External review of NAA 2014

Report of the review panel
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1 Summary

This report presents the results of the review of the National Accreditation Agency of the Russian Federation (NAA) undertaken in September 2014 for the purpose of determining whether the agency meets the criteria for Full membership of the European Association for Quality Assurance in Higher Education (ENQA).

The panel considers that NAA fully complies with the following criteria:
- ENQA criterion 1, sub-criterion (ESG 2.1): Use of internal quality assurance procedures
- ENQA criterion 1, sub-criterion (ESG 2.2): Development of external quality assurance processes.
- ENQA criterion 1, sub-criterion (ESG 2.3): Criteria for decisions
- ENQA criterion 1, sub-criterion (ESG 2.7): Periodic reviews
- ENQA Criterion 1, sub-criterion (ESG 2.8): System-wide analyses
- ENQA criterion 1, sub-criterion (ESG 3.3): Activities
- ENQA criterion 2, (ESG 3.2): Official status

The criteria where substantial compliance has been achieved are:
- ENQA criterion 1, sub-criterion (ESG 2.4): Processes fit for purpose
- ENQA criterion 1, sub-criterion (ESG 2.5): Reporting
- ENQA criterion 1, sub-criterion (ESG 2.6): Follow-up procedures
- ENQA criterion 1 (overall) (ESG 3.1): Use of external quality assurance procedures for higher education
- ENQA criterion 3 (ESG 3.4): Resources
- ENQA criterion 7 (ESG 3.8): Accountability procedures
- ENQA criterion 8 (miscellaneous).

The criteria where partial compliance has been achieved are:
- ENQA criterion 5 (ESG 3.6): Independence
- ENQA criterion 6 (ESG 3.7): External quality assurance criteria and processes used by the agencies.

On the basis of the documents provided and interviews, the panel recommends to the ENQA Board to renew the full membership of NAA for five years. ENQA should attach a clear request to the renewed membership that legislation concerning state accreditation must be amended in order to enhance transparency and the autonomous responsibility of NAA in the accreditation procedures. It should be made clear that such amendments should be in place before the next ENQA membership review of NAA. The Panel recommends that a further progress report should be sought from NAA in early 2016.
# Glossary

## List of terms, acronyms and abbreviations

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
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<tbody>
<tr>
<td>AB</td>
<td>Accreditation Board (Commission) of Rosobrnadzor</td>
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<tr>
<td>EHEA</td>
<td>European Higher Education Area</td>
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<td>ENQA</td>
<td>European association for Quality Assurance in Higher Education</td>
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<td>ESG</td>
<td>Standards and Guidelines for Quality Assurance in the European Higher Education Area</td>
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<td>ESU</td>
<td>European Students’ Union</td>
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<td>EUA</td>
<td>European University Association</td>
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<td>FSES</td>
<td>Federal State Educational Standards of Higher Education</td>
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<td>HE</td>
<td>Higher Education</td>
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<tr>
<td>HEI</td>
<td>Higher Education Institution</td>
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<tr>
<td>INQAAHE</td>
<td>International Network for Quality Assurance Agencies in Higher Education</td>
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<td>NAA</td>
<td>National Accreditation Agency</td>
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<td>Rosobrnadzor</td>
<td>Federal Service of Supervision in Education and Science</td>
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<td>QA</td>
<td>Quality Assurance</td>
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3 Introduction

This is the report of the review of the National Accreditation Agency of the Russian Federation (NAA) undertaken in September 2014 for the purpose of determining whether the agency meets the criteria for Full membership of the European Association for Quality Assurance in Higher Education (ENQA).

3.1 Background and outline of the review process

The Statutes of ENQA require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they fulfil the membership provisions.

In November 2004, the General Assembly of ENQA agreed that the third part of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) should be incorporated into the membership provisions of its (then) regulations (now statutes). Substantial compliance with the ESG thus became the principal criterion for membership of ENQA. The ESG were subsequently adopted at the Bergen ministerial meeting of the Bologna Process in 2005.

The third part of the ESG covers the cyclical external review of quality assurance and accreditation agencies. The external review of NAA was conducted in line with the process described in Guidelines for external reviews of quality assurance agencies in the European Higher Education Area and in accordance with a revised version of the timeline set out in the Terms of Reference (see Annex 1), which also define the purpose and scope of the review as a type A review, as defined in the Guidelines for external reviews of quality assurance agencies in the European Higher Education Area. The review therefore evaluates the way in which and to what extent NAA fulfils the criteria for the ENQA membership and thus the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). Consequently, the review will also provide information to the ENQA Board to aid its consideration of whether NAA should be reconfirmed Full Member of ENQA. The review panel is not expected, however, to make any judgements as regards the reconfirmation of Full Membership.

The review panel for the external review of NAA was composed of the following members:
- Riitta Pyykkö, Vice-Rector and Professor of Russian Language and Culture, University of Turku, Finland - Chairman
- Mati Heidmets, Professor and Head of the Educational Policy Centre, Institute of Psychology and Tallinn University, Estonia
- Andrejs Rauhvargers, Secretary General, Latvian Rectors’ Council, Latvia - EUA nomination
- Emilia Todorova, Student in Information Systems Development, Glasgow Caledonian University, UK - ESU nomination
- Tue Vinther-Jørgensen, Special Adviser, Unit for Higher Education, Danish Evaluation Institute (EVA), Denmark – Secretary.

NAA produced a self-evaluation report which provided a substantial portion of the evidence that the panel used to form its conclusions. The self-evaluation report included an account of the cultural and historical background and legal context of quality assurance of Higher Education in Russia, which was very helpful for the panel’s understanding of the mission and role of NAA. The report also included NAA’s account for the agency’s compliance with the ESG’s, and also NAA’s reflections about strengths and weaknesses in the activities of the agency. 5 annexes were at-
The panel conducted a **site-visit** to validate fully the self-evaluation and clarify any points at issue. The site visit took place on 25 and 26 September 2014 in Moscow. The panel had a preparatory meeting on 24 September 2014 to finalise the lines of inquiry and divide tasks among themselves. During the site visit the panel met with the following groups representing NAA and external stakeholders:

- The Directorate of NAA
- The NAA self-evaluation committee
- Members of the Accreditation Board (Commission)
- Directors of relevant NAA departments
- NAA staffs from relevant departments
- NAA reviewers/experts (including student experts)
- Representative of the Federal Service of Supervision in Education and Science (Rosobrnadzor)
- Representatives of the students’ organizations
- Representatives of the employers’ organizations
- Representatives of the Rectors’ Councils (from both state and non-state institutions)
- Representatives of Higher Education Institutions and Programs that have undergone NAA reviews in 2014.

The panel would like to thank NAA for its assistance in preparing the site-visit. The visit was well organized and all meetings were conducted as scheduled. The panel did not have the occasion to meet with representatives of the Ministry of Education and Science of the Russian Federation. The complete visit schedule can be found in Annex 2.

Finally, the review panel produced the present **final report** on the basis of the self-evaluation report, site-visit and its findings. In doing so, it provided an opportunity for NAA to comment on the factual accuracy of the draft report. The final report was delivered to ENQA 16 December 2014.

The review panel confirms that it was given access to all documents and people it wished to consult throughout the review.

### 3.2 Main findings of the 2008 review and NAA follow up

The review panel highlighted a number of areas for development in its final report in the 2008 review of NAA. Below is a chart setting out progress made in key areas since 2008:

<table>
<thead>
<tr>
<th>ESG Standard and overall 2008 judgement</th>
<th>Issue</th>
<th>2008 Panel and ENQA Board recommendations</th>
<th>NAA’s description of its implementation of the recommendations (as at April 2014)</th>
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<tbody>
<tr>
<td>2.1 Use of internal quality assurance procedures (Fully compliant)</td>
<td>Institutional processes are heavily influenced by the work of the NAA itself.</td>
<td>- Russian HEIs should take a more proactive approach to their own internal quality assurance procedures. The NAA should assist them by paying more attention to institutional QA during the accreditations.</td>
<td>In 2009-2010 the federal state educational standards of the third generation were introduced. They established the requirement to introduce the monitoring of the quality of educational institutions’ activities on part of stakeholders: students, employers’ representatives, representatives of the academic community. The procedure of self-evaluation of educational activities of HEIs was legally ratified on September 1, 2013. The results of self-evaluation are</td>
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The criteria are clear and published, and mainly worked out by NAA, but NAA is not a decision-making body. It is stipulated by the law that the decision on state accreditation shall be made by an accreditation body - the Federal Service of Supervision in Education and Science. The accreditation body takes the decision on state accreditation based on the statement of the Accreditation Board (Commission) which in its turn takes into account the opinions of all stakeholders. The Accreditation Board (Commission) is a representative advisory body, composed of representatives of students, employers and the academic community.

The role of NAA at the decision-making stage is to prepare information and analytical materials on the results of the expert panels’ work. NAA has no opportunity to influence the decisions made. Thus, the decision-making mechanism ensures the maximum objectivity and independence of the structures involved in the decision-making process. This mechanism has a historical background, takes into account the specifics of the Russian education system and its change is unreasonable. Recommendation is not implemented, but the eligibility criteria are fully met.

2.4 Processes fit for purpose (Partly compliant)

HEI’s only play a minimal role in the process in the self-evaluation process as the first draft of the self-evaluation report is automatically generated based on collected performance indicators.

- The completion of accreditation expert teams should be the full responsibility of NAA and it should be fixed in the Statute of NAA;
- There is need to increase the role of an HEI in the self-evaluation process, particularly in the study program accreditation. There should be obligatory SWOT analysis with added development plans in a different part of the self-analysis report;
- The procedure of expert groups’ formation is part of the organizational and technical support of the state accreditation procedure and is completely NAA’s responsibility. Experts are selected from the electronic database using specialized software. According to the nomination results the Federal Service of Supervision in Education and Science drafts an executive order with the indication of the expert panel composition, the educational programs assigned to experts and timing of the external review. The role of the Federal Service of Supervision in Education and Science is to formally approve the draft order.

Recommendation has been implemented.

Continues on next page
- Include a greater focus on improvement in the external evaluation processes;

- Include greater international participation in all NAA processes to enhance general fitness for purpose;

- There should be greater participation of students in the QA processes, particularly in the self-evaluation.

2. The procedure of self-evaluation and a list of self-evaluation indicators are established by the law. The list of indicators to be self-evaluated is formed so that the educational organization has an opportunity to identify strengths and weaknesses of its activities. The annual conduct of self-evaluation procedure allows to analyse the dynamics of changes of the organization’s performance indicators. However, the organization determines the appropriateness for the use of SWOT-analysis tools independently.

The recommendation has been partially implemented.

3. The enhancement of the external quality assurance procedures, especially in light of significant changes in the legal framework of the Russian system of education is a priority for NAA. With this aim in view various projects are being carried out: expansion of the use of IT-technologies, research studies, development of new approaches to quality assurance. NAA has been actively involved in elaborating normative and legal acts regulating the external quality assurance procedures.

Recommendation has been implemented.

4. Participation of international experts in the external quality assurance procedures is not provided for by the law. However, NAA is actively studying international best practices and participates in various international events being a member of many international organizations.

Currently the legal framework for recognizing the international accreditation results conducted within public and/or professional public accreditation during state accreditation is being formed. NAA is a co-performer of the project aimed at developing mechanisms for such recognition.

Recommendation has not been implemented. The work is being done to fulfil this requirement.

5. Involving students in internal quality assurance procedures is set forth in the federal state educational standards.

Recommendation has been implemented.
2.5 Reporting (Partly compliant)
The final NAA reports are published and accessible on the NAA website, but the expert panels’ reports, which form the basis for the NAA reports, are not publicly available.

- The expert panels’ reports should be publicly available.

All the conclusions drawn up by the results of the expert panels’ work are publicly available in the Internet. This procedure is set forth in the law. The conclusion drawn up by the results of the external review should include the description of the content and quality of students’ training on educational programs declared for state accreditation, as well as the conclusion whether the content and quality of training corresponds (doesn’t correspond) to the requirements of the federal state educational standards for each educational program submitted for state accreditation.

Recommendation has been implemented.

3.3 Activities (Fully compliant)
Twice a year NAA offers internet testing of students and graduates. The outcomes of testing are used by HEIs in their self-evaluation procedures and the testing provides an opportunity for external evaluation of the quality of taught programs.

- To ensure the quality of teaching the NAA should encourage the HEI-s to participate more in the internet based state exams.

In the past few years and till the end of 2013 the Internet-exam has been widely used not only as an external education quality assurance tool, but also as an internal quality assurance mechanism applied by HEIs. However, due to the gradual failure of training according to the educational standards of the second generation, the current system of Internet testing has lost its relevancy. Currently the Internet-testing is not conducted and new methodological approaches to its implementation are being developed.

The recommendation has been partially implemented.

3.6 Independence (Substantially compliant – in terms of NAA’s operations. Partly compliant – in terms of decision making)
The composition of an expert panel is coordinated with the HEI and is approved by the Rosobrnadzor.

- The clear legal link between AB and NAA should be established. NAA should be the servicing body (bureau) to the AB and AB the supervising and decision making body to NAA.

The report on the implementation of this recommendation is fully presented in the commentaries to § 2.3. However, it should be emphasized that the current system of distribution of powers has a historical background and characterizes the specifics of the Russian education system. Whereupon the role of NAA is to ensure the objectivity of the decisions taken which is achieved due to NAA’s independence from all stakeholders.

Recommendation has not been implemented, but the eligibility criteria are fully met.
Continued from previous page

3.7 External quality assurance criteria and processes used by the agencies (Substantially compliant)

- Final reports on accreditation of HEIs are not published in full, and only official outcomes of the procedure are made public.

The full publication of all expert panels’ materials is not provided for; however, the conclusions drawn up according to the results of expert panels’ work are publicly available in the Internet. This is set forth by the law. The conclusion made according to the results of external review should contain the description of the content and quality of students’ training on the educational programs declared for state accreditation, as well as the conclusion whether the content and quality of training corresponds (doesn’t correspond) to the requirements of the federal state educational standards for each educational program submitted for state accreditation.

The recommendation has been partially implemented.

3.8 Accountability procedures (Fully compliant)

There is no formally described and published document on NAA’s internal quality assurance.

- The panel encourages the NAA to work out as soon as possible the NAA’s internal quality assurance document.

