express an appropriate expert standpoint;

b) To express an expert standpoint concerning requests for the accreditation of study programmes, for authorization to carry out procedures for habilitation and for the appointment of professors, for the granting the state permission to

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3 The Ministry coordinates and funds the development programmes based on the priorities set in the Long-Term Plan and its annual updates. Higher education institutions are invited to submit projects which reflect the programme priorities, broad enough to enable institutional development strategies to work, declared by the Ministry every year.
operate a private higher education institution, for determining the type of higher education institution, and for establishing, merging, amalgamating, splitting or dissolving a faculty of a public higher education institution.

The improvement-driven activities listed under a) are initiated mostly by the AC. The accountability-driven activities listed under b) lead to a decision. The AC itself has only limited decision-making power, deciding only on the type of institution (typically approval of a new institution). As concerns faculties (establishment, merger, amalgamation, splitting, or dissolution), the decision is within the responsibility of the academic senate of the higher education institution, while the standpoint of the AC is a necessary precondition.

To decide on the accreditation of a degree programme, authorization to conduct procedures of habilitation, and appointment of professors, as well as to grant state permission to establish a private higher education institution lies within the responsibility of the Ministry. In all cases, the Ministry is bound by the expert standpoint of the AC, and not allowed to grant accreditation in case that the standpoint of the AC is negative. Thus, the quality assurance responsibility is shared between the AC and the government authority, represented by the Ministry, which is attributed with a number of decision-making powers (Kohoutek et al., 2006), while responsibility for internal/institutional quality assurance is retained by the higher education institutions themselves.

8.2.4. Areas Covered by Quality Assurance

The organization of external quality assurance is essentially national in scope, and the AC’s activities cover the whole higher education system, i.e. they are applicable to types of higher education institutions differentiated on the basis of the level of degree programmes (higher education institutions of university and non-university type), and also to all types of higher education institutions as determined by their founder (public, state, and private institutions). The evaluation procedures leading to a decision on accreditation of a degree programme, authorization of habilitation procedures, procedures for the appointment of professors, and state permission to establish a private higher education institution are all obligatory. Improvement-oriented evaluations (evaluations of institutions and/or of accredited activities) are based on a selection made by the AC with regard to findings from accreditation-based procedures.

The scope of the AC’s activities is complemented by some supranational elements. These are for example EUA evaluation (undertaken by several Czech higher education institutions), US accreditation of Faculties of Medicine, professional evaluation of higher education institutions focusing on veterinary medicine, agriculture, economics,

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4 In the Czech Republic, to be a professor and/or docent (associate professor) means to achieve an academic title that is valid for ever; it is not a job position. The procedures are demanding, requiring the approval of high qualification and quality of the candidate in both teaching and research. The procedures are described in detail in the Act, i.e., at national level.
and business, involvement of faculties of technology in the FEANI\(^5\) quality procedures, etc. International evaluation activities are voluntary, and are mostly improvement-driven (except, as a rule, for professional evaluations usually resulting in the award of a certificate).

8.2.5. Procedures of Quality Assurance

8.2.5.1. Procedures of Internal Quality Assurance

Briefly, the Act sets the basic requirements for internal quality assurance as to develop the internal quality assurance system, to evaluate the quality of institutional activities regularly, and to make the results of evaluations public through the annual report of institutional activities. The Act further requires that details on internal evaluation processes are included in institutional internal regulations. Up to now, developments pertaining to internal evaluations of higher education institutions have not been considered fully satisfactory. The situation “varies from some cases of well-organized systems to only formally applied procedures of a non-systemic and short-lived nature, as represented by student evaluations of tuition and infrastructure-related issues” (Kohoutek et al., 2006). Presentations and discussions of institutional internal quality-related measures at the national seminar on quality assurance and evaluation, held annually, have revealed that the EFQM Excellence Model, ISO 9000 standards and a number of other models have already been implemented at some institutions. A drawback of developments is that, due to the high diversity and non-comparability of the outcomes, the models, from a system perspective, can scarcely be used as a “generally acknowledged prerequisite for external quality evaluation, which is an integral part of quality assurance systems” (Ministry, 2005).

8.2.5.2. Procedures of External Quality Assurance

The most important, system-wide procedure for ensuring the minimal standards of higher education is accreditation of degree programmes. Each degree programme, no matter if it is provided by a public, state, or private higher education institution\(^6\) has to be accredited. Accreditation is awarded by the Ministry for a limited period of time – for at most twice the standard length of the period of study\(^7\), or ten years in the case of doctoral degree programmes. The Act stipulates that the Ministry shall

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\(^5\) European Federation of National Engineering Associations.

\(^6\) The Czech higher education system is composed of public, private, and state (only University of Defence and Police Academy) higher education institutions. All higher education institutions can be of university or non-university type. University type higher education institution can provide all three levels of degree programmes (Bachelor, Master, doctoral). A non-university type higher education institution is expected to provide mostly Bachelor programmes. It can provide Master programmes, but it is not allowed to offer doctoral study programmes.

\(^7\) The standard length of study is expressed in academic years, pertaining to an average study load (the Act, 1998).
not award accreditation if the AC’s standpoint is negative. Other reasons for not granting accreditation stipulated by the Act are: insufficiently qualified staff members (not sufficient qualification relevant to the level of the degree programme in question); insufficient financial, material or technical resources; or incorrect data presented in the application for accreditation.

The private higher education institutions are still “new elements” in the Czech higher education system, as their establishment has been possible only since 1998, when the Act came into force. In this respect, the main purpose of the state permission, obligatory for all private entities who intend to run a private higher education institution, is to ensure the same quality standards for the public and private sector of the higher education system. State permission is awarded by the Ministry, and, as in case of accreditation, the Act binds the Ministry to follow the AC’s expert standpoint, as “the Ministry shall not grant the state permission if the AC’s expert view regarding all degree programmes is negative” (the Act, 1998, §39).

Before granting state permission, the Ministry shall assess the financial, material, personnel and information resources for the activities of a private higher education institution seeking establishment, and also the proposal of the institutional long-term plan, the design of internal regulations, and other relevant issues. It is important to mention that though seemingly cumbersome, the accountability-driven measures, i.e. accreditation and the state permission, have played a significant role in the “introduction of Czech private higher education institutions without experiencing some of the serious problems of academic quality and integrity that seem to have beset other countries in Central and Eastern Europe” (File et al., 2006).

The two accountability measures – granting accreditation and state permission – are not ultimate and irreversible acts (Kohoutek et al., 2006). The AC (in the case of accreditation) or the Ministry (in the case of state permission) can invite the institution to deal with inadequacies found in an application for accreditation/state permission. After making the improvements, the higher education institution or the legal entity which intends to establish such an institution is free to apply again (ibid.).

The AC may suggest withdrawing the accreditation in cases when it identifies problems or shortcomings in providing accredited activities. However, the withdrawal of accreditation is not a strict and sudden act. The AC can suggest that the Ministry should restrict the accreditation in the sense of a ban on admitting new applicants. In the next step, the AC can propose temporary termination of accreditation, which means a ban on performing state examinations and awarding academic degrees. Only as a final step, in cases when the AC’s recommendations are not followed, does the AC propose the withdrawal of accreditation. In all instances, if the AC’s requirements are acted upon with the prospect of improving on the threshold criteria, the AC invites the Ministry to cancel the restrictive measures.

Improvement-driven quality assurance processes have been developing in recent years. The AC working programme includes the evaluation of private higher education institutions, faculties of public higher education institutions (the first evaluation of a whole public higher education institution was planned for the second half of 2008) and of accredited activities provided by both public and private higher
education institutions with the aim to provide recommendations for improvement. The improvement-oriented external evaluations of institutions provided by the AC are based on the AC's invitation to the institution to undergo an evaluation process. In principle, this is not an obligatory procedure along the lines of the Act, however, in reality, once the institution has been selected, it cannot say no. Currently, the selection of institutions for external evaluation is usually based on evidence suggesting difficulties in maintaining the threshold quality standards, as identified in the accreditation procedures.

8.2.6. **Uses of Quality Assurance**

In general, there would probably be quite a high level of agreement among Czech higher education stakeholders on the multi-dimensionality of the quality concept in higher education, suggesting that it could be applied to many purposes regardless of the specificity of the institution, and that insufficient information on such a purpose to the institutional staff might result in misunderstanding of the purpose of quality evaluation, leading to scepticism toward the possible benefits of its results (Šebková et al., 2005). Similarly, widespread agreement can also be found for putting quality activities in context, for the purpose of evaluation supplemented by clearly defined and published possible benefits for the higher education institution and its stakeholders (ETF, 2000).

The purpose and effects of programme accreditation (and similarly the authorization to provide habilitation procedures and procedures for the appointment of professors) are clearly defined in the Act and are publicly available. The expectation is that most of the academic community, including students, are informed about accreditation-based processes including measures when not granted. This may not be the case for other stakeholders, though, who may not be sufficiently interested to read the AC website, which is, in fact, the only medium containing information on the outcomes of the AC's procedures. At this point, it seems appropriate to mention other consequences of programme accreditation. The restrictions made by the Ministry in the event that the AC expresses a negative standpoint, i.e. a ban on the admission of new applicants or termination of the accreditation, have direct implications for the institutional budget. A significant part of the institutional budget is allocated on the basis of formula funding. Hence, if there is a non-accredited degree programme, the institution is not allowed to admit students and the institutional budget is commensurately decreased (cf. Schwarz, Westerheijden, 2004a).

The use of outcomes resulting from an evaluation of accredited activities or from an evaluation of the institutions is, as a rule, not quite clear, because the purpose of these evaluations is not fully explicit. An evaluation of the accredited activities of a higher education institution, in particular, is theoretically an improvement-driven activity, but the results may cause the AC to suggest that the Ministry take restrictive measures regarding the relevant accredited activity. The situation is less complicated in the case of evaluations of institutions, the main results of which are
recommendations for improvements. However, these results may also influence the expert standpoint of the AC if the institution in question intends to apply for accreditation of a degree programme (or accreditation of the habilitation procedure or the procedure for the appointment of professors). In dealing with these issues, the OECD experts argue that “[it] has been shown that, broadly speaking, quality assurance procedures can serve two major purposes: accountability and improvement. From the perspective of tertiary education systems as a whole, both purposes are essential” (Tremblay, Kis, 2008). From the Czech perspective, it can be argued that the national quality assurance system fits these arguments quite well, but it would still be helpful to have a context-bound debate among Czech stakeholders to make the purposes of these two underlying rationales clearer nationwide.

As concerns the internal evaluation processes of higher education institutions, higher education institutions are completely free to decide about the use and the consequences of the results. This is in line with the policy expectation that the internal processes will be mostly improvement-driven, and they will, first of all, serve the institution itself. On the other hand, it is required that the results of internal evaluations should be made public through the annual reports on institutional activities. Nonetheless, the relevant viewpoint of the OECD experts reminds us that “international experience suggests that self-evaluation is most effective in achieving improvement if institutions are not required to publish self-review reports (and self-review reports cannot be used by those outside to make judgements on the institutions)” (File et al., 2006). Different viewpoints regarding reporting on the outcomes of institutional quality procedures may again be useful for opening a nationwide debate on this issue.

8.3. THE ACCREDITATION COMMISSION AND ITS ACTIVITIES (2004-2008)

In the field of external evaluation, the AC established relevant procedures at national level already in 1990, following the stipulations of Act No. 172/1990 Coll. From its establishment until 1998, the AC primarily conducted external comparative evaluations of faculties of higher education institutions on the basis of peer reviews, resulting in recommendations for improvements. The AC’s positive expert view was necessary for the approval of new doctoral degree programmes and also for the establishment of a new faculty. Even if the AC did not have a strong decisive power during this period (1990-1998), its recommendations were considered very seriously, and its prestige at that time was quite high (Vinš, 2004). The competencies and responsibilities of the AC were considerably extended by the 1998 Act (as explained in Section 2), to make the AC the only external body responsible for external quality assurance of Czech higher education.

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8 1 September 1990.
8.3.1. **AC Composition and Internal Rules of Activities**

The Act requires the AC be an expert and independent body, and determines the AC’s composition and the procedure for the appointment of its members. With the expenses covered from the budget of the Ministry and organizational support provided by the Secretariat, the AC is composed of twenty-one members, appointed by the Czech government on the basis of a proposal by the Minister. The Minister is obliged to discuss the proposal for nomination with the representative bodies of higher education institutions (the Czech Rectors’ Conference and the Council of Higher Education Institutions), the Research and Development Council, and the Academy of Sciences of the Czech Republic. It is expected that the AC members “are irreproachable persons enjoying general authority as experts” (the Act, 1998, §83). They are appointed for a six-year term with the possibility of one re-appointment. To prevent conflicts of interests, the Act requires that the members of the AC should not be academic officials, i.e. rectors, vice-rectors, or deans.

The Act further determines the basic activities of the AC, as already mentioned in Section 2. The Statute, which is approved by the Czech Government, extends the Act’s provisions regarding the AC’s activities and fixes the main elements of the evaluation procedure used both for evaluation of institutions and for evaluation of accredited activities. In addition, the Statute determines the scope of authority of the chair, the vice-chair, and the AC members, the tasks and responsibilities of the Secretariat, and the organizational rules of the AC’s work. Another part of the Statute refers to the work groups of the AC. In accordance with the Act, the AC Statute distinguishes two types of work groups which the AC is authorised to establish. These are standing work groups “the composition of which must correspond to the type of study programme, its form and objectives of studies” (the Act, 1998, §83), and special work groups established “for the evaluation of institutions or for consideration of other issues concerning higher education, which cannot be examined by permanent work groups” (Statute, 2004, Art. 9).

The individual members of the AC are selected with the aim that their qualifications cover all study fields provided by higher education institutions. The majority of the twenty-one members are academics from public higher education institutions of university type (12), five of them are experts from the Academy of Sciences of the Czech Republic, and three members represent foreign higher education institutions (Eben-Karls-Universitaet Tuebingen, Fachhochschule Wiesbaden, Vysoká škola Zitava), while only one member comes from outside academia (from ŠKODA AUTO company). The composition of the AC changes in accordance with the terms of appointment of the individual members and/or with the other legal rules (eg, when a

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9 The Secretariat of the AC, responsible for supporting the AC in administrative, organizational, technical and financial matters, operates as a section of the Research and Higher Education Department within the Ministry. Currently composed of four members, the AC’s Secretariat is directed by the Secretary of the Commission, who is appointed and dismissed by the Minister upon a proposal of the Commission’s Chair (Statute, 2004).
A member of the AC is appointed to the position of rector, but a lack of experts from outside higher education and academic research has been a characteristic of the AC’s composition since its establishment. The involvement of experts from abroad in the AC’s activities faces limitations due to the language-barrier issue, also well-known in other countries than the Czech Republic. To involve experts of Czech origin living outside the country but speaking Czech language, seems to be, to some extent, a solution, though with certain limitations (currently all foreign experts come from Germany).

The standing work groups\(^{10}\) are composed of specialists in the particular study field (field of accredited activities), and they are chaired by an expert who is an AC member. The AC itself and the work groups are composed mostly of members from academia, and only a minority of AC or work group members represent other higher education stakeholders (employers, students) or come from abroad. Table 19 shows that the situation has been changing only very modestly in this sense since 1999.

<table>
<thead>
<tr>
<th>Year</th>
<th>HEIs</th>
<th>Academy of Sciences</th>
<th>Other institutions</th>
<th>Foreign members</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>1999</td>
<td>146</td>
<td>21</td>
<td>19</td>
<td>9</td>
<td>186</td>
</tr>
<tr>
<td>2000</td>
<td>171</td>
<td>20</td>
<td>14</td>
<td>6</td>
<td>205</td>
</tr>
<tr>
<td>2001</td>
<td>171</td>
<td>20</td>
<td>15</td>
<td>5</td>
<td>205</td>
</tr>
<tr>
<td>2002</td>
<td>166</td>
<td>21</td>
<td>15</td>
<td>6</td>
<td>208</td>
</tr>
<tr>
<td>2003</td>
<td>172</td>
<td>21</td>
<td>13</td>
<td>6</td>
<td>206</td>
</tr>
<tr>
<td>2004</td>
<td>176</td>
<td>21</td>
<td>14</td>
<td>5</td>
<td>211</td>
</tr>
<tr>
<td>2005</td>
<td>177</td>
<td>23</td>
<td>15</td>
<td>5</td>
<td>220</td>
</tr>
<tr>
<td>2006</td>
<td>191</td>
<td>23</td>
<td>20</td>
<td>7</td>
<td>241</td>
</tr>
<tr>
<td>2007</td>
<td>194</td>
<td>23</td>
<td>21</td>
<td>6</td>
<td>242</td>
</tr>
</tbody>
</table>


An important change came in 2007 with the closure of the standing work group for higher education institutions of non-university type. The AC decided that this group had fulfilled its mission during the time from 1999, consisting first of all in elaborating the methodology for evaluating these institutions (Akreditace komise, 2007). The experience proved that higher education institutions of non-university type should not be considered an independent part of the higher education system, but that they should be evaluated within the context of the system as such. The AC expects, as indicated in the annual report, that the knowledge of the experts who composed this group will be used when evaluating non-university institutions within the improvement-oriented AC procedure.

\(^{10}\) The AC had 21 standing work groups in 2007.
8.3.2. Scope of Activities

As suggested by the competencies and responsibilities with which the Act mandates the AC, the range of activities that the Commission performs is considerable. The activities of the AC can be grouped into several categories, as follows:

- evaluation of higher education institutions;
- elaboration of standpoints on applications for accreditation;
- elaboration of standpoints on applications for granting state permission;
- elaboration of standpoints on the establishment/division of faculties, for setting the type of higher education institutions;
- preparation of documents and conceptual materials;
- collaboration with external partners at both national and international level;
- implementation of the Bologna Process principles, namely ENQA standards.

The AC is authorised to require from the Ministry and also from public, state, and private higher education institutions (and their parts) the necessary information, documentation and co-operation for accomplishing its obligations (Statute, 2004, Art.1). The Statue further requires that the AC members meet at least three times a year. In practice, there are five to six meetings annually.

8.3.3. Accountability-driven Activities

Within its general responsibility for ensuring quality of the whole higher education system, the AC undertakes a number of the accountability-driven procedures on the basis of which the relevant Ministerial decisions are taken. In the scope of the AC’s activities, accountability-driven quality assurance processes (see also 2.3b) have prevailed in recent years. The main reasons have been the expansion of the higher education system, resulting, among other things, in the accreditation of a multitude of new degree programmes, the corresponding programme diversification (implementation of the Bologna structure of degree programmes), as well as institutional diversification as a result of the rapid development of private higher education.

8.3.3.1. Accreditation of Degree Programmes

In this sense, the most important part of the AC activities has been the elaboration of standpoints on applications for the accreditation of degree programmes. The process of accreditation of a degree programme starts with the application submitted to the Ministry by the rector or the relevant authority of the educational institution\(^\text{11}\). The

\(^{11}\) Accreditation of a degree programme may be requested by legal entities with domicile in the Czech Republic undertaking educational, scholarly, research, developmental, artistic or other creative activities. Such a request is made together with a higher education institution (the Act, 1998, §81).
obligatory basic content of the application is given by the Act. In addition to a detailed description of the programme, the application should include information about staff; financial, material, and technical provisions; the rationales and objectives of the programme; and the expected number of applicants. Further details of the application are set by the decree of the Ministry (prepared in collaboration with the AC)\textsuperscript{12}. The Secretariat of the AC processes all applications into the proper form and publishes recommendations (detailed instructions) on how to make a proper application, with the aim to facilitate the work of the applicants (and its own work). On receiving the application, the Ministry is obliged to ask the AC for its expert standpoint. The relevant standing work group has the responsibility to assess the curricular content as well as the personnel and material resources for the programme, and to pass its view to the AC for consideration and final assessment. As the last step of the process, the Ministry awards accreditation or, in accordance with an explicit list of reasons (given in the Act) for possible refusal of accreditation, it decides negatively. As already mentioned, the decision is not necessarily final and conclusive. Improvements can be made, and the applicant is free to resubmit the application (Kohoutek et al., 2006).

The steadily increasing number of applications for accreditation of study branches at both Bachelor and Master level (for explanation why study branches rather than programmes see further down this paragraph), as shown in Tables 20 and 21, is the response of higher education institutions to the implementation of the three-level study structure in accordance with the principles of the Bologna Process. The Bologna Process also accounts for the decreasing number of applications for "long" Master programmes. Currently, these can be offered only in fields where the Bc./Ma. structure is not recommended by the AC, such as in the fields of medicine, veterinary medicine, and several others (law, education). As regards doctoral degree programmes, Table 22 shows that the number of applications has recently increased rapidly, especially due to the fact that the Act amendment from 2006 also enabled the design of doctoral degree programme four years in length, instead of three years (former practice). This change has met with a positive response from higher education institutions.

\textsuperscript{12} The decree describes the administrative procedure for submitting the application, lays down the requirements for the each level of the programme (Bachelor, Master, doctoral), and requires the submission of documents on the institution's potential to deliver the programme. The decree also requires the application to include a statement on the development of the programme and the expected profile of its graduates. The last part of the decree deals with re-application for accreditation.
Table 20. Accreditation of Bachelor programmes

<table>
<thead>
<tr>
<th>Bachelor Programme Level</th>
<th>Study Branches of Bachelor Programmes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Year 2004</td>
</tr>
<tr>
<td></td>
<td>Positive</td>
</tr>
<tr>
<td>Application for Accreditation</td>
<td>79</td>
</tr>
<tr>
<td>Application for Extensions of Accreditation</td>
<td>83</td>
</tr>
<tr>
<td>Application for Widening of Accreditation</td>
<td>77</td>
</tr>
<tr>
<td>Proposals to limit Accreditation</td>
<td>15</td>
</tr>
<tr>
<td>Joint Accreditation with TPS</td>
<td>9</td>
</tr>
</tbody>
</table>


Table 21. Accreditation of Master/continuing Master programmes

<table>
<thead>
<tr>
<th>Master Programme Level</th>
<th>Study Branches of Master Programmes/Continuing Master Programmes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Year 2004</td>
</tr>
<tr>
<td></td>
<td>Positive</td>
</tr>
<tr>
<td>Application for Accreditation</td>
<td>4/53</td>
</tr>
<tr>
<td>Application for Extensions of Accreditation</td>
<td>98/41</td>
</tr>
<tr>
<td>Application for Widening of Accreditation</td>
<td>33/43</td>
</tr>
<tr>
<td>Proposal to Limit Accreditation</td>
<td>28/3</td>
</tr>
</tbody>
</table>


Table 22. Accreditation of doctoral programmes

<table>
<thead>
<tr>
<th>Doctoral Programme Level</th>
<th>Study Branches of Doctoral Programmes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Year 2004</td>
</tr>
<tr>
<td></td>
<td>Positive</td>
</tr>
<tr>
<td>Application for Accreditation</td>
<td>20</td>
</tr>
<tr>
<td>Application for Extensions of Accreditation</td>
<td>7</td>
</tr>
<tr>
<td>Application for Widening of Accreditation</td>
<td>15</td>
</tr>
<tr>
<td>Proposals to Limit Accreditation</td>
<td>4</td>
</tr>
<tr>
<td>Joint Accreditation with Institute of AS CR</td>
<td>22</td>
</tr>
</tbody>
</table>


The AC’s annual report for 2007 states that the AC issued a total of 1,603 standpoints regarding degree programmes, out of which 1,493 were positive and the
remainder were negative. In the case of a negative assessment of the application, the AC
clearly described the weak points, which helped the institution to make the necessary
improvements. The degree programmes of Czech higher education institutions are
mostly designed very broadly, and they are composed of a number of study branches.
In this regard, the experience of the AC suggests that, as a rule, only one, or at most, a
small number of particular study branches do not fit the AC requirements, while the
rest of the programme meets the accreditation criteria. The consequence is that the AC
standpoints consider particular study branches rather than a degree programme as a
whole. This measure may prevent the problem of institutions being asked to submit
applications repeatedly. On the other hand, the AC’s assessment goes deeply into
details, which is questionable, and makes the AC’s workload quite considerable (as
documented by the data presented in Tables 20-22).

8.3.3.2. Accreditation of Habilitation Procedures and Procedures for
the Appointment of Professors, Standpoints on Faculties
In principle, the processes leading to the accreditation of procedures of habilitation and
procedures for the appointment of professors—i.e. application, assessment of the
application, and approval—are based on the same principles as programme
accreditation. The AC statistics show that standpoints on applications for accreditation
of the habilitation procedure and the procedure for the appointment of professors were
issued approximately 40 times a year during the time period 2004-2006. 2007 was an
exceptional year as concerns the number of standpoints issued. The recommendation
made by the AC in 1999 on the accreditation of both procedures was to award
accreditation for four or eight years. As a consequence, most accreditations needed to
be extended in 2007, and the AC therefore elaborated 1,118 standpoints in that year,
out of which only twenty-one were negative. The negative standpoints were issued
mostly on grounds of an inadequate number of research publications.