In connection with the transfer of NAA’s head office to Moscow and preservation of the branch in Yoshkar-Ola, significant changes in the structure of NAA and the need to ensure the efficiency of all performance processes it was decided to establish and document a system of management based on the process-oriented approach to management. Currently this work is at its final stage. All the fundamental documents have been developed.

Recommendation has been implemented.

NAA effectiveness in the context of Russian higher education quality (overall consideration of the ENQA Board)

Concerns that especially private HEIs, to keep students, will lower requirements to pass the exams.

- Rosobrnadzor should seriously rethink licensing rules of new HEI-s.

In 2013, the institutional accreditation failed in favour of program accreditation. This is stipulated by the law. Currently NAA successfully provides support to the state accreditation of separate educational programs.

Recommendation has been implemented.

The Panel’s overall assessment is that NAA itself has responded appropriately to all the recommendations contained in the 2008 ENQA report. A number of the recommendations outside the scope of NAA, for instance the distribution of powers and responsibilities in the legislation, have not been followed up. NAA is to be commended for its openness and willingness to discuss strengths and weaknesses of the agency and the state accreditation system.

3.3 Higher education in Russia

Higher education in Russia is characterized by a very large number of institutions and a relatively high level of central regulation of the programs’ structure, delivery and outcomes.

As of January 2014 1179 educational institutions are delivering higher education programs: 648 state HEIs, 11 municipal HEIs, and 520 private HEIs. There are over one thousand and fifty branches of state (949) and private (533) HEIs.
The number of private HEIs grew rapidly in the 1990's during a period of time with very liberal rules for establishing new institutions. Despite the facts that about 40 % of the institutions belong to the private sector, only 14.5 % of the total numbers of students study there. In 2008, private institutions enrolled 17.2 % of students.

The Federal Law "On Education in the Russian Federation" from 2013 introduced the current structure for categorizing HEIs. The law distinguishes 45 institutions with a special status:
- Lomonosov Moscow State University, St. Petersburg State University;
- Federal Universities - 9 universities;
- National Research Universities - 29 universities;
- Federal state educational organizations of higher education included in a separate list of the President of the Russian Federation, which develop and approve their own educational standards at all levels of higher education - 5 universities.

The Federal Law "On Education in the Russian Federation" also introduced the current multilevel system of training of specialists with higher education and set the following levels of higher education:
- Bachelor’s level (first cycle);
- Specialist’s and Master’s levels (second cycle);
- Training of highly qualified staff (third cycle).

A typical learning path is realized by the scheme "Bachelor - Master - Training of highly qualified staff". In some areas (e.g. in the sphere of healthcare) there is no level of basic higher education (Bachelor) and training is conducted by the scheme "Specialist - Training of highly qualified staff." See figure 1.

**Figure 1**
Qualification levels in Russian HE

[Diagram showing the qualification levels: Bachelor (4 years), Magister (2 years), Specialist (5-6 years), Training of highly qualified staff (postgraduate training) 3-4 years.]

It is an important special feature of Russian higher education, that programs are regulated through the so-called Federal State Educational Standards of Higher Education (FSES). The FSES establish the requirements for the realization of higher education programs at all levels. FSES are developed for Bachelor, Specialist and Master level programs and currently FSES are being elaborated for programs of training highly qualified staff.
FSES describe the requirements for:
1. the structure of educational programs - (the scope of parts of an educational program, the ratio of the compulsory part of the educational program, the field-oriented part etc.);
2. the conditions of educational programs’ delivery (faculty, financial, logistical and other conditions);
3. the outcomes to be obtained upon the completion of educational programs.

Currently FSES have been developed for:
• 179 fields of training of higher education – Bachelor’s programs;
• 181 fields of training of higher education – Master’s programs;
• 96 specialties of higher education – specialist programs.

Fields of training and specialties are grouped into broad subject areas – so-called “integrated groups of professions, specialties and fields of training” (hereinafter IGS, e.g., “Natural Sciences”, “Automatics and Operation”, “The Humanities”, etc.). Until 2013, classification of specialties and fields of training included 29 IGS. Today, 55 IGS are distinguished.

Leading universities, representatives of the academic community, and employers are involved in developing FSES. Their work is coordinated by the Ministry of Education and Science of the Russian Federation, who also approves the list of fields of training and specialities. Since 2010, the third generation of FSES have been used. These are in a process of being amended, and a fourth generation of FSES is foreseen within a couple of years. Each new generation of FSES has gradually changed the focus from content to (learning) outcomes and labour market needs leaving still more room and freedom for the HEIs to decide on the content and delivery of programs.

All HEIs should offer educational programs in accordance with the federal standards. Only the around 60 HEIs with special status have the right to deliver educational programs of higher education according to their own educational standards.

3.4 Quality assurance of HE and NAA

State accreditation is the main form of external quality assurance of higher education in the Russian Federation. NAA is the quality assurance agency responsible for the practical operation of state accreditation procedures. The operational tasks of NAA have mainly been delegated from the Federal Service of Supervision in Education and Science (Rosobrnadzor), which is the ministerial executive body responsible for carrying out strategic management of the entire system of education quality evaluation in the Russian Federation.

3.4.1 State accreditation of programs

State accreditation is mandatory for all HEIs in the Russian Federation. The state accreditation procedures are regulated through a number of laws, decrees and orders, and since September 2013 it has aimed at assessing and – if positive - confirming the compliance of educational activities on basic educational programs delivered by a HEI with the federal state educational standards (FSES). Before September 2013, state accreditation focused on the institutional level.

Institutions applying for state accreditation submit an application including data on its educational activities and results. The data is to a large extent identically with the data, each HEI is obliged to provide in an annual self-evaluation. Self-evaluation is conducted in order to ensure the availability and transparency of the information about a HEI’s activity. The self-evaluation process includes the evaluation of educational activities, organization’s management system, content and quality of students’ training, organization of the educational process, graduates’ being in demand, the quality of faculty, teaching, library and information support, logistics, internal education quality assurance system, as well as the analysis of the performance indicators of the organization subjected to self-evaluation. Self-evaluation report shall be published on the website of a HEI.
Apart from the data submitted by the HEI, the site visit of a group of experts is the main data collecting activity in the state accreditation procedures. A site visit normally takes five days for the whole expert group. The number of experts is determined by the number of integrated groups of specialties and fields of training, levels of training and actually the educational programs submitted for accreditation. The experts work often independently as the assessment of a number of programs will be assigned to each expert. Some times more experts collaborate within one subject area, if for instance an institution has a large number of programs.

Experts evaluate educational and scientific activities, assess student learning outcomes, and determine the compliance of library, information, human resources and logistics. Organization and coordination of the expert group’s work is assigned to the head of the expert group. The external review of the panel results in a number of expert reports on the individual programs as well as an overall conclusion of the panel drafted by the head.

The experts are selected from among the representatives of HEIs, having high qualification, significant achievements in teaching and research work, and special training the procedure determined by the Ministry of Education and Science. NAA maintains a data base with app. 2.000 certified experts and the agency is responsible for nominating the expert group for each HEI applying for state accreditation.

Based on the results of the external review conducted by the independent experts and the data submitted by the HEI, NAA prepares an analytical report for the Accreditation Board (commission). The Accreditation Board is a deliberative body attached to Rosobrnadzor, and the board has an advisory role. With due consideration of the Accreditation Board’s conclusion Rosobrnadzor makes a decision (issues an order) on state accreditation or refusal of state accreditation of the educational activities on the educational programs being accredited in relation to every level of higher education in each integrated group of professions, specialties and fields of training. The HEI receives a state accreditation certificate, indicating a list of accredited IGS and educational levels. The certificate is valid for 6 years. If any drawbacks are revealed the HEI may be deprived of state accreditation for separate levels of higher education and IGS. In case of the refusal of state accreditation a HEI is entitled to apply for a recurrent accreditation procedure not earlier than a year after its accreditation was cancelled.

3.4.2 NAA

While state accreditation under Russian legislation formally is conducted by Rosobrnadzor – the federal executive power body – the function of NAA is to provide methodological, organizational, technological, information and analytical support of the procedure of state accreditation as well as promoting the development of the system of monitoring and evaluation of the education quality in the Russian Federation. In practical terms, NAA is responsible for operating the entire state accreditation procedure until the preparation of the analytical report to the Accreditation Board. NAA was responsible for state accreditation of more than 11.000 programs in 2013.

The functions and goals of NAA can be summarized as:

- Providing the collection and processing of the documented information about the organizations subjected to external review;
- Organizational, technical, information and analytical support of the external review procedure and preparation of materials based on the results of the expert panel’s work;
- Analysing the educational programs’ compliance with the requirements of educational standards, summary of the outcomes of the analysis of the content and quality of students’ training;
- Information, organizational and technical support of the procedure of certification of experts and (or) expert organizations;
- Improving the procedure of external review of the quality of educational organizations’ performance by way of:
  - constant professional development of personnel as well as experts and expert organizations;
- enhancement of the efficiency of all the processes the agency is engaged in;
- improvement and extension of the resource base for ensuring the agency’s activity;
- studying the best practices of quality assurance agencies and introducing innovations in the agency’s activity which are compliant with modern global standards.

- Introducing and enhancing the methodology for self-evaluation of the agency as a whole and of its separate subdivisions and personnel.
- Improving the agency’s organizational structure and working environment.

NAA moved from Yoshkar-Ola to Moscow in June 2011. The agency’s organizational structure underwent significant changes in this process and new staff was recruited. NAA still has a branch office operating in Yoshkar-Ola.

NAA is administered by the director. The directorate also includes three deputy directors for various issues and activities and the chief accountant. The agency has 13 structural units (12 departments and the branch in Yoshkar-Ola). 101 people work in the agency, and the 2013 budget was set to 88 million rubles (EUR 1.8 million), while the budget of 2014 amounts to 270 million rubles (EUR 5.3 million). The numbers for 2013 and 2014 are not directly comparative. NAA is a non-profit organization, but the agency has the right to carry out profit-bearing activities if they comply with the statutory purpose of the agency.

3.4.3 Other types of external quality assurance

State accreditation is not the only form of external quality assurance in the Russian Federation. Especially two other types of accreditation are worth mentioning, as they are new, growing in importance, and to some extent constitute a challenge to state accreditation and NAA. These two types of accreditation are:

- Public accreditation of organizations engaged in educational activities
- Professional public accreditation of educational programs.

It is voluntary for the HEIs to decide if they should apply for these kinds of accreditation in addition to the mandatory state accreditation.

Public accreditation aims at assessing and – if positive – recognizing the level of a HEI’s activity as compliant with the relevant criteria and requirements of the Russian, foreign and international organizations authorized to conduct the accreditation. The procedure of public accreditation, evaluation forms and methods applied during this accreditation, as well as the rights granted to an accredited organization, are established by the organization carrying out public accreditation.

Professional public accreditation aims at assessing and – if positive - recognizing the quality and level of training of graduates who have mastered an educational program delivered by a HEI as compliant with the requirements of professional standards, labour market requirements for specialists, workers and employees of the corresponding specialization. The procedure of professional public accreditation of professional educational programs, forms and methods of assessment during this type of accreditation, as well as the rights granted to an educational organization delivering accredited higher educational programs, and (or) to graduates who have mastered such educational programs, are established by an employer, employers’ association or their authorized organization that conduct such accreditation.

The outcomes of both public accreditation and professional public accreditation are considered during state accreditation.
4 Findings: NAA compliance with the criteria for ENQA membership

4.1 ENQA Criterion 1A / ESG 3.1 / ESG Part 2: Use of external quality assurance procedures

ESG 3.1: Use of external quality assurance procedures for higher education

Standard:
The external quality assurance of agencies should take into account the presence and effectiveness of the external quality assurance procedures described in Part 2 of the European Standards and Guidelines.

Guidelines:
The standards for external quality assurance contained in Part 2 provide a valuable basis for the external quality assessment process. The standards reflect best practices and experiences gained through the development of external quality assurance in Europe since the early 1990s. It is therefore important that these standards are integrated into the processes applied by external quality assurance agencies towards the higher education institutions. The standards for external quality assurance should together with the standards for external quality assurance agencies constitute the basis for professional and credible external quality assurance of higher education institutions.

NAA’s compliance with ESG 3.1 depends on the agency’s compliance with each standard of Part 2 of the ESG. The 8 standards of Part 2 are therefore discussed separately in the following sections. Section 4.1.9 gives a summary of the findings and the panel’s overall judgement of ESG 3.1.

4.1.1 ESG 2.1: Use of internal quality assurance procedures

ESG 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: 1.1 Policy and procedures for quality assurance 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

Guidelines:
The standards for internal quality assurance contained in Part 1 provide a valuable basis for the external quality assessment process. It is important that the institutions’ own internal policies and procedures are carefully evaluated in the course of external procedures, to de-
termine the extent to which the standards are being met.

If higher education institutions are to be able to demonstrate the effectiveness of their own internal quality assurance processes, and if those processes properly assure quality and standards, then external processes might be less intensive than otherwise.

2008 review recommendations:
• Russian HEIs should take a more proactive approach to their own internal quality assurance procedures. The NAA should assist them by paying more attention to institutional QA during the accreditations.

Evidence:
The federal state educational standards of higher education requires the HEIs to annually update basic educational programs in line with the development of science, culture, economics, engineering, technologies, and social spheres, and with reference to the recommendations on quality assurance in high schools, namely by way of:
• developing strategies to ensure the quality of graduates’ training with the involvement of representatives of employers;
• monitoring, periodic review of educational programs;
• developing unbiased procedures for the assessment of students’ knowledge and skills, graduates’ competencies;
• ensuring the competence and proficiency of the faculty;
• conducting regular self-evaluation based on the coherent criteria for the assessment and comparison of its own activities (strategies) with those of other educational institutions and with the involvement of employers’ representatives;
• informing the public about the results of its activity, plans and innovations.

In addition to this, the HEIs are by law obliged to conduct yearly self-evaluations and maintain an internal system of quality evaluation of education. As a consequence, the institutions must prepare a self-evaluation report annually, and publish it on the official web site of the HEI so that it is available for all stakeholders. NAA provides the HEIs with program software to be used for the preparation of self-evaluation reports, and NAA also aims at monitoring the HEIs’ web-sites in order to see, that self-evaluation reports are actually published.

Compliance with the federal state educational standards of higher education is subject to evaluation during state accreditation of Russian HEIs. In this process the materials of the HEIs’ self-evaluation are used both at the preparatory stage and during the site visit by the expert panel.