As regards the standpoints on applications for the establishment of a new faculty,
several new faculties were established between 2004 and 2007; in some cases, the
application was turned down, and a positive standpoint was given only after removal of
shortcomings. Applications for a change in the type of institution were submitted by
private non-university institutions applying for university status. The AC agreed only in
two cases, while three other applicants were recommended to reconsider their
application and possibly apply again.

8.3.3.3. State Permission
The request to grant state permission should be elaborated in accordance with the Act
and submitted to the Ministry. The Ministry assesses the overall ability of a private entity
to run an institution of higher education, and it asks the AC for a standpoint on all of its
degree programmes (ex-ante accreditation). The Ministry grants state permission only if
all requirements of the Act are fulfilled.

The AC members put significant effort into elaborating standpoints on the
applications of private entities who ask for permission to establish a private higher
education institution. From 1999 to 2004, thirty-six private higher education institutions were established. New applications were also submitted during the 2004-2007 period. In 2004, the AC received four applications and approved two of them. In 2005, there were seven applications out of which three were found acceptable. During the next two years (2006-2007), eighteen applications were submitted (nine each in 2006 and 2007), but the success rate was not high – only four applications were evaluated positively in 2006, and three in 2007. The relatively high number of applications indicates that the development of the private sector of higher education has not yet been finalised.

Applications were turned down mostly on the basis of insufficiently qualified human resources. The AC formulates for each applicant the rationales and reasons for its standpoint. Some applicants take their aims very seriously and, in spite of initial failure, are willing to re-apply, even several times, until they are successful. As an example, the Higher Education Institution of Tourism and Territorial Studies applied for state permission in 2006, in March 2007 and again one month later. In April 2007, it finally received a positive standpoint from the AC.

Summing up Section 3.3, it is fair to state that the AC, having in mind the high demands that accountability-oriented procedures place on institutions, has elaborated a number of instruments (documents) which serve primarily to reduce the administrative burden. The most important of these are the AC’s criteria for assessment of joint-degree programmes, requirements related to applications for accreditation of degree programmes in health, requirements related to applications for accreditation of degree programmes taught in foreign languages, and general requirements related to applications for accreditation. All these documents are available on the AC’s website.

8.3.4. Improvement-driven Activities

8.3.4.1. Evaluation of Institutions

The AC has been involved in improvement-evaluation processes since its establishment on the basis of the stipulations of the 1990 Higher Education Act. Since 1992, “it has conducted external evaluation of HEIs on the basis of peer reviews and comparative evaluations of faculties and related fields of study” (Accreditation Commission, 2004). Since 1998, due to the responsibilities consisting, first of all, of expert standpoints on the accreditation of all degree programmes and on state permission for private higher education institutions, the AC has been involved only to a limited extent in pursuing improvement-oriented activities. In the recent years, however, these activities have returned to the regular AC agenda.

The evaluation activities of the AC focus on evaluations of institutions or on evaluations of accredited activities. The Statute sets the basic steps of the evaluation method (Statute, 2004, Art.3). The subject of the institutional evaluation can be a higher education institution or a part of a higher education institution (a faculty). The process starts with the selection of the evaluated subject (a higher education institution or several institutions/faculties providing accredited programmes in similar study fields), and with the authorisation of the AC members responsible for the whole evaluation process (formation of a special work group). The evaluation procedure as such is
The following steps are, as a rule, standard parts of the evaluation procedure:

- notification to the Rector, dean or director of a higher education institution of the fact that the institution has been chosen for evaluation by the Accreditation Commission;
- elaboration of requirements concerning information used for the evaluation of the higher education institution. This is submitted to the head of the higher education institution to be evaluated, with a request to complete the questionnaire (self-evaluation report);
- elaboration of the information by the special work group;
- expression of the opinion of the evaluated higher education institution’s head concerning the composition of the special work group;
- visit of at least three members of the special work group to the evaluated higher education institution;
- elaboration of recommendations and conclusions from the evaluation carried out by the special work group and discussions with representatives of the evaluated higher education institution about these recommendations and conclusions;
- submission of recommendations and conclusions to the Accreditation Commission;
- acceptance of recommendations and conclusions related to the evaluated higher education institution by the Accreditation Commission with the participation of its representatives (Accreditation Commission, 2004).

The main results of the evaluation – the recommendations supplemented by the views and comments of the representatives of the evaluated institution – are submitted to the Ministry and published.

8.3.4.2. Evaluation of Accredited Activities

The AC explains that the main aim of the evaluation of accredited activities is to find out whether the institution selected for evaluation has in reality kept the promises made at the time of accreditation (Accreditation Commission, 2005). Responsibility for the evaluation is in the hands of the special work groups established for this purpose. This type of evaluation concentrates preferably on accredited degree programmes, research and development connected with teaching activities, as well as human and material resources available for the programme. Further issues considered are the number of students, students’ diploma theses, profile of graduates, a summary of obligatory and optional courses offered, etc. The AC has prepared a detailed questionnaire (used in various modifications) with explanatory notes to facilitate the process for the evaluated institutions. At the same time, it is stressed that the content of the questionnaire/form should be taken as a recommendation, not as a strict obligation. To this end, institutions
are invited to elaborate the text on their own, though the range of issues in the questionnaire should be adhered to. In order to evaluate the accredited activities, the AC also asks for additional documents, especially internal institutional regulations regarding studies and examinations, the annual report on institutional activities, and the learning materials used for both face-to-face and distance mode of study.

The AC’s plans and the time-schedule of the evaluations of the accredited activities are not related to the time period for which accreditation for the degree programme was awarded. This means that AC-initiated external evaluations can be undertaken at any time, independently from the process of accreditation of degree programmes. As concerns the results of these evaluations, the problems and deficiencies identified may influence the expert view on an application to extend accreditation of the programme. Negative results of the evaluation can also lead to a proposal to the Ministry to impose restrictions on the accreditation. Overall, therefore, the evaluation of accredited activities is a mixture of accountability-driven and improvement-driven processes.

8.3.4.3. SUMMARY OF EVALUATION ACTIVITIES

The AC itself states that although the demand for expert standpoints issued for various reasons (especially for programme accreditation and for state permission to run a private higher education institution) has not been decreasing significantly, evaluation of institutions and of their accredited activities has become a more important part of its work in recent times. In 2004, four private higher education institutions were selected for an evaluation of their accredited activities, while two private higher education institutions and three faculties in the field of economics underwent an institutional evaluation. In 2005, the AC focused on evaluating the accredited activities of two private higher education institutions, on evaluating five faculties of theology of public higher education institutions, and on evaluating one private higher education institution. The widening scope of evaluation activities continued in 2006, with eleven evaluations, including institutional evaluations as well as evaluations of accredited activities. To cover all these activities, the AC established six special work groups. The findings and recommendations of all evaluations made by the work groups were discussed at the regular AC meetings, and the final results were published through the annual report on AC activities in 2006. The 2006 annual report explains that the importance of improvement-oriented evaluations within the AC’s procedures is growing all the time, for various reasons. These reasons include the increasing number and size of private higher education institutions. Another important reason is the gradual implementation of the principles of the European Standards and Guidelines (ESG), discussed in greater detail in Section 4. In 2007, the AC evaluation activities comprised twelve evaluations focusing on cross-sectional evaluations of faculties operating in similar fields of study (agronomy and transport), and evaluations of independent parts of higher education institutions located outside the main campuses (branch faculties). The increasing depth

13 All located at public higher education institutions.
and complexity of these evaluations can be documented by the establishment of eighteen special work groups responsible for these processes. Similarly as in the previous year, the AC argues that the evaluations are very important in the light of the principles recommended by the ministerial communiqués of the Bologna Process and the ESG. The evaluation outcomes and all the recommendations are clearly summarized in the AC’s annual reports, and are therefore publicly available.

In order to provide an insight into the outcomes of the AC’s evaluations, the findings from the evaluation of the faculty of transport of one regional public university are given. Following the evaluation procedure, the faculty’s identified strong points were: good collaboration with partners from industry, close orientation on railway transport, and the establishment of a new department offering courses until 2007 also to other faculty departments. As concerns the weak points, the AC was not satisfied with the human resource development based on qualified personnel coming from Slovakia after the splitting of the country in 1993 (until that time transport-oriented higher education had been provided only in Slovakia). Similarly, difficulties in recruiting regional industry experts were also noted. In the final evaluation report, the AC took into consideration that the faculty leadership was aware of these weak points, and was seeking an acceptable solution.

8.3.5. Other Activities

From 2007 onwards, the AC activities seem to have started on a new trend. First of all, there has been a focus on preparing various conceptual documents for discussion, e.g. on new standards for evaluating applications for accreditation of doctoral programmes, not only within the AC itself but also within the Czech Rectors’ Conference and the Council of Higher Education Institutions14; and with the Ministry on decree regulations pertaining to accreditation of degree programmes.

Significant developments can also be seen in the field of international involvement of the AC. The AC continued its membership in CEEN, ENQA, and INQAAHE throughout the period (2004-2007), and the influence of ENQA-associated activities in the framework of the Bologna Process has become more visible and more challenging. Implementation of the ESG relates directly to the internal evaluation of the AC organised in 2006, and is discussed in Section 4. At this point, it is appropriate to mention the long-term collaboration between the AC and the Accreditation Commission of the Slovak Republic. The Czech and Slovak commissions were both established as early as 1990, when the Czech and Slovak Federal Republic was in existence, and they worked under the same legal regulations until 1993. Sharing of experience gained from carrying out quality assurance procedures in both countries

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14 The collaboration of the AC with the Czech Rectors’ Conference and with the Council of Higher Education Institutions involves inviting the chairs of these bodies to participate in regular meetings of the AC. Collaboration with the Ministry has continued for years, and both sides consider it useful. Broadly, this also applies to the AC’s collaboration with the Ministry of Health, the Ministry of Defence, and the Ministry of Internal Affairs on discussing the design of study fields and programmes relevant to them.
from 1993 onwards has been extremely useful, and has contributed to the preparation of a joint project aimed at producing a mechanism for mutual recognition of evaluation and accreditation results, and at cooperation in preparation for an ESG-related evaluation of the commissions.

8.4. IMPLEMENTATION OF ESG

8.4.1. Accreditation Commission from the Point of View of ESG Implementation

The AC’s 2007 annual report states that the AC is committed to the ESG principles with a view to gaining full ENQA membership, contingent on successfully undergoing the ESG review, the granting of which entitles the AC to be included in the European Quality Assurance Register for Higher Education (EQAR). The AC already has long-term experience with external evaluations, and, in the Czech context, most of the standards for quality assurance agencies as determined by the ESG were already taken into account at the time the Act was under preparation (late 1990s). The regulations of both legal documents (the Act and the AC’s Statute) stipulating the scope of the AC’s activities included most of the ESG principles, even if in slightly modified forms (ESG 3.1). There are, however, some standards which are new in the Czech context and therefore more demanding in terms of implementation (see further).

The establishment of the AC by the Act corresponds to the ESG standard requiring that the agency should be formally recognised by the competent public authorities and should be established on a legal basis (ESG 3.2). The AC also complies with any requirements of legislative jurisdictions within which it operates (ENQA, 2005). The Act determines the AC to be a fully independent body (ESG 3.6). The way in which its members are selected, and also its composition, are considered an adequate guarantee of the AC’s independence from any “third parties such as higher education institutions, ministries or other stakeholders” (ENQA, 2005) that might influence the outcomes of quality assurance processes (expert panel’s conclusions and recommendations).

The AC is financed from public sources through the Ministry, which also supports all activities of the AC’s Secretariat. Very recent internal AC debates about its workload have led to agreement that the AC is underfinanced because of its high number of responsibilities, emanating not only from the stipulations of the 1998 Act but also from developments in the field of quality assurance in the framework of the Bologna Process. Therefore, it was recommended to request that the Ministry of Education, Youth and Sports increase the budget of the AC in view of its new responsibilities (Accreditation Commission, 2007). The Czech AC does not completely fulfil the ESG standard that requires an agency to have sufficient resources for quality assurance activities (ESG 3.4).

The mission of the AC, including its main objectives, is stipulated by the Act, while detailed organizational arrangements are confined to the AC’s Statute (see ESG 3.5). While the AC’s goals regarding accreditation and state permission, including the procedures to be undertaken, are very clear, the statements concerning evaluations of institutions and their activities are more general and broader. Their translation into “a
clear policy and management plan” (ENQA, 2005), as required by the corresponding standard (ESG 3.5), is developing on the basis of gaining experience of these activities.

The activities of the AC comprise accreditation, evaluation of accredited activities, and institutional evaluation. While the AC’s activities regarding degree programmes (and habilitation procedures and procedures for the appointment of professors) are carried out on a regular basis, no long-term concept for evaluation of institutions and their activities is in place. The AC’s selection of institutions for evaluation is mostly initiated on grounds of finding various shortcomings, especially in the case of private higher education institutions, and sometimes within an agreed and planned scheme, as in the case of an evaluation of a group of faculties in similar fields of study. The AC is still short of reaching the stage when all AC quality assurance activities are undertaken on a regular basis (ESG 3.3).

The criteria and processes of the AC differ according to the purpose of the evaluation (ESG 3.7). All criteria for all processes are clearly formulated, supplemented with explanatory notes and published on the AC’s website, in accordance with the ESG requirements. The evaluation processes are in principle composed of five basic steps, as recommended by the ESG. Nonetheless, it should be admitted that there is room for improvement as regards the involvement of external experts, including students, a good concept of the follow-up stage, and professionalisation of the agency’s quality assurance processes. The same applies to the rules pertaining to the appeals procedure, though such a procedure is available and is made use of from time to time. The AC admits that “these mechanisms have not yet been institutionally implemented to a sufficient degree” (Sojka et al., 2007).

As regards the accountability procedures of the AC itself (ESG 3.8), they were not in place in the past. From 2005, when the ESG standards and guidelines were submitted to the ministers at their meeting in Bergen, the AC started working on implementation of these procedures. Also to this end, the AC initiated a joint project with the Accreditation Commission of the Slovak Republic. The main rationale of the project is that the commissions of the two countries should capitalise on their experience with quality assurance activities that have been in place since 1990, when both commissions were founded. They then worked in cooperation until 1993 within a federal state (the Czech and Slovak Republic). The experience gained by the commissions over a period of more than fifteen years, pursuing largely similar procedures, having no significant language barrier, and facing similar challenges were seen as an appropriate basis for what has turned into a joint project aimed at closer inter-agency cooperation. Apart from sharing examples of good practice, the number of joint activities carried out within the project includes “cooperation in the creation of a system of internal evaluation for both ACs, creation of the necessary foundations for external evaluation, as well as further cooperation in the development of national systems of quality assurance in higher education” (Sojka et al., 2007). The most important objective of the project is to implement mutual recognition practices both for accreditation decisions and for evaluation results.

Within the framework of the first stage of the project, the AC went through a self-evaluation process in 2007, following the guiding principles of the ESG review, with the
goal of ensuring that “the report on the internal evaluation be sufficiently analytical and openly address the strengths and weaknesses of the AC’s activities and take the form of recommendations for the resolution of existing problems” (Sojka et al., 2007). To that end, an internal evaluation board was set up by the AC, using SWOT analysis to good ends in meeting these goals (ibid.). The resulting self-evaluation report is clearly structured, evaluating AC organizational structures including the Secretariat, effectiveness of activities (typically evaluation, accreditation), transparency of procedures, independence and control mechanisms of the commission, ways of communication, and international cooperation. The final part of the report addresses existing problems and gives recommendations. As the next step in inter-agency cooperation within the project, a peer review, interpreted as a means of transparency, visibility, and comparability of the agencies, is being prepared.

8.4.2. Implementation of ESG Regarding External Quality Assurance

Similarly as in the case of the ESG standards for quality assurance agencies, most of the ESG principles for external quality assurance were included either in the provisions of the Act or in the regulations of the AC’s Statute, which has been in operation since 1998, when the Act came into force. In general, there are no serious obstacles to full integration of the ESG Part 2 standards into the AC’s activities. However, for AC to be declared fully compliant with all these standards, several issues will have to be addressed, such as the involvement of a higher number of foreign experts, professional training of the AC’s members, and the elaboration of summary reports. It will require significant effort and time to implement these issues successfully. A more detailed overview of the extent to which the AC complies with the ESG Part 2 standards at the present time follows.

The ESG 2.1 Standard requires that “external quality assurance procedures should take into account the effectiveness of the internal quality assurance processes” (ENQA, 2005). Improvement-oriented external evaluations of both types, i.e. evaluation of institutions and evaluation of the quality of accredited activities, are provided in accordance with the rules stipulated in the AC’s Statute. As for evaluation of accredited activities, the AC has elaborated several types of questionnaires complemented with detailed and useful explanatory comments. While the questionnaire regarding evaluation of accredited activities focuses mainly on quantitative parameters, the questionnaire elaborated for the evaluation of non-university higher education institutions can be considered as an example of good practice. In the latter case, the questions are thematically arranged, and they are broad enough, involving a set of questions dealing with internal quality evaluation. However, neither the reports on evaluation of accredited activities nor those on evaluation of institutions (especially private non-university higher education institutions) during the time period in question (2004-2007) refer directly to institutional policies on internal quality evaluation and their effectiveness. Only exceptionally do the reports describe the students’ evaluations in terms of outcomes, and they do not tackle the subject of institutional quality policies comprehensively. Partly as a result, the AC does not rely on internal evaluation results in
the evaluations provided for the purpose of accreditation, arguing that “functioning internal systems of quality assurance can be found in only a small number of public and private institutions” (Sojka et al., 2007). Finally, the ESG guidelines recommend that good internal quality evaluation policy may allow for “external processes [being] less intensive than otherwise” (ENQA, 2005). For this reason, it should be admitted that the ESG 2.1 Standard seems not to have been fully implemented at the present time.

Speaking of whether the aims and objectives of quality assurance processes are determined before the processes themselves are developed and published with a description of the processes to be used (ENQA, 2005), the AC procedures fit this standard (ESG 2.2) in general. The minimal requirements for a positive standpoint of the AC, decisive for awarding accreditation, are quite clearly described in the application form. However, it is common practice that the AC itself elaborates such requirements by itself; the involvement of other stakeholders is rather exceptional. Another problem lies in the mixture of purposes of various procedures, most vividly manifest in evaluations of accredited activities undertaken by the AC. While accreditation has a quite clear accountability purpose, the purpose of AC-performed evaluations, even if all types are declared as improvement-driven processes, is often more or less connected with accreditation or state permission, i.e. also with accountability. This can be documented by the number of quality evaluations of private non-university institutions that have been initiated on the grounds of shortcomings found in their performance. The results of quality evaluations are used for improvement of weak points that have been discovered, but also, implicitly, as a warning from the AC that the next accreditation procedure will go into the details and will be relatively strict. For this reason, it would be helpful if these mixed evaluation/accreditation procedures were either clearly specified as to the objectives (the objective is to accredit on the basis of external evaluation), or, terminated, with external evaluation and accreditation performed separately by different agencies.

The formal decisions, which in the case of the AC entail the granting of accreditation and state permission, follow the ESG 2.3 Standard, as they are “based on explicit published criteria that are applied consistently” (ENQA, 2005). Obviously, the decision on accreditation of a degree programme has important consequences for the whole institution. For this reason, the Act, in accordance with the ESG, stipulates “the ways of moderating conclusions” (ibid.), the stipulation of which the AC holds to if necessary.

The external quality assurance processes are designed specifically to serve various objectives, and the AC undertakes “different external processes for different purposes and in different ways” (ENQA, 2005), as the ESG 2.4 Standard requires. Nonetheless, for widely used elements of the external review processes, the relevant ESG principles have been implemented only partly. The typical model consisting of the choice of the agency, self-evaluation, site visit, published report, and follow-up (cf. Van Vught, Westerheijden, 1993) is used by the AC in the case of improvement-oriented processes, and it is stage-modified as deemed suitable for the particular type of evaluation. This, however, does not pertain to external evaluation for the purpose of accreditation, in which case recognition of the importance of internal institutional policies for
improvement-oriented quality evaluation “as a fundamental element in the assurance of quality” (ENQA, 2005) is only theoretically in place. Notwithstanding the unclarity of the concept itself, in practice, due to very diversified institutional approaches to internal quality assurance, it has unfortunately been difficult to take the outcomes of institutional quality procedures into consideration in processes of external evaluation by the AC.

This difficulty may well bear on the composition of the AC and its work groups. The AC and its permanent and special work groups are composed of experts in teaching and research work, who are co-opted through the demanding process stipulated by the Act. A weak point, however, has been the low involvement of international experts, mainly for reasons well known also in other countries – the necessity to use a foreign language (English) for communication, and the relatively high costs for the services of these experts. Importantly, there had also until recently been no student members of the AC work groups. In this regard, the situation has been changing, though, and the composition of the AC’s special work groups (dealing with various types of improvement-driven evaluation) nowadays involve students. The most important problem unaddressed so far is the implementation of appropriate expert training. Psychological obstacles play a crucial role, and it has proved very difficult to overcome them. It should also be borne in mind that there is a nationwide shortage of people with adequate knowledge in the field of quality assurance to provide training for the AC members.

The AC’s regulations on publishing reports on external quality evaluation, and the easy accessibility of the reports, are fully in harmony with the ESG 2.5 Standard. However, the structure and content of the reports sometimes differ significantly, and their style and tone (ENQA, 2005) depends on the composition of the AC work group responsible for the evaluation. In the AC’s practice, it has not been usual that the “reports ... should be opportunities for readers and users of the reports (both within the relevant institution and outside it) to comment on their usefulness” (ENQA, 2005). These issues could and should also be discussed within the process of external evaluation of the AC’s activities.

Accreditation of a degree programme (as well as accreditation of the habilitation procedure and the procedure for professorial appointments) is awarded for a limited period of time in accordance with the Act. This guarantees that the evaluation processes are undertaken on a cyclical basis and are well defined in advance, as the ESG 2.7 Standard requires. However, with regard to the same standard, it is not possible to argue that the evaluation of accredited activities and the evaluation of institutions are dynamic and continuing processes with the cycle of the review defined in advance.

The ESG 2.6 Standard requires that the follow-up procedure be predetermined. The practice of the AC does not fit this standard completely. If the evaluation results are not fully satisfactory, the AC usually initiates a follow-up evaluation within a relatively short time period. If there is a successful accreditation/evaluation procedure, it is not standard practice to set the time of the follow-up. The corresponding guideline recommendation that “external quality assurance does not end with the publication of the report and should include a structured follow-up procedure to ensure that recommendations are dealt with appropriately ... [involving] further meetings with
institution or programme representatives” (ENQA, 2005) should therefore be taken into account in the near future.

The accreditation procedures undertaken by the AC cover the whole of the higher education system, so summary reports on general findings, including general recommendations in the sense of the ESG 2.8 Standard, would be very useful. However, producing cross-section reports would increase the already extremely high workload of the AC, and it might therefore be preferable to plan rather modestly. It should be pointed out that some kind of summary reports have recently been produced and made publicly accessible by the AC, following the evaluation of faculties operating in the similar fields of study (faculties of health and faculties of humanities). The detailed public annual reports of the AC’s activities also contribute to a kind of general overview.

8.5. ANALYSIS OF AC’S STRENGTHS AND WEAKNESSES

There are three main sources for determining strong and weak points in the quality assurance system in the Czech Republic. First, there is the synthesis of outcomes of the OECD project “Thematic Review of Tertiary Education” (2004-2008) in the publication Tertiary Education for the Knowledge Society: OECD Thematic Review of Tertiary Education: Synthesis Report. Second, within this OECD project, a supranational review of Czech tertiary education was made, with expert recommendations, some of them pertaining to quality assurance, summarized in the Czech Republic: Country Note. The third important source is the Report on Self-Evaluation of the Accreditation Commission of the Czech Republic, produced by the AC in 2007. In addition, the SWOT analysis of the Long-Term Plan can be taken into consideration.

8.5.1. Strengths

The OECD experts, when evaluating the Czech tertiary system of education, and also the AC members themselves, when carrying out the first self-evaluation of the AC, identified a number of strengths in the AC’s activities. Both evaluation documents (Country Note, Self-Evaluation Report) demonstrate that, in many cases, there are evident strong points, but these are sometimes not developed fully, and are connected with various problems and weaknesses which should be dealt with. The AC’s views on its own work sometimes do not conform fully with the findings of the OECD expert team. The divergence of views might be beneficial in launching a serious debate on the recommendations of the OECD on the development of Czech higher education quality assurance, taking into consideration international experience vs. the country’s specifics.

The OECD experts emphasise that the strength of Czech higher education quality assurance is that “it is a mature system with widespread participation among Czech academics” (File et al., 2006), and they evaluate positively that the AC “is able to

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undertake a regular and recurring review of programmes” (ibid.). It is very important to compare and contrast such a positive assessment of programme accreditation (and re-accreditation) with the self-evaluation of the AC, which stresses the excessive time demands due to the prerequisites of the accreditation process. The AC’s self-evaluation report says that “fixed-period accreditation and periodic extensions of that accreditation result in extensive demands on resources and time for both the AC and the institutions of higher education” (Sojka et al., 2007). The AC’s view on the accreditation process is implicitly positive, but it concedes that some issues complicate it (see below). It would be helpful to think seriously not only about the AC’s intention to make the processes more effective but also about the possibly excessively detailed accreditation requirements, including evaluations of particular branches of study (see also 3.3.1), and about accreditation of institutions as an idea already contemplated by the AC itself (see also “challenges and agenda ahead”).

In the self-evaluation report, the AC evaluates communication with the relevant authorities of the Ministry as well as with the representative bodies (Czech Rectors’ Conference and Council of Higher Education Institutions) as satisfactory. As regards awareness of academia of the quality assurance system under the AC’s responsibility, the AC’s self-evaluation report identifies occasional problems in communication with some higher education institutions. For this, the report presents reasons such as “uncertainties about the AC’s mission, criteria and procedures [the AC] uses in evaluating institutions on the one hand, and delays, and inflexibility in updating the AC’s website, resulting in the presentation of confusing information, on the other” (Sojka et al., 2007).

In assessing the results of the AC’s activities, the OECD team presented a positive view, maintaining that “the accreditation activities of the AC/HEI have permitted the Czech Republic to introduce private higher education institutions without experiencing some of the serious problems of academic quality and integrity that seem to have beset other countries in Central and Eastern Europe” (File et al., 2006). In contrast to the OECD viewpoint, the AC’s self-evaluation report does not deal with the outcomes of the AC’s activities, as it rather focuses on organizational, methodological and technical issues, stating that the AC’s functional and procedural independence is sufficiently guaranteed by the Act and that all the AC’s members are “able to resist pressures from lobby groups” (Sojka et al., 2007). The AC’s independence is also approved in the results of the SWOT analysis (Ministry, 2005). Correspondingly, the AC is satisfied with its composition as regards the representation of research/educational disciplines, and stresses the importance of the participation of international members, even if with reservations about the current situation when all three foreign members come from Germany.

Finally, two more strengths of the AC should be mentioned. The first relates to the high level transparency of the AC’s procedural criteria, which are publicly available on the AC’s website. However, it must be admitted that the criteria may not always be interpreted in the same way by the work groups, and that there are also other issues for consideration such as “interdisciplinary comparison and consistency in the evaluation of differing fields” (Sojka et al., 2007). The international cooperation of the AC is another
strong point. Being a member agency of ENQA, CEEN (Central and Eastern European Network of Quality Assurance Agencies in Higher Education) and INQAAHE (International Network for Quality Assurance Agencies in Higher Education), the AC stresses the importance of cooperation especially with ENQA, which, among other things, leads toward greater professionalisation of the AC's activities. The collaboration with the Slovak Accreditation Commission that has been developing in recent years in the pilot project supporting an internal and external evaluation of both agencies also seems to be very helpful.

8.5.2. Weaknesses

With regard to Czech higher education quality assurance, the 2006 report of the OECD experts also presents a limited number of weaknesses, the composition of the AC being the first of them. The OECD experts found insufficient representation of members from outside academia, both in the AC itself and in its work groups. They noted a contradiction between the priorities of the Ministry to promote “co-operation between higher education institutions, partnership with the relevant region, [and] promotion of links to the private sector and cooperation with clients” (File et al., 2006), and the composition of the AC, which suggests otherwise. In the self-evaluation report, the AC itself admits that academic staff from higher education institutions and the Academy of Sciences of the Czech Republic dominate the AC’s composition, and that composition of the AC’s work groups in terms of the representation of employers, students and other stakeholders is not optimal.

The second important weakness indicated in the OECD report is the inward orientation of the AC as regards both its accreditation/evaluation criteria and its working methods. It is criticised that the AC’s judgements are made on the basis of inputs rather than outputs, and that the accreditation process focuses mostly on personnel and material resources (i.e. input-oriented indicators such as numbers of professors, available facilities etc.), not taking into consideration “the wider scope of institutional performance such as institutional management and governance and student support services” (File et al., 2006). To make a full picture of the OECD experts' critical views, it should be added that, in their reservations, they also mention the excessively complicated Czech academic career system, presenting itself in high institutional demand for high-ranking academe members (professors, associate professors) to guarantee the quality of tuition at all degree programme levels, thus raising the question “whether quality as recognised by the process of habilitation is necessary or sufficient for teaching excellence in those higher education programmes that focus primarily on professional education for working life” (File et al., 2006). “Problematic, often only formally satisfied, requirements of the Accreditation Commission for human resources in degree programmes which fail to produce real quality” (Ministry, 2005) is the view of the state regarding this issue. The AC’s self-evaluation report does not consider the above-mentioned points of view, but it states that the AC makes “every effort to apply internationally recognized standards and procedures, to achieve the greatest degree of transparency in these procedures and to adhere to explicitly formulated evaluation
criteria” (Sojka et al., 2007). Nevertheless, a debate on the disharmony of these views, both coming from different experience, would certainly be beneficial to the AC’s practice.

Another weakness that the OECD reviewing team indicated is low diversification of the Czech tertiary education system, to which the accreditation procedures currently in operation contribute. The OECD experts reason that the AC does not “make quality judgments that focus on the relationship between means and ends, or fitness for purpose, without which diversification will be limited, and programme and resource allocation standards will converge” (File et al., 2006). In spite of assessing the role of the AC in the development of the private higher education sector in the CR very positively, the OECD expert team warns of “two risks: the risk of approving an institution as being of sufficient quality when in fact it is not, and the risk of rejecting an institution as lacking in quality when in fact it is of satisfactory quality” (ibid). This is made even more “risky” in cases when “those who assess institutional applications are predominantly representatives of institutions already in operation” (ibid.).

These issues are not tackled in the AC’s self-evaluation report. As already noted, the report does not evaluate the results of the AC’s activities as the OECD experts did, because this will be the role of the external evaluators when the external evaluation of the AC in accordance with the ESG takes place. Instead, the AC’s self-evaluation report indicates limitations of the AC’s procedures due to: the technically complicated application for accreditation; problems in communication with the general public, higher education institutions (sometimes), and the AC work groups (occasionally); and, last but not least, insufficient support from the AC’s Secretariat as concerns both personnel and material provision. In addition, the AC’s self-evaluation report states that the extensive workload of the AC, due to the breadth and depth of the activities performed, prevents the AC from paying enough attention to discussing strategy concepts and documents (Sojka et al., 2007), and contributes, due to the legally-mandated procedural deadlines, to “the arguments for rejecting an application for accreditation ... not [being] sufficiently convincing, which occasionally leads to misunderstandings and incorrect interpretations on the part of the applicants” (Sojka et al., 2007).

8.5.3. Issues to be discussed

A recurrent theme in the literature relates to the purposes of quality assurance and whether (and how) the purposes of accountability and quality improvement may be combined in a balanced strategy ... On the one hand, some argue that accountability and improvement are incompatible as the openness essential for improvement will be absent if accountability is the purpose of the quality procedure ... By contrast, others consider that accountability and improvement are closely linked and cannot be addressed separately, in which case the challenge for policy makers is to find effective ways of combining these two functions in the design of the quality assurance framework (Tremblay, Kis, 2008).

In the Czech context, the important weak point as regards higher education quality assurance can be seen in the fact that the debate on the two main purposes of quality
assurance among all stakeholders has yet to be initiated, in spite of the relatively long-
term experience in this field – at least in comparison with other Central and Eastern
European countries. The AC’s mandated responsibilities are very broad and require that
the AC assures quality of higher education in all aspects. Such practice is very demanding,
though not exceptional from the international point of view, as e.g. the Norwegian case
demonstrates. The Norwegian Agency for Quality Assurance in Education (NOKUT) is
an independent public agency, established by law in 2002, with the task of carrying out
external quality assurance of higher education and tertiary vocational education in
Norway (NOKUT16). The purpose of NOKUT is to oversee the quality of Norwegian
higher education by means of evaluation, accreditation and approval of quality systems,
institutions and course programmes (NOKUT17). Both agencies, the AC and NOKUT,
make no distinction between the two purposes of quality assurance – accountability and
improvement – in their missions, being responsible for all activities regarding quality
assurance of the country’s higher education system. The OECD Final Synthesis Report
further argues that the “debate [on quality assurance purposes] has contributed to the
development of a simple cause-effect model implying that internal processes are related
to improvement, while external processes are associated with accountability [and that] .
... a number of authors argue that accountability and improvement may be combined –
and should be combined since they are both among the aims of the government – and
they advocate the combination of internal and external quality assurance mechanisms to
build on their complementarities” (Tremblay, Kis, 2008).

The quotation above may be applied to the Czech case only to some extent.
External quality assurance, which serves the accreditation purpose, is completely
accountability-driven, while internal quality assurance systems developed as
improvement-oriented processes by institutions complement externally initiated
accreditation, currently not satisfactorily, but at least to some extent. In contrast,
external evaluation of institutions by the AC is generally considered an improvement-
oriented process. However, because it uses public reports and several other elements
characteristic of and significant for the accountability processes, the situation is not
completely clear. Even more complicated in this respect is the AC’s evaluation of
accredited activities of higher education institutions, which rather mixes purposes that
otherwise complement each other, often leading to general confusion. With this quality
assurance approach in place, institutions cannot be fully open in stating their
weaknesses, having in mind that the evaluation will influence the process of
accreditation. Correspondingly, the AC can hardly provide the institution under
“evaluation of accredited activities” with really useful recommendations if the
information about institutional activities attempts to mask problems because of the
institution’s desire to protect itself from possible restrictive measures.

16 <http://www.nokut.no/sw335.asp>.
17 <http://www.nokut.no/sw2497.asp>.
The debate on the purposes of quality assurance activities has been on the agenda of both national quality assurance agencies and international organizations such as EUA, with the latter declaring that, “one of the most important debates in quality is whether the purpose of external evaluation is accountability or improvement. It has been acknowledged that it is difficult to do both at the same time” (EUA, 2006). The AC itself admits that a number of institutional evaluations already performed have initiated a debate among its members about the use of the results, presenting the idea “to maintain an improvement-oriented approach and provide institutions with enough time to improve in case of negative findings before issuing any unfavourable decision” (Accreditation Commission, 2004). The last part of the quotation can be read in the sense that restrictive measures can be taken even after a certain (sufficient) time delay, and so the process would combine the improvement and accountability purposes, which may cause difficulties, as indicated, e.g. in the EUA projects. The misguided mixture of purposes served by external quality assurance can be considered a weak point in the activities of the AC. It would therefore be distinctly helpful to initiate a discussion leading to clarification of the purposes of the quality assurance activities under the AC’s responsibility.

8.6. CHALLENGES AND THE AGENDA AHEAD

Similarly as in the previous section, the challenges and the agenda that the AC faces can be derived from the recommendations of the OECD experts and from the AC’s self-evaluation. These reports indicated a number of opportunities and threats, with the threats possibly turning into opportunities if seriously considered and if relevant measures are taken. The AC clearly articulated its very high workload, which may threaten the quality of its work in general. New responsibilities arising from the country’s involvement in the Bologna Process – most prominently associated in the area of quality assurance with implementation of the ESG – will only bring more work for the AC.

In connection with the high workload issue, the AC sees an opportunity to make “its activities more effective and create space for discussion of conceptual issues ... [while] applications for accreditation should be submitted and processed primarily in electronic form” (Sojka et al., 2007). Once the conceptual issues are on the AC’s agenda, the opportunity to improve in providing information and in communicating with all partners should be considered, so that the goals and objectives of all the AC’s activities are clearly understandable. The AC’s self-evaluation report takes this into account, and recommends providing information about the AC’s activities more effectively to higher education institutions and to the general public.

On the issue of resources (see the ESG 3.4 Standard), the AC would like to enter into closer collaboration with the Ministry, which would also enable the Commission to provide greater support (both personnel and material) for its Secretariat.

In policy development terms, the OECD experts stressed the need for diversification of tertiary education, as declared in the national strategy documents, namely in the Long-Term Plan of the Ministry, which determines diversification of
Czech tertiary education as one of the key policy goals. According to the experts, system diversification should be complemented by a reform of quality assurance with the aim that it “supports, rather than restricts, the diversification of Czech tertiary education ... The system of quality assurance in the Czech Republic should support the key policy goals laid out in the Long-Term Plan, rather than inhibit their realisation ... The AC selection procedures, membership and quality criteria should be revised to focus on stakeholders and outcome-oriented quality criteria relevant to professional Bachelor degree education” (File et al., 2006). The OECD expert team thus strongly focuses on the issues of diversification, finding the accreditation/evaluation criteria used by the AC for different levels of degree programmes too narrow and too detailed. The opportunity for the near future in the view of the OECD team is that “the criteria used to assess the quality of degree programmes [at Bachelor and Master levels] should be appropriately differentiated, ... and that the kinds of evidence that should be brought to bear in accreditation should be fitted to the purpose of the programme” (File et al., 2006). Similarly, the opportunity of the SWOT analysis “would take more account of the actual requirements of programmes at various levels and contribute to the shaping of the relevant higher education institution’s profile” (Ministry, 2005).

The AC itself does not consider system diversification and related issues (outcome-oriented criteria, focus on stakeholders, etc.) as a threat. Consequently, the AC does not see a need for overall transformation of its procedures along the lines suggested by the OECD experts. It would be extremely useful to have an additional viewpoint from external experts on this issue within the upcoming external evaluation of the AC’s activities to assess compliance with ESG.

As regards both the selection procedure for the AC’s members and the composition of the AC, the degree of accord between the OECD experts and the AC is much higher. As an opportunity for the near future, the OECD experts recommend that a range “of stakeholders outside of higher education are consulted in the selection of Commission members” (File et al., 2006), and that the AC consider “a significantly larger share of the members of the AC – perhaps one-quarter – drawn from this wider set of stakeholders” (ibid.)18. In this respect, the AC’s intention, expressed in the self-evaluation report, to open the debate on how to involve students as well as outside experts in the activities of the standing and special work groups suggests a potential for future improvement.

Both the OECD experts and the members of the AC consider the system of quality assurance to be a complex issue with internal and external dimensions, and stress the opportunity to facilitate the development of internal quality assurance processes. In connection with this, according to the OECD experts, there is an opportunity to support internal assessment for quality enhancement which is independent of external assessment (File et al., 2006). Moreover, the OECD experts underline the need to make it clear in the law that “first and foremost, institutions have to take care of the quality of their academic activities” (File et al., 2006). This reflects the belief that internal quality assurance

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18 The recommendation is also valid for the composition of the AC’s work groups.
assurance systems are considered essential for institutional quality culture building in the sense of “quality as a shared value and a collective responsibility for all members of an institution including students and administrative staff” (EUA, 2006), with the aim to establish a quality culture that encompasses the whole institution in a consistent and integrative manner.

As concerns the Czech quality assurance system, the AC revers to a possible shift from accreditation of degree programmes to accreditation of institutions as an important policy opportunity. A current barrier and a potential threat for the future is that “it is not possible to move from a system of accrediting degree programmes to the accreditation of institutions when functioning internal systems of quality assurance can be found in only a small number of public and private institutions of higher education” (Sojka et al., 2007). Nevertheless, the AC suggests that “it would however be appropriate to move to the accreditation of institutions for those institutions of higher education that can conclusively demonstrate internal systems of quality assurance that function well” (ibid.). In reality, it is necessary to recognise that the procedures used by particular institutions of higher education for internal evaluations differ considerably (see 2.5.1.). At this point, it is necessary to stress that students’ evaluations of teaching and sometimes also of other activities (infrastructure) have been developed at most Czech higher education institutions as parts of the internal quality assurance system. The threat to these evaluations, however, lies in the fact that there is no relevant feedback and, consequently, no measures are taken on the basis of students’ opinions (Šebková, Kohoutek, 2007).

In theory, the variety of institutional approaches to internal evaluation should be considered an opportunity for the future. However, there is no overall system-wide framework, little coordination of activities, little focus on sharing experience, and inefficiency resulting from parallel development of the same (or nearly similar) measures, e.g. as regards organizational measures of students’ evaluation, which obviously represent threats for the integrity of internal quality assurance processes as such.

To make another comparison with Norway, as an example, it can be argued that higher education institutions in both countries enjoy a considerable degree of autonomy. In the Czech Republic, there are neither general objectives regarding internal quality assurance systems, except for the legal obligation that each institution should establish such a system, nor a policy on linkages between internal and external processes of quality assurance. In contrast, in Norway, it is stated that quality of educational provision is the responsibility of each institution. The institutions are required to demonstrate their current quality assurance and the link between internal and external quality assurance established through NOKUT’s evaluations (NOKUT, 2004). Norway’s approach to linking internal and external quality assurance activities may thus serve as an example of good practice. Similarly, a challenge for both the AC and higher education institutions would come from the OECD recommendation that “while full regard must be given to institutional autonomy and to the virtues of institutional
An opportunity for quality assurance in Czech higher education would lie in putting greater focus on conceptual work and policy objectives for quality assurance development along with wider consideration and/or the dissemination of examples of good practice, which would, overall, contribute to the implementation of a complex quality assurance system in which external and internal processes complement rather than clash with each other.

8.7. CONCLUSION

The recent developments in higher education in the Czech Republic, similarly as in most of the Central and Eastern European countries, have come to be regarded as a highly dynamic process with the number of important characteristics in common (most importantly massification), taking place within a considerably shorter time frame than in Western Europe. This quick and extensive development has been accompanied by the establishment and elaboration of quality assurance activities supported by legal regulations. As a result, and not surprisingly, in the CEE context, accountability-driven evaluation processes leading to related kinds of decisions (accreditation, state permission) prevailed for some time over improvement-driven activities. During the last few years, more attention has started to be paid to evaluations aimed at improvement of institutions (or parts of institutions), supported, in the Czech case, e.g. within the framework of institutional development programmes funded by the Ministry, in reconsideration of “heavy-touch” external measures including evaluations serving the purpose of accreditation. The development of especially external quality assurance processes is enhanced by ENQA and its partners’ activities associated with the ESG, “full” implementation of which can be considered an important incentive for the AC to eliminate its weaknesses identified in the self-evaluation report and elsewhere. To discharge the full ESG potential, however, it remains essential to implement the ESG wisely. As Harvey comments, “It was hoped that countries at different levels of implementation [of ESG] would share practices and obstacles ... An overemphasis on compliance with the standards, rather than treating the ESG as advisory, may lead to a tick-box mentality, with institutions becoming ‘slaves to the ESG’ instead of being creative in their development of quality assurance” (Harvey, 2008).
CHAPTER 9

IMPLEMENTING THE EUROPEAN STANDARDS AND GUIDELINES AT INSTITUTIONAL LEVEL: CASE OF THE UNIVERSITY OF WEST BOHEMIA IN PILSEN

Eva PASÁČKOVÁ, Hana RENDLOVÁ

9.1. INTRODUCTION

The University of West Bohemia (UWB) has been pursuing quality principles since its establishment, and thus has considerable experience in this field, in the Czech context. The importance of quality issues at UWB has been emphasized since the beginnings of the university’s existence, and has been reflected in all strategy documents. Quality has been considered an inseparable component of all concepts adopted by the university boards. It was officially claimed that the success of the university depends first and foremost on its quality (UWB, 1996), especially in the perspective of attaining outstanding results (high-quality graduates, high-quality research and creative activities, and attractiveness for both internal and external stakeholders). Within the university culture, a definition was made of a “high-quality university”, which was subsequently explicated and promoted. Quality as such was the determining issue for the positioning of the newly established institution, and was an essential condition for the survival and prosperity of UWB in a competitive environment. The quality concept at UWB reverberates throughout the university development strategy, in which “the targeted solution is the temple not a solitary pillar. The construction of solid pillars is a matter for the individual departments, while the architecture as such is, after discussion in the Senate, a matter for the management … We strive to find our own distinctive profile as an institution that will, for the most part, cover the educational needs and the particular creative activities of the relevant area” (UWB, 1996). Thus, with reference to the quality concept delineated here, the aim of this chapter is to outline the internal quality assurance system functioning at UWB, and to analyse the implementation of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) at institutional level.

9.2. QUALITY CULTURE AT UWB: BEGINNINGS

UWB was founded by Act of the Czech National Council No. 314/91 on August 9, 1991, through the merger of the Faculty of Education (founded in 1948) and the Pilsen
Institute of Technology (founded in 1950). UWB is a public, university-type higher education institution. In order to satisfy the new needs of the tertiary education market in the region of West Bohemia, in reflection of the economic changes in the 1990s, new faculties were established at the time of the foundation of UWB, or shortly after. In correspondence with current developments and needs, the Faculty of Medical Studies was established. It has been in operation since academic year 2008-09, following the takeover of the Higher Education Institution in Pilsen. At present, UWB has eight faculties1 with sixty-one departments and two institutes (the New Technology Centre, and the Institute of Art and Design2), and one centre (the Centre for Language Preparation). The University of the Third Age and the Institute for Lifelong Learning were established to promote and provide lifelong learning activities. The specializations of the faculties provide a broad spectrum of degree programmes (Bachelor, Master, doctoral). The total student population is over 18,000, which ranks UWB as the ninth largest higher education institution in the Czech Republic. UWB is a major employer in the region, having 1,957 employees (of whom 1,164 are academic staff and 793 are non-academic staff) (UWB, 2006).

9.3. MISSION AND STRATEGIC GOALS OF UWB

The university mission is a direct response to the new requirements of the society expressed in a vision of UWB “through partnership with the university towards a society based on knowledge, creativity and innovation” (UWB, 1999). The mission of the UWB includes the following issues:

- to serve as the main higher education institution in the West Bohemian Region;
- to offer both general and specific educational programmes contributing to the development of students’ professional as well as social skills and abilities;
- to provide degree programmes which meet the changing demands of society through relevant projects.

From the quality assurance point of view, UWB’s goal is to incorporate a quality culture into all activities performed. Quality forms an integral part of the university’s strategic goals and is taken into account in the university’s long-term plan – its main strategic policy document – and in the annual updates to this plan. Generally speaking, the strategic goals in the long-term plan cover the areas of education, research and development (R&D), human resources, internationalisation (mobility), and employability of graduates. However, in line with the aims of the chapter, we give a

1 Faculty of Applied Sciences (1991), Faculty of Economics (1991), Faculty of Electrical Engineering (1991), Faculty of Education (1991), Faculty of Mechanical Engineering (1991), Faculty of Law (1993), Faculty of Philosophy and Arts (1999), Faculty of Medical Studies (2008).

2 Further in the text, the term “faculty” is used for the Institute of Art and Design.
detailed overview here only of the goals concerning education and mobility that bear most directly on the quality of educational activities. These goals are:

- Share of the educational market. Quantification indicator: tertiary education of 6 per cent to 8 per cent of the population of the Czech Republic, with growth at UWB up to a limit of 20,000 people studying simultaneously, out of whom approximately 25 per cent are part-time students.

- To constantly monitor the employability of graduates and to reach a state in which the number of graduates who register with the Employment Agency within two years after graduation does not exceed the average unemployment rate in the Czech Republic.

- In every degree programme (field of study), there is to be at least one professor in the active age (the active age is not limited to 65 years, but is defined by a substantial contribution to the project activities in R&D and generally to fulfilment of this strategy). A professor is considered as guarantor of not more than one Master programme and one doctoral programme.

- In all degree programmes, quality language preparation is provided, and in every field of study, at least one module is offered in a foreign language, usually in English.

- Mobility. In doctoral programmes, 70 per cent of students conduct a part of their studies (preferably at least one semester) at an institution other than UWB. In continuing, two-year Master's programmes, at least 20 per cent of students conduct a part of their studies (preferably at least one semester) at an institution other than UWB (UWB, 2005, 2008a).

9.4. HISTORY OF EVALUATION AND QUALITY MANAGEMENT AT UWB

Since its foundation, UWB has been built to be “modern” in terms of its range of degree programmes, to be an “effective” institution in terms of its management and all activities undertaken, to be “open-orientated towards all innovative ideas” and “integrated” (UWB, 1996). In reflection of both external and internal stimuli (ECTS implementation, the Bologna Process and the corresponding reforms aimed at restructuring degree programmes, developing internationalisation, and greater awareness of quality assurance activities also in the institutional context), UWB has paid continuous attention to quality management and evaluation issues. For development at both international and national level, this involves, first and foremost, evaluating degree programmes and evaluating educational activities. Management and evaluation of the educational process, including its conceptual formation, was significantly influenced in the first decade of UWB’s existence by the following factors:

- implementation of a credit system at all faculties;

- launching a TEMPUS JEP+ project;
— compilation of the UWB’s Strategic Plan for 1996-2005;
— adoption of Rector’s Directive No. 16R/2000 (UWB, 2000) as the fundamental internal regulation signifying a breakthrough for the institution of formative quality processes.