Analysis
The site visit confirmed, that the HEI’s produce a yearly self-evaluation report. The interview with students gave some examples where students have also been involved in the process at their university. The reports have a fixed template and cover most of the themes addressed in the ESG part 1. They focus mainly on figures and quantitative data, e.g. about the number of students, number of lessons etc. The reports do not contain a SWOT-analysis or other kinds of quality self-assessment with reflections on needs for improvements.

Until recently, the HEI should submit their self-evaluation reports to NAA, who in this way had a natural opportunity to monitor that the reports actually were made. New legislation from 2013 now request the HEI’s to publish the reports at their websites as public information. This new procedure has not yet been fully implemented in the sector, as it was evident for the panel, that some universities did not have such information available. However, the panel was confident, that the procedure takes place, and the interviews also gave the impression, that internal quality assurance has become more important for the institutions in recent years. The institutions have for instance established special departments responsible for supporting the internal quality assurance processes, e.g. by providing the technology to test the learning and progress of students.
oversee the compliance of the curricula with the federal standards, and introducing “best practices” etc. These departments also assist the programs during external accreditation processes. NAA does not yet have in place a procedure for monitoring, that HEI’s publish the self-evaluation reports at their websites. A quick visit to a number of homepages of Russian universities by members of the review panel showed, that not all HEIs have self-evaluation reports available. It was also confirmed that the content of published reports is primarily statistics without any analysis of strengths and weaknesses. NAA is currently testing new technology for monitoring that HEIs publish the requested information about their educational activities at their homepages.

As mentioned, the HEI’s are also obliged to have a functioning internal quality assurance system for each program. This is taken into account in the state accreditation procedure as one of the criteria when expert groups assess the programs. If procedures for the test of students are found satisfactory by the experts, they can reduce their own collection of evidence concerning this matter.

Although available for the expert groups, the yearly self-evaluation reports seem to have less importance during state accreditation of programs, as the reports mainly focus on the institutional level.

The panel considers it as a positive feature that the results of internal quality assurance at the program level are taken into account in the state accreditation process.

Panel Conclusion:
Fully compliant.

Panel recommendations:
• The annual self-evaluation process at the institutions should have a stronger developmental element where the institutions assess their own strengths and weaknesses and identify needs for improvements.

4.1.2 ESG 2.2: Development of external quality assurance procedures

ESG 2.2: Development of external quality assurance procedures

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.

Guidelines:
In order to ensure clarity of purpose and transparency of procedures, external quality assurance methods should be designed and developed through a process involving key stakeholders, including higher education institutions. The procedures that are finally agreed should be published and should contain explicit statements of the aims and objectives of the processes as well as a description of the procedures to be used.

As external quality assurance makes demands on the institutions involved, a preliminary impact assessment should be undertaken to ensure that the procedures to be adopted are appropriate and do not interfere more than necessary with the normal work of higher education institutions.
2008 review recommendations:
None

Evidence:
The aims and objectives of NAA’s external quality assurance processes are determined in a num-
ber of official documents. State accreditation of programs is the main external quality assurance
process in the Russian Federation. The aim of state accreditation of HEIs is to examine the com-
pliance of the content and quality of students’ training with the requirements of the federal state
educational standards. The process leads to a formal decision by the Accreditation Board on ac-
creditation or deprivation of the state accreditation status of the HEI. The decision is endorsed by
an order of Rosobrnadzor. NAA is responsible for the methodological, organizational, technologi-
cal, information and analytical support of the procedure of state accreditation.

The requirements to the HEIs’ internal quality assurance procedures are stated in the federal state
educational standards of higher education. These requirements also form the basis for NAA’s ac-
tivities, as the state accreditation process aims to examine the HEI’s compliance with these stand-
ards. The standards contain a number of mandatory requirements addressing questions about the
structure of educational programmes, conditions for their delivery, and outcomes to be obtained
upon the completion of educational programs.

The Law on Education from 2012 lays out the more general framework for state accreditation,
and the goals and objectives of internal quality procedures which are applied by NAA were de-
efined by Law. The Ministry of Education and Science of the Russian Federation published the draft
law in the Internet for open public discussion in the course of which 1442 amendments suggest-
ed by stakeholders were introduced.

The Regulations on state accreditation of educational activities determine in more details the
methodology used in state accreditation. The regulations were drafted by representatives of
Rosobrnadzor, NAA, HEIs and external experts. At the moment these draft documents are at the
stage of public discussion. When this process is finalised, the content of the procedure is to be
approved by the orders of the Ministry of Education and Science of the Russian Federation and
published on the Internet.

The indicators used for state accreditation are developed by NAA and approved by Rosobrnadzor.
The indicators reflect the content and requests of the federal standards.

Analysis
The interviews during the site visit made it quite clear, that the whole procedure related to state
accreditation was well known in the Russian Higher Education Sector. Both institutions, experts,
students and other stakeholders seemed to be well informed about the aims of the procedure
and also potential consequences, if an institution does not succeed in having its accreditation re-
confirmed. State accreditation is regulated in great detail by law and decrees, which of course
also contributes to a high degree of predictability and transparency.

The indicators for state accreditation have not been developed in a process with involvement of
the HEIs or other stakeholders, nor have the indicators been subject to public hearing. However,
these indicators seemed to be of less importance to the stakeholders during the interviews, as the
indicators are merely an operational version of the federal standards and a working tool. The fed-
eral standards are developed in groups involving HEIs and other stakeholders.

The development of the federal standards on the other hand seems to have been a comprehen-
sive task involving a large number of stakeholders, namely leading universities, representatives of
the academic community, and employers. Their work is coordinated by the Ministry of Education
and Science of the Russian Federation, and there seems to be widespread acceptance of this kind
of centralized regulation. Around 60 leading institutions, however, have the right to develop their
own standards.
The panel notices, that the concept of having federal standards for academic programs is a specific feature for Russian Higher Education, as national standards in the educational system is known only for primary and secondary education in most other European countries. The panel acknowledges that the federal standards have played an important role in maintaining the quality of Russian Higher Education during the very liberal and extensive period in the 1990’s, when a large number of new and private institutions were established. The current standards are third generation standards, which are much more open, than the originally very rigid standards of the first generation. The standards are being amended now using a more framework oriented approach and focusing more on learning outcomes and cooperation with employers. As such, the standards can still play a constructive role, although it would be in line with developments in most other European countries to aim at having more self-regulating and responsible institutions with delegated authority to develop curriculum, teaching, and examination methods.

Panel Conclusion:
Fully compliant.

Panel recommendations:
None

4.1.3 ESG 2.3: Criteria for decisions

ESG 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.

Guidelines:
Formal decisions made by quality assurance agencies have a significant impact on the institutions and programmes that are judged. In the interests of equity and reliability, decisions should be based on published criteria and interpreted in a consistent manner. Conclusions should be based on recorded evidence and agencies should have in place ways of moderating conclusions, if necessary.

2008 review recommendations:
• The clear legal link between AB and NAA should be established. NAA should be the servicing body (bureau) to the AB and AB should be the supervising and decision making body to NAA.

Evidence:
Decisions on accreditation are taken by the Accreditation Board (commission) at the board’s meetings. The board is a deliberative body attached to Rosobrnadzor composed of representatives of education management bodies, HEI’s, employers and students’ organizations. The decisions of the board have the status of recommendations to Rosobrnadzor. These are subsequently considered by an Accreditation Collegium consisting of senior officials from Rosobrnadzor. If approved, the decisions are endorsed by Rosobrnadzor in an order, which is published on its website.

A list of accreditation indicators uniform for all HEIs is used for state accreditation. The accreditation indicators are determined on the basis of the requirements of federal state educational standards with regard to the priorities of state educational policy. In other words, there should be a clear link between the indicators and the requirements of the federal state educational standards. The indicators combine qualitative criteria, which must be assessed by the experts, and quantitative criteria, which are assessed on the basis of the data submitted by the HEI. The list of indicators and criteria for accreditation is developed by NAA and approved by Rosobrnadzor.
The federal state educational standards of higher education in this way form the evaluative framework of the state accreditation process. Standards have been developed for bachelor, specialist and master programs, and standards are currently being elaborated for programs of training highly qualified staff (post-graduate (doctoral) training). Federal state educational standards include requirements for:

1. the structure of the educational programs, e.g. the scope of parts of an educational program, the ratio of the compulsory part of the educational program established by the state, and the field-oriented part established by the HEIs;
2. the conditions of educational programs’ delivery, e.g. faculty, financial resources, logistical requirements and other conditions;
3. the intended learning outcomes to be obtained by the students upon the completion of the educational programs.

Federal state educational standards of higher education are developed with reference to professions, specialties and fields of training according to the appropriate levels of higher education. A list of specialties and fields of training, indicating qualifications awarded upon the acquisition of an educational program are approved by the Ministry of Education and Science of the Russian Federation.

Currently, this list includes:
- 179 fields of training of higher education – Bachelor’s programs;
- 181 fields of training of higher education – Master’s programs;
- 96 specialties of higher education – specialist programs.

Fields of training and specialties relating to a broad subject area, are grouped into so-called “integrated groups of professions, specialties and fields of training” (IGS, e.g., “Natural Sciences”, “Automation and Operation”, “The Humanities”, etc.). Until 2013, classification of specialties and fields of training included 29 IGS, today 55 IGS are distinguished.

All federal state educational standards of higher education are developed in a process that involves leading universities, representatives of the academic community, and employers. The standards are published by the Ministry of Education and Science of the Russian Federation.

The expert panels assess the educational practices’ compliance with the federal state educational standards when reviewing a HEI. The panels use a predefined methodology described in a methodological manual when conducting the site visit and preparing the external review report in order to ensure consistency and objectivity in the assessments. Each expert submits a report to the panel chair, who makes an overall conclusion on the basis of all the experts’ sub-reports. All panel members must sign the conclusion before it is submitted to NAA together with the sub-reports.

NAA prepares the documentation about each HEI under state accreditation for the Accreditation Board meeting. The documentation includes three different types of documentation:
- data submitted by the HEI according to the indicators of state accreditation of educational institutions’ activities;
- results from student tests conducted as part of the state accreditation process;
- the report of the expert panel;
- analytical materials synthesized by NAA based on the two former types of data.

Only the analytical materials prepared by NAA are presented to the Accreditation Board.

Analysis
The indicators for state accreditation are used as criteria in the assessment process. As described earlier, the indicators reflect the federal standards, and the interviews proved that the content and requirements to HEIs are well known in the sector.

During the site visit, the NAA management emphasized the role of NAA in securing consistency in the assessments of experts. First and foremost, NAA organises an extensive training program...
and retraining program for experts as part of an ongoing certification process, where experts are approved to take part in state accreditation. This process ensures a high level of competencies in assessing the programs’ compliance with the indicators/federal standards and a continuous updating of the experts’ knowledge about the federal standards. Secondly, NAA has developed detailed manuals for the assessing of each criterion, which also support a high level of consistency. Thirdly, the NAA Information-Analytical Department undertakes a review of each expert’s report and of the overall conclusion of the expert panel. If assessments are not properly based on facts and documentation, the department will consider, if an alternative recommendation should be made when preparing the analytical report to the accreditation board.

The expert panel did not get any information during the interviews indicating that consistency in assessments should be a major problem in the state accreditation system. This might be surprising for two reasons. First, the assessment process is delegated to autonomously working expert panels going on site visits without the participation of NAA officers. The attendance of agency officers on site visits – and often also their drafting of review reports – is a means to ensuring consistency in many countries. Second, the resources available for quality assurance of expert panels’ reports at NAA are very limited considering the huge number of accreditation processes. 10 persons are employed in the Information-Analytical Department, and 11,000 programs were reviewed in 2013. The interviews with both management and employees confirmed that NAA only undertakes a quite formal kind of consistency check. Examples were given, where NAA has rejected reports without sufficiently evidence-base for expert conclusions.

When challenges with consistency none the less did not occur as an important topic in the interviews, it is probably due to the fact, that state accreditation is a quite basic kind of external quality assurance with some resemblance to what is normally referred to as inspection. The interviews confirmed that state accreditation is a control of the HEIs’ compliance with some absolute minimum requirements to the educational programs. The indicators are to a large extent quantitative and factual. The assessment process – although comprehensive – is primarily a check list with only little room for subjectivity and individual views of the experts. Therefore the risk for errors in the assessment process is reduced.

Panel Conclusion:
Fully compliant.

Panel recommendations:
• The state accreditation requirements to the institutions should be more ambitious and qualitative in order to stimulate quality development and ensure the relevance of state accreditation as a valuable external quality assurance process.

4.1.4 ESG 2.4: Processes fit for purpose

ESG 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.

Guidelines:
Quality assurance agencies within the EHEA undertake different external processes for different purposes and in different ways. It is of the first importance that agencies should operate procedures which are fit for their own defined and published purposes. Experience has shown, however, that there are some widely-used elements of external review processes which not only help to ensure their validity, reliability and usefulness, but also provide a basis for the European dimension to quality assurance.
Amongst these elements the following are particularly noteworthy:

• insistence that the experts undertaking the external quality assurance activity have appropriate skills and are competent to perform their task;
• the exercise of care in the selection of experts;
• the provision of appropriate briefing or training for experts;
• the use of international experts;
• participation of students;
• ensuring that the review procedures used are sufficient to provide adequate evidence to support the findings and conclusions reached;
• the use of the self-evaluation/site visit/draft report/published report/follow-up model of review;
• recognition of the importance of institutional improvement and enhancement policies as a fundamental element in the assurance of quality.

2008 review recommendations:

• The completion of accreditation expert teams should be the full responsibility of NAA and it should be fixed in the Statute of NAA;
• There is need to increase the role of an HEI in the self-evaluation process, particularly in the study program accreditation. There should be obligatory SWOT analysis with added development plans in a different part of the self-analysis report;
• Include a greater focus on improvement in the external evaluation processes;
• Include greater international participation in all NAA processes to enhance general fitness for purpose;
• There should be greater participation of students in the QA processes, particularly in the self-evaluation.

Evidence:

All experts involved in state accreditation shall be certified by Rosobrnadzor.

NAA provides organizational and technical support to the certification process, which aims at ensuring that experts have the necessary competences. Experts must be highly qualified and have extensive work experience and significant achievements in teaching and research within their fields. Expert organizations – both public and private – can legally be involved as experts in the accreditation of a HEI. Students cannot be certified to take part in expert panels for state accreditation. However, the Accreditation Board includes representatives of student organizations. The participation of foreign experts in accreditation of Russian HEIs is not stipulated by the Russian legislation, but is not illegal.

8 of the 16 members of the Accreditation Commission of Rosobrnadzor on certification of experts and expert organizations are NAA’s representatives. The opinion of NAA is in other word crucial when including new experts or expert organizations into NAA’s database of certified experts. The commission meets once a month.

As part of the certification process, NAA conducts training seminars for experts on a monthly basis. It is mandatory for experts to attend these seminars, and they must undergo a test and an interview conducted by NAA in the end. NAA offers three types of training:

• Training for those who wish to become experts: general training with the use of practical cases.
• Training for active experts: update on legislation and review procedures.
• Training for heads of panels: management training.

NAA nominates the head and the other members of each panel by random selection from the database of certified experts. The number of experts depends on the complexity of the HEI under review, and the nomination process shall ensure, that a panel includes specialists in each evaluated educational program at the HEI. Rosobrnadzor approves the head and composition of each expert panel. Experts receive a fee of 6,000 rubbles (EUR 110).
In 2013, Russia phased from institutional accreditation of HEIs to program accreditation. This change implied a transition from the analysis of an educational organization’s competence to the analysis of educational processes. The state accreditation does still, though, address the delivery of an entire institution, and accreditation is given to the institution of its educational activities on the educational programs being accredited in relation to every level of higher education in each integrated group of professions, specialities and fields of training. The HEI receives a state accreditation certificate with a list of accredited IGS and educational levels. The certificate is valid for 6 years.

The state accreditation process involves a number of different data sources and methodologies:

- Data submitted by the HEI, which has applied for state accreditation. The data follows the requirements of the list of accreditation indicators developed by NAA and approved by Rosobrnadzor.
- Data published at the HEI at its website as well as the results of the annual self-evaluations by the HEI.
- The external review by an expert panel of the HEI’s educational activities and the quality of students’ training on the basis of a site visit (normally 5 days). The external review can involve results from students’ tests carried out by NAA as part of the accreditation process, if the internal assessment procedures of the HEI are judged as insufficient. The external review of the panel results in a number of expert reports on the individual programs as well as an overall conclusion of the panel.

NAA summarizes the information gathered about the HEI and prepares analytical materials for the decision making process in the Accreditation Board. The materials comprise a draft decision on compliance or non-compliance of the HEI’s activities with the accreditation indicators.

The conclusion of the panel is sent to the HEI for information by Rosobrnadzor, and Rosobrnadzor also publishes the conclusion at its website. The HEI can comment on the conclusion of the expert panel, but the conclusion will not be changed. The HEI’s can challenge the outcomes of the state accreditation process in court.

Institutions, which have not obtained reaccreditation, can reapply after one year. There are no kinds of follow-up with institutions that have had all their programs accredited.

All though the main purpose of the state accreditation process is to control the compliance of the HEIs’ educational activities with the federal standards, the state accreditation process is also aimed at promoting quality improvement at the institutions. First of all, it is a requirement, that HEIs establish internal quality assurance systems for each educational program delivered at the institutions. These systems shall support the HEIs in their strategy development and improvement of their activities. The existence of internal quality assurance systems is subject to review during state accreditation. Also the yearly self-evaluations at the institutional level aim at enhancing the HEIs’ capacity for short-term and long-term planning of their activities.

**Analysis**

The site visit underlined the importance of the experts in the state accreditation system. NAA spends approximately 60% of its budget on experts. Experts are responsible for conducting the site visits, making assessments and writing review reports. Experts mostly work alone during a site visit, and very often an expert is solely responsible for the assessment of the program(s) assigned to her or him in her or his field – although supervised by the head of panel. Therefore, the training and selection of experts is taken very seriously by the agency.

The selection of experts is primarily taken care of in the certification process. Once an expert has been certified and listed in the database, the nomination to take part in specific accreditations is done by random selection. NAA takes care, though, that an expert is only nominated for a maximum of four panels per year.

The training seems to be solid. In the interview with experts, experiences from training seminars were shared. Experts receive written material, which is to be read prior to the seminar. During the
seminar, which takes several days, the potential experts are trained by very experienced experts in the methodology of assessment and the relationship to NAA. Cases with typical problems are presented, and the potential experts are taught the best ways to deal with them. The experts also confirmed that they had been tested before being certified. They have to pass a pre-test answering 30 selected questions from a pool of 1,500 questions formulated by NAA. In the final stage is a personal interview. Failure rate in the certification process is around 40 %. Only 60 % passes.

The review panel is concerned if the fee for experts is sufficient to attract the best professionals to take part in expert groups. Taking part in a state accreditation of an HEI normally implies around 10 days of work. The fee of 6,000 rubles (EUR 110) seems very low for this amount of work.

NAA does not include international experts or students in the expert panels. This issue was discussed with several stakeholders as well as with NAA officials.

It was clarified, that there are no legal obstacles to the use of international experts, but it is not part of the tradition. This is especially due to the fact that state accreditation is not an assessment of a programs quality in relation to international academic standards, but an assessment of a programs compliance with the federal state educational standards. Therefore, international experts should have a very good understanding of these standards, if they should be able to take on the task. In addition, international experts should be able to act alone to a large extent at the site visits in a Russian speaking environment and make written assessments of the programs assigned to her or him. They need attend the training seminars and go through the certification process, which all in all makes the use of international experts somewhat more complicated than in many other countries. However, NAA intends to try to involve international experts in the future. The experts might be recruited from other countries in the Bologna-process or from China. NAA has international cooperation as a priority in its development strategy, and the agency is planning to organize an international forum in April 2015 in which issues of nomination and certification of international experts will be discussed.

It was made clear during the site visit, that students cannot be nominated as experts in the state accreditation system, as they do not fulfil the formal requirements, e.g. the request that experts have at least five years of experience as an active scientist in her or his field of study. Experiments have been made in order to involve students more in the accreditation process at the institutional level, e.g. as observers, and this has led to positive experiences. But even the students interviewed during the site visit had difficulties seeing students as experts with the same tasks as experienced academic scientist. This is to a large extent due to the fact that the experts do only partly work as a panel when conducting site visits. Each expert has individual responsibility for the assessment of one or a number of programs, and each expert writes on her or his own an assessment report about the program or programs assigned to her or him.

The review panel acknowledges that it would be a very difficult task for a student to take on the responsibility as an expert in the current accreditation system. However, the panel also believes that it would be possible to find alternative ways to involve students as experts with slightly different tasks than that of the traditional expert role, e.g. building on the positive experiences from the experiments. Students have an important perspective on the quality of provisions, and it is crucial that this perspective be incorporated in the state accreditation procedure in the future. Starting from September 2014 NAA has introduced a student survey to be conducted at each HEI during state accreditation. The survey focuses on the students’ satisfaction with the learning conditions. Although strengthening the student perspective in state accreditation, the survey does not replace the need for developing a role for students in the expert groups.

The accreditation process seems in itself to fulfil its purpose of controlling the compliance with the federal standards. It was confirmed in the interviews that the site visits to HEIs always are of the duration of five days, and that this is sufficient to make the assessment process evidence based.
It also became clear during the interviews, that although the formal purpose of state accreditation is primarily control, both institutions and experts appreciate the possibility to discuss educational practices and exchange experiences during the five day site visit. Actually, this possibility of professional exchange seems to be the major motivation for experts to engage in state accreditation.

**Panel Conclusion:**
Substantially compliant.

**Panel recommendations:**
- NAA should ensure that international academics are recruited, trained and certified as experts in state accreditation in the future.
- NAA should act proactively to ensure a formal platform for the involvement of students as experts in state accreditation in the future.
- NAA should ensure that experts work more as a common team in order to facilitate the inclusion of students and international experts in the groups and in order to avoid the risk of subjective assessments by separately working experts.

### 4.1.5 ESG 2.5: Reporting

<table>
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<th><strong>ESG 2.5: Reporting</strong></th>
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<tbody>
<tr>
<td><strong>Standard:</strong></td>
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<tr>
<td>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.</td>
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<th><strong>Guidelines:</strong></th>
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<tr>
<td>In order to ensure maximum benefit from external quality assurance processes, it is important that reports should meet the identified needs of the intended readership. Reports are sometimes intended for different readership groups and this will require careful attention to structure, content, style and tone.</td>
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In general, reports should be structured to cover description, analysis (including relevant evidence), conclusions, commendations, and recommendations. There should be sufficient preliminary explanation to enable a lay reader to understand the purposes of the review, its form, and the criteria used in making decisions. Key findings, conclusions and recommendations should be easily locatable by readers. Reports should be published in a readily accessible form and there should be opportunities for readers and users of the reports (both within the relevant institution and outside it) to comment on their usefulness.

<table>
<thead>
<tr>
<th><strong>2008 review recommendations:</strong></th>
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<tbody>
<tr>
<td>The expert panels’ reports should be publicly available.</td>
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</table>

**Evidence:**
The state accreditation process of an HEI is not documented in a single report, but in a number of documents with different purposes and intended for different readerships.
<table>
<thead>
<tr>
<th>Document</th>
<th>Author/source</th>
<th>Intended readership</th>
<th>Published</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Data on the institutions and programmes under accreditation</td>
<td>HEI sends data to NAA, who processes it and make a report</td>
<td>Expert panel, NAA, and the general public</td>
<td>Yes – at the website of Rosobrnadzor</td>
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<td></td>
<td>Similar information is available in the yearly self-evaluation reports</td>
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<td></td>
<td></td>
<td></td>
<td>published at the HEIs' websites</td>
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<tr>
<td>2 Results from students tests</td>
<td>NAA</td>
<td>Expert panel and NAA</td>
<td>No</td>
</tr>
<tr>
<td>3 Expert reports on the evaluated programs</td>
<td>Individual experts in the panel</td>
<td>Expert panel, HEI, and NAA</td>
<td>No</td>
</tr>
<tr>
<td>4 Conclusions of the expert panel</td>
<td>The expert panel</td>
<td>NAA, AB, HEI, and the general public</td>
<td>Yes – at the website of Rosobrnadzor</td>
</tr>
<tr>
<td>5 Analytical materials</td>
<td>NAA</td>
<td>Accreditation Board</td>
<td>No</td>
</tr>
<tr>
<td>6 Decision/order on accreditation</td>
<td>Accreditation Board/Rosobrnadzor</td>
<td>HEI and the general public</td>
<td>Yes – at the website of Rosobrnadzor</td>
</tr>
</tbody>
</table>

The form and structure of the expert panel conclusion is defined and regulated by legal documents like all other elements in the state accreditation procedure. NAA has developed a template for the expert reports on programs and also for the panel conclusions.

The analytical materials prepared by NAA for the Accreditation Board summarize the data submitted by the HEI under review and the report(s) from the expert panel. The materials also comprise an easily found draft decision on compliance or non-compliance of the HEI’s activities with the accreditation criteria.

The expert reports on the evaluated programs contain comments with recommendations for quality improvement to the institutions.

Only the expert panels’ conclusions and the positive decisions of the Accreditation Board are published. Negative decisions can only be found in the annual analytical report made by NAA.

**Analysis**

The site visit confirmed that conclusions and decisions in the state accreditation process are made available for the general public. Expert reports on the individual programs are only communicated to the HEI under review and not made public. This means, that future students, employers, the academic community, or other stakeholders do not have the possibility to study the analyses and recommendations of the experts. This is important information, and it should be made available for the general public.

NAA and Rosobrnadzor only publish positive decisions deriving from state accreditation. It is only with a substantial effort, that information about institutions and programs receiving a denial of accreditation – or withdrawing their application during the process – can be found. NAA publishes a list of institutions, whose programs are up for accreditation, but negative decisions on accreditation and withdrawals are only accounted for in the annual analytical report. This makes it difficult for the general public to follow the outcomes of state accreditation.

Conclusions and comments are easy for the reader to find in the template developed by NAA for experts’ reports and conclusions. The comments in the expert reports on evaluated programs might be seen as recommendations, and they are listed systematically under each point. As such, the reports fulfil their purpose for the intended readership in the decision making process.
An HEI under review does not have the possibility to comment on the experts’ reports, the joint conclusion of the expert panel, or the analytical report prepared by NAA for the Accreditation Board before the decision making process in the Board. The review panel finds it inappropriate that HEIs do not have an opportunity to correct factual misunderstandings with potential importance for the overall conclusions.

**Panel Conclusion:**
Substantially compliant.

**Panel recommendations:**
- NAA should publish experts’ reports on the programs under review as the reports contain important information to the academic community and the general public.
- NAA and the responsible authorities should make it possible for an institution under review to comment on the experts’ program reports and the joint conclusion of the expert panel before the decision making process in the Accreditation Board. NAA should also consider making it possible for the institutions to comment on the analytical report from NAA.
- NAA should produce a user-friendly tool for future students and their parents, so that they easily can access the outcomes of state accreditation from all the years (including information about HEIs withdrawing their application for state accreditation during the process).

4.1.6 **ESG 2.6: Follow-up procedures**

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<th>ESG 2.6: Follow-up procedures</th>
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<tbody>
<tr>
<td><strong>Standard:</strong></td>
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<tr>
<td><strong>Guidelines:</strong></td>
</tr>
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</table>

**2008 review recommendations:**
None

**Evidence:**
State accreditation does not include any legal framework for a structured follow-up procedure that could encourage the HEI’s to work with the recommendations or any areas of non-compliance with the federal standards pointed out by the experts in their reports or in the panels’ conclusions.

If the educational activities of an institution are found satisfactory, the HEI receives a state accreditation certificate with a list of accredited IGS (integrated groups of programs) and educational levels. The certificate is valid for 6 years, but a HEI may be deprived of state accreditation for specific educational levels and IGSs, specialties and fields of training, if any drawbacks are revealed in the work of the HEI in that period of time. The HEIs shall continue to conduct the yearly self-evaluations during that time and publish the results on their websites.
In the case of a negative decision by the Accreditation Board on some specific programs, Rosobrnadzor refuses the HEI of state accreditation for those groups of programs and/or educational levels. In the case of a refusal of state accreditation, a HEI can only apply for a recurrent accreditation procedure one year after its accreditation was cancelled.