Due to the importance of these factors for the further development of the system of internal quality management at the UWB, they are analysed in greater detail below.

9.4.1. Implementation of a Credit System

At UWB, the transition towards a credit system was made in academic year 1993/1994. In instituting the system, the following points were considered:

— operation of departments on an inter-faculty basis;
— unified university rules for the education process;
— re-distribution of decision-making powers pertaining to teaching activities to the lowest possible (departmental) level;
— compatibility with the European Credit Transfer System (ECTS).

The principle of departments operating on an inter-faculty basis results from the fact that UWB has been built as an integrated higher education institution with distinct and mutually interconnected operating areas of the individual parts of the university. The advantage of institutionalising such a principle lies in the departments providing tuition in a specific field for all degree programmes offered at the university. This strengthens the effectiveness of education, and, at the same time, avoids splitting the scientific, research and other potential of the academic staff. Institutionalisation of the principle that departments operate on an inter-faculty basis, limiting fragmentation of faculty activities, proved to be necessary for the creation of a unified study environment, and was supported by internal legislation (above all, the Study and Examination Rule).

In compliance with this principle, the Rector’s Directive on the Principles of the Credit System (UWB, 2002), in force as of April, 1, 1993, and the Study and Examination Rule, in force as of academic year 1993/94, were adopted. Both documents were amended over the years, reflecting the changing external and internal environment, but the fundamental principles still remain in force. The process of implementing the credit system in the integrated university environment gave rise to the need to set up a specialised body charged with ushering in the establishment of quality management and teaching within an evaluation system of which they were integral parts. For this purpose, the rector appointed the Course Coordinating Councils for Interfaculty Coordination to oversee the allocation of a specific number of credits to each course. The main task of these councils was to make sure that courses were not taught at departments which did not possess appropriate staff competencies. In addition, the councils consolidated similar courses taught by various departments within a single programme and guaranteed the same number of credits, the same course statute, and the same study options for all students, irrespective of the student’s home department. Importantly, the establishment
of the internal accreditation scheme was essential for finalising implementation of the credit system itself. It also helped to assure a higher quality of teaching activities (see further). Hence, to aid in the process of implementing the credit system and in assuring the quality of educational activities, the Accreditation Board, with a university status, was established in October 1993.

The main objective of the Board was to assure the quality of study courses offered, and to put a stop to insufficiently prepared and insufficiently professionally guaranteed courses. To guarantee the quality of the courses, the Board’s was charged with making an ongoing review of the content of UWB’s course database, the adequacy of the number of credits allotted (also in relation to other courses), the adequacy of the intended course content, the staff and material infrastructure, literature, and the monitoring of pre-conditioned and contra-indication links. Simultaneously with the establishment of the Accreditation Board, the sub-commissions of the Board were established. These were formed by professionals from particular fields, with the aim of harmonizing the interrelations between courses similar in content. While these sub-commissions, and also the Course Coordinating Councils, became unnecessary as soon as the course database had been consolidated, the Accreditation Board is still operational, as the internal accreditation scheme has become an essential precondition for objective evaluation of departmental performance, which now serves as the basis for stipulation of budgetary rules. However, it is worth stressing that internal accreditation was established in response to the internal needs of the institution, and thus developed independently from external factors. Since its establishment, internal accreditation has been an inherent component (instrument) of quality management and evaluation of the educational process at UWB (see further).

9.4.2. Quality Assurance Guide Draft as a Result of Launching a JEP+ Project

In academic year 1994/95, UWB was the only university in the Czech Republic to obtain a project in the framework of the TEMPUS programme. The outcomes of this project, fully named “JEP+ 08222-94–Strategic and Institutional Management of Czech Higher Education Institutions: Concept and Implementation of Quality Assurance System at Higher Education Institutions in the Czech Republic” (UWB, 1994-1996), provided a motivating incentive for raising awareness of the issues of evaluation of educational activities at UWB, and they were projected into setting the university’s strategic goals. The basic model of teaching process evaluation was proposed as one of the activities to be undertaken in the project. In the course of the project, it emerged that the proposed model and the corresponding guidelines were applicable and could be implemented throughout the university.

The document known as the Quality Assurance Guide, containing UWB’s quality assurance concept, can be considered the most important outcome of the JEP+ project. The Guide did not aim at certifying the system according to standards, but rather at

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3 The fiscal methodology has been in force since 2002 and was amended in 2004.
assuring improvement in all UWB activities (UWB, 1995). In the process of compiling the Guide, the need of the university management to respond to external stimuli was taken into account. These stimuli included the changing socio-economic conditions after 1989, which led, in the higher education context, to decentralization, an upsurge in student numbers, growing internationalisation, and thus the emerging recognition issue. In effect, these considerations, and others, led to growing interest in quality assurance and evaluation of teaching at system level, i.e. from the Ministry of Education, Youth and Sports (Ministry). At institutional level, the interest in quality assurance arose due to specific internal needs and factors, such as, in the case of UWB, the operation of departments on an inter-faculty basis, leading to the creation of an integrated study environment. Another factor was the rising demand for information on and evaluation of course quality by internal stakeholders. The fundamental principles of the quality assurance concept formulated in the Guide were subsequently translated into the first Strategic Plan of the UWB (UWB, 1996).

9.4.3. Strategic Plan of the UWB, its Amendment, Second Strategic Plan of the UWB

The second Strategic Plan (UWB, 1999), as a follow-up document to the Strategic Plan of the UWB (UWB, 1996), was elaborated by the strategy development team whose members were representatives of management and of the faculties, as well as experts from the university departments and external advisors. The analysis (education, R&D, external relations, internationalisation, financing) contained in these two documents formed the basis for strategic goal setting, with explicitly formulated objectives concerning evaluation of quality in education and research. It is reasoned that the establishment and operation of the Accreditation Board, its sub-commissions, and the Course Councils was the starting point for institutionalising the quality assurance mechanism for educational activities. Application of the mechanism has resulted in an unbiased evaluation of all courses offered, but there is still no feedback loop containing information on quality of teaching. For future quality assurance and quality evaluation of educational activities, a model has been proposed based on the principle of maximal efficiency by maximal simplicity, i.e. with maximum usage of the existing university structures. In addition, the role of the Professional Councils, as initiators of the evaluation process, was stressed. Most of the evaluation of educational activities should be carried out at course level, or, more precisely, at group-course level, with the proposed evaluation cycle containing:

- collection of information;
- evaluation of information;
- external evaluation, recommendations for improvements;
- implementation of recommended changes.

Both strategic plans of the UWB also refer to the outcomes of the JEP+ project, which raised awareness of quality issues among UWB’s staff, in particular concerning the quality of the educational process and implementation of the corresponding
mechanism. To give complete information, the first Strategic Plan of the UWB (UWB, 1996), after being approved by UWB’s Academic Senate, was published in January 1996, followed by the external audit of UWB in the framework of Tempus Output Promotion. The Commission of the European Rectors’ Conference became acquainted with the Strategic Plan, assessing it positively and presenting some further suggestions. Following these processes, the amendment to the plan, containing the proclamation that significant progress had been made in institutional quality evaluation, reflecting on the results of pilot implementation of the outcomes of the JEP+ project at selected university departments (see Chapter 10), was elaborated in February 1997 (UWB, 1997). The experience of the rector of UWB was made use of through his involvement in the European Rectors’ Conference evaluations of selected universities (UWB, 1997).


In response to the obligation to carry out institutional evaluations and make their results public, as stipulated in the Act No. 111/1998 Coll. (the Act, 1998) and aiming at greater coordination of the so far isolated and individual evaluation activities, Rectors’ Directive No. 16R/2000 on Implementation of the System of Evaluation and Quality Management in Educational Process at UWB (Rector’s Directive No. 16R/2000) (UWB, 2000) was issued as an internal regulation mandatory for staff involved in the education process. This directive sets the responsibilities, defines the basic terminology and elements of quality assurance of education activities, and describes the process of evaluation and quality management (see further). The introduction of this directive was of significant importance to the development of institutional quality assurance; year 2000 can be characterized as starting the period of step-by-step implementation of the concept of evaluation and quality management of educational activities, corresponding to the content of the directive. The ongoing implementation of this concept (also influenced by external conditions) is evident in the university’s move toward a comprehensive, coherent quality assurance system, in line with the objectives formulated in the Long-Term Plan of the UWB for the period 2006-2010, aimed at attaining a level in the existing system of internal quality evaluation corresponding with the coherent internal evaluation system, covering all university activities, implemented at European universities (UWB, 2005). To achieve this objective, projects such as “Quality-07”, funded from the development programmes of the Ministry, were undertaken at UWB.

9.4.5. Participation in National and International Projects

In the context of existing activities at supranational level within the framework of the Bologna Process, UWB launched not only the above-mentioned JEP+ project but also the Quality Culture Project (2002-2006), which aimed to develop and systematically embed a quality culture into the activities of universities (EUA, 2005a,b; EUA, 2006), and ESMU Benchmarking, which aimed to share good practice and continuous improvement of ways of benchmarking with other institutions (UWB, 2007). A more
detailed description of UWB's involvement in these two international projects is given in Chapter 10.

Implementation of the system for evaluation and quality management of the educational process at the departments of the university was supported, particularly in the period 2002-2004, by the Ministry's development programmes. Following UWB's interest in research into quality assurance issues, the university participated in project LS0316 “Quality Evaluation of Higher Education Institutions”, undertaken by the Centre for Higher Education Studies in cooperation with the Council of Higher Education Institutions, the Accreditation Commission, and other representatives of higher education institutions within the “Research for Public Administration” programme. This project, undertaken in the period 2002-2006, aimed to establish a comprehensive methodology for external quality assurance, supporting the improvement rationale in part by utilizing the coherent internal quality evaluation schemes in place at higher education institutions, such as those based on the ISO 9000 series, the TQM and EFQM models. The most important outcomes of the project was a draft of this methodology and pilot testing at selected higher education institutions (UWB did not participate in the testing phase).

The overview of activities leading to the embedding of an internal system for evaluation and quality management at UWB illustrates that these activities were initiated as a response both to external factors – especially the experience gained through international projects and contacts between the UWB's management and representatives of European universities in the first decade of the UWB's existence – and to internal factors arising from the objective to establish a modern, integrated university and to be competitive with the long-established comprehensive universities in the Czech Republic. The need to implement a sophisticated internal system for evaluation and quality management was supported by the UWB's management, irrespective of the lack of support in the internal legislation. In this respect, the adoption of Rector's Directive 16R/2000 (UWB, 2000) was not only a response to the new legal requirements of the state (the Act on Higher Education No. 111/1998 Coll.) but also a logical consequence of internal processes.

9.5. CONCEPT OF INTERNAL EVALUATION AND QUALITY MANAGEMENT IN BASIC UWB DOCUMENTS

Paragraph 21 of Act No. 111/1998 Coll., coming into force in 1999, has required higher education institutions to evaluate their activities regularly and to publish the results from such an evaluation (the Act, 1998). However, the Act does not specify the mechanism, content, scope and frequency of the evaluation. This is entirely at the discretion of the higher education institutions. At UWB, the evaluation concept is institutionalised in the internal legislation and strategic documents which are named and characterized below.

9.5.1. The Statute

The Statute gives the basic internal regulations of UWB, and is subject to registration by the Ministry. In the statute, paragraph 32, the areas subject to evaluation at UWB are
defined as evaluation of education, research, art and other creative activities, quality of the academic and self-governing environment, and functional and financial efficiency (UWB, 2008b). The quality, its level, and overall efficiency are evaluated in relation to the objectives set in the Long-term Plan of the UWB, and the results are further analysed in view of stakeholders’ requirements (including students’ and employers’ perceptions and preferences) and the performance of other national and foreign higher education institutions. The resulting analysis is used for updating the long-term plan on an annual basis, and by the boards and teams operating at UWB. Hence, internal evaluation of quality, its level, and overall efficiency at UWB is related with some general evaluation criteria used in higher education in the Czech Republic and elsewhere.

9.5.2. The Long-Term Plan and the Annual Updates

The Long-Term Plan of Education, Research, Art, and Other Creative Activities (further LTP) is the key strategic document of the university. The obligation to elaborate such a plan is given by Act No. 111/1998 Coll. (paragraph 21). If quality is defined as fitness for purpose and the purpose is defined as an objective, the LTP can be used as an instrument for appraising the extent to which the strategic objectives have been fulfilled. The LPT can therefore be understood as an instrument for quality evaluation. The LPT itself contains the mission, strategic objectives, further development, and future orientation of UWB. The document was prepared by the strategic team, and is valid for five years. Currently, UWB is working under the LPT for the period 2006-2010 (UWB, 2005).

In general terms, UWB’s LTP reflects the long-term plan of the Ministry, whereas its structure is customized to meet the needs of university management, which enables its use as an effective instrument for quality assurance. The quality aspect is expressed in almost all strategic objectives of the university. To evaluate the fulfilment of the objectives of the LTP, the Strategic Team developed an instrument in which indicators with twenty-seven indices are defined for each of the eleven objectives of the LTP. For each index, the data source, responsibility, frequency, and monitoring level are defined. Currently, data are being gathered for evaluating the LTP. In the annual updates, priorities are set to ensure that the objectives will be achieved in correspondence with the plan. For each priority, measurable values are set for achievement of the objective and for the responsible person, and a monitoring schedule is established. The Ministry has put forward the UWB’s conceptualisation of annual updates as an example of good practice for other Czech higher education institutions.

In the annual update for 2009 (UWB, 2008a), UWB modified those objectives which, according to the evaluation, clearly could not be achieved at the required level.

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4 The Strategic Team, whose members are representatives and professionals from the faculties and other parts of the university, is appointed by the rector.

5 Indicator is understood as the value of a set goal.

6 Index is understood as a numeric/non-numeric part of an indicator.
within the required time. This applied to the age structure of research and teaching staff, students' employment in a profession relevant to their degree programme, prestigious publication activities, and mobility of students in doctoral programmes. In the LTP and its annual updates, the recommendations of external stakeholders are taken into account when the LTP is discussed by the Board of Trustees and the Scientific Board, and approved by the Academic Senate of UWB. In the LTP for 2006-2010, the concept of quality evaluation and management is formulated as covering quality evaluation and quality management in education (including life-long learning), R&D, internal university structure, university management, infrastructure, self-government, human resources, internal environment, and external relations.

9.5.3. Annual Reports

The basic legally required document for evaluating the activities of UWB, and all other Czech higher education institutions, is its Annual Report. The Annual Report indicates the degree of fulfilment of the LTP and its annual updates. In the case of UWB, the report is structured into seven chapters (plus the introduction and the conclusions), dealing with quality and excellence of academic activities, quality and structure of academic staff, and internationalisation; a separate chapter, consisting of a descriptive part supplemented by empirical data (in tables and graphs), is devoted to quality assurance at UWB. Following the recommendation of the Ministry to match the structure of the annual report and the long-term plan (and its updates), starting with the Annual Report for 2007, UWB has adjusted the internal structure of the report to include an evaluation summary referring to chapters in the long-term plan and the developmental priority set in the updates. The summary provides information on what was achieved in the period under review, reasons why particular objectives were not achieved, and recommendations for improvements.

9.5.4. Rector's Directive No. 16R/2000

The basic internal regulation codifying the system for evaluation and quality management of the educational process is Rector's Directive No. 16R/2000 (UWB, 2000). This directive sets the responsibility, defines the basic terminology and elements of quality assurance of education, and describes the process of evaluation and quality management. In the unified study environment of UWB, the conditions of study are regulated by the Study and Examination Rule. Under this rule, programmes are conducted at faculties but departments operate on an inter-faculty basis, and the data

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7 The Scientific Board, appointed by the rector, deals, among other issues, with habilitation procedures, makes critical comments on the long-term plan and its annual updates, and approves candidates for doctorates honoris causa. Its members come from UWB and from other Czech universities, the Czech Academy of Sciences, the Czech Association of Innovative Enterprise, and also from the private sector.

8 The Academic Senate of UWB is a self-governing body whose members are representatives of the academic staff and representatives of students.
are administrated jointly (for all parts of the university) with the use of the university information system for the study agenda (IS/STAG). All these factors have influenced the implementation of the system for evaluation and quality management of the educational process at university level, allowing for reasonable flexibility to take into account the specific conditions at each faculty. This system, subject to regulations, is still being implemented into the educational process. To ensure more effective management and coordination of the educational process and control processes, the Commission for Quality of Teaching was set up as an advisory body to the rector, with at least one member representing each faculty and the Student Council of the Academic Senate.

The major university documents dealing with the concept of evaluation and quality management at UWB attest to the following development: in the early years of UWB’s existence, quality evaluation of the educational process was in focus, as regards the quality of human resources and the quality of the infrastructure supporting the educational activities. Steps were also taken to pursue evaluation and quality management of UWB’s non-educational activities. This implies the formulation of a coherent system of quality management and evaluation, as documented in the LTP for 2006-2010, which explicitly formulates the creation of a coherent system of internal quality assurance (UWB, 2005).

9.6. OUTLINE OF EVALUATION AND QUALITY MANAGEMENT OF THE EDUCATIONAL PROCESS

The system for evaluation and quality management of the educational process comprises activities leading toward continuous quality improvement within the internal environment of UWB, namely:

- the educational process itself (structure of degree programmes, adequacy of the objectives, instruments, methods, form of teaching, etc.);
- the human factor (high expertise, pedagogical competences, open attitudes, communicativeness, ability and willingness to engage in life-long learning and to responding to current developments in the field, etc.);
- material and technical infrastructure of teaching and learning.

9.6.1. Responsibilities Defined within Assurance of Quality of Education

At central level, the rector is responsible for quality of education. Similarly, at faculty level, the dean is responsible for the quality of accredited degree programmes, for the quality of courses taught by the faculty’s departments, including those taught within degree programmes accredited at other faculties. At departmental level, the head of department is responsible to the dean for the quality of all courses provided by the department, and, if the courses are included in degree programmes of other faculty, also
to the dean of that faculty. At course level, the guarantor is responsible to the head of department for the course that she/he is charge of. Other teaching staff members are responsible to the course guarantor for the quality of their teaching.

The system of quality management at UWB has been developed in relation to the environment represented by the external and internal stakeholders. In brief, the external stakeholders are the state, applicants for programmes, and employers, while the internal stakeholders are students, academic staff and non-academic staff. Within such an environment, the departments that provide courses and programmes and the faculties play a crucial role. The quality management objectives within the institutional context from different stakeholders’ perspectives are as follows:

- from the society’s perspective, the objective of quality management is to help to fulfill the mission of the university to develop intellectual and human resources in the society;
- from the students’ perspective, the system of quality management should aim at continuous quality improvement of the courses and programmes that are offered, ways of teaching, infrastructure of teaching, and support activities and services;
- from the employers’ perspective, the objective is to identify the main requirements for human resource development and for the quality of human resources;
- from the departments’ and faculties’ perspective, the objective is to improve linkages between courses and to customize their content in compliance with the objectives of the degree programme, to support systematic inter-departmental communication between the guarantors of interlinked courses (courses that are parts of a degree programme), to enhance fulfilment of the educational goals of the courses, to raise the effectiveness of the educational process and the support activities, to provide a feedback loop for the course guarantors, and, more generally, to provide information concerning the quality of staff performance for the management.

The basic elements of the system of quality management at UWB – courses, degree programmes, study plans, control proceedings, submitters and processors, are treated in greater detail below.

- A course is the basic teaching unit. It is characterized by a course code, the number of credits awarded, and further attributes that are described in the course syllabus in the study agenda database. The draft of the course content is made by the course guarantor, and is submitted to the head of department, who may make changes and assumes responsibility for the draft. The draft passes through

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9 Each course at UWB has a guarantor, whose responsibilities include the content of the course and the expertise of other staff participating in teaching the course.
the approval procedure (approval by the dean, the accreditation body at faculty level, the UWB Accreditation Board at central level) in accordance with the Study and Examination Rule.

• A degree programme is defined in Act No. 111/1998 Coll. (paragraph 44) (The Act, 1998), and can comprise individual fields of study. The proposal for a degree programme is discussed in the faculty’s academic senate, approved by the faculty’s scientific council and submitted by the rector for the accreditation procedure at national level. As the proposal for a degree programme passes through the internal accreditation procedure, the external stakeholders (advisors from other higher education institutions, employers of the graduates, graduates with work experience) can participate in developing the degree programme.

• A study plan is the basic document that determines the structure of a degree programme or study field (where applicable), and the student workload. It specifies the preconditions for graduation (credit limits), blocks of compulsory, compulsory optional, and optional courses included the recommendation for course selection in the standard year of study. The study plan is given a unified pattern in IS/STAG, and its structure is subject to the following codified principles:
  – the minimum number of credits for graduation is sixty times the standard length of the degree programme, given in academic years;
  – the course statute (compulsory, compulsorily optional, and optional);
  – the standard study procedure (sixty credits/academic year) corresponds to twenty-six teaching weeks (on average);
  – the total number of credits for compulsory and compulsory optional courses is not more than 90 per cent of the minimum number of credits required for graduation from a given degree programme;
  – a maximum of twelve credits may be awarded for preparing the Bachelor’s thesis, and a maximum of eighteen credits for preparing the Master’s thesis.

• Control procedures – information gathering and evaluation of information:
  – the submitter is the employee of UWB responsible for the quality of teaching in accordance with the given responsibilities (rector, vice-rector for study affairs, dean, vice-dean for study affairs, head of department, course guarantor). The control procedure can also be initiated by a resolution of both the accreditation body and the academic senate of the faculty, together with UWB’s Academic Senate (including the Student Council);
  – the processor of the control proceedings is an employee of UWB commissioned by the submitter, who gathers and processes the information and transmits the results to the submitter. The data with which the processor works is confidential, and the processor is bound to secrecy.
The process of evaluation and quality management can be described as a cycle with the following six phases:

- control proceedings, consisting of data gathering and data evaluation, self-assessment (each evaluated employee obtains feedback from his/her line manager), which can lead to careful consideration of the feedback and suggestions for ways to deal with any shortcomings that are identified;
- external consultancy, as the submitter is entitled to ask for an external expert assessment (by professionals from other faculties or from outside UWB), which can help significantly in dealing with shortcomings;
- a summary evaluation is made at a meeting, initiated by the submitter, with all involved parties present;
- recommendations formulated in order to deal with shortcomings and to enhance the quality of the educational process;
- implementation of recommendations in accordance with the given responsibility for the quality of the educational process;
- control of fulfilment of the recommendations. This can be performed by the submitter in subsequent control proceedings, or by a senior member of the university staff, or by the Commission for Quality of Teaching.

The system evidence with all the results from the control proceedings is processed electronically and saved in the database. Basic information about each of the control proceedings is published on the UWB website. The system is designed for data gathering from three main respondent groups: students, graduates, and employers. At central level (in relation with IS/STAG), the student questionnaire (the staff questionnaire on quality evaluation of support activities and services) is processed. The employer and graduate questionnaires aimed at gathering information on the quality of degree programmes, especially from the perspective of graduates’ success in the labour market, are collected and analysed centrally (quantitative evaluation). Comments requiring specific answers (qualitative evaluation) are analysed at faculty level (and further inquiries are made, if necessary).

Although not all points of the Rector’s Directive have been fully implemented (e.g., the sixth point in the quality management cycle is not yet fully in place), and some points have been modified since the directive came into effect, the Rector’s Directive has been of significant importance in developing quality management at UWB. Student evaluation of teaching activities, up to 2000 largely random and initiated individually by teachers interested in having feedback, has been replaced by an integrated and coherent system that is obligatory both for teaching staff and for staff indirectly involved in the educational process (e.g., support staff). In the near future, UWB intends to amend the directive in reflection of current developments in quality assurance, including internal and external stimuli.
9.7. IMPLEMENTATION OF THE SYSTEM FOR EVALUATION AND QUALITY MANAGEMENT OF THE EDUCATIONAL PROCESS

At UWB, the approved concept of evaluation and quality management of the educational process is implemented through the internal accreditation procedure, which involves both course and programme accreditation, and also through student evaluation of teaching.

9.7.1. Process of Internal Course Accreditation

The study environment at the university can be said to have two basic characteristics:

- degree programmes designed and implemented at the faculties;
- departments incorporated into faculties, from the organizational point of view, but operating university-wide (providing tuition in all relevant courses for all faculties).

This necessitates the Study and Examination Rule, the central data evidence system (IS/STAG), which gathers data on study activities, and the procedure for course approval (for all courses registered in the central database). The Accreditation Board and the internal accreditation procedure, covering both courses and degree programmes, were established to make these instruments more effective at UWB. The status of the Accreditation Board, which also functions as an advisory body to the rector, is codified in Article 35 of the Study and Examination Rule (UWB, 2004). The members of the Accreditation Board, two representatives from each faculty, are appointed by the rector after discussion in the Academic Senate of UWB. The Board’s main task is to examine the content of courses submitted by the faculties. The main evaluation criteria are:

- the quality of the guaranteeing unit, i.e. the competency of the department designing and teaching the course, and the professional and teaching competency of the course guarantor (see above);
- the adequacy of the number of credits awarded for the course;
- conditions restricting enrolment for the course (special prerequisites, i.e. courses required to be taken by the student before enrolling for the course);
- quality of the course syllabus.