**Analysis**

As state accreditation is mandatory for all HEIs in Russia, the system has built in follow-up procedures in two ways: HEIs must follow-up on programs or levels that have not been reaccredited, if the institutions want to be able to deliver these programs and levels in the future. HEI must also go through a new process of state accreditation after six years, when the certificate listing the accredited programs and levels expires. In that sense, NAA does have follow-up procedures in place.

The interviews during the site visit showed, that NAA does not have any kind of formal contact or communication with an HEI in the 6 years period until the next accreditation or in the minimum 1 year period before reaccreditation. It was also clear, that NAA does not have the resources necessary for comprehensive follow-up procedures in the light of the enormous number of accreditation procedures pr. year. The review panel finds that this might reduce the learning and development potential embedded in state accreditation, all though the panel also acknowledges that the large number of accreditation procedures does give a challenging context. Never the less, NAA should request that HEIs produce and file a follow-up plan showing how they will act on flaws and recommendations highlighted in the experts’ reports and conclusions. This follow-up plan could be integrated in the annual self-evaluation report of the HEI and could be a valuable document in the next round of accreditations.

**Panel Conclusion:**
Substantially compliant.

**Panel recommendations:**
- NAA should request that HEIs produce a follow-up plan when the state accreditation process is finalised. The HEIs should send their follow-up plans to NAA.

**4.1.7 ESG 2.7: Periodic reviews**

**ESG 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.

**Guidelines:**
Quality assurance is not a static but a dynamic process. It should be continuous and not “once in a lifetime”. It does not end with the first review or with the completion of the formal follow-up procedure. It has to be periodically renewed. Subsequent external reviews should take into account progress that has been made since the previous event. The process to be used in all external reviews should be clearly defined by the external quality assurance agency and its demands on institutions should not be greater than are necessary for the achievement of its objectives.

**2008 review recommendations:**
None
Evidence:
A state accreditation certificate listing the HEI’s accredited IGS (integrated groups of programs) and educational levels is valid for 6 years. After the 6 years the HEI must apply for a new accreditation procedure to have the accreditation reconfirmed.

Both public and private HEIs are required to conduct yearly self-evaluations after a nationally determined scheme and publish the reports on their official websites. These reports are not subject to external review, but NAA intends to monitor that reports are being published, and the reports are taken into account in the following state accreditation process.

Analysis
The state accreditation is a clearly cyclical process, and the length of the accreditation cycle is clearly defined to 6 years. The interviews during the site visit showed, that this well communicated and known in the sector. The institutions are also well informed about the procedures in state accreditation although the system has recently changed from an institutional focus to a program focus.

Panel Conclusion:
Fully compliant.

Panel recommendations:
None

4.1.8 ESG 2.8: System-wide analyses

ESG 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.

Guidelines:
All external quality assurance agencies collect a wealth of information about individual programmes and/or institutions and this provides material for structured analyses across whole higher education systems.

Such analyses can provide very useful information about developments, trends, emerging good practice and areas of persistent difficulty or weakness and can become useful tools for policy development and quality enhancement. Agencies should consider including a research and development function within their activities, to help them extract maximum benefit from their work.

2008 review recommendations:
None

Evidence:
NAA produces and publishes an annual analytical report based on the results of the state accreditation processes conducted during the past year. The analytical report describes the results of the work of expert panels and the Accreditation Board, and it analyses the development of the HE system in the Russian Federation and the activity of the institutions – both the institutions within higher education and within secondary vocational education and training also covered by NAA’s mandate.

The analytical report also includes a section with reflections and suggestions on ways to improve the accreditation procedures.
NAA also carries out research about quality assurance of education with the purpose of enhancing the efficiency and effectiveness of state accreditation, e.g. enhancing the methodology of the experts’ work in the external review procedure, considering the outcomes of public accreditation processes, and studying the challenges with quality assurance of programs delivered as e-learning etc.

Analysis
At the site visit, the review panel had the opportunity to study the original Russian version of the 2013 analytical report, which content was in line with the descriptions provided by NAA.

Nor the annual analytical report, nor the researches carried out by NAA were mentioned by the stakeholders in the interviews during the site visit. This might indicate that these activities are not targeted at a wider public.

Panel Conclusion:
Fully compliant.

Panel recommendations:
• NAA could consider paying more attention to communicating the annual analytical reports and the results of its research activities.

4.1.9 ENQA Criterion 1A / ESG 3.1: Summary of findings

Analysis
The analyses and conclusions concerning ESG 2.1-2.8 show a picture of NAA as a well-functioning and highly productive accreditation agency. The procedures used in state accreditation reflect the high number of institutions and programs in Russian Higher Education and the need to ensure, that all programs comply with some basic requirements in relation to their structure, delivery and the evaluation of student learning. The focus on high productivity and control of basic requirements has as a consequence that accreditation procedures do not always follow best practice. As discussed in the analyses of ESG 2.1-2.8, NAA need to improve the procedures in order to involve students and international experts in the expert panels, publish all reports and documents produced in the accreditation process, and enhance the learning and development potential by introducing follow-up procedures.

More generally, NAA and the Higher Education authorities should consider how state accreditation as such could be made more relevant for the institutions and the stakeholders. State accreditation is being challenges as the most important kind of external quality assurance of Higher Education in the Russian Federation. The challenge comes from public accreditation and public professional accreditation, which both were introduces in the new law on education from 2013.

These new forms of accreditation were mentioned by almost all stakeholders during the site visit – and even by NAA officials – as more enhancement oriented and more valuable to the institutions. With the strong labour market focus in the new types of accreditation, the process is also more valuable to employers. NAA is in a process where they consider practical ways to take results from public accreditation and public professional accreditation into account in the state accreditation procedure. This seems to be a good, pragmatic and necessary step. However, NAA might also consider how the added value of going through a state accreditation process could be increased for the HEIs. The development of state accreditation will be closely linked to the development of the federal standards. The 3 plus and 4. generation of federal standards under development will give more freedom to the institutions as to how they will fulfil the requirements. NAA can use its experiences in the field of quality assurance to advocate for standards with high and challenging ambitions, so that state accreditation can become more relevant to the institutions and more than just control of basic minimum standards.
Panel Conclusion:
Substantially compliant.

4.2 ENQA Criterion 1B / ESG 3.3: Activities

**ESG 3.3: Activities**

**Standard:** Agnies should undertake external quality assurance activities (at institutional or pro-gramme level) on a regular basis.

**Guidelines:** These may involve evaluation, review, audit, assessment, accreditation or other similar ac-tivities and should be part of the core functions of the agency.

**2008 review recommendations:**
- To ensure the quality of teaching the NAA should encourage the HEIs to participate more in the internet based state exams.

**Evidence:**
NAA is engaged in a huge amount of accreditation processes within higher education every year. NAA is also engaged in external quality assurance of vocational education and training, but state accreditation of HEIs’s activities is the main area of NAA’s work. In 2013, NAA conducted state accreditation processes at 940 educational organizations and approximately 11,000 programs. Almost three quarters (74 %) of the accreditation activities took place at federal state educational organizations of higher education. Another 15 % of the accreditation activities took place at private higher education institutions.

NAA’s role is primarily to inform HEIs and the general public about state accreditation processes and procedure, train and nominate experts to the external reviews of specific HEIs, conduct internet testing of student at HEIs under accreditation, analyse information submitted by HEIs and expert panels, prepare analytical materials for the Accreditation Board meeting, and engage in research and development in relation to external reviews and accreditation processes.

NAA has a new and growing function as provider of consultancy services to educational institutions. These services are sold to the institutions at a market basis, and NAA is allowed to generate a surplus on these activities. The surplus can be used to finance other kinds of activities within NAA.

**Analysis**
The interviews as well as the evidence provided by NAA showed, that state accreditation of Higher Education programs is the core activity of NAA.

The panel finds it positive that NAA is permitted to use its competencies to advice and give can-celling to the institutions. On the other hand, NAA should be very much aware of the ethical challenges embedded in these activities. NAA should produce strict guidelines about when to take on a task and when to reject it, so that its role as provider of consultancy services does not risk to conflict with the agency’s core activities. In addition to that, NAA should aim at only hav-ing its cost covered, not generating a surplus.

**Panel Conclusion:**
Fully compliant.
Panel recommendations:
• NAA should make strict guidelines for its consultancy service activities.

4.3 ENQA Criterion 2 / ESG 3.2: Official status

ESG 3.2: Official status

Standard:
Agencies should be formally recognised 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.

2008 review recommendations:
None

Evidence:
NAA is a public institution established by federal authorities responsible for education, and the activities of the agency are determined by laws, decrees, orders etc. NAA plays a central role in the procedure of state accreditation of HEIs in the Russian Federation, where state accreditation is the main quality assurance procedure for external evaluation of HEIs.

NAA was established in 1995 by order of the then operating State Committee for Higher Education of the Russian Federation. NAA has the status of a federal state budgetary institution, and is a legal entity with an independent balance sheet. The statutes of NAA are approved by an order of Rosobrnadzor from 2011.

As a public institution the agency’s activities must be in consistency with the legal framework set by the constitution of the Russian Federation, federal constitutional laws, federal laws, decrees and instructions of the president of the Russian Federation, resolutions and instructions of the Government of the Russian Federation etc. NAA is also governed by normative legal acts of the Ministry of Education and Science of the Russian Federation, Rosobrnadzor, and other federal executive authorities.

Analysis
The interviews during the site visit and the evidence provided by NAA made it absolutely clear, that NAA is a formally recognised quality assurance agency within the Higher Education sector in the Russian Federation.

Panel Conclusion:
Fully compliant.

Panel recommendations:
None.
4.4 ENQA Criterion 3 / ESG 3.4: Resources

**ESG 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 and staff.

**2008 review recommendations:**
None

**Evidence:**
In the self-evaluation report of NAA, NAA’s total budget of 2013 was set to 88 million rubles (EUR 1.5 million). During the site visit, the review panel received documentation from NAA setting the total budget of 2014 to 275 million rubles (EUR 4.7 million). The numbers for 2013 and 2014 are not directly comparative, as the 2013 budget apparently does not take into account costs connected with hiring experts and financing their travel expenses etc. However, NAA has had a very substantial rise in funding mainly due to the transition from institutional accreditation to program accreditation. 60 % of the 2014 budget is spent on costs related to the work of experts.

The funding comes from different sources of which the funding of the state task implementation and research activities is the largest.

NAA has 101 full-time staff, 20 of whom work in NAA’s branch in Yoshkar-Ola and 81 in the headquarters in Moscow. The staff is composed of the following groups:

**Main staff groups at NAA**

<table>
<thead>
<tr>
<th>Groups of employees</th>
<th>Total number of persons / number in branch</th>
</tr>
</thead>
<tbody>
<tr>
<td>Management staff</td>
<td>4 / 1</td>
</tr>
<tr>
<td>Administrative staff</td>
<td>4 / 1</td>
</tr>
<tr>
<td>Officers responsible for external quality assurance procedures</td>
<td>43 / 0</td>
</tr>
<tr>
<td>Research/information officers</td>
<td>20 / 14</td>
</tr>
<tr>
<td>Support personnel</td>
<td>26 / 4</td>
</tr>
</tbody>
</table>

All officers working with external quality assurance procedures are located in Moscow, whereas the officers working with research and information primarily work in the branch in Yoshkar-Ola. 8 members of the staff hold candidate of science degrees (Ph.D.-level), and 2 members hold doctor of science degrees (Ph.D.-level).

NAA should have modern physical and technical facilities supporting the work of the staff. Some of the staff of the agency has extensive knowledge and know-how about program software development, and this know-how is used to support and facilitate different steps in the state accreditation procedure, e.g. the submission of data from the HEIs and helping expert panels in their work.

NAA frequently conducts surveys among the staff, e.g. including questions about the employees’ needs for logistic support of the agency’s activities.
Analysis
The review panel finds it positive that extra resources have been allocated to NAA in the transition from institutional focus to program focus in state accreditation. The interviews with management and staff gave a clear impression, that NAA has sufficient resources for conducting the state accreditation procedures in its current form. Many processes are highly standardized and automatized, and NAA has an ongoing focus on providing new types of technological support for institutions, experts and employees in order to reduce the workload connected with the different processes.

The number of 101 full-time staffs seems all in all low in light of the more 11,000 programs accredited in one year. However, the accreditation process is to a large extent delegated to the expert panels, and also the training of experts is delegated to experienced experts. The staff at NAA is primarily working with initiating, supporting, and quality assuring the assessment process of the experts. This implies tasks such as recruitment of new experts to the database and facilitating the certification process of new experts; nomination of expert panels to undertake the accreditation of programs at a specific institution under review; handling of documents and contracts; processing of data submitted by the applying institutions; reviewing panels’ reports; and preparation of material for the Accreditation Board meetings. Employees from NAA do not accompany the expert panels on site visits, and the employees do not write or edit the reports of the panels.

The review panel is concerned about the capability of NAA to review and quality assure the reports and assessments of expert panels. The interviews did not reveal any dissatisfaction within the Higher Education community about the quality of assessments and thus accreditation decisions. But a system with assessments made by autonomously working expert panels does imply a high risk for inconsistency. When this does not seem to be a problem today, it is probably due to the fact, that the indicators used in state accreditation to a large extent are quantitative and factual. NAA would need more resources to ensure consistency, if the federal standards – as foreseen in the 3 plus and 4. generation – take on a more open approach making assessment of compliance more qualitative. NAA could consider raising experts’ fees in order to attract the best professionals to work as experts in state accreditation.

Panel Conclusion:
Substantially compliant.

Panel recommendations:
None

4.5 ENQA Criterion 4 / ESG 3.5: Mission statement

ESG 3.5: Mission statement

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

Guidelines:
These statements should describe the goals and objectives of agencies’ quality assurance processes, the division of labour with relevant stakeholders in higher education, especially the higher education institutions, and the cultural and historical context of their work. The statements should make clear that the external quality assurance process is a major activity of the agency and that there exists a systematic approach to achieving its goals and objectives. There should also be documentation to demonstrate how the statements are translated into a clear policy and management plan.
2008 review recommendations:
None

Evidence:
The goals and objectives of NAA are of course clearly linked to the goals and objectives of state accreditation, as this is the main activity of the agency. The goals and objectives of state accreditation are determined by the Law “On Education in the Russian Federation” and the regulations on state accreditation of educational activities adopted by the decree of the government of the Russian Federation. These documents are publicly and readily accessible in the Internet.