New courses designed for new or innovated degree programmes, proposed in reaction to identified needs of students and broadening the range of optional courses on offer are negotiated with the Board. There is also renegotiation when there are significant changes to courses, e.g. modification of the number of credits, replacement of the course guarantor, modification of contact teaching hours, or, when shortcomings are objectively identified.
Officially, there is a regular annual meeting of the Accreditation Board as part of the preparatory process for the new academic year. However, in the context of ongoing broadening of the range of degree programmes offered at UWB and responding to the mechanism for accreditation and re-accreditation of degree programmes at national level, extra meetings are required. The declaration that no course may be entered into the UWB’s central course database, and that no course may be taught, without approval by the Board, is the fundamental principle framing the activities of the Board. Credit allocation, the essential condition for approval, requires the assent of the absolute majority of all members of the Board. Most submitted proposals are approved, as they have already passed through an accreditation process at faculty level, which to a great extent assures the quality of the proposal. However, in some cases, accreditation is not granted. In such a case, the Vice-Rector for Study Affairs is informed about the Board’s negative decision. She/he then initiates negotiations on dealing with the shortcomings and gives feedback to the Chair of the Board. After the shortcomings have been successfully dealt with, renegotiation takes place within the Board. In specific cases, when negotiations with the departmental representatives or with the deans of faculties are inconclusive, and the proposal is not modified in a way acceptable to the Board, the rector makes the final decision on accreditation. It is worth noting that, since the initiation of internal accreditation, such cases have occurred a few times, not due to poor quality of the proposal but as a result of inter-faculty disagreements on the division of competences.

9.7.2. Course Description and Syllabus Content

The Accreditation Board monitors the quality of the course syllabus. The pattern of the course syllabus is set in IS/STAG. Within the pattern, the main items are as follows:

- course name and course identification code;
- time period of course validity;
- number of credits;
- course guarantor and lecturers’ names (including who gives the lecture and who supervises seminars and practicals);
- number of teaching units (number of contact units per week);
- type of course (lecture, seminar, practical training, supervised independent work by the student, etc.);
- course annotation (short identification of educational objective);
- course content (specification of basic topics and schedule);
- course requirements (given by guarantor);
- course completion and assessment rules;
- study sources.
The syllabus items giving the course description were designed in the context of the implementation of the UWB credit system in the 1990s, and were modified in correspondence with the development of IS/STAG. In connection with the greater emphasis given to quality enhancement of the study environment, UWB launched projects aimed at a qualitative shift in course description. Particular inspiration came from ESMU Benchmarking (see Chapter 10), from innovative teaching and learning methods, and also from cooperation with other Czech universities in preparing the documentation for the ECTS Label. Knowledge gained from these sources, and also from management and monitoring, revealed that the approach to course description at UWB was not very systematic. It tended to inhibit the use of less teacher-centred approaches, which had been successfully introduced only in a limited number of fields of study. Recommendations made on the basis of such findings were analysed and discussed by UWB’s management and boards, and were made use of by teams working on the development of teaching and learning processes (e.g., the Team for Credit System Development).

It was explicitly stated that the university should focus on innovations aimed at the step-by-step transformation of the current teacher-centred model towards a student-centred model. In order to fulfil this strategic objective, it is essential to develop instruments for managing innovation in the educational process. Specifically, the two teaching methods have to be monitored and evaluated, and support for innovative teaching methods has to be established (cf. ENQA, 2005). In this context, a project was launched in 2007 aimed at qualitative transformation of study activities. Within the framework of the project, a detailed analysis was made to compare the current functioning of UWB’s credit system with the ECTS requirements. As a consequence, a new, updated version of course descriptions was prepared in IS/STAG, together with a draft on the methodology for innovative course creation.

The updated course syllabus pattern, which takes into account innovative teaching approaches, contains the following new items:

- aims (objectives) of the course, i.e. formulation of the expected “added value” of the course from the student perspective;
- learning outcomes and competencies (formulation of knowledge, abilities and skills, both specific and generic);
- teaching methods and teaching strategies, including formulation of teaching methods in relation to expected outcomes and course content; e.g. a classification based on both student work organization (collective, individual, course work, training, field trips) and methods of work in class (e.g., in terms of orientation of the lecture: lecture with activisation, discussion, analysis of video recordings, practical applications, e-learning, participation of external professionals; or in terms of orientation of the seminar toward group work, cooperative work, team project work, dialogue-based work, multimedia supported work, presentations by students, individual or group project consultations, etc.);
— assessment methods including verbal assessment, self-assessment, feedback loop, reflection, self-reflection, peer assessment, combination of grades and verbal assessment, written reflection, self-evaluation, as well as, more broadly, the requirements for passing the course.

The methodology for setting up innovative courses developed by the expert team (which includes teachers, teacher educators, and psychologists), has been tested through innovative descriptions of hundreds of courses from all faculties. This methodology will become obligatory for all study courses in the process of qualitative transformation of the database, which will be carried out in 2009, with the strategic objective of gaining ECTS Label certification. The quality of courses designed according to the new syllabus pattern will be assessed by UWB’s Accreditation Board, as a crucial element in gaining internal accreditation approval.

9.7.3. Internal Accreditation of Degree Programmes

According to Act No. 111/1998 Coll., the introduction of a new degree programme is conditional on accreditation granted by the Ministry following the expert standpoint of the Accreditation Commission, the body legally responsible for Czech higher education quality assurance (the Act, 1998). A proposal for programme accreditation, or re-accreditation, is first approved by the faculty’s scientific board and by the academic senate. Then, it is submitted to the rector, who in turn submits the written application to the Ministry. At UWB, new degree programmes are designed in accordance with the strategic plans of the faculties, which are subject to annual review and are discussed by UWB’s management. UWB’s concept of an integrated environment necessitates coordination of degree programme design; programmes that can be provided by departments from more than one faculty are not internally accepted for accreditation without activities being coordinated, responsibilities being clarified and demarcated, and duplication being limited. To accomplish this, internal accreditation (UWB, 2004) with explicit principles for degree programme design has been established at UWB.

In procedural terms, internal accreditation is initiated by the dean of the faculty submitting to the Rector’s Council a proposal for a degree programme, which contains the graduate profile, demarcation of the participation of other faculties, its relation to other degree programmes that have already been accredited, and a statement on the likelihood of being granted accreditation by the Accreditation Commission. After discussing the proposal, the Rector’s Council10 decides whether the negotiations will be continued in the form of “full” or “shortened” internal accreditation. Full internal accreditation is initiated in cases when the proposed degree programme requires significant inter-faculty cooperation, has a significantly interdisciplinary character, or is duplicated by a degree programme that has already been accredited. If any of these possibilities arise, e.g. in the case of an interdisciplinary programme, the Accreditation

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10 The members of the Rector’s Council are the members of university management (the rector, vice-rectors, bursar), deans of faculties, and directors of university institutes.
Board launches an expert assessment of the programme proposal, specifying its relation to other degree programmes, identifying partners at other faculties, and suggesting a team (whose members are representatives from all participating faculties) to cooperate on preparing the accreditation documents in accordance with the official methodology developed by the Accreditation Commission. Simultaneously, the proposal to offer an interdisciplinary degree programme is discussed internally among the faculties concerned. The faculty’s positive standpoint, confirmed by the dean’s signature, is of great importance, as it obliges the faculty to assume co-responsibility for providing the programme. The faculty’s agreement is sought in order to ensure stable conditions during implementation of the degree programme, as this is essential for the quality of the process. The outcomes of the expert assessment, along with the standpoints of the faculties, are again discussed in the Rector’s Council and submitted by the dean of the faculty proposing the programme to the faculty’s scientific board for approval. The shortened internal accreditation scheme is carried out only at the faculty submitting the proposal, and is used in cases when the Rector’s Council finds no reason for negotiating the proposal with UWB’s Accreditation Board, and when an agreement has already been signed between the faculty guaranteeing the programme and the cooperating faculties. It is obvious that content of the degree programme proposal is fully in the competence of the guaranteeing faculty, and internal approval of its quality is primarily in the competence of the faculty’s scientific board. At the faculty level, to a greater or lesser degree, cooperation is sought with external stakeholders (especially with potential employers of graduates) on elaborating the proposed content of the degree programme.

The educational objectives of each degree programme are defined in the “graduate profile”. Fulfilment of these objectives is assessed by means of a questionnaire sent to external members of university’s examination boards and boards for thesis defence. The respondents are asked to assess the level of theoretical knowledge and practical skills of the graduates, the level of graduate performance, and the level of preparedness for professional work, and to determine three strengths and weaknesses of the proposed degree programme. Respondents are also asked for recommendations and suggestions on the graduate profile and study plans (made on an annual basis within the programme provision).

9.7.4. Student Evaluation of Educational Activities

At UWB, student evaluation of educational activities is perceived as a standard activity of the academic year. At the end of each study period (typically a semester), there is student inquiry into the quality of educational activities, the results of which are regularly analysed and discussed by the university and faculty management. A search for appropriate instruments for carrying out student evaluations of educational activities throughout the university revealed that electronic evaluation should be chosen. After considering the limitations of the method, those in favour of instituting electronic evaluation put forward the following arguments: electronic inquiries do not burden the teaching staff and are a minimal burden for students. In addition, they allow for flexible introduction of new questionnaires. In the process of institutionalising electronic
student evaluations of educational activities, two types of questionnaires were devised: Questionnaire A, for evaluating all the courses for which the student is enrolled in a given study period, and Questionnaire B, for detailed evaluation of a given course. Later, a questionnaire for evaluating services and infrastructure (study offices, library, canteen, etc.) was added.

At the beginning of 2003, students were for the first time asked to evaluate educational activities in the winter semester, which was just coming to an end. A questionnaire was generated for each student, asking about the courses that she/he was enrolled for. Each course was evaluated on the basis of the following three positive statements identical for all courses:

- the lectures were interesting, comprehensible and useful;
- the tutorials (seminars) were well conducted and useful;
- the knowledge necessary for passing the course was reasonably demanding to acquire, and the assessment was done objectively.

The student was able to give answers expressing the extent of her/his agreement. On a scale, these were: “I completely agree”, “I partly agree”, “I partly disagree”, “I disagree”, “I completely disagree”. In addition, there was the option “no answer” for respondents who did not know the answer, or would/could not answer.

The piloting of such a type of evaluation could be considered successful, though it revealed many problems that needed to be solved in the following years. Technical issues were addressed by integrating the EVALUATION module into IS/STAG, thus establishing an administrative module for the design of a new inquiry (respondents option, heading adjustment, question and answer text setting), and also for setting the scope of the inquiry (special customised questionnaires for faculties, forms of study, programmes, fields), and other parameter setting (inquiry opening date, text of e-mail sent to potential respondents, veto period for publication of results, etc.). Organizational issues were also resolved; since winter semester 2002/03, an evaluation of all courses (questionnaire type A) has been undertaken periodically. In organizational terms, the submitter is the Vice-Rector for Academic Affairs; the inquiry opening time corresponds with publication of the evaluation results for the previous year. The two activities are deliberately set to overlap, and the evaluation is timed to be held with an overlap of at least two weeks between the provision of the courses in question in the evaluated study period and the following study period. Before finally submitting the questionnaire, the respondent can enter repeatedly and edit her/his answers. In addition to providing answers to tick-off questions, respondents also have the option to insert additional remarks, and teaching staff can comment on them. The evaluation results are continuously available to certain staff members (course guarantor, the head of department, the dean, the Vice-Rector for Academic Affairs) who can, within the fixed period of three weeks, veto publication of results. If not vetoed, the submitter makes the results available to all academic staff members. Anonymous verbal evaluations are not published, whereas comments signed by students – it is interesting and pleasing to note that there are plenty of such comments – are available for academic staff in
addition to the results of the tick-off questions. Since the first launching of the evaluation, the content of the questionnaire has been significantly modified on a respondent-recommendation basis, with an additional option to evaluate the inquiry itself. The originally grouped statements have been separated and simplified in formulation, with the number of statements rising from three to five, as follows: “The lectures were interesting”, “The lectures were comprehensible”, “The tutorials (seminars) were well conducted”, “The tutorials (seminars) were useful”, “The evaluation of knowledge necessary for passing the course was done objectively”.

The explicitness of the statement formulations (the content and form of the questionnaire were assessed by an external evaluator) enables students to decide for a specific statement option more precisely. The main issue limiting the effectiveness of the evaluation system, and quality management of the educational process in particular, is the low student participation rate. This has a negative impact on the credibility and predictive value of the data, information efficiency, and on data utilization in qualitative enhancement of teaching activities. It is essential to achieve improvements in these areas in order to develop the evaluation of the educational process.

9.7.5. Utilization of Evaluation Results

The standard system has also been developed over the years in the area of utilisation of the evaluation results. We are currently working with student evaluation results at several levels, corresponding to the university level hierarchy. Reports on the organization of the inquiry and the results of the inquiry are regularly discussed and assessed in the Rector’s Council (central level), and recommendations are given on how to use the results.

On the basis of the evaluation results, a prize was awarded to the best-evaluated member of the academic staff, and, based on the example of good practice of the Faculty of Engineering, institutionalisation of student quality managers was discussed. The focal point for utilization of the data is at faculty level (coming within the purview of the deans). It is standard procedure to have official discussions on evaluation results (including verbal evaluations) with heads of department. Responsibility for solving problems with the course guarantor lies with the head of department. If a significant or recurrent problem is identified, it is the dean’s responsibility to discuss the problem personally with the staff member concerned, and, importantly, also in person with the students involved (field of study, study period, programme, course, etc.). Another responsibility of the dean is to provide an evaluation summary of his/her faculty to the internal stakeholders (students). Dialogue, partnership, problem explanation, and a search for objective solutions are considered the most important conditions for fulfilling the objectives of the evaluation process. The lowest, most fundamental level is implementation of the results by the course guarantor and by the course teaching staff. The set-up of the evaluation system enables staff members to respond directly to the evaluation results, with a general reaction or with specific comments. Staff responses are not obligatory, but if they are made they are published. Both the number of responses and their content are monitored; unfortunately, staff members make only sporadic use
of this instrument. However, this should not be taken to mean that they do not respond at all; in an ideal situation, each staff member should make students aware of the existence of the evaluation procedure and inform them about the evaluation results for his/her course at the beginning of each study period. It is essential that staff members learn to accept questionnaire evaluation as an instrument for self-assessment and as a starting point for dialogue with students. It is the belief of UWB’s central management that the way to go forward is not primarily through regulation and directives, but through internal motivation and self-reflection of the staff.

On the basis of experience of organising evaluations of educational activities over eleven study periods (semesters), it is possible to draw some explicit conclusions. Student evaluation of educational activities by means of electronic questionnaires is conducted systematically, and the evaluation results for individual periods are mutually comparable. For academic and management staff at all levels, instruments are available for identifying and monitoring problems. The availability of such instruments helps to indicate the quality of educational activities. It is pleasing to note that there is a growing tendency for students to participate in student evaluations, suggesting that limited student participation is being overcome. However, there is still only limited effective utilisation of the outcomes. Further developments in the evaluation of educational activities thus hinge on achieving greater activation of the academic staff. The key element here is to facilitate the conditions for more pro-active involvement of the dean and faculty management, as the faculty level is the focal point both for enhancing the quality of degree programmes and for mutual interaction and feedback between students and teaching staff members.

The approved concept of evaluation and quality management of the educational process has been implemented and institutionalized at UWB. The university Accreditation Board and the Commission for Quality of Teaching, both with specific competencies, have been established and are working. The fundamental system processes (questionnaire inquiry) are run on a regular basis. However, more effective utilisation of the gathered data, formulation of recommendations, their implementation, the feedback loop, and systematic implementation of control proceedings with external respondents (employers, graduates) are still to be mastered.

9.8. INSTRUMENTS OF IMPLEMENTATION OF QUALITY CONCEPT IN EDUCATIONAL PROCESS

Quality assurance of the educational process is supported by monitoring the quality of the material and technical infrastructure, the information system, study sources, and the technical equipment of laboratories, in particular. High-quality internal study regulations are also an important consideration.

9.8.1. Information System

In 1993, the study system was restructured and the credit system was made compatible with ECTS. It was necessary at this time to implement an information system as a support tool for the study agenda. IS/STAG, the information system for study and
study agenda management, was therefore developed together with the transformation of the credit system. A new version of IS/STAG, launched in 2000, was introduced in response to the legislative requirements of the Act No. 111/1998 Coll. At present, IS/STAG is used as a comprehensive tool for the entire study process – from registration of applicants through the admission process, student enrolment, monitoring, and control of student study results to final exam documentation and printing the diploma and Diploma Supplement. One of IS/STAG components is the EVALUATION module, in which electronic questionnaires are generated, and data is collected and statistically processed. Within this system, a student is able to create an individual study plan and also a course schedule on her/his own. From the technical point of view, IS/STAG is supported by the study plan and course schedule visualization. It displays both courses that the student has already passed (including grades/assessments) and courses for which the student is enrolled (and that therefore have not yet been passed). In terms of study organization, the student has excellent information support available. The information support for the faculties and for the university administration is also excellent.

9.8.2 Study Sources and Student Support

The educational process is supported by various resources (literature, study materials, technical equipment) provided by departments, faculties, and university departments (central level). UWB’s library contains circa 356,000 volumes, of which circa 161,000 are freely accessible. There are 493 places in study rooms inside the library that are accessible on working days. Projects dealing with quality enhancement in the study environment (see Chapter 10) link IS/STAG with the library information system, so that a student can find information in the course syllabus not only about study literature but also where it can be found in the library building. The library information system also supplies the course guarantor with information about the availability of specific literature items; every item of literature required for a given course is required to be available in the university library (at least for study inside the library).

Electronic sources are further items of information and sources of study material. UWB has successfully completed a Courseware (CW) project under the title “Quality Improvement of Access to the Electronic Study Resources of Selected Study Programmes at UWB” (UWB, 2008c), funded by the European Commission in the framework of the European Structural Funds (Operation Programme Human Resource Development). This project aims to establish a central environment for publishing electronic study resources, to gather together all electronic information and materials for courses offered at the UWB, and to present them in a unified form. The project has also led to the design of a substantive system for study support and for communication between teacher and student. The CW is widely comprehensible and simple-in-use, and meets the expectations of all faculties. Significant advantages are its maximal integration into IS/STAG and data mining into other university information systems. The key principle was to present registered courses in a unified form and in a unified structure. A pattern was therefore constructed that ensures a uniform structure and web page
design, structured information, and easy orientation and information access both for logged-in users and for the public. The structure was created by a team of teachers and programming engineers, in compliance with modern teaching and learning procedures, focusing on a partnership between student and teacher. Experience from the creation of the first hundreds of courses confirms that this project is beneficial for both teachers and students.

Both students and staff members benefit from the increasing efficiency of teaching activities. Both study comfort and the quality of the educational process have been enhanced. The prerequisites for a student-teacher dialogue have been established – easily accessible and well-structured information appropriately provides student with basic information, so that during classes the focus can be on problem solving. Such a pattern structure motivates the teacher to provide an explicit definition of the course learning objectives, course content, teaching and assessment methods. In the context of strategic support for the combined study mode (distance study), study resource design is ensured (including e-learning courses, entire study courses or parts of study courses). To support such activities, the Centre for Computer-Aided Teaching has been established as a part of the Institute for Life-Long Learning, operating at all-university level. The Centre provides methodological and technological support for authors and tutors of e-learning courses. Cooperation has been established with two other Czech universities (since academic year 2005/2006, e-learning courses have been mutually conducted and offered to students), and cooperation with other universities is now being developed.

9.9. CURRENT UWB ACTIVITIES IN THE QUALITY ASSURANCE AGENDA

In the context of international and national development, UWB has focused so far on quality evaluation in the educational process. Though specific activities are being pursued in quality enhancement, UWB has not yet implemented a comprehensive quality assurance system. In the very first phase of quality assurance, UWB decided to follow a step-by-step attitude based on implementing activities leading to stocktaking in particular areas. Then data analysis steps were taken to ensure ongoing quality enhancement in given areas. Currently, UWB is aiming at a new degree of quality management not only in education, but also in R&D, services, and third role activities of the university. For R&D evaluation, quantitative measurements are used. All launched projects are evaluated annually by comparing planned outcomes with realised outcomes. R&D results are analysed in relation to the R&D results of other Czech higher education institutions, while detailed evaluations are made down to faculty level. For these analyses, UWB uses the same methodology as the Research and Development Council\(^{11}\) (financial resources acquired, score evaluation, state budget index, impact factor, number of publications and quotations). UWB is now aiming to implement instruments that will also reflect qualitative issues of R&D and will, for example, make it

\(^{11}\) The Research and Development Council is an advisory body of the Czech government.
possible to evaluate project proposals. In services, UWB has worked on introducing a questionnaire method (including technical support) which is fully implemented in evaluating educational activities (see above). Technically, the system for service evaluation is ready, but the methodology itself must be revised, due to lack of interest from internal stakeholders (academic staff). UWB is also focusing on systematic monitoring and criteria implementation for services. Another movement in quality assurance is the launching of project management for core university activities at all levels of management; the process model construction methodology is in force, and the “Atlas of Processes” has been established, containing five parts: education, R&D, administration, human resources, and ICT.

Another strategic tool in use at UWB is the risk management system (RMS). Started up in 2006 and fully implemented since 2007, the RMS enables risks to be identified that endanger smooth process organization and provides information for decision-making. It is thus understood as a further element in performance enhancement. The key purpose of the RMS is to identify risks arising from carrying out all the roles of a university. Risk monitoring can be performed horizontally, across the organizational structure. UWB believes that, in the case of an institution of higher education, the following categories should be taken into consideration: study agenda, strategy, management, infrastructure, human resources management, finance, legislation, ICT, and public relations. At present, sixty items (risks), including sixteen key risks, are identified in these categories. A risk-owner is assigned to each risk, monitoring it continuously, and twice a year compiling a report based on all findings. Half-yearly, based on the risk-owners’ reports, the RMS manager produces a summary report, which is subject to approval by the Risk Management Board. If necessary, the Risk Management Board also approves steps for improvements suggested by the risk-owner. If during monitoring the risk-owner identifies a particular risk that is immediately threatening, he/she can launch the early-warning system by informing both his/her direct line manager and the risk manager, and may suggest steps for improvements.

The early-warning system is understood as a tool that facilitates an immediate reaction to a risk event (leading to risk diversion or to minimization of an imminent threat). A comprehensive quality assurance system will be designed with the objective of compatibility not only with UWB’s strategy but also with the RMS. UWB is aiming at a system structure that can be linked with both process models and the internal legislation system, and perhaps with ISO 9000 (ISO standards issues are currently being piloted at the Faculty of Mechanical Engineering). Both systems – the comprehensive quality assurance system in the making and the RMS – could serve as effective instruments, but only if the top management supports full instrument implementation, monitors whether steps for improvement are continuously implemented, and ensures that system efficiency is regularly evaluated. Without such support, such systems cannot be utilized effectively.

12 The Risk Management Board’s members are: the risk manager, the rector, the vice-rectors, the bursar, and the head of the internal audit department (without voting right).
9.10. DEGREE OF IMPLEMENTATION OF THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA FOR INTERNAL QUALITY ASSURANCE

This overview of the development and the current activities in quality assurance at UWB implies the following extent of implementation of ESG Part 1 in the internal quality assurance of the university (ENQA, 2005):

9.10.1. Policy and Procedures for Quality Assurance

UWB has institutionalised an official strategy, policy and procedures for quality assurance. The strategy and policy is formulated in the Long-Term Plan of UWB and particularly in its annual updates. The Long-Term Plan and its updates contain the institutional strategy on quality, its goals, realization and fulfilment. The approval procedure of the plan, which is discussed in UWB’s Scientific Council and in the Administration Board, and approved in the Academic Senate, is given by the law. UWB’s Statute and the corresponding internal legislation (particularly Rector’s Directive 16R/2000) explicitly determine the responsibilities and competencies within the structure of the internal quality assurance system.

9.10.2. Approval, Monitoring and Periodic Review of Programmes and Awards

The UWB’s strength is its sophisticated system for internal accreditation of study courses and programmes, supported by the IS/STAG advanced information system. Specific bodies such as UWB’s Accreditation Board and the scientific councils at faculty level are institutionalised and active; it is their task to evaluate study courses and programmes. However, the problem remains that these bodies focus predominantly on newly prepared proposals (programmes, study courses) and not, as a rule, on evaluating programmes that are currently offered. With the exception of final examinations, such evaluations are made, rather infrequently, by external stakeholders on the basis of questionnaires. The results of the questionnaires are analysed and are used for innovation of programmes. Student evaluations of educational activities are conducted regularly, at university level, supported by IS/STAG. These questionnaires are analysed by the university management. However, teaching staff play the key role in establishing and maintaining the quality of the courses and providing feedback to student evaluations. The most important level of quality management is therefore the departmental level. Student evaluation is thus understood as giving feedback to the course guarantor, and as a starting point for a dialogue between students and teaching staff members. Study materials, including electronic sources, are accessible, and have been developed especially for part-time study, which is often based on e-learning. A priority for UWB in the study area is an orientation towards explicit formulation of learning outcomes and designing mechanisms for regular monitoring of the fulfilment of learning outcomes, financially supported by the Ministry’s development programmes.
9.10.3. Assessment of Students

Criteria for the assessment of students during the study process are set in the Study and Examination Rule. According to this internal legislation, teaching staff must make the conditions for passing the course explicit and publicly available. However, detailed criteria for classification are not given. Students are assessed by a commission in final examinations, in progress examinations, or in special cases. In most cases, however, students are assessed by a single examiner.

9.10.4. Quality Assurance of Teaching Staff

Evaluation of the competencies of academic staff primarily reflects their research activities. The teaching competencies of members of the teaching staff are assessed by student evaluation, which is perceived as a source of feedback and as an instrument for self-assessment. No systematic training on management and quality development of the teaching activities of teaching staff members has been implemented. In the framework of life-long learning courses, teacher education for teachers in higher education is offered, but there has been a weak response to this. A significant change is expected as a result of the strategic decision to create conditions for ECTS Label certification. The preparatory process involves a qualitative transformation of the credit system. A transformation of teaching activities, educational and assessment methods (both at course level and at programme/field level) is necessary for the implementation of learning-outcome focused educational strategies. This implies a learner-centred transformation of the educational process at UWB. To achieve this, a new course description methodology has been prepared, and is now being piloted. The aim is to involve all teaching staff members actively, and to put on workshops for course guarantors. Until now, innovative teaching and learning have been rare and unsystematic. There are university level plans to enhance the implementation of innovative teaching methods (including assessment) in the near future.

9.10.5. Learning Resources and Student Support

The corresponding ESG standard is met; the availability of course resources including recommended study literature is monitored by internal accreditation, and significant attention has been paid to developing electronic study support. At UWB, there are excellent computer facilities which are continuously developed with the help of funding from the Ministry's development projects and from Higher Education Development Fund projects, among other sources. The university development project was launched to establish and further develop the network of consultancy and counselling services; consultancy and counselling in study matters is done at the faculties, while the Information and Consultancy Centre (operating at central level) conducts other consultancy/counselling services, i.e. career, social, psychological consultancy/counselling; also for disabled students. No system of personal tutors is in place at UWB, though at faculty level such a role is often played by teaching consultants or Vice-Deans for Study Affairs.
9.10.6. Information Systems

The study agenda is supported by IS/STAG, with modules supporting study administration from the admission process to the process of graduation. The EVALUATION module forms a part of IS/STAG and is used, on a standard basis, for student evaluation of educational activities, and, recently, for evaluating the material and technical support for education (services such as study departments, library, etc.). In addition, the INIS information system is available. It contains both general study information (obtained from IS/STAG) and other information concerning university activities (project administration, figure tables for management, students’ and teachers’ mobility, etc.). Data for monitoring of the employability of graduates is mined from national databases; a regular analysis is made of numbers and rates of graduate unemployment (detailed down to fields of study).

9.10.7. Public Information

Information about degree programmes is regularly published in university publications (a separate supplement/separate issue containing a basic overview of accredited degree programmes being offered and admission procedure information). Such overviews are also published in professional periodicals such as “Teaching Newspaper” and “How to Enter a University”. Annual reports and reports on admission procedures are also published. The publication “Study Information”, containing an overview of all degree programmes and study plans, course annotations and other relevant information is issued annually and made available for students and the public. In the near future, the UWB will publish an “Information Package” in compliance with the ECTS methodology for the ECTS Label certificate. Information support is now ready. All parts of the university are currently participating in processing innovated versions of all degree programmes and study courses in conformity with the ECTS Label methodology, including a focus on learning outcomes.

9.11. STRENGTHS AND WEAKNESSES OF UWB IN THE ESG CONTEXT

The overview of ESG Part 1 implementation at UWB indicates the following strengths: institutionalised strategic documents containing the concept of quality management and evaluation, standardized and codified internal accreditation processes of degree programmes and study courses, student evaluation of educational activities, support for the study agenda and for administration through the IS/STAG information system, continuous development of electronic study resources, continuous development of consultancy services for students, objective information on degree programmes. On the other hand, the challenges that UWB faces are as follows: insufficient awareness of the creation and publishing of explicit learning outcomes, monitoring and feedback from employers and graduates on a regular basis, little emphasis on student assessment procedures (e.g., setting criteria for the examination process, establishing examination by commission), and on establishing processes for recognizing the teaching competencies of academic staff and providing conditions for their development. Qualitative
transformation of the credit system in compliance with the ECTS Label methodology is a short-term strategic objective in the study area. This requires much greater emphasis on learning outcomes, modern teaching and learning procedures, and assessment methods. These are weaknesses that need to be eliminated.

As regards quality assurance policy, the development of the quality assurance system at UWB has attested to the findings from the EUA-organised institutional evaluations, which pointed to the importance of devising an appropriate procedure for establishing an internal quality assurance system. At UWB, this procedure entailed phased implementation of quality management processes affecting different university levels to a different extent. In first phase, centralised quality management was created as a unifying element, ensuring that various mechanisms of and approaches to quality assurance functioning of the university parts (faculties, departments) could be subsumed under a single unifying concept, followed by institutionalisation and establishment of the corresponding legislation framework for quality assurance at the central level. University management and university boards have taken on the role of guarantors for application of the normative framework (see the Rector’s Directive concerning quality, in particular). Finally, at central level, a comprehensive system for quality assurance has been established, providing an appropriate framework for regular monitoring and a feedback loop for strategic decision making. UWB has already gone through the first two phases, and is currently taking steps to implement the third phase, i.e. launching a comprehensive system for internal quality assurance. To this end, UWB has submitted a project proposal within the call for projects supported by the European Commission in the framework of the European Structural Funds.
CHAPTER 10

PARTICIPATION OF THE UNIVERSITY OF WEST BOHEMIA IN EUROPEAN QUALITY PROJECTS FOR INSTITUTIONAL IMPROVEMENT

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10.1. INTRODUCTION

In the context of internal and external aspects of embedding a quality culture within the structure of the University of West Bohemia (UWB), the university considers it a necessity to implement its own policy on quality assurance and its own instruments of quality assurance. In addition, in the context of labelling itself as a university open to all innovative ideas (UWB, 1996), the university learns from its participation in European quality projects, and benefits from such experience in implementing its quality policy. The orientation toward European projects rather than overseas projects is not only based on historical conformity and geographical proximity. Furthermore, an important factor playing a significant role has been implementation of the Bologna Process agendas, which has brought greater benefits than could have accrued from a non-European initiative.

In this chapter, we focus on the most important quality projects that have improved UWB’s institutional quality assurance policy throughout almost two decades of UWB’s presence on the Czech higher education market, and we outline the impact that they have had on institutional quality assurance policy.

10.2. THE JEP+PROJECT

In the first decade of UWB’s existence, the university’s participation in a JEP+ project was a very important milestone in the development of its quality evaluation and management, and had a strong influence on its future orientation (the consequences are described in Chapter 9). UWB was selected by the Ministry of Education, Youth and Sport (the Ministry) in the call for proposals of projects in the Ministry’s departmental research programmes. The project, fully named “JEP+ 08222-94 – Strategic and Institutional Management of Czech Higher Education Institutions: Concept and Implementation of Quality Assurance System at Higher Education Institutions in the
Czech Republic”, was carried out in the framework of the TEMPUS project in 1994/95.

The main outcome of the JEP+ project was the Quality Assurance Guide (UWB, 1995). This document represents a conceptual beginning, where the various aspects of quality assurance system implementation are discussed and confronted with examples from foreign higher education institutions, and a generic methodology is developed for constructing a quality assurance system at any higher education institution, with the methodology applied in practice within the institutional conditions at UWB (ibid.). In the Quality Assurance Guide, the basic conception of quality for the university is defined as follows:

At UWB, the quality assurance system does not aim in any manner to be certificated in the sense of certification in industrial corporations. It does not aim to create quantitative measures that could be used for any confrontation. The quality assurance system should serve as an instrument for systematic detection of insufficiency and to create conditions for its improvement. The system should be also used for identification of strengths. The quality assurance system is based on the internal need of employees to improve their teaching in particular. At UWB, quality assurance of the teaching process is conceived as a process of regular teaching evaluation (UWB, 1995).

In the first phase of the project, an analysis of existing European quality assurance systems was carried out. The project team made comparisons with the aim of identifying the best practice for UWB. In the second phase, the team designed a basic model of a system of evaluation of the teaching process, which was piloted at the Faculty of Applied Sciences (Department of Mathematics), and at the Faculty of Electrical Engineering (Department of Electrical Appliances) (UWB, 1994-96). Further outlined stages were dissemination of the system within all university departments and maintenance of the system including its continuous improvement (UWB, 1995).

Within the pilot project, the Board for Quality Assurance (Board) was established, with direct responsibility to the Vice-Rector for Academic Affairs. This institutionalisation provided a basis for working on guidelines for implementation of quality assurance system at UWB. Through close cooperation between the Board and the staff involved in the university departments, top-down and bottom-up approaches were linked (UWB, 1994-96). As the pilot project focused mainly on evaluation based on questionnaires, it also provided the basic features of the self-assessment procedure at UWB, reflecting the objectives set in the development plans (more recently known as University/Faculty Long-Term Plans) at both university and faculty level. While institutional self-assessment was institutionalised by the Rector's Directive in 2000 (UWB, 2000), the development plans, which were put in practice shortly after, are used until now as a managerial tool, helping to assess the extent to which strategic objectives are being fulfilled. Constraints that were noted in the case of student and external questionnaires

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1 The Ministry had introduced the evaluation of higher education teaching as a priority in the TEMPUS programme reflecting developments taking place about that time (rising attention to evaluation of teaching from the system level).
content, structure, number of questions, data processing – processing was done manually during piloting – and peer review) have been improved since then by introducing a new structure of the student questionnaire (for further reference see Chapter 9), launching the university information system STAG (and in particular its EVALUATION programme unit), regular consultations with external experts (from other universities, institutions, industry), and evaluating final state examinations by means of peer review as a standard tool. In recent years, UWB’s Long-Term Plan and its updates have been used in a more sophisticated way (see Chapter 9). Nowadays, questionnaires and also the Long-Term Plan are used as standard tools for quality assurance of UWB’s activities.

The JEP+ TEMPUS project at UWB aimed at answering the fundamental question: What quality models are acceptable for higher education institutions, and for UWB in particular? In the light of running the pilot project, it became obvious that the proposed model and guidelines were generally applicable at UWB, and that they could be implemented within the university. At the same time, undertaking the JEP+ TEMPUS project also drew attention to specific features of the UWB’s education environment, where it is essential to build the system on voluntarism and activism of the academics involved. An essential precondition was to promote the issue of quality of teaching. To this end, during the piloting period, workshops on quality assurance were held to train the staff involved. By undertaking this project, UWB manifested its significant interest in evaluation of teaching, and the university incorporated the outcomes of the project into the formulation of strategic documents and the implementation of follow-up measures.

10.3. QUALITY CULTURE PROJECT

Quality Culture Project 2002-2006 (QC 02-06) was initiated by the European Council in the framework of the Socrates programme. It was coordinated by the European University Association (EUA) in response to the Bologna Process initiatives heading towards the creation of the European Higher Education Area (EHEA). The project itself reflected the developments in the EHEA and benefitted the universities by familiarizing them with various internal quality assurance systems, promotion and notification of quality as a tool for management and strategic decision-making, and

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2 Theoretical part of this section is based especially on Quality Culture Project 2002-2006 and EUA Report on the Three Rounds of the Quality Culture Project.

3 Since 1994, the EUA has supported quality culture initiatives in the European Higher Education Area.

4 As quality assurance is an essential prerequisite for implementation of the Bologna Process priorities.

5 As quality of higher education is itself essential for the creation of such an area.

6 In Berlin 2003, the Ministers committed themselves to support further development of quality assurance at institutional, national, and European level, thus leading to the embedding of mutually shared standards for both internal and external quality assurance (see Standards and Guidelines for Quality Assurance in the European Higher Education Area).
achieving a competitive advantage. In addition, the project identified strategies for searching for available resources for quality enhancement at universities. Undertaking the project gave a significant boost to the implementation of an internal quality culture. From the perspective of the objectives of the Bologna Process, the project contributed strongly to improving the transparency and attractiveness of the EHEA institutions. The project addressed the relation between internal and external quality assurance processes, and also the issue of seeking a balance between performance enhancement (internal quality assurance) and accountability (external quality assurance). The main outcome of the project was the publication *Quality Culture in European Universities: A Bottom-up Approach* (EUA, 2006), which is now used not only as a reference paper for the EHEA institutions, but also serves as a source for other projects currently undertaken by the EUA. Briefly, the Quality Culture Project aimed at promoting the importance of institutional quality, a quality culture and mutual sharing of good practice. The project methodology was based on conducting SWOT analyses, developing action plans, and sharing each other’s practice, resulting in mutual learning of the institutions involved (Quality Culture, Methodology).

The Quality Culture Project was conducted in three rounds (see below). The selection of participating universities within each round was based on a separate selection procedure, consisting of the application, a profile description, and the motivation of the university (including an assessment of current activities and contemplated enhancement of such activities within the chosen network). Each round comprised three workshops in which the participating institutions presented a package of three documents containing information on the activities and the current situation with regard to the chosen topics (institutional presentation), a SWOT analysis, and measures scheduled for adjustment and improvement of issues identified by the SWOT analyses. These documents formed the groundwork for the sectional reports, which were summarized into the final project report. From 134 higher education institutions involved in the project, eighteen networks were created on the basis of geographical diversity, size and type, organizational and internal culture. The activities within each of the networks were guided and coordinated by an expert with long-term experience in dealing with a particular topic. The networks were active during the meetings, and through e-mail correspondence between the meetings.

The four-year EUA project consisted of three rounds. In Round I (launched in 2002-2003), fifty institutions grouped into six networks were involved, working on the following themes: research management, teaching and learning, student support services, implementing Bologna, collaborative arrangements, communication flow and decision-making structures (Quality Culture, Round I). The outcomes of a week of intensive work by a large number of participants were elaborated in the report *Developing an Internal Quality Culture in European Universities – Report on the Quality Culture Project 2002-2003*, in which basic principles were identified, and objectives and essential conditions for quality management and the organizational structure for creating a quality culture within institutions were outlined, dealing with issues related to external accountability, institutional autonomy, top-down and bottom-up implementation approaches, and approaches to quality culture (EUA, 2005a).
In Round II, which was launched in 2004, forty-five institutions were grouped into five networks, and the following themes were covered: research management and managing academic staff careers, student support services, implementing the Bologna reforms, teaching and learning, partnerships between universities and other types of higher education institutions, and programme evaluations (Quality Culture, Round II). In this round, there was a significant shift towards the link between quality culture and external environment issues (ibid.). In Round III of the project, launched in 2005, with forty-four participating institutions grouped into six networks, the following themes were worked on: research strategy and industrial partnerships, leadership, implementing the Bologna reforms, teaching and learning: implementing learning outcomes, women in universities: research, teaching and leadership, and joint degrees (Quality Culture, Round III). The outcomes of the final round verified the findings from the previous rounds and supplemented them by adding some more aspects. There was a significant shift in the definition of “quality” (output orientated vs. process orientated) (ibid.). Last, but not least, Round III focused significantly on the involvement of external stakeholders in strategic processes within the institution, with emphasis on involving alumni in quality assurance processes. All findings are summarized in the final report (EUA, 2006).

Being successful in the selection process in a significantly competitive environment, UWB was involved in the first two rounds of the Quality Culture Project. The university did not take part in the final round, due to staff changes in the department that represented UWB in this project. The university was represented by the International Relations Office (IRO), which cooperated internally with other specialised departments and provided a regular information flow to the management and rector of UWB. In Round I, UWB participated in Network 5 Collaborative Arrangements, focusing on cooperation at inter-university, regional, national and international level. UWB collaborated with other national and international universities, developed internationalisation, especially with regard to incoming students, developed its cooperation with industry, public service institutions, etc. Special attention was given to the positive and negative aspects of centralized and decentralized management. In accordance with the outcomes of Round I, UWB started to pursue activities aimed at promoting a quality culture7 within the institution. In Round II, UWB participated in Network 5 Partnerships between Universities and Other Types of Higher Education Institutions, within which UWB analysed its strengths and identified further challenges. Strong points related to cooperation with industry were: involvement of UWB in the industrial zone (by establishing the Research-Technological Park), collaboration with international corporations located in the zone (such as Panasonic AVC Network Czech), collaboration with business incubators, and the establishment of the New Technologies Centre. The relatively low living costs in the Pilsen Region and in the Czech Republic as

7 While the JEP+ project set the basis for evaluating teaching at UWB, the Quality Culture Project – in the sense of UWB benefitting from it – focused on internationalization and the involvement of external stakeholders in UWB’s quality assurance system.
a whole, and excellence in certain areas of R&D are other strong points. The internationalisation-oriented strengths of UWB included the professional department that is responsible for internationalisation, administration of European Educational projects, development of international partnerships, assistance with student and staff mobility, membership in various national and international associations, the existence of a quality assurance system in teaching, excellent IT support, as well as implementation of the credit system. On the other hand, challenges that UWB encountered were related to membership in the European Union, upgrading existing international contacts to develop collaborative partnerships, establishment of the information and consultancy centre, establishment of alumni clubs. The analysis also raised awareness of the university's weaknesses, e.g. insufficient demand from industry for customized research, inadequate marketing, insufficient language skills of academic and non-academic staff, a weak system for accepting incoming foreign students, insufficient staff loyalty (identification with the institution), ineffective information flows (both internal and external). Awareness of threats was also raised. Threats that have been identified include: declining numbers of students applying for technical programmes, weak motivation of academic staff for involvement in European projects, low salary levels in the Czech Republic, which are a disincentive for incoming foreign staff, and insufficient demand of SMEs for university R&D results (EUA, 2005b).

The networks in which UWB participated were selected in accordance with the university's strategy. Through internal project cooperation of some of the professional departments of the university, a significant number and a wide spectrum of university staff have become involved. Working on the background materials for each round of the project (presentation of UWB, SWOT analysis, action plan) brought significant benefits to the university management. It not only acquired up-to-date information (situation mapping, identification of strengths and weaknesses in particular areas) but also used the analyses and project findings in decision-making on further university development. However, the question remains to what extent the materials elaborated within this project were finally used, and what specific steps were taken on the basis of them. It can be reasoned that the International Relations Office (IRO) benefitted most from the project. As an example, the SWOT analysis was used by the IRO to form an office strategy on further development of internationalisation, to establish new partnerships with foreign universities, for bilateral mobility of students and academic staff, for an admission strategy for foreign students, to form degree programmes in English language (not only) for incoming foreign students, and to establish new services for these students (e.g., assistance in settling in to the new study environment, IT support, board and accommodation, cultural integration). Last but not least, the IRO benefitted from the Quality Culture Project by gaining experience in undertaking a supranational project. This experience has been put to further use in other international projects. Undertaking the Quality Culture Project has also proved beneficial to members of UWB's project team, which has capitalised on the availability of expert papers dealing with quality assurance systems in various institutional settings. Members of the team had an opportunity to enhance their competences in the subject. Regrettably, the staff and organizational changes (mentioned above) that led to the termination of UWB's
participation in the Quality Culture Project after the second round contributed to the fact that it has not been possible to implement some aspects of the action plan for improvements at UWB. Nevertheless, participation in the Quality Culture Project helped UWB to identify challenges that have been addressed (accession of the Czech Republic to the EU provided an opportunity for UWB to access the European Structural Funds, and to get more fully involved in the sixth and seventh Framework Programmes), by the establishment of the Information and Consultancy Centre in 2006, and to eliminate weaknesses identified by establishing the Department for Intellectual Property Rights, Technology Transfer and Structural Funds, expanding the Department of Public Relations, issuing periodicals primarily for readership inside UWB (STADY) and outside the university (TROJUHELNIK), three-level provision of information from management meetings on the web application portal, raising the language skills of university staff through language courses abroad, and improving the infrastructure for incoming foreign students by setting up the so-called “Buddy System”\(^8\). Finally, UWB’s participation in the Quality Culture Project led to the establishment of a motivation programme for long-term visits of foreign experts, and has led to intensified marketing for students of technical secondary/grammar schools. Workshops and open-days have been held, summer schools and special events such as “Science and Technology Days” have been put on in an attempt to attract school leavers to consider taking up scientific studies.

Reflecting the outcomes of the Quality Culture Project, i.e. terminology definitions, setting objectives, organizational structure and management as essential conditions for embedding the internal quality assurance system, UWB has been able to maintain and boost the efforts put into creating a quality culture at both university and faculty level. In keeping with both the Rector’s Directive (UWB, 2000) and the EUA project outcomes, UWB has persisted in applying a two-level quality assurance system, with some activities processed at university level and others at faculty level. Likewise, UWB has improved its performance in its internationalisation-related agenda, including partnerships with foreign higher education institutions, and has repeatedly addressed the issues referred to in the SWOT analysis created within this project.

10.4. ESMU BENCHMARKING

The main principle of the ESMU (European Strategic Management of Universities) Benchmarking programme lies in mutual learning, sharing of good practice, and continuous improvement of ways of benchmarking. The programme was initiated in 1999, and since then four areas of activities usually performed by higher education institutions have been evaluated annually (Závada et al., 2006). The global objective of benchmarking is to guarantee and to promote excellence of management of higher education institutions, while aiming to establish platforms for an annual evaluation of

\(^8\) Within this system, Czech students provide personal assistance to incoming foreign students, thus easing their integration into the institutional environment.
the situation and of the results obtained. Enhancement is achieved by disseminating the experience that has been gained (UWB, 2007).

As for methodology, the first step is to elaborate a self-assessment report (an evaluation questionnaire with the same structure for all institutions involved), which helps institutions to identify their strengths and weaknesses in their particular scope of activities. Then, at the joint workshop, there is a discussion on the activities that have been performed and on the processes at the participating institutions. The objective of the workshop is to identify to what extent and under what conditions the activities and processes have been implemented at each institution. During this phase, the first benchmarking is done. This may reveal that some activities/processes are run in the framework of everyday operations at a particular institution, and are therefore understood as a minimum standard. At other institutions, the same activities and processes may be treated as special actions at the maximum level (UWB, 2007). The items in the questionnaire are then evaluated by the Steering Committee, and the resulting values, together with examples of good practice, are sent back to the institutions. The examples of good practice emerging from the workshop discussions are scored at the institutions according to the availability and the degree of implementation of a given activity/process. The questionnaires and the self-assessment of examples of good practice form the basis for the final report, which positions the institution in benchmarking (corresponding to the above-mentioned institutional scoring), identifying what is going right (strengths) and what is not (weaknesses), in comparison with the other participating institutions. The final report includes the recommendations of the evaluators arising from sharing of good practice.

The UWB participated in ESMU Benchmarking in 2006/2007, and the following areas were assessed:

- Internal quality processes in the context of external quality assurance;
- Marketing at higher education institutions – positioning the institution in an increasingly competitive higher education market;
- Student services;
- Innovative teaching and learning.

As the top-down strategy was chosen for this project, the project team members at UWB were members of the university management (the rector, the vice-rectors, the bursar, and the chancellor). The management worked together with the professional departments on background papers for both self-assessment and the workshop activities. The team elaborated a self-assessment report (UWB, 2006), in which a detailed analysis was conducted of the institutional development of quality processes, marketing, students’ services, and teaching and learning. UWB considered this analysis to be a very important material, and it is still being used as a background paper for decision-making and managing the institution. While the self-assessment questionnaires have proved their importance for UWB in notifying to what extent given procedures and activities have already been implemented, the greatest benefits of the final report lie...
in the inclusion of a critical, detailed self-assessment by external peers of all institutions involved in the project, and in the detailed description of what each institution does right and what it does not do right. UWB could therefore learn not only from its own shortcomings, but also from the shortcomings of others. According to the findings in the final report, UWB’s project team elaborated an internal report (UWB, 2007), describing both the process of the running of the project, ranking UWB in comparison with the other institutions, identifying UWB’s strengths and weaknesses, and including the evaluators’ recommendations. Finally, UWB responded to the benchmarking results. For each area of activities assessed, the member of the university management with delegated responsibility compiled an action plan aimed at reformation and enhancement, and also saw to implementation of the follow-up measures.