NAA’s own mission is to ensure the implementation of the external quality assurance processes in the Russian system and promoting the recognition of student learning outcomes in Russian educational organizations at national and international levels. The responsibilities of NAA in the procedure of external quality assurance of HEIs in the Russian Federation are described in the statutes of the agency.

The Agency’s activities are aimed at achieving the following objectives:
• assisting in the implementation of state functions on state accreditation;
• meeting the needs of individuals, society and the state in enhancing the quality of education and promoting the development of academic, professional and social mobility of citizens;
• competitive growth of Russia and its citizens on the global labour market.

The statutes are approved by Rosobrnadzor in 2011 and publicly available at the website of NAA.

The annual action plan of NAA contains the more practical objectives for the work of the agency. The current work of NAA is also illustrated by a document on its website listing the HEIs that have applied for accreditation.

The mission, goals and objectives of NAA are published on the web-site of the Agency together with the agency’s strategic plan until 2020. The documents are also available in English.

Analysis
The review panel consider it well documented, that NAA informs in an easily accessible way about its mission, goals and objectives for the work of the agency. The panel also finds a clear link between the stated goals and the activities and plans of NAA.

Panel Conclusion:
Fully compliant

Panel recommendations:
None

4.6 ENQA Criterion 5 / ESG 3.6: Independence

**ESG 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.

**Guidelines:**
An agency will need to demonstrate its independence through measures, such as:
• its operational independence from higher education institutions and governments is
guaranteed in official documentation (e.g. instruments of governance or legislative acts);
• the definition and operation of its procedures and methods, the nomination and appointment of external experts and the determination of the outcomes of its quality assurance processes are undertaken autonomously and independently from governments, higher education institutions, and organs of political influence;
• while relevant stakeholders in higher education, particularly students/learners, are consulted in the course of quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.

2008 review recommendations:
• The clear legal link between AB and NAA should be established. NAA should be the servicing body (bureau) to the AB and AB the supervising and decision making body to NAA.
• The completion of accreditation expert teams should be the full responsibility of NAA and it should be fixed in the statute of NAA.

Evidence:
The operational independence of NAA in its external quality assurance activities is formally guaranteed in the Regulations on state accreditation of educational activities from 2013, and the practical implications of this is further supported by the procedure of state accreditation of educational activities of HEIs in the Russian Federation, which is developed by NAA and approved by Rosobrnadzor.

All though approved by Rosobrnadzor, the state accreditation indicators, used as criteria, are developed and determined by NAA. The accreditation indicators are the same for all kinds of HEIs in the Russian Federation regardless of their location, legal status (public or private), etc.

NAA processes the quantitative data provided by the HEIs in a uniform way using mathematical methods.

The experts are responsible for the assessments made in their reports and for the quality of the review procedure. NAA assures a certain level of uniformity in the work of the expert panels, e.g. by issuing a methodological manual supporting them in the assessment of the indicators. NAA also monitors the experts’ performance, and one of NAA’s departments has been created for this purpose.

NAA is responsible for maintaining a database of experts and nominating expert panels. This responsibility includes a number of tasks, among which is to give organizational and technical support to the expert certification procedure and to undertake the training of experts. All experts taking part in state accreditation must be certified by Rosobrnadzor. NAA is solely responsible for nominating experts to panels. NAA does so by randomly selecting qualified persons among the more than 2,000 experts listed in the database and ensuring, that selected experts do not have any personal interest in the review results of the specific HEI. NAA however does not have the authority to formally appoint the expert panels. This authority lies with Rosobrnadzor, who approves the composition of the expert panel for the accreditation of each HEI and issues a formal document (decree).

NAA has autonomous responsibility for preparing the documentation for the Accreditation Board meeting, where the decision on accreditation for an HEI under review will be taken. The documentation takes the form of an analytical report, where NAA has synthesized the review inputs from different sources into an overall conclusion and recommendation for the Accreditation Boards decision. The sources include the review report and conclusion from the expert panel, the quantitative data submitted by the HEI and potentially also data from students’ tests conducted by NAA as part of the accreditation procedure.
NAA is not responsible for making accreditation decisions. This authority lies with the Accreditation Board – and in the end Rosobrnadzor. The Accreditation Board is a body integrated into the organisational structure of Rosobrnadzor. The board is chaired by the head of Rosobrnadzor, and the vice-chair of the board is the deputy head of Rosobrnadzor. A part from representatives of Rosobrnadzor, the board is composed of heads of educational institutions, representatives of employers, students, and public organizations. The board meets 6 times a year.

Rosobrnadzor is as the official government authority responsible for the endorsement of the Accreditation Board decision. NAA gives practical support in this process by preparing the draft order on state accreditation and the layout sheet of the state accreditation certificate issued for the HEI. NAA is also responsible for updating the Register of accredited educational organizations.

Analysis
The site visit gave convincing evidence that NAA in practical life has operational freedom to conduct its external quality assurance activities and reach its conclusions without interference from Rosobrnadzor, the Ministry, HEIs or other stakeholders. NAA has as the operating agency the knowhow and experiences to develop the detailed procedures of state accreditation, and they are responsible for the practical implementation of all steps in the procedures. The interviews with the employees confirmed that they see themselves as those who help the experts in the accreditation process, and they emphasized that they are not state officials with special obligations.

However, the operational freedom of NAA is not ensured, although it is guaranteed in the Regulations on state accreditation of educational activities from 2013. At least two issues are of concern to the review panel:

First, NAA does not have formal independence to decide who can be used as experts in state accreditation. Rosobrnadzor has to certify all experts before they are included into the database of experts. NAA has the practical responsibility for the whole training and certification process, but Rosobrnadzor has one member in the commission, which take the final decision on certification. And Rosobrnadzor also issues the certificate to a newly accepted expert. Though the participation of Rosobrnadzor in the process seems to be first and foremost formal, the direct participation of a government body does raise concern.

Second, NAA does not have formal independence to compose the concrete expert panels for each accreditation. NAA is responsible for making the random selection of experts from the database, but the final composition of the panel has to be approved by Rosobrnadzor as does the head of the panel. The reason for this is apparently legalistic, as the panels have to be formally approved by a government body because they are on a state mission. According to employees, Rosobrnadzor has not interfered with the composition of a panel for at least three years, but the management of NAA gave a concrete example, where Rosobrnadzor earlier had asked for more qualified experts to a panel, which should accredit one of the leading universities in the Russian Federation. The review panel finds it very important, that no formal possibilities exist, where Rosobrnadzor has the possibility to interfere in the operations of NAA.

The review panel was also concerned with the role and status of the Accreditation Board (council). Although not a part of NAA, the Accreditation Boards plays an important role in the state accreditation system as a whole. The decisions of the board are only to be considered as recommendations to Rosobrnadzor, who takes the final decision on accreditation. Apparently, Rosobrnadzor always follow the recommendations given by the Accreditation Board. However, the review panel did not obtain a clear understanding of under which circumstances and on what ground, Rosobrnadzor might consider altering a decision made by the Accreditation Board. The review panel also considers it a major challenge to the legitimacy of the entire state accreditation system (but not the work of NAA), that representatives from Rosobrnadzor are members of the Accreditation Board. The head of Rosobrnadzor is even chairing the board. This leads to a lack of transparency in the decision making process because quality assurance principles might risk be mixed with political priorities at the meetings of the Accreditation Board.
Panel Conclusion:
Partially compliant.

Panel recommendations:
- NAA should have full and formal responsibility for the recruitment and certification of new experts.
- NAA should have delegated authority to complete the composition of expert panels.
- Representatives from Rosobrnadzor should under no circumstances be members of the Accreditation Board.

4.7 ENQA Criterion 6 / ESG 3.7: External quality assurance criteria and processes used by the agencies

ESG 3.7: External quality assurance criteria and processes used by the agencies

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

Guidelines:
Agencies may develop and use other processes and procedures for particular purposes. Agencies should pay careful attention to their declared principles at all times, and ensure both that their requirements and processes are managed professionally and that their conclusions and decisions are reached in a consistent manner, even though the decisions are formed by groups of different people.

Agencies that make formal quality assurance decisions, or conclusions which have formal consequences should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of each agency.

2008 review recommendations:
- Final reports on HEIs’ evaluation should be published in full.

Evidence:
The procedure for state accreditation includes a number of elements:
- Criteria for state accreditation. Indicators of state accreditation have been developed by NAA and approved by Rosobrnadzor. The indicators reflect the requirements of the Federal State Educational Standards, describing the intended quality and outcomes of teaching and learning in Russian higher education. The set of indicators is common for all HEI's.
- Self-evaluation reports from the HEI under accreditation. Self-evaluation reports are not prepared for the purpose of state accreditation, but data from the latest report is included in data, that an institution has to submit when applying for state accreditation. All HEIs in the Russian Federation are obliged to prepare and publish such reports on a yearly basis, and the last report is taken into consideration in the accreditation process. NAA is responsible for providing program software to be used by the HEI's in the preparation of their self-evaluation reports.
Quantitative data submitted by the HEI. A HEI must submit data about its educational activities as part of its application for state accreditation to Rosobrnadzor. NAA is currently developing special program software allowing for automatic submission of the information necessary to undergo state accreditation, including the data contained in the self-evaluation report.

Internet testing of students. NAA can initiate testing of student and graduates knowledge, if the internal examination system of a HEI is not deemed satisfactory.

Expert panels. An expert panel is appointed for each accreditation of a HEI. A panel is composed, so that its members all in all have the necessary knowledge and competencies to assess the provisions of the HEI under review, and so that the members do not have any conflicts of interests concerning the outcomes of the accreditation process. Students are not appointed to be part of expert panels.

Site visits. An expert panel goes on a five day site visit to the HEI under review. During a site visit, the panel conduct interviews with representatives of the administration, faculty and students as well as examine the facilities, classes, laboratories, libraries etc. NAA employees support the expert panels in their work, but they do not assist the panels by accompanying them on the site visits.

Expert panel reports. Each expert writes a report about the programs, that he or she was responsible for assessing. On the basis of the experts’ individual reports, the head of the expert panel drafts a conclusion which must be signed off by all panel members. NAA has developed a template for the expert reports and conclusions.

Publication of reports. The expert panels’ conclusions and the accreditation decisions are being published. The individual expert reports on each group of programs are made available to the institution under review, but not to the general public.

Follow-up procedures. Accreditations are valid for six years, after which an institution must apply for reaccreditation of its programs. Institutions, whose programs have been rejected, must apply for reaccreditation after one year. There is no follow-up procedure in state accreditation within these periods of time.

Appeals procedures. There is no formal appeals procedure incorporated in the accreditation system, but HEIs have the possibility to challenge an accreditation decision in court.

The processes, criteria and procedures for state accreditation are all determined by law or are ministerial orders and decrees. As it is the case for all kinds of legislation in the Russian Federation, the indicators and procedures for state accreditation – and hence the operational framework for NAA – have been subject to public hearing and potential debate, and all documents describing the criteria and procedures are publicly available and communicated through the websites of the Ministry of Education, Rosobrnadzor and NAA.

Analysis

The review panel finds that the procedures of state accreditation and the processes used by NAA are very well described and easily accessible for the general public.

As accounted for in earlier paragraphs, especially 2.4, 2.5, and 2.6, NAA has not implemented good practices in all of its processes:

- NAA does not include students as experts in the panels.
- NAA does not publish all analytical material deriving from an accreditation process. Especially the individual experts’ reports contain recommendations, which could be interesting for the general public.
- NAA does not have a follow-up procedure beside the reaccreditation processes after 1 or 6 years.

There is not any permanent appeals procedure in the state accreditation system. From the view of the review panel, this is aggravated by the fact, that HEIs under review do not have a formal possibility to comment on the expert reports and conclusion before the decision making process in the Accreditation Board. As an experiment, NAA has created an internal appeal board consisting of NAA managers. The board has reviewed two claims from universities, one of which affected the final conclusion on state accreditation. If experiences from the experiment are positive, NAA will initiate a process aiming at amending the regulations and giving the Appeal Board a formal status.
Panel Conclusion:
Partially compliant.

Panel recommendations:
• NAA and the responsible authorities should see to that a formal appeals procedure be established as part of the state accreditation system.

See also recommendations under 2.4, 2.5 and 2.6.

4.8 ENQA Criterion 7 / ESG 3.8: Accountability procedures

ESG 3.8: Accountability procedures

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

Guidelines:
These procedures are expected to include the following:
1. A published policy for the assurance of the quality of the agency itself, made available on its website;
2. Documentation which demonstrates that:
   − the agency’s processes and results reflect its mission and goals of quality assurance;
   − the agency has in place, and enforces, a no-conflict-of-interest mechanism in the work of its external experts;
   − the agency has reliable mechanisms that ensure the quality of any activities and material produced by subcontractors, if some or all of the elements in its quality assurance procedure are subcontracted to other parties;
   − the agency has in place internal quality assurance procedures which include an internal feedback mechanism (i.e. means to collect feedback from its own staff and council/board); an internal reflection mechanism (i.e. means to react to internal and external recommendations for improvement); and an external feedback mechanism (i.e. means to collect feedback from experts and reviewed institutions for future development) in order to inform and underpin its own development and improvement.
3. A mandatory cyclical external review of the agency’s activities at least once every five years, which includes a report on its conformity with the membership criteria of ENQA.

2008 review recommendations:
• The panel encourage the NAA to work out as soon as possible the NAA’s internal quality assurance document.

Evidence:
NAA has a number of mechanisms and procedures, which aim at ensuring the fulfilment of the agency’s mission and goals and making the agency able quality assure and account for its results.

The departments of NAA have a clear division of labour and the responsibility for all tasks and activities necessary to fulfil the agency’s goals have been clearly assigned to one of the departments. Tasks have further been delegated to the employees who all have clear responsibilities described in their job descriptions. NAA works with detailed planning in annual, quarterly and monthly action plans. Each department reports on its results on a monthly basis. NAA prepares an annual report on the results of its performance to the state fiscal organs, and an annual analytical report about its activities to Rosobrnadzor.

NAA has planned an audit scheme for 2014 with internal review of the quality management system in all departments.
NAA has formulated a steering document outlining the agency’s internal quality assurance policy. The internal quality assurance includes a number of procedures, e.g. feedback questionnaires to employees, representatives of HEIs and experts. As mentioned earlier (ESG 2.3 and 3.4) NAA quality assures the reports and conclusions from the expert panels, while preparing the analytical report for the Accreditation Board meeting. According to the agency’s procedures, all analytical reports are considered and agreed upon by the Heads of three Departments, a Deputy Director and the Director.