As regards the findings, UWB scored highest in strategic management and planning; other strengths were the institutional quality assurance system (see Chapter 9), the focus on external customers’ needs, responsibility for information processing delegated to the professional departments, usage of feedback loops, establishment of managerial principles, evaluation of processes, etc. However, with respect to institutional quality assurance, it must be admitted that the quality assurance system at the UWB is still often assessed in a non-systematic and random manner, with little attention to human resource development, accompanied by a lack of internal staff training on quality-related issues. Specific steps have been taken by drafting and implementing an action plan. In addition, UWB has submitted a project proposal within the ESF operational programme “Education for Competitiveness”, aimed at implementing an integrated university quality assurance system and training university staff in quality matters in general and quality assurance mechanisms in particular. The findings concerning other areas subject to benchmarking, i.e. innovative teaching and learning, are mentioned in Chapter 9. Overall, it can be said that the ESMU benchmarking project findings were thoroughly analysed and discussed at top university management level, in the Rector’s Council (comprising university management representatives, deans of faculties and directors of university institutes), in the Academic Senate, and in the supporting boards (the Board for Development, the Strategic Team, the Board for Credit System Development), whose activities are related to administration and further development of the areas assessed.

UWB has benefitted from the ESMU benchmarking project, especially by having been able to identify and give further support to internal examples of good practice. In practice, this has involved mutual learning about what is functioning and what is not. As far as the benchmarking methodology is concerned, UWB has gained awareness of alternative ways of implementing the examined processes. Last but not least, participation in the ESMU benchmarking project brought UWB experience with the external assessment. UWB is currently implementing an action plan reflecting the project findings.
10.5. **THE QAHECA PROJECT**

QAHECA (Quality Assurance for the Higher Education Change Agenda) is conducted by the European University Association (EUA) in cooperation with the project partners: ACQUIN (an evaluation and accreditation agency, Germany), the Higher Education Academy (HEA, United Kingdom), and the National University of Ireland (NUI, Ireland). In addition, thirty institutions\(^{10}\) from the Bologna signatory countries are involved in the project. The selection of participating institutions was made through a selection procedure where the main factors were: motivation of the institution to participate in the project, experience in particular activities, and the quality of the action plan for implementation of results. QAHECA is a pilot project, supported by the European Commission in the framework of life-long learning activities, aimed at developing and testing a new quality system for education, focusing on creativity\(^{11}\) and innovation practices which should enhance both internal and external quality processes (QAHECA project). The principle lies in the formation of a mechanism for quality assurance whose building block rests on dialogue and experience of the institutions involved. The methodology that is applied should significantly increase the dissemination of good practice and boost creativity in the quality assurance process. The quality assurance process itself has the character of questions that aim to be motivating for and to stir self-reflection in the institutions involved. The questions addressed within the QAHECA methodology relate to the following range of institutional activities: student involvement, internal and external evaluation/assessment, curriculum development, dissemination of quality assurance practices, research-based higher education, lifelong learning, and institutional strategy. The thirty participating institutions were grouped into eight teams which have available a package of five questions. From the package, each institution chooses two questions. One question should address existing practice, where the institution has already succeeded in its institutional policy and which should be disseminated as an example of good practice (including a detailed description, also identifying obstacles that might occur), while the second question should stimulate institutional self-reflection on an activity or a process that the institution does not have in place or struggles with, meaning that the institution should implement a new practice, test it, and report on experiences or results achieved. Each institution elaborates an interim and final report covering both questions.

Another part of the QAHECA project involves workshop meetings, during which the participating institutions work together with the project partners on methodology formation, a testing phase in which the institutions test and report on implementation-

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9 Theoretical part of this section is based especially on the QAHECA project website documents <http://www.eua.be/quality-assurance/qaheca/>.

10 Including 8 quality assurance agencies, 8 artistic higher education institutions, and 14 higher education institutions with technical and other orientations.

11 The working paper for the QAHECA project is the publication Creativity in Higher Education; Report on the EUA Creativity Project 2006-2007 (EUA, 2007).
related issues, and a project proceedings phase in which the project participants elaborate the final publication. The time frame of the project is 2008-2009, and the outcome of the project will be a final report containing a theoretical section and a methodology description, as well as the selection of case studies.

At institutional level, UWB has established a project team whose members are the rector, the Vice-Rector for Study Affairs, the Vice-Rector for Strategy and Research, representatives of the Board for Evaluation of Teaching, and the project manager. The team prepares and discusses the materials for the project workshops, informing the university management on working procedures and overseeing the testing phase of the project at UWB (UWB, 2008d). UWB’s participation in the QAHECA project, in terms of implementation of the project results, will be reflected in the annual update of the Long-Term Plan of UWB for 2009.

As the QAHECA project is still running, it is impossible to draw any definite conclusions. However, it can be reasoned that UWB’s participation follows the university’s strategy to continue in launching international projects at university level in order to improve the institutional quality assurance policy, whether it is directly connected with rising awareness of quality issues and the need for embedding quality culture within the institution, or whether it enhances the internal and external quality assurance processes themselves. As the participation of UWB in the QAHECA project is a subject for reflection in the university strategic document (update of the Long-Term Plan), project-relevant issues are likely to be high on the institutional agenda in the foreseeable future.

10.6. CONCLUSIONS

Participation in European quality projects aimed at institutional improvement creates conditions for developing an institutional quality system that takes into account experience gained abroad and yet respects specific national and institutional conditions. The participation of UWB in European quality improvement projects has also enabled the university to test and to find links between top-down and bottom-up implementation approaches. The activities undertaken within the Quality Culture, ESMU and QAHECA projects have reflected the top-down strategy, while the activities carried out in the JEP+ project were bottom-up. By its involvement in these projects, UWB continuously responds to one priority in EHEA building, which is quality assurance not only at international and national level but also internal quality assurance at institutional level (which in fact goes hand in hand with the other two levels).

Through internal quality assurance, UWB proves that it fulfills its accountability role in relation to external stakeholders (society), whereas within the institution the tendency is to set the system in a way that assures that it focuses exactly on enhancing the core university functions, thus embedding an institutional quality culture. The participation of UWB in European projects on institutional quality improvement and quality assurance has revealed a clear tendency to incorporate project findings into the quality management processes and into decision-making at UWB. By launching the JEP+ project, UWB was able to some extent to raise the awareness of its staff of evaluation of
teaching. This led towards institutionalisation of the corresponding activities, codified both in strategic documents and in internal legislation. The conclusions from Quality Culture Project have proved beneficial not only for the coordinating department of the UWB, but also for stepwise implementation of the improvement/corrective measures (see the strengths and challenges, mentioned above). Within the Benchmarking project, an internal report was elaborated, including an action plan aimed at correction and improvement, with explicit responsibility for implementing the follow-up measures, which are currently being executed. The QAHECA methodology (or at least part of it) and the project findings are to be incorporated into the projected comprehensive quality assurance system at UWB, and will also be addressed in the strategic documents of UWB. However, the extent to which each step will be implemented differs. It is an ongoing challenge for UWB's management to work with the findings, to implement them in correspondence with the action plans, and to keep engaging itself in promoting the quality agenda and training staff in quality issues.
11.1. MUDDLING THROUGH AMBIGUITY AND TRUST IN QUALITY ASSURANCE

The first chapter of this book presents the argument that the predominant higher education quality assurance approach in the CEE region has been that of accreditation. While such an argument meets with widespread acceptance, and is once again upheld by the empirical case studies which this book contains, there is considerably less agreement on factors leading to inter-national policy borrowings and variations in inter-agency quality assurance practices. The general pattern of policy borrowings in quality assurance methodology can be established as Europe borrowing from the US. The active role of “pioneering countries” in translating and diffusing the borrowed schemes was played by the UK, the Netherlands and France (see Chapter 2). As Kells points out, “the ripples which started in these ponds have in the last ten to twelve years been felt substantially in probably forty to fifty countries wherein on or one or another kind of organised and more or less nationally-sponsored system has been developed” (1999). In ascertaining the reasons for instituting a particular type of a quality assurance scheme within a given country, Kells (ibid.) makes use of general dimensions of organizational culture, introduced by Hofstede (1991), developing a set of propositions on why national quality assurance schemes differ. However, some have found Kells’ propositions generally unconvincing, as “caution should be applied in trying to apply the same type of QA system in countries with different cultures, although academic cultures probably occupy a more compressed range of variation than wider social cultures” (Billing, 2004). The same arguments are put forward for the CEE countries, for “[t]hey imply an extent of rational planning and implementation that would be surprising in any setting, let alone in a newly-formed democracy in difficult economic circumstances” (Temple, Billing, 2003).

The limitations of the relevance of the rational-planning approach to assuring quality within the higher education setting, which are first of all characteristic of loosely coupled organizational structures due to the faculty’s professional adherence primarily to their discipline, are pointed out by Schmidtein (2004). He contrasts the rational-planning approach, based on the proposition that sufficient knowledge of current
conditions can be obtained, and relationships between ends and means determined\(^1\), with the approach of incrementalism originally postulated by Lindblom (1959), whose underlying assumptions are: the difficulty to specify, obtain consensus on, and measure the ends or goals of public programmes; discovery of the nature of policy choices in a complex environment by practitioner’s reactions to choices rather than by analysis; agreement on goals obtained largely through political bargaining; and accommodation to limitations of time, knowledge, and location through permitting inconsistencies, flexibility, and experimentation. Applied to the CEE context in the early 1990’s, particularly to national quality assurance policy domains facing entire reconstruction at that time, it does not seem unlikely that the reform propositions offered by foreign experts were based on implicit assumptions that they had sufficient knowledge of the country’s transformation specifics, on the possibility of attaining consensus on “the quality issue”, on how it should be solved, and by what method(ology). In other words, leaving aside the ulterior motives alluded to by Brennan (2005) and Kells (1999), foreign experts may have been proposing solutions of the theoretical\(^2\), rational-planning type in a setting where, due to the complexity of the quality issue being dealt with, a sequence of incremental solutions was needed. The first of these incremental solutions was to implement a system-wide regulatory measure in line with the national specifics. This may help to account for the fact that from the US accreditation concept, the CEE countries, as a rule\(^3\), adopted only assessment against threshold standards, leading to approval/accreditation. The other conceptual elements were either discarded (voluntary basis of accreditation, prevention of regulation of the system by public authorities) or modified (consequences of not granting accreditation). Not only the frictions internal to the politics of quality assurance affecting national actors – with the academe from well-established institutions getting the upper hand by the mid 1990s – but also the misunderstandings and confusion stemming from the foreign expert’s language of theory may have made the task no easier for those muddling through the quality assurance issues in implementing newly devised quality assurance schemes in the CEE countries (for available accounts, see e.g. Szanto, 2004).

That said, in retrospective, there is reason to assume that the processes of devising and implementing quality assurance policy in CEE countries have contained, in combination, elements of both of ambiguity and trust, whose varying intensity has helped to shape the character of the corresponding policy domain in time. Matland’s contingency concept (Chapter 3) and, to some extent, Scott’s periodisation (Chapter 1) can be employed to make this point clearer. The immediate post-1989 socio-economic

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1 In greater detail, the propositions of the rational-planning approach are: sufficient knowledge of current conditions can be obtained to discover circumstances that are detrimental to quality, relationships between ends and means can be determined to identify alternative courses of action, specific ends and measures of their attainment can be defined and agreed upon, effective methods for attaining selected ends are available (Schmidtlein, 2004, 275).

2 See the Lindblom’s (1959) characteristic of the rational approach relying heavily upon theory.

3 With most notable exception being Estonia, Poland (pre-2002), and the Czech Republic (pre-1999).
reforms in the CEE countries, initiated in the process of the transition to democracy and a market economy, led to an overhaul of the legal framework, and, in economic terms, to massive redistribution of wealth. These phenomena also affected higher education – typically through quick adoption of new higher education legislation and through funding limitations, both having implications for quality assurance. Within the higher education quality assurance policy domain, which was facing entire reconstruction, power was up for grabs and few if any concepts were available to make use of. This policy setting, characteristic of a high-conflict-high ambiguity configuration, thus made the immediate post-1989 implementation process of quality assurance policy in CEE countries, a period which can be somewhat arbitrarily set between 1989 and 1992, rather symbolic. However, the high-conflict-high ambiguity setting did not last long. Foreign experts’ advice and consultancy, however relevant and implementable the emerging propositions were, gradually made known the basic quality assurance rationales, approaches (accreditation, evaluation), and methodology (at least better known than in the pre-1989 situation). This somewhat reduced the element of ambiguity – as suggested by reaching a general consensus on the need to maintain a threshold quality level – but retained a high level of conflict over who should do it and how. In other words, in the mid-1990s, implementation of quality assurance policy in the CEE countries changed from symbolic to political, with the outcomes decided by the most powerful of the competing coalition of actors. As soon as this happened, the academe from public universities captured the quality assurance agencies that had been created, and forced through their preferred measures (mid-late 1990s). These were input based, accountability-heavy accreditation, or, to be precise, evaluation for accreditation. Implementation of these measures resulted in establishing an institutional quality compliance culture (cf. van Vught, 1989), thus eventually becoming rather technical/administrative with success dependent on the generosity of the Ministry’s financial backing of the agency rather than threatened by non-compliance of the target group (HEIs). However, the initiation of the Bologna Process agendas such as structured study has made an impact on the implementation of CEE quality assurance practices, making them increasingly time-consuming and labour intensive, due to the necessity to accredit every new degree programme also within the private higher education sector, with the amount of state funding not rising commensurately. For this reason, it is possible to assume that CEE agencies have, as of late, to some extent started considering implementation of less “heavy touch” measures, such as audit schemes (see the Hungarian case) which would, once implemented, to some extent, empower bottom-level actors. Correspondingly, the ESG guidelines for quality assurance agencies, which, if implemented fully, will put the agencies under the obligation to undergo periodic external reviews and keep to accountability standards, factor into the quality assurance policies of the CEE agencies, making them more “experimental” than ever before. Hence, the post-2005 developments in CEE higher

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4 Clearly, non-compliance with accreditation standards would have serious financial consequences for public/state HEIs, and private HEIs would have the license to operate denied/taken away.
education quality assurance can be seen as containing an element of *experimental implementation*. The factoring of ambiguity-trust relationships into the development of system-level higher education quality assurance policies in the CEE countries is shown in the figure below.

**Figure 7. Development of Ambiguity-Trust Relationships in CEE Higher Education Quality Assurance**

![Diagram showing the development of ambiguity-trust relationships with axes for low and high ambiguity and conflict, and quadrants labeled with types of implementation: administrative, political, experimental, and symbolic.](image)

*Source: The Authors.*

Obviously, this application of Matland’s contingency concept to explain the development of CEE quality assurance policy over time has limitations. Despite having some generalisable explanatory power, by making use of the “stagist” approach, it runs the risk of arbitrariness and simplifying too much in a domain where exceptions from the rule (in the CEE context, most notably Poland) are fairly common. This retrospective heuristic thus does not aim to be all-explanatory; rather to provide a starting point for developing testable hypotheses. Still, with its relevance also to the explanation of the ambiguity-conflict issue pertaining to ESG implementation, Matland’s contingency concept seems to be, in application, a useful heuristic tool for higher education policy research (cf. Sabatier, 2005).

As suggested, the redefinition of the quality assurance policy domain in the CEE countries, by the mid-1990s, was done by means of devising and implementing accreditation-like measures as an outcome of the external evaluation/approval scheme, reflecting the need to have a regulatory policy instrument in place. As Campbell and Rozsnyai point out:

It appears that in the Central and Eastern European countries, the predominant choice of “fitness for purpose” as the quality standard has emanated from the understanding that the purpose of a higher education institution or programme is defined in the pertaining legislation and that fitness is measured against the degree of compliance with the legislated requirements ... . It is evident that the preference in all the Central and Eastern European countries for accreditation rather than quality assessment alone occurred because, at the time of transition, a priority was to establish some sort of quality control for the higher education sector (2002).
The proposition that the change in the underlying characteristics of policy implementation within the CEE quality assurance policy domain follows the symbolic-political-administrative-experimental pattern prompts a question on the extent to which recent developments in the individual CEE quality assurance agencies reflect the dominance of input-based evaluation for the accreditation/approval concept. To shed some light on this issue, Perellon’s (2005, 2007) framework, which contains five central variables (objectives, control, areas, procedures, uses), is employed for inter-agency comparison (for an overview of the framework, see Chapter 2). In total, CEE quality assurance agencies from five countries, i.e. Latvia, Hungary, Poland, the Slovak Republic, and the Czech Republic are compared. A synthesis of the results (the full agencies’ accounts are given in the annex) points to the primacy of the application of accountability-oriented evaluation for the accreditation/approval concept, as suggested by the agencies’ scope of activities (areas) and procedures applied (based on the general quality assurance model), and publication of results (uses). However, it has to be admitted that e.g. the Latvian HEQEC undertakes a wider array of activities, such as maintaining the National Education Opportunities Database. The agencies’ scope of activities are set in their mission statements/statutes which closely follow national policies on quality assurance, formulated in general terms in legal enactments covering higher education, setting the objectives and the scope of actors’ control over the relevant schemes, typically divided between internal and external. Not surprisingly, the Polish “academic”-owned accreditation scheme (KRASP) deviates most noticeably from the general pattern given here.

Nonetheless, instigation of the compliance culture alluded to by Campbell and Rozsnyai, as the outcome of heavily accountability-oriented system level quality assurance policies in the CEE countries has not, as the case of the University of West Bohemia in Pilsen suggests, prevented some institutions of higher education from taking a pro-active approach and developing internal quality enhancement schemes. As documented in the case study (see Chapter 9), the University of West Bohemia in Pilsen (UWB) has considered institutional quality assurance, containing elements of both improvement and accountability, as one of its priorities since the university’s establishment in 1990. The adoption of ESG in Bergen in 2005 has not brought about any significant change to UWB’s system of quality management, mainly for the reason that implementation of the university’s quality management system was largely a spontaneous, step-by-step process. Within this process, it was, first, necessary to develop an institutional profile, clearly distinguishing UWB from the Czech universities that had already been in existence for many years. Quality assurance was seen as a major feature that UWB could make use of in profiling itself in the quickly developing, competitive Czech higher education system.

Development of quality management at the UWB reflected the development dynamics of the institution itself. At the beginning, following foreign examples of good practice also within developing partnerships, the improvement rationale was

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5 Covering the 2004-2008 period.
accentuated. Institutionalisation of the improvement rationale was further enhanced by UWB’s involvement in international quality management-oriented projects, which is still continuing (QAHECA). Experience obtained from participating in these projects was made good use of in formulating the university’s strategic policy documents, which set further institutional priorities in quality assurance. Later, in reaction to the legal obligations on accreditation as an external regulatory measure (1999 onwards), UWB also started to pay more regard to the accountability rationale. UWB was one of few Czech universities to go so far as to institute an internal accreditation procedure, aimed, simply speaking, at high-quality preparation of the degree programmes to be externally accredited by the Accreditation Commission. However, as the university’s participation in the international benchmarking project (ESMU Benchmarking) manifests, UWB continues to remain open to other forms of external assessment. Participation in ESMU Benchmarking brought significant experience of comparing UWB’s quality standards with those of other institutions of tertiary education in the international context.

In line with the institutional development strategy, such developments took UWB towards preparing to implement a comprehensive quality management system. In putting the comprehensive system into effect, UWB will understandably draw on experience accumulated over the years of the university’s participation in international projects, including identification of examples of good practice. By implementing a comprehensive quality management system, the university’s aim is to progress far beyond managing the quality of educational activities, and to focus on areas such as research and development, the “third role” of the university, service activities, and governance. The activities of UWB in quality assurance and management should thus raise the institutional quality culture and contribute towards continuous “self-improvement” of the university itself.

The development of quality management at UWB has also, to a considerable extent, been influenced by the Bologna Process. Reflection on the priorities of the Bologna Process has led UWB towards restructuring its degree programmes and more intense development of international cooperation, mainly in terms of greater participation in mobility programmes and greater attention to recognition issues. Hand in hand with recognition of periods of studies goes emphasis on recognition of the university’s activities based on a robust system of quality management. In this respect, UWB is endeavouring to implement a system compatible with ESG, thus potentially contributing to recognition of UWB’s activities, first, within partnership networks, and, subsequently, by other foreign higher education institutions. As far as the ESG guidelines are concerned, their underlying principle – openness and empowering of bottom-level actors – fully fits the integrated setting at UWB and UWB’s fundamental approach to quality management. At the time of ESG adoption, UWB had already implemented functioning, clearly described and well-defined schemes for management of educational activities. For the time being, UWB cannot state full implementation of the ESG Part 1 standards (is that the major purpose of ESG for HEIs?), and the university considers ESG as a frame of reference and as a challenge to put greater
effort into assuring the quality of those university activities that have so far been given minor attention, with only isolated, unsystematic measures taken.

The adoption of ESG in 2005, making full ENQA membership conditional on agencies successfully undergoing the ESG review, can hardly be regarded as a supranational policy initiative of the type that blows away without making any impact at all. Followed by the elaboration of rules qualifying agencies to be listed in the European Quality Assurance Register for Higher Education, based again on a review against ESG, ESG implementation is likely to have achieved a reasonably high position on the agendas of agencies whose activities centre on assuring higher education quality primarily within state or federal borders. How have quality assurance agencies coped with this challenge? In the CEE context, the ESG implementation analysis for the quality assurance agencies in Latvia, Hungary, Poland, the Slovak Republic, and the Czech Republic made in this volume suggests that the agencies are generally compatible with ESG, with contextual variations reflecting the degree of embeddedness of national quality assurance practices. Although the ESG experimental implementation pattern makes room for contextual interpretations by implementing actors, it is not unreasonable to expect certain adjustments to agencies' quality assurance practices. Such adjustments to agencies’ quality assurance practices relate especially to the standard on fitness for purpose (2.4), which the Czech concept of evaluation of accredited activities and the Slovakian concept of complex accreditation, under present conditions, seem to meet only partly. In addition, the standard on follow-up procedures (2.6) is not fully adhered to (not only) in CEE practice, where there are inconsistencies in approach. The standard on accountability procedures (3.8) is also not fully met – though it has to be added that it presents no difficulty for the Hungarian Accreditation Committee. Last but not least, the issue of meeting the standard on sufficiency of resources (3.4), which often prevents an agency from performing a wider range of activities – such as system-wide analyses (2.8) – is taken up in most of the country-specific ESG implementation analyses. Although resources are always hard to come by, the argument can be made in the CEE context that underfunding of agencies places limitations on their activities, including undertaking innovations. With regard to the primarily academic composition of the CEE quality assurance agencies, it prompts the question how many experts with provable experience in quality matters, knowledge of and sensitivity to the country’s specifics would be willing to engage themselves seriously in the time-consuming work of the agencies. The answer may well be not many, and since the agencies’ tight budgets do not, as a rule, allow for training of experts …

Unlike the situation at the national quality assurance agencies, implementation of the ESG for higher education institutions represents a black-box at the present time. Reflecting the lack of empirical investigations on this subject, Chapter 3 gave two theoretical propositions explaining this fact, both converging on the lack of proper incentives either because of the potentiality of implementation misfit as a result of successful ESG implementation not being recognised by the quality assurance agency (which might itself not be declared fully ESG compliant), or because successful implementation of the institutional ESG is taken for granted. The costs associated with
an ESG review also play a role – to make an impact, the review would have to be done by some preferably international experts of renown – and the incentives for institutions to undergo the ESG review may not be high enough.

A few remarks on the impact of quality assessment on institutions may be helpful to clarify the matter further. In conceptualising the impact of quality assessment, Brennan and Shah (2001) distinguish three mechanisms of impact: rewards, changing policies and structures, and changing higher education cultures. Specifying the relationship between the impact and the method of assessment, Brennan and Shah point out:

impact through rewards is likely to be a function of the published outcomes of assessment, in particular the nature of any summative judgements (numerical or otherwise) and their effects on funding, reputation, influence and so on. Impact through changing policies and structures is likely to be in response to the overall pattern of the internal quality assessment methodology as institutions organize themselves to respond to the requirement of external assessment. But, in addition, the impact of policy and structural changes might arise in response to recommendations made in particular assessment reports, concerning either specific programmes/departments or the institution as a whole. Impacts through changing cultures are likely to arise from experiences of the self-evaluation process and the effects of institutional quality assessment procedures (2001).

Applied to the ESG for higher education institutions, undergoing the ESG review successfully would make an impact through rewards. However, as the impact of publicising such a reward is presently presumably not high enough to offset the review-associated costs, an indirect impact of the ESG on institutional policies by means of internal benchmarking against the standards is more to be expected. This line of reasoning applies to UWB, whose quality enhancement activities have been implemented step-by-step, in line with the profiling of UWB as a dynamic, modern and comprehensive regional university, thus leading to implicit implementation of the ESG in time. That said, UWB’s quality management reflected the institutional-standard part of the ESG well before ESG was adopted. At the present time, ESG is considered as the reference framework, and as a guide to further development of quality enhancement schemes at UWB.