NAA has in place a non-conflict-of-interest mechanism. When an expert panel has been composed by random selection from the database, NAA makes sure, that none of the experts work or have recently worked for the institution under review. First, NAA contacts the each individual expert to ask if he or she works for the HEI. Then NAA sends a letter of agreement – including a no-conflict-of-interest statement – to be signed by the expert. When the panel has been approved by Rosobrnadzor, all experts must confirm, that they are not assigned to the institution under review in the contract. The HEI is not consulted in the process. HEIs under review can see the composition of the expert group on Rosobrnadzor’s homepage prior to the site visit, and NAA does consider the composition of a group, if a HEI expresses its disagreement.

NAA went through its first ENQA review of the agency in 2008 and obtained full membership of ENQA in 2009.

Analysis
The review panel got an impression of NAA as a well driven and effective organisation with sufficient plans, written procedures and feedback mechanisms to consider it as an accountable agency.

The interviews during the site visit gave examples of the use of feedback questionnaires. The results are discussed by management and used by employees responsible for development of state accreditation procedures. NAA seems to react on wishes and needs of the institutions, e.g. by simplifying the application procedure.

The interviews also gave examples, where low standard expert reports had been caught and rejected in the quality assurance process by NAA. The review panel however considers it unlikely, that NAA would have resources for more than a formal check, e.g. to see if conclusions are based on evidence. A quality assurance which goes to the core of the assessment process would require much more resources than currently available.

The review panel is confident, that NAA enforces a no-conflict-of-interest mechanism, but the panel consider it to be a weakness that the view of the HEIs under accreditation is not taken into account. That might risk undermining the legitimacy of the state accreditation procedure in some cases.

Panel Conclusion:
Substantially compliant.

Panel recommendations:
• NAA should invite the institutions under review to comment on the composition of the expert panel.
4.9 ENQA Criterion 8: Miscellaneous

**ENQA Criterion 8: Consistency of judgements, appeals system and contribution to ENQA aims**

1. The agency pays careful attention to its declared principles at all times, and ensures both that its requirements and processes are managed professionally and that its judgments and decisions are reached in a consistent manner, even if the judgments are formed by different groups;
2. If the agency makes formal quality assurance decisions, or conclusions which have formal consequences, it should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of the agency;
3. The agency is willing to contribute actively to the aims of ENQA.

**2008 review recommendations:**

The ENQA Criterion 8 was not included in the 2008 review.

**Evidence:**

As discussed under ESG 2.3, consistency of judgments and decisions is ensured through thorough training of experts, detailed manuals for the experts work, quality assurance of experts’ reports and conclusions, and a relatively basic and factual approach to quality assurance.

As discussed under ESG 3.7, there is not an official appeals procedure in state accreditation. HEIs have the possibility to challenge an accreditation decision in court.

NAA is a full member of ENQA since 2009. NAA declares its willingness to take part in European cooperation and contribute to the work of ENQA. This could be as host for ENQA workshops and conferences or by participating in competence development with other ENQA agencies, where employees could be involved in the work of expert panels during state accreditation. It could also be by participating in international projects in the sphere of quality assurance of higher education. NAA attends ENQA meetings and seminars, but has not yet played a very proactive role in working groups etc.

NAA holds itself ready to provide updated information about the state-of-affairs of higher education quality assurance system in Russia both to ENQA members and to all stakeholders.

**Analysis**

As discussed under ESG 3.7, there is not any appeals procedure in the state accreditation system. From the view of the review panel, this is aggravated by the fact, that HEIs under review do not have the possibility to comment on the expert reports and conclusion before the decision making process in the Accreditation Board.

The review panel got the impression during the site visit, that NAA sees the ENQA membership as an important asset to the agency, and that the agency is engaged in promoting the Bologna process in a Russian context. NAA attends ENQA meetings and seminars, but the interviews indicated that the agency has not yet played a very proactive role in ENQA working groups etc. In its research activities, NAA has not yet established strong traditions for international cooperation.

**Panel Conclusion:**

Substantially compliant.

**Panel recommendations:**

See recommendation under ESG 3.7!
Conclusions and development

5.1.1 Overall findings
The review panel is impressed by NAA’s efficiency in organizing the state accreditation procedures and also by the overwhelming number of accreditation assessments produced in the system. The panel is convinced that NAA has operational independence in its work from nomination of expert groups, over support and guidance of the groups, to the preparation of the analytical report to the Accreditation Board.

State accreditation is a comprehensive process with its standard five day site visit. Each HEI under accreditation involves a large number of persons and spend significant resources in the process. And expert groups can be voluminous in order to include enough academic experts to cover the scientific fields in the programs under accreditation – especially at the big institutions. It is clear that both institutions and experts appreciate the possibility to discuss educational practices and exchange experiences during the five day site visit. As such, state accreditation seems to have a great learning potential. On the other hand, this learning potential seems to be primarily informal, as the formal purpose of state accreditation is control of the degree to which programs comply with the requirements in the Federal State Educational Standards of Higher Education (FSES). This formal accreditation process can be characterized as a basic kind of external quality assurance based on some absolute minimum requirements to the educational programs. The added value of the formal process does not equal the invested time and resources, and state accreditation seems most of all to be viewed as a necessary burden by the institutions. State accreditation does have an important function, though, in reducing the number of institutions and programs that do not fulfil the basic quality requirements. This mainly concerns private institutions established in a very expansive period for Russian higher education in the 1990’ies.

Experts are given intensive and demanding training, and the process of approving and re-approving experts is taken very serious with only around 60 % of candidates passing the certification test. Students cannot be appointed as experts, and this is somehow understandable considering the responsibility of each individual expert during the site visit. An expert is given sole responsibility for the assessment of one or a group of programs. Positive experiments have been made where students are involved as experts with other tasks than the certified academic experts. There are no experiences with involving international experts in state accreditation, but although challenging, there are no formal obstacles for doing it.

The review panel finds that NAA’s profile could be strengthened in the Russian higher education landscape. NAA is perceived as the practical tool for Rosobrnadzor in the operation of the state accreditation procedures. NAA is not seen as an agency with a strong platform for promoting high academic standards and quality enhancement in a broader sense. This view of NAA as an organisation delivering services for Rosobrnadzor also prevails internally in NAA.

The current profile of NAA is a direct consequence of the division of labour and distribution of authority between Rosobrnadzor and NAA. It is stated in the legislation that state accreditation is conducted by Rosobrnadzor as the federal executive power body, and that the principal statutory function of NAA is methodological, organizational, technological, information and analytical support of the procedure of state accreditation conducted by Rosobrnadzor. This implies for instance, that HEIs applying for state accreditation submit the application to Rosobrnadzor, who then forward it to NAA, and Rosobrnadzor must approve the composition of expert groups. In addition, NAA does not have the authority to certify experts after training and testing. This authority lies with the Ministry of Education and Science.
Although NAA has operational independence in practical terms, these formal procedures imply an important limitation to the autonomous responsibility of the agency. NAA has to coordinate with Rosobrnadzor in too many ways. Although Rosobrnadzor seems to apply an arms-length-principle in its approach, for instance do not in practice change the composition of expert groups, the formal procedures reduce transparency and open an unnecessary possibility for political interference in the process of state accreditation.

The composition of the Accreditation Board (Commission) is a major challenge to the transparency and legitimacy of the state accreditation procedure. There is no clear procedure for the nomination and appointment of the board members, and the head of Rosobrnadzor chairs the meetings of the board. Although outside the organizational structure of NAA – and thus outside the scope of this review – it is important to highlight the active participation of Rosobrnadzor in the meetings and decision making process of the Accreditation Board as unacceptable. The decisions of the board have a status of recommendations. Final decisions on accreditation are taken by Rosobrnadzor. It is problematic, that no clear guidelines are formulated as to when Rosobrnadzor could change a decision taken by the Accreditation Board.

There is not an appeals procedure in the state accreditation system. HEI’s can only challenge the outcomes of the state accreditation process in court.

5.1.2 Overall conclusions
The review panel has discussed whether the overall assessment of NAA in the light of these findings should be one of substantial or partial compliance with the ENQA membership criteria and thus the European Standards and Guidelines. If NAA should be considered on its own, the panel would find NAA to be substantially compliant with the ENQA membership criteria, as NAA to a large extent is in accordance with the ESG’s and follows their principles and spirit in practice. If NAA should be considered in close relation to the entire state accreditation system, the panel would find the agency to be only partially compliant, as some aspects of the ESG are met while the legislation regulating the state accreditation system needs to be changed at some points, if all aspects of the ESGs should be implemented in an effective manner.

The panel finds it important to acknowledge NAA for its professional work and effort, and therefore recommends the ENQA Board to renew the full membership of NAA for five years. ENQA should attach a clear request to the renewed membership that legislation concerning state accreditation must be amended in order to enhance transparency and the autonomous responsibility of NAA in the accreditation procedures. It should be made clear that such amendments should be in place before the next ENQA membership review of NAA. The Panel recommends that a further progress report should be sought from NAA in early 2016.

5.1.3 Recommendations/suggestions for further development
The review panel has three general recommendations to NAA and the educational authorities in the Russian Federation.

Firstly, NAA should have a stronger mandate and a better platform for promoting high academic stands and quality enhancement in Russian higher education. As a first important step in that direction, NAA should have released its ties with Rosobrnadzor and have full responsibility for conducting the state accreditation procedures. That implies, that HEIs should submit their application for state accreditation with NAA; that NAA should have the authority to nominate, train and certify experts according to their own standards; that NAA should have full authority to decide on the composition of expert groups without further approval; etc. It is important that NAA is given the possibility to act as an agency insisting on enhancement of the quality in teaching and learning and the use of best practices throughout the higher education sector. Although often linked to the state and ministerial systems, the external quality assurance agencies in many other European countries have this more general function of development and promotion of a quality culture connected to their operation of the quality assurance processes.
Secondly, the state accreditation system should have a higher degree of transparency. It is important with a clear division of labour between NAA as the independent quality assurance agency, the Accreditation Board as the decision making authority, and the ministry and Rosobrnadzor as the political and executive powers. This is crucial, if the value and legitimacy of state accreditation is to be ensured. More autonomous responsibility to NAA would in itself contribute to higher transparency. It is however decisive that the Accreditation Board has a better described statute and function, and that its decision making processes take place without the participation of Rosobrnadzor. Guidelines should be developed for if and when Rosobrnadzor or the ministry can change an accreditation decision taken by the Accreditation Board.

Thirdly, state accreditation should be more oriented towards development. The current focus on compliance with the requirements of the Federal State Educational Standards has too little added value for the institutions under accreditation. It is in its methodological approach too oriented towards what is normally referred to as inspection and too little towards genuine quality assessment and development. Expectations should be raised in order to make state accreditation more challenging and give the institutions a higher learning potential. The federal standards could still function as the frame of reference, but interpreted into criteria for good practice instead of minimum standards. Although other more developmental types of accreditation are expanding, state accreditation will still be the most significant form of external quality assurance in the Russian Federation in many years to come. Therefore, it is important to strengthen the impact of the system and its ability to enhance the quality of Russian higher education.

The following more specific recommendations have been given in the discussion of the ENQA membership criteria and ESGs in the report:

- The annual self-evaluation process at the institutions should have a stronger developmental element where the institutions assess their own strengths and weaknesses and identify needs for improvements.
- The state accreditation requirements to the institutions should be more ambitious and qualitative in order to stimulate quality development and ensure the relevance of state accreditation as a valuable external quality assurance process.
- NAA should ensure that international academics are recruited, trained and certified as experts in state accreditation in the future.
- NAA should act proactively to ensure a formal platform for the involvement of students as experts in state accreditation in the future.
- NAA should ensure that experts work more as a common team in order to facilitate the inclusion of students and international experts in the groups and in order to avoid the risk of subjective assessments by separately working experts.
- NAA should publish experts’ reports on the programs under review as the reports contain important information to the academic community and the general public.
- NAA and the responsible authorities should make it possible for an institution under review to comment on the experts’ program reports and the joint conclusion of the expert panel before the decision making process in the Accreditation Board. NAA should also consider making it possible for the institutions to comment on the analytical report from NAA.
- NAA should produce a user-friendly tool for future students and their parents, so that they easily can access the outcomes of state accreditation from all the years (including information about HEIs withdrawing their application for state accreditation during the process).
- NAA should request that HEIs produce a follow-up plan when the state accreditation process is finalised. The HEIs should send their follow-up plans to NAA.
- NAA could consider paying more attention to communicating the annual analytical reports and the results of its research activities.
- NAA should make strict guidelines for its consultancy service activities.
- NAA should have full and formal responsibility for the recruitment and certification of new experts.
- NAA should have delegated authority to complete the composition of expert panels.
- Representatives from Rosobrnadzor should under no circumstances be members of the Accreditation Board.
- NAA and the responsible authorities should see to that a formal appeals procedure be established as part of the state accreditation system.
- NAA should invite the institutions under review to comment on the composition of the expert panel.
6 Annexes

1 Terms of reference

Annex 1: TERMS OF REFERENCE
December 2013

1. Background and Context

The National Accreditation Agency of the Russian Federation (NAA) was established by the Ministry of Education of the Russian Federation in 1995. The overall aim of the Agency is to support the higher education institutions, the educational establishments of vocational training, and the educational authorities of the Russian Federation in carrying out their state accreditation procedures.

NAA is involved in European and international cooperation through ENQA, the Asia-Pacific Quality Network (APQN), the Eurasian Quality Assurance Network (EAQAN), the International Network for Quality Assurance Agencies in Higher Education (INQAAHE) and the Network of Central and Eastern European Quality Assurance Agencies in Higher Education (CEE Network).

NAA has been granted Full member of ENQA on 7 September 2009.

2. Purpose and Scope of the Evaluation

This is a type A review, as defined in the Guidelines for external reviews of quality assurance agencies in the European Higher Education Area. It will evaluate the way in which and to what extent NAA fulfills the criteria for the ENQA membership and thus the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). Consequently, the review will also provide information to the ENQA Board to aid its consideration of whether NAA should be reconfirmed Full Member of ENQA. The review panel is not expected, however, to make any judgements as regards the reconfirmation of Full Membership.

3. The Review Process

The process is designed in the light of the Guidelines for external reviews of quality assurance agencies in the European Higher Education Area.
The evaluation procedure consists of the following steps:

- Formulation of the Terms of Reference and protocol for the review;
- Nomination and appointment of the review panel;
- Self-evaluation by NAA including the preparation of a self-evaluation report;
- A site visit by the review panel to NAA;
- Preparation and completion of the final evaluation report by the review panel;
- Scrutiny of the final evaluation report by the Review Committee of the ENQA Board;
- Analysis of the scrutiny by the ENQA Board and their decision regarding ENQA membership;
- Follow-up of the panel’s and/or ENQA Board’s recommendations by the agency.

3.1 Nomination and appointment of the review team members

The review panel consists of five members: Four external reviewers (one or two quality assurance experts, representative(s) of higher education institutions, student member) and a review secretary. Three of the reviewers (including the review secretary) are nominated by the ENQA Board on the basis of proposals submitted to ENQA by the national agencies, and are drawn from senior serving members of Board/Council or staff of ENQA member agencies. The fourth external reviewer is drawn from a nomination provided by the European University Association (EUA). The nomination of the student member is asked from the European Students’ Union (ESU). One of the panel members serves as the chair of the review.

Current members of the ENQA Board are not eligible to serve as reviewers.

ENQA will provide NAA with the list of suggested experts with their respective curriculum vitae to establish that there are no known conflicts of interest. The experts will have to sign a non-conflict of interest statement as regards the NAA review.

3.2 Self-evaluation by NAA, including the preparation of a self-evaluation report

NAA is responsible for the execution and organisation of its own self-evaluation process and shall take into account the following guidance:

- Self-evaluation is organised as a project with a clearly defined schedule and includes all relevant internal and external stakeholders;
- The self-evaluation report is broken down by the topics of the evaluation and is expected to contain, among others: a background description of the current situation of the Agency; an analysis and appraisal of the current situation; proposals for improvement and measures already planned; a SWOT analysis;
- The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which NAA fulfills its tasks of external quality assurance and meets the criteria for the ENQA membership and thus the ESG. The report is submitted to the review panel a minimum of four weeks prior to the site visit.

3.3 A Site Visit by the Review Panel

NAA will draw up a draft proposal of the schedule for the site visit to be submitted to the review panel at least two months before the planned dates of the visit. The schedule includes an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit, the duration of which is 2 days. The approved schedule shall be given to NAA at least one month before the site visit, in order to properly organise the requested interviews.

The review panel will be assisted by NAA in arriving in Moscow, Russia.

The site visit will close with an oral presentation and discussion of the major issues of the evaluation between the review panel and NAA.

3.4 Preparation and completion of the final evaluation report

On the basis of the review panel’s findings, the review secretary will draft the report in consultation with the review panel. The report will take into account the purpose and scope of the evaluation as defined under article 2. It will also provide a clear rationale for its findings with regards to each ENQA membership criteria. A draft will be submitted for comment to NAA within two months of the site
visit for comment on factual accuracy. If NAA chooses to provide a statement in reference to the draft report it will be submitted to the chair of the review panel within two weeks after the receipt of the draft report. Thereafter the review panel will take into account the statement by NAA, finalise the document and submit it to NAA and ENQA.

The report is to be finalised within three months of the site visit and will not exceed 40 pages in length.

4. Follow-up Process and Publication of the Report

NAA will consider the expert panel’s report and will publish it on its website. The report will also be published on the ENQA website, regardless of the review outcome and decision by the ENQA Board. NAA commits to preparing a follow-up plan in which it addresses the recommendations of the review panel and to submitting, if requested, a progress report to the ENQA.

5. Use of the report

ENQA shall retain ownership of the report. The intellectual property of all works created by the expert panel in connection with the review contract, including specifically any written reports, shall be vested in ENQA.

The review report is to be used by the Board of ENQA for the purpose of reaching a conclusion on whether NAA has met the membership criteria/ESG.

The review report is to be considered as property of ENQA only after being approved by the ENQA Board. Once submitted to NAA and ENQA and until the decision by the Board is made, the report may not be used or relied upon by NAA, the panel and any third party and may not be disclosed without the prior written consent of ENQA. NAA may use the report at its discretion only after the Board decision has been made.

Should the review report be used for applying to the European Quality Assurance Register for Higher Education (EOAR), the Chair of the panel shall remain available to respond to questions of clarification or further information from the EOAR Register Committee provided that the ENQA Secretariat is copied in all such requests.

6. Budget

NAA shall pay the following review related fees:

<table>
<thead>
<tr>
<th>Fee</th>
<th>Amount</th>
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<tbody>
<tr>
<td>Fee of the Chair</td>
<td>4,750 EUR</td>
</tr>
<tr>
<td>Fee of the Secretary</td>
<td>4,750 EUR</td>
</tr>
<tr>
<td>Fee of the 3 other panel members</td>
<td>8,250 EUR  (2,750 EUR each)</td>
</tr>
<tr>
<td>Administrative overhead for ENQA Secretariat</td>
<td>5,000 EUR</td>
</tr>
<tr>
<td>Experts Training fund</td>
<td>1,250 EUR</td>
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<tr>
<td>Travel and subsistence expenses (approximate)</td>
<td>6,000 EUR</td>
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</table>

This gives a total indicative cost of 30,000 EUR for a review team of 5 members. In the case that the allowance for travel and subsistence expenses is exceeded, NAA will cover any additional costs after the completion of the review. However, the ENQA Secretariat will endeavour to keep the travel and
subsistence expenses in the limits of the planned budget, and will refund the difference to NAA if the travel and subsistence expenses go under budget.

In the event of a second site visit required by the Board and aiming at completing the assessment of compliance, and should the agency accept a second visit, an additional fee of 500 EUR per expert, as well as travel and subsistence costs are recoverable from the agency.

7. Indicative Schedule of the Review

<table>
<thead>
<tr>
<th>Event</th>
<th>Date</th>
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<tbody>
<tr>
<td>Agreement on terms of reference and protocol for review</td>
<td>January 2014</td>
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<tr>
<td>Appointment of review panel members</td>
<td>February 2014</td>
</tr>
<tr>
<td>Self-evaluation completed</td>
<td>April 2014</td>
</tr>
<tr>
<td>Preparation of site visit schedule and Indicative timetable</td>
<td>April-May 2014</td>
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<tr>
<td>Briefing of review panel members</td>
<td>May 2014</td>
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<tr>
<td>Review panel site visit</td>
<td>June 2014</td>
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<tr>
<td>Draft of evaluation report to NAA</td>
<td>September 2014</td>
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<tr>
<td>Statement of NAA to review panel if necessary</td>
<td>September 2014</td>
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<tr>
<td>Submission of final report to ENQA and NAA</td>
<td>October 2014</td>
</tr>
<tr>
<td>Consideration of the report by ENQA</td>
<td>November 2014</td>
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<tr>
<td>Publication of report and implementation plan</td>
<td>November 2014</td>
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</tbody>
</table>
# 2 Site Visit Schedule

## Schedule for the Review Panel’s visit to NAA

### Arrival Day, 24 September, 2014

Panel meets in late afternoon (16:30) for planning session in Warsaw Hotel

### Site visit day 1, 25 September, 2014

<table>
<thead>
<tr>
<th>N of meeting</th>
<th>Time</th>
<th>Participants</th>
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<tbody>
<tr>
<td>1</td>
<td>9.00-9.30</td>
<td>Review Panel getting settled in</td>
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<tr>
<td>2</td>
<td>9.30-10.15</td>
<td>Meeting with the Directorate of NAA</td>
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<tr>
<td></td>
<td></td>
<td>1. Vladimir Karelin (Director)</td>
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<td></td>
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<td>2. Elena Efimova (Deputy Director) - organizational maintenance activity</td>
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<td>3. Sergey Nechaev (Deputy Director) – the IT sector of NAA</td>
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<td>4. Larisa Davydoyna (Chief Accountant)</td>
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<tr>
<td>3</td>
<td>10.15-11.00</td>
<td>Meeting with the NAA Committee responsible for the self-evaluation report</td>
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<td></td>
<td>1. Petr Velichenkov (Deputy head of Department of innovative development)</td>
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<td>2. Olga Nefedova (Head of information-methodical Department of the Branch)</td>
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<td>3. Flura Garifullina (Analyst of information-methodical Department of the Branch)</td>
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<td>4. Mihail Petropavlovskiy (Director of the Branch)</td>
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<td></td>
<td></td>
<td>Break</td>
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<td>4</td>
<td>11.15-12.15</td>
<td>Meeting with the Directors of the NAA departments:</td>
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<td></td>
<td></td>
<td>1. Tatiana Bibik (Department of innovation development)</td>
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<td>2. Vladimir Karpenko (Department on work with experts)</td>
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<td>3. Elvira Mudarisova (Information-analytical department)</td>
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<td>4. Alevtina Baranova (Department of automated data processing)</td>
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<td>5</td>
<td>12.15-13.15</td>
<td>Meeting with the NAA staff in the Departments</td>
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<td>1. Department of automated data processing</td>
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<td></td>
<td></td>
<td>• Sergei Napolskih (Leading programmer of the department)</td>
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<td>• Julia Savelieva (Engineer of the department)</td>
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<td>2. Department on work with experts</td>
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<td>• Denis Shabanov (Deputy head of the department)</td>
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<td>• Nikita Dvoretz (Leading economist of the department)</td>
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<td>Panel’s lunch</td>
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<td>6</td>
<td>14.15-15.00</td>
<td>Meeting with the NAA staff in the Departments</td>
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<td>1. Department of innovation development:</td>
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<td></td>
<td>• Petr Velichenkov (Deputy head of the department)</td>
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<td>• Elena Zahvatova (Analytic of the department)</td>
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<td>2. Information-analytical department</td>
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<td>• Elena Nikiforova (Deputy head of the department)</td>
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<td>• Julia Kovalchuk (Analytic of the department)</td>
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<tr>
<td>Time</td>
<td>Session</td>
<td>Participants</td>
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</tbody>
</table>
| 7:00  | Meeting with the representatives of the Accreditation Board (Commission) | 1. Dmitriy Stroganov (Head of educational department of Bauman Moscow State Technical University)  
2. Elena Shapkina (Member of the public Chamber of the Russian Federation) |
|       | Break                                                                    |                                                                               |
| 8:00  | Meeting with representatives of a selection of Higher Education Institutions and Programs that have undergone NAA reviews in 2014 | 1. Bauman Moscow State Technical University (Boris Padalkin, first vice-rector)  
2. Moscow State University of Economics, Statistics and Informatics (MESI) (Svetlana Kocherga, vice-rector)  
3. Russian University of cooperation (Natalia Nazarova, vice-rector)  
4. National University of science and technology (Vadim Petrov, vice-rector)  
5. Moscow Institute of Television and Broadcasting "Ostankino" (Lubov Martynova, head of educational department)  
6. Vladivostok state University of Economics and Finance (Chebova Julia, head of educational department) |
| 9:00  | Panel's wrap up session after day 1                                      |                                                                               |
## Site visit day 2, 26 September, 2014

<table>
<thead>
<tr>
<th>N of meeting</th>
<th>Time</th>
<th>Participants</th>
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<tbody>
<tr>
<td>1</td>
<td>9.00-9.30</td>
<td>Transfer to the Ministry</td>
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<tr>
<td>2</td>
<td>9.30-10.30</td>
<td>Meeting with representatives of the Federal Service of Supervision in Education and Science (Rosobrnadzor) and representatives of the Ministry of Education and Science of the Russian Federation</td>
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<tr>
<td></td>
<td></td>
<td>1. Sergey Rukavishnikov, Head of the Department of public services of the Federal Service of Supervision in Education and Science (Rosobrnadzor) (Former Department of Licensing, Attestation and Accreditation)</td>
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<tr>
<td>Break, transfer to NAA</td>
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<td>3</td>
<td>10.45-11.30</td>
<td>Meeting with the representatives of the students’ organizations</td>
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<td></td>
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<td>1. Michael Falchenko Deputy (Head of All-Russian public organization &quot;Russian student Union&quot;)</td>
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<td>2. Students from the Peoples’ friendship University of Russia (RUDN):</td>
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<tr>
<td></td>
<td></td>
<td>• Olga Batrakova</td>
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<td>• Ann Prokina</td>
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<td></td>
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<td>• Ekaterina Chechel</td>
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<td>3. Students from Moscow state university of food production:</td>
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<td></td>
<td></td>
<td>• Ann Marchenko</td>
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<td></td>
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<td>• Helen Naumkina</td>
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<td>• Tatiana Ruzina</td>
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<td>4</td>
<td>11:30-12:15</td>
<td>Meeting with representatives of the employers’ organizations (both private and public sector)</td>
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<td>1. Artur Valiev (representative of the All-Russian Public Organization «The Russian Union of Industrialists and Entrepreneurs»)</td>
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<td>2. Ivan Schepanskiy (Representative of the Association of lawyers of Russia)</td>
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<td>3. Igor Redkin Deputy (Chairman of the Board of the Association of lawyers of Russia)</td>
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<td>Lunch</td>
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<tr>
<td>5</td>
<td>13.15-14.15</td>
<td>Meeting with representatives of the Rectors’ Councils (from both state and non-state institutions)</td>
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<td>1. Vladimir Stroev (Rector of the First Moscow Institute of law, representative of the Board of the Association of private universities of Russia)</td>
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<td>2. Mariya Gusarova (Representative of the Leading Russian Universities Association)</td>
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<td>3. Karavaeva Evgenia (Executive Director of Association of Classical Universities of Russia)</td>
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<tr>
<td>6</td>
<td>14.15-15.15</td>
<td>Meeting with NAA reviewers / experts (including student experts)</td>
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<td>1. Experts from the HEIs:</td>
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<td></td>
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<td>• Sergey Goncharenko (Professor of The National University of Science and Technology “MISIS”)</td>
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<td>• Natalia Alimova (Assistant professor of The Institute of public administration, law and innovative technologies)</td>
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<td>• Lubov Karavaeva (Deputy Dean of the Moscow University of Foreign Relations)</td>
</tr>
</tbody>
</table>
2. Student experts:
   - Evgeniya Ivanova (Postgraduate student of The National University of Science and Technology “MISIS”)
   - Stiven Lihtenberg (Master’s degree student of the Bauman Moscow State Technical University)

| Break | 7. 15.30-17.00 | Panel’s final wrap up session and concluding meeting with NAA’s Directorate |

All meetings were interpreted by Irina Zubanova and Kseniya Chikina.