Let us now open the ESG institutional black-box somewhat. Given the inter-institutional variety throughout Europe, the study on ESG implementation at UWB should be followed by more case studies to obtain more empirical evidence and gain a further analytical insight into institutional implementation of ESG.

11.2. WHERE IS THE TRUST? GONE AWAY – WITH ACCOUNTABILITY TAKING ITS PLACE

In the CEE context, the choice of accreditation as an underlying approach to quality assurance attests to the dominance of the accountability rationale ever since the corresponding system-wide regulatory measures were taken. The dominant position of
accountability in higher education policy discourses, in turn, has led to the “often-cited
tension between accountability and improvement ... [meaning] that the improvement
essence of quality is sidelined in assurance processes by a focus on demonstrating compliance” (Harvey, Newton, 2007). Taken in the context of ESG, sadly or not, “the perceived incompatibility of accountability and enhancement approaches is not resolved by the ESG” (Harvey, 2008), presumably due to the experimental pattern of ESG implementation facilitating the interpretation of the standards and guidelines by bottom-level implementing actors⁶.

However, apart from the accountability-improvement tension, following Lane’s
normative propositions on the policy implementation process (see Chapter 3), a
relationship can also be established between accountability, characteristic of top-down
processes, and trust, which is central to bottom-up processes. With the reasons for the
loss of trust in higher education institutions treated in detail elsewhere (Trow, 1996;
Massy, 2003; Enders, 2005; Rosa, Amaral, 2007; Amaral, 2007), for the sake of our
argument, suffice it to say that the prominence of the accountability rationale,
supported by implementation of top-down regulatory quality assurance mechanisms
(accreditation) is likely to contribute to erosion of trust within loosely-coupled,
bottom-heavy, professional-type organizations such as institutions of higher education.
Accountability and trust, then, can be posited as two qualities inherent to the
implementation of quality assurance policies (cf. Blackmur, 2007), warranting further
investigation.

Given the centrality of the accountability rationale to higher education quality
assurance, a further investigation of its role can be made using the Accountability
Triangle (Burke et al., 2005). Developed by Burke and associates on the basis of Clark’s
triangle (1983) for assessing the accountability of US programmes, the Accountability
Triangle makes use of state priorities, academic concerns, and market forces (three
corners), with the central argument running as follows:

Higher education and its colleges and universities, both public and private, are
inevitably accountable to state priorities, academic concerns, and market forces. They
should serve all while submitting to none of these imperatives. Being accountable to
each of the three corners of the Accountability Triangle means balancing the response
to ensure service without subservience to public priorities, academic concerns, and
market forces (Burke et al., 2005).

The ideal accountability mechanism is thus positioned at the very centre of
the accountability triangle. Applied to the predominantly accountability-oriented
accreditation mechanisms in the CEE countries, the Accountability Triangle
looks as follows:

⁶ Although as Hill and Hupe convincingly argue, the top-down vs. bottom-up distinction “implies a
normative choice ... [as] there is always a ‘top’ in the analytical sense that somewhere is formulated and
decided what has to be implemented, but the location of that ‘top’ may vary: it may be even ‘at the bottom’”
The application of the Accountability Triangle in the CEE quality assurance context (quality assurance agencies in Latvia, Hungary, Poland, the Slovak Republic, the Czech Republic plus the University of West Bohemia in Pilsen) shows different degrees of dynamics because of the differences in the underlying characteristics between the schemes, most eye-striking in the Polish case, where two different attitudes are shown, i.e. the more state-accountable PKA accreditation scheme and the more academe-market oriented KRASP accreditation scheme conceptually more akin to evaluation, and because of the differences in configuration of the scheme itself as a result of the interplay of the three forces (academe, state, market) over time. By this logic, it can be seen that, in time, the Latvian, Hungarian, and Czech quality assurance schemes, partly as a response to changing higher education legislation, have been developing away from the state-academe configuration to somewhat greater affinity with market forces. On

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7 The positioning of the national agency/institutional cases was done by the authors of the corresponding chapters, being at liberty to apply more “stagist” or “dynamic” approach where applicable.

8 In this respect, it is worth bearing in mind that the Polish “academic” accreditation scheme is paid for by institutions.
the other hand, the Polish and Slovak state accreditation schemes have remained more stable in time, with less market orientation. To demonstrate this market affinity more clearly, the balance of power, in the Latvian case, has recently been shifted considerably towards empowering the stakeholders representing the “market”, i.e. the employers have become aware of their stake in assuring quality of higher education, and have started to become actively involved in it. The major emphasis in the Latvian quality assurance scheme is still on the academic community, with a slight increase in state involvement, as the society requires a reform of higher education (with a greater share of professionally oriented programmes), and the state has a responsibility to answer these needs, as it has undertaken to do so by signing the Bologna Process supportive documentation. With respect to power attributed to the academe, the CEE Accountability Triangle shows the Czech quality assurance scheme as most strongly academe-oriented at the outset. Given such a balance of powers in the early 1990s, in view of further policy developments, it can be reasoned that Czech academe, in comparison with the other CEE countries, has lost a great deal of its power to influence the design of quality assurance mechanisms at state level.

However, the institutional case of the University of West Bohemia in Pilsen displays a reluctance to yield to market forces, with UWB's accountability almost equally shared between academe and the state, thus not following the dynamics of the Czech state accreditation scheme. The share of institutional accountability to the state, which has not risen since UWB's foundation in 1990, to the detriment of academe-oriented accountability as one might have expected, can be ascribed both to the externally applied evaluation for accreditation and also, importantly, to the internally implemented accreditation scheme, with the institutional Accreditation Board in place since 1993. However, with the intended implementation of a comprehensive internal quality assurance scheme oriented more towards the needs and preferences of the university's external stakeholders, together with the upcoming changes in Czech higher education legislation aimed at making institutional decision-making more corporate than collegial, the hypothesis can be made that, in the near future, UWB's accountability position is likely to reflect market forces more than up to now.

11.3. CONCLUSIONS, POINTERS FOR FUTURE RESEARCH

Since the emergence of the quality issue in the wake of the higher education reform processes initiated to limit the impact of the Communist policy legacy, quality assurance in the CEE countries, based on the approach of evaluation for accreditation/approval, has developed into a robust, system-wide policy tool. The debates on the (in)compatibility of practicing both schemes (evaluation, accreditation), attesting to different rationales (improvement, accountability), “under one roof” have reached no unanimous conclusion, as is often the case (Kis, 2005; Tremblay, Kis, 2008). In the CEE context, top-down implementation of system-level quality assurance mechanisms, though helpful in keeping rogue providers out of operation, has, however, contributed to the rise of a compliance culture at institutional level. However, more empirical investigations into implementation of quality enhancement or assurance schemes by
CEE higher education institutions – preferably traditional comprehensive universities or private non-university institutions – are needed in order to ascertain whether implementation of accountability measures has been seen solely an intrusive requirement of external actors with the likely consequence of building institutional accountability superstructures to protect the academic core, or, rather, as in the case of the University of West Bohemia in Pilsen, a part of the university’s strategy fitting the institutional development policy in terms of enabling the university’s management to set and maintain threshold standards and the numbers of (inter-) faculty courses under control.

At system level, Perellon’s framework has proved helpful for ascertaining and comparing the recent practices of quality assurance agencies within the quality assurance policy domain, particularly by keeping the inquiry focused on five central variables. Nevertheless, given the fact that the framework variables were applied to the study of national quality assurance domains only by country experts and/or practitioners, the outcomes may be somewhat biased. A more balanced composition of teams testing the applicability of Perellon’s framework across the countries is to be recommended. Nevertheless, a comparison of post-2004 quality assurance practices in five CEE countries suggests some topics that are worth further investigation. The small country effect, which impacts on the impartiality of experts’ viewpoints in the course of peer reviews, is the first of these topics. Understandably difficult to solve, more empirical evidence is needed to find out how this problem is tackled in other even smaller countries in the region (Slovenia, Montenegro, Macedonia, Albania), and whether inter-agency cooperation similar to that within the Baltic states is realistically to be expected. The point on inter-agency cooperation also bears on the development and institutionalisation of mutual recognition of accreditation decisions. The Czech and Slovak case studies in this volume suggest that mutual recognition of accreditation decisions between the two countries is now coming to be considered more seriously, and the chances are that the stage of intentions (Hofmann, 2006) will be followed by the stage of implementation. Given the cooperation taking place under the Baltic Higher Education Coordination Committee, endorsing the realization of the Baltic Recognition Agreement following the principles of the Lisbon Recognition Convention, similar developments may be expected in the Baltic region. In a similar vein, further cooperation between the actors involved in implementation of the “academic” quality scheme in Poland may lead to modification of the scheme by merging the activities of the individual committees, thus aiming at greater transparency and effectiveness. The modus operandi will provide fertile ground for further research, the more so with the

9 In addition, this strategy of internal accountability, resting on the internal accreditation procedure overseen by the university’s Accreditation Board, helps to prevent duplication of courses at different university units (faculties, departments).

10 In force since 18 May 2000.

11 As suggested by Ewa Chmielecka in e-mail correspondence, 3 November 2008.
increasing pressure to adapt accreditation/evaluation schemes in place to the guiding rationales of the Framework for Qualification in the European Higher Education Area. Obviously, the predominantly academic composition of CEE quality assurance agencies, pointing to the phenomenon of agency capture by the interest group of one of the actors, is another topic for comparative research to find out more about the nature on the relationship between agency composition and the effect it has on the outcomes of agency activities. The findings accumulated in the course of the OECD “Thematic Review of Tertiary Education” project, summarised in the Final Synthesis Report (Santiago et al., 2008), may serve as a starting point.

Another set of propositions for future research pertains to accountability as the prevailing rationale behind implementation of quality assurance schemes and implementation of ESG as a supranational policy programme. Although exceptions apply, generally speaking, in the CEE region, accountability became central to the elaboration of system-wide accreditation measures right after the initiation of the post-1989 reform processes. On the other hand, quality mechanisms in West European countries have become assurance mechanisms with a strengthening accountability orientation in the wake of the initiation of the Bologna Process agendas. Needless to say, the rise of the accountability rationale has had repercussions at institutional level, leading in certain cases, particularly in the CEE context, to “accreditation fatigue”. These assumptions on differences in accountability dynamics are fertile ground for comparative research, both at system level and at institutional level, for which the accountability triangle (Burke et al., 2005) can be used as another heuristic tool. Solutions may be sought to the following problems that beset accountability in higher education:

- the lack of agreement on priorities and goals that leaves open-ended the commitments of, and demands on, higher education and leads to “360-degree harassment”;
- the disconnect among policy-makers, providers, and purchasers in developing accountability programs for higher education;
- the split between institutional improvement and external accountability;
- the lack of direct methods for measuring [student] learning ...;
- isolated programmes rather than integrated approaches to accountability;
- symbolic rather than effective implementation of accountability programmes (Burke et al., 2005).

Correspondingly, implementation of the ESG standard (3.8) on procedures of accountability by quality assurance agencies, despite the interpretation of the corresponding guidelines at implementing agency level, is likely to factor into agencies’ operational practices. This may in effect help to redress the balance between the
accountability requirements laid on institutions and on the agencies themselves. In this respect, more systematic research should be done into whether the unproblematic implementation of this standard, requiring improvement of agencies’ operational practices, in the sense of greater transparency, by the Hungarian Accreditation Committee represents an exception rather than the rule in the CEE context.

In a general sense, however, the analysis of ESG implementation by quality assurance agencies in five CEE countries made throughout this volume does not point to the existence of unbridgeable implementation gaps between ESG and agencies’ policies. Nevertheless, revisions of follow-up procedures, so far often only formally in place, and, to some extent, clarification of certain procedures (complex accreditation, evaluation of accredited activities) can be expected. Two major reasons qualify to explain this implementation success. First, the configuration of the implementation setting, which empowers actors in implementing agencies possessing the ability to interpret the guidelines according to the agencies’ specifics, and, second, in most cases, the considerable experience of the agencies in implementing quality assurance schemes. Although in the case of quality assurance agencies in Latvia, Hungary, Poland, the Slovak Republic, and the Czech Republic ESG does not represent a powerful driver for change (cf. Westerheijden, 2007), one wonders whether such a finding also applies to CEE agencies with a considerably shorter time span of their activities.

Implementation of ESG at institutional level presents a case for further empirical investigations by itself, largely for the simple reason that, due to the absence of case studies on this topic, little is known about it. Given the need for such investigations, both in the CEE countries and in the West European countries, attention should be focused on (dis)proving two theoretical propositions offered – the potentiality of implementation misfit and taken-for-grantedness of implementation success, with the ESG implementation-related costs factoring into both of them. Correspondingly, institutional case studies should look into the impact of ESG on institutional quality management. The UWB case, pointing to the use of ESG as a frame of reference for developing internal quality enhancement processes without actually undergoing the ESG review procedure (so far), suggests an impact through policy modification.

Overall, assessing whether implementation of ESG as a supranational programme falls under the rubric of successful implementation is a matter of seeing the glass either half-empty or half-full (O’Toole, 2000). With reference to ESG implementation, those seeing the glass half-full may point to the success of the process empowering implementing actors down the implementation “woven thread”, with forty per cent of

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12 See the research question on the likelihood of ESG shifting the balance on the accountability-improvement continuum at system and institutional level posed in Chapter 1.

13 While the Accreditation Commissions of the Czech Republic and of the Slovak Republic were established as early as 1990, the Polish State Accreditation Commission (PKA) has been operating since January 2002. However, apart from the PKA, which represents the national quality assurance scheme, Poland has a considerable tradition of the “academically owned” professional scheme, in operation since 1993 (Chmielecka, Dabrowski, 2003, see also this volume).
national agencies successfully reviewed to date, hoping for sufficient institutional incentives to make institutions of higher education join quality assurance agencies in undergoing ESG reviews. Conversely, those seeing the glass half-empty may come forward with arguments that, in reality, interpretation of the standards and guidelines is shrouded in obscurity, there is almost nothing to be implemented, the review-associated costs are therefore too high, which is just another “nail in the coffin” as far as institutional incentives are concerned, and the like. However, following the typology of scholarly approaches to implementation (Lester, Goggin, 1998), it might be a good idea for the “sceptics” to think about getting involved, if not for anything else, just to prove the ESG “testers” wrong.
REFERENCES


REFERENCES


REFERENCES

REFERENCES


REFERENCES


REFERENCES


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<table>
<thead>
<tr>
<th>Policy / Beliefs</th>
<th>Latvia</th>
<th>Hungary</th>
<th>Poland</th>
<th>Slovak Republic</th>
<th>Czech Republic</th>
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</table>
| Objectives       | Accreditation scheme evaluates against minimum standards assuring the quality of higher education and both internal and external recognition of Latvia’s diplomas; alignment with European quality assurance system. | HAC’s objective is to contribute to advancing the quality of the social commitments of the Republic of Hungary and of the HEIs. In this sense, the general aim of HAC is to safeguard the quality of Hungarian HE, to ensure its functioning in compliance with the requirements proclaimed in laws and legislative provisions, and to support the quality development of HE. | Two principal accreditation schemes in Poland:  
- the national (state-owned) scheme; the State Accreditation Committee (PKA);  
- the “academic” accreditation committees established by the Conferences of Rectors. The objectives of the schemes:  
  enforce at least the minimum quality requirements, removing those HEIs units which fail to meet them – it is mainly PKA that does this. Improvement of quality, and distinguishing HEIs with high quality of education – mainly the “academic” committees. | The Accreditation Commission, following the stipulations of the Act, monitors, assesses, and independently evaluates the quality of the teaching, research, development, artistic or other creative activities of HEIs and contributes to their improvement. | Set in the Long-term Plan of the Ministry for 2006-2010. Internal quality enhancement as a building block of the national QA system as well as international evaluations. Quality assurance should be developed with regard to HEIs’ strengths and with regard to achieving excellence where potential exists. Support for implementation of ESG. External QA fully in the competence of the AC. |
<table>
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<tr>
<th>Policy Instruments</th>
<th>Latvia</th>
<th>Hungary</th>
<th>Poland</th>
<th>Slovak Republic</th>
<th>Czech Republic</th>
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<tbody>
<tr>
<td>Control</td>
<td>Main stakeholders of the accreditation scheme – the state and HEIs, Expert Teams conduct the assessment, process organized by HEQEC, HEI accreditation done by HEC, programme accreditation done by AC.</td>
<td>By three main actors: HEIs, HAC and, less directly, the Hungarian Ministry of Culture and Education.</td>
<td>The PKA was established and acts on the basis of the Act on Higher Education, which set its fundamental obligations, powers and procedures. The Ministry established the PKA and is the main recipient of its findings. “Academic” ACs were established and act on the basis of agreements of rectors and under the control of the Rectors Conferences. Supervision by the Conference of Rectors of Academic Schools of Poland.</td>
<td>- Scientific board of HEI (evaluation of teaching and other activities); - Student’s right at least once a year to comment on the quality of teaching and teaching staff in the form of an anonymous questionnaire; - Accreditation Commission responsible for external assessment.</td>
<td>In the responsibility of the AC and the Ministry. Minimal standards by means of accreditation (also covering habilitation and professorial appointments) and state permission (approval). Accreditation awarded by the Ministry based on the AC’s standpoint; negative standpoint of the AC cannot be overruled. Institutions obligated to carry out internal evaluations and make the results public.</td>
</tr>
<tr>
<td>Areas</td>
<td>Latvia</td>
<td>Hungary</td>
<td>Poland</td>
<td>Slovak Republic</td>
<td>Czech Republic</td>
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</table>
|       | External QA of HEIs and programmes complies in general with ESG. Internal QA is implemented in every HEI, but should be adapted to ESG. External assessment of the quality assuring agency is on its way. | Accreditation of new HEIs, degree programmes, and audit of QA schemes, as well as re-accreditation of operating institutions and programmes every eight years. (Additional areas covered by QA procedures that are carried out on a case by case basis are listed in the 2005 Higher Education Act). | PKA programme accreditation for the two cycles of study, compulsory for every programme and HEI, whether public or private; covers all aspects of the teaching process and scientific research. “Academic” AC programme accreditation: for the two cycles of study; voluntary – for state and private HEIs; for programmes typical for groups of universities. | – Study programme provision;  
– Habilitation procedure and procedure for the appointment of professors;  
– Evaluation of research, development, artistic and other activities of HEIs. | External quality assurance (accreditation) leading to the decision covers the whole system (public, state, private HEIs).  
External quality assurance (institutional evaluation, evaluation of accredited activities) based on the AC’s selection (any type of institution may be chosen).  
Internal quality assurance (internal evaluation) obligatory, system-wide. |
<table>
<thead>
<tr>
<th>Procedures</th>
<th>Latvia</th>
<th>Hungary</th>
<th>Poland</th>
<th>Slovak Republic</th>
<th>Czech Republic</th>
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<tbody>
<tr>
<td>Current system applies the suggested model of review:</td>
<td>- self-assessment;</td>
<td>Built around a core set of guidelines, the procedures vary according to area. The procedure for ex post evaluation and accreditation carried out in the manner commonly accepted in Europe. Ex ante evaluation and accreditation carried out as paper-based exercises, with institutions submitting applications evaluated by external experts. HAC’s internal decision-making stream is basically the same in both ex ante and ex post procedures.</td>
<td>PKA: standards set by the Ministry. “Academic” AC: standards set by academic communities themselves. For both schemes, the procedure consists of: setting evaluation teams, HEI’s self-evaluation report, an on-site visit of the team to the HEI, evaluation report, accreditation decision taken by the Committee, follow-up procedures.</td>
<td>– Set by law and government regulation (published);</td>
<td>External QA procedures fully in the competence of the AC. Based on the general model of QA (with stages modified where necessary). The procedures include questionnaire-filling, constituting the major part of the self-evaluation report and data-processing (still more orientation on inputs). Internal QA procedures fully in the competence of HEIs and significantly diversified as to their complexity (typically ISO, EFQM vs. only questionnaire-based students’ evaluations).</td>
</tr>
<tr>
<td>Uses</td>
<td>Latvia</td>
<td>Hungary</td>
<td>Poland</td>
<td>Slovak Republic</td>
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<td></td>
<td>Information source for recognition of individual credentials from Latvia, by all stakeholders; information source for improvement-oriented activities.</td>
<td>The ultimate outcome of HAC's decisions is accreditation or non-accreditation of the areas covered by its procedures. The information collected is thus used to provide evidence for accreditation decisions. All HAC's resolutions and ex post accreditation reports are publicly available on its website.</td>
<td>PKA: basis for the Ministry decision to allow (or not) educational activities of the HEI. “Academic” AC: improvement of quality, distinguishing excellence. Both: implementation of internal quality assurance systems within HEIs; public information for a broad range of stakeholders.</td>
<td>Basis for decisions of the minister; Published on web pages; Recommendations for improving the whole system.</td>
<td>Outputs of the AC's procedures made public. Funding effects of accreditation. External QA declared as improvement-oriented, however in practice sometimes with consequences for accreditation. Publication of the outcomes of internal evaluations obligatory, but in practice with variations as to the scope of information. Outcomes of internal evaluation procedures used by the HEIs themselves.</td>
</tr>
</tbody>
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# ANNEX 2
## ANALYSIS OF STRENGTHS AND WEAKNESSES OF HEQEC AND THE CURRENT QUALITY ASSURANCE SYSTEM IN LATVIA

<table>
<thead>
<tr>
<th>Issue</th>
<th>Strengths</th>
<th>Weaknesses</th>
</tr>
</thead>
</table>
| Accountability procedures of the HEQEC | • Latvia’s external quality assurance system in general complies with the ESG;  
• HEQ has already committed itself to conduct the external assessment of the HEQEC;  
• many of the elements of the self-assessment are already annually considered in the annual reports of the HEQEC. | • the process of the external assessment has not yet been started. |
| Legal status change | • by amending the statutes, it became possible to restore functionalities, but in slightly other form. | • shareholders have to re-elect the board in case it does not follow the aims set by the shareholders;  
• the seven board members are legal entities that are responsible with their own property for the activities conducted. |
| HEQEC board and stakeholders: challenge to balance the representation of the shareholders in the board | • the shareholder may entrust any person with the right to represent it: the best experts may be selected. | • the representative does not need to be attached to the shareholder’s institution – the balance of shareholders’ representation may be distorted. |
| HEQEC board and stakeholders: challenge to balance the interests of the stakeholders | • common aim – international credibility of awards allows to reach a consensus between stakeholders. | • in separate cases students may be interested in decrease of quality of learning;  
• HEIs interested in a minimal display of negative information to the public. |
| Staff of HEQEC and knowledge accumulation | • staff of HEQEC is professionally highly qualified;  
• competences of the staff members are continuously developed;  
• HEQEC closely cooperates with the academic community in Latvia;  
• HEQEC actively and regularly participates in international networks;  
• system of knowledge accumulation exists. | • in case of an unexpected increase of the average number of programmes to be accredited in the following years, it will be necessary to increase the number of staff employed at HEQEC. |
<table>
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<tr>
<th>Issue</th>
<th>Strengths</th>
<th>Weaknesses</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Quality assurance system</strong></td>
<td>• future re-accreditation procedures will put more emphasis on the internal quality culture of HEIs.</td>
<td>• it cannot be ensured that HEIs conduct a high quality genuine self-assessment.</td>
</tr>
<tr>
<td><strong>Current quality assurance system:</strong> foreign experts role</td>
<td>• “outside view”; • international credibility of Latvian accreditation; • “European dimension”; • strong arguments for the national debate with stakeholders; • reduction of “small country effects”.</td>
<td>• see below.</td>
</tr>
<tr>
<td><strong>Current quality assurance system:</strong> foreign experts and the knowledge of the Latvian system</td>
<td>• same experts can be invited repeatedly.</td>
<td>• it is not easy for a foreigner to immediately grasp the intrinsic features of Latvian higher education.</td>
</tr>
<tr>
<td><strong>Current quality assurance system:</strong> foreign experts and the language issue</td>
<td>• several exceptions are foreseen.</td>
<td>• information exchange in English adds workload and costs for HEIs, and it may lead to misunderstandings.</td>
</tr>
<tr>
<td><strong>Current quality assurance system:</strong> foreign experts and the high costs of accreditation procedures</td>
<td>• cases may be considered individually; • the breakdown of costs is based upon known methodology and tariffs.</td>
<td>• paying the travel and subsistence costs plus expert fees is a heavy burden to HEIs.</td>
</tr>
<tr>
<td><strong>Current quality assurance system:</strong> foreign experts and the judgements</td>
<td>• a vast database of international experts available.</td>
<td>• judgments of foreign experts can be over-forgiving or over-demanding; • cultural differences.</td>
</tr>
</tbody>
</table>
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