
ENQA AGENCY REVIEW: NATIONAL ACCREDITATION AGENCY (NAA)

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EXECUTIVE SUMMARY

After an external review in 2014, The National Accreditation Agency of the Russian Federation (NAA) was awarded the status “full member under review” by ENQA in March 2015. In May 2016, NAA informed the ENQA Secretariat that necessary enhancements have already been made, and the agency was now ready to undergo an additional partial review. The new partial review was to be carried out to assess the eligibility of NAA to the renewal of membership of ENQA.

In accordance with the Terms of Reference, the review panel for the external partial review of NAA was asked to focus on the way in which, and to what extent, NAA fulfils the following former ENQA criteria based on the ESG 2005:

1. Criterion 1, sub-criterion (ESG 2.4): Processes fit for purpose
2. Criterion 1, sub-criterion (ESG 2.5): Reporting
3. Criterion 5 (ESG 3.6): Independence
4. Criterion 6, (ESG 3.7): External quality assurance criteria and processes used by the agencies.

The panel performed a site visit in January 2017 and has found that NAA complies substantially with three of these ESG, and partially with one of the ESG 2005. A table with an overview of the panel’s conclusions and recommendations in relation to the four ESG is presented below.

In light of the documentary and oral evidence considered by it, the review panel is satisfied that, in the performance of its functions in relation to state accreditation of Russian HEIs, NAA is in substantial compliance with the ESG 2005.

The panel hopes that its analyses and recommendations will support NAA in its efforts to enhance the quality and raise the impact of state accreditation in the future.

Table 1: Overview of conclusions and recommendations

ESG	Level of compliance	Recommendation(s)
ENQA CRITERION 1 / SUB-CRITERION ESG-2005 2.4: PROCESSES FIT FOR PURPOSE	Substantially compliant	<p>The panel recommends NAA to continue its effort to recruit and train international experts in order to allow for an international perspective on the quality of Russian higher education.</p> <p>The panel recommends NAA to define a specific role for students as full members of expert panels, for instance with tasks regarding the general quality of the learning environment, students’ involvement in internal quality assurance procedures at the institution, and students’ satisfaction across the individual programmes. This is especially important with a view to the explicit requirement of the ESG-2015 that external quality assurance should be carried out by groups of external experts that include (a) student member(s).</p>
ENQA CRITERION 1 / SUB-CRITERION ESG-2005 2.5: REPORTING	Substantially compliant	The panel recommends NAA to develop the report template so that the experts’ analyses and arguments behind the assessments as well as recommendations for enhancements are presented in the reports and published. This would greatly ameliorate the transparency, the possibility to check consistency as well as the value of the state accreditation process for the HEIs in terms of enhancement orientation.
ENQA CRITERION 5 / ESG-2005 3.6: INDEPENDENCE	Substantially compliant	<p>The panel recommends that NAA staff should not be members of the Accreditation Board of NAA responsible for selecting and certifying experts and expert organisations.</p> <p>Although outside the scope of this review, the panel also recommends Rosobrnadzor not to include its own staff as members of its collegial body.</p>
ENQA CRITERION 6 / ESG-2005 3.7: EXTERNAL QUALITY ASSURANCE CRITERIA AND PROCESSES USED BY THE AGENCIES	Partially compliant	The panel recommends NAA and Rosobrnadzor to make the complaints procedure more transparent, for instance with explicit and predefined criteria for assessing a complaint. The panel also recommends that the possibility to complain against the conclusion of the panel be described on NAA’s website. The panel recommends NAA to create a basis for a follow-up in the form of genuine feedback to HEIs in the reports and subsequent contact with the institutions about their progress.

INTRODUCTION

This report analyses the compliance of the Russian agency Federal State Budgetary Institution National Accreditation Agency (NAA) with selected requirements of the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external partial review conducted from November 2016 to March 2017.

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

BACKGROUND OF THE REVIEW

ENQA's regulations require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they act in substantial compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

The National Accreditation Agency of the Russian Federation (NAA) was awarded the status "full member under review" on 6 March 2015 and was informed of the decision by a letter on 18 March 2015. The agency was given two years to undergo an additional partial review. On 30 April 2015 NAA submitted an appeal to the ENQA Board against the Board's decision. Following this, the Board took a decision at its meeting on 15 September 2015, to stand with its initial decision to designate NAA as a Full Member under review following the statement of the Appeals and Complaints Committee. In its letter of 5th of May 2016 NAA informed the ENQA Secretariat that necessary enhancements have already been made and the agency was now ready to undergo an additional partial review.

Regarding the status of "member under review" the ENQA rules of procedure state the following:

(2) A further, partial review shall be carried out by the Board, or its nominated reviewers, at the end of the two-year period (or sooner, if the member agency so requests) and shall focus on the deficiencies mentioned in the report of the first review. The details of the partial review process are detailed in the ENQA procedure for partial reviews.

(3) The Board will take a decision regarding the renewal of membership based on the outcomes of the partial review. Should the outcome of the partial review be positive, membership shall be valid for five years from the date of the Board's decision in which the status of member under review was granted.

(4) An agency that, in the opinion of the Board, following the further review, still does not comply with the ESG and thus ENQA's criteria for membership shall, by confirmation of the General Assembly, be debarred from ENQA. (ENQA Rules of Procedure, Article 7)

This partial review was carried out to assess the eligibility of NAA to the renewal of membership of ENQA.

MAIN FINDINGS OF THE 2014 REVIEW

In 2014, the panel considered that NAA fully complied with the following ENQA 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
- ENQA criterion 4 (ESG 3.5): Mission statement.

The criteria where the panel found that substantial compliance had been achieved were:

- 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 the panel found that partial compliance had been achieved were:

- 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 recommended to the ENQA Board to renew the full membership of NAA for five years. The panel recommended that ENQA should attach a clear request to the renewed membership that legislation concerning state accreditation was to 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 recommended that a further progress report should be sought from NAA in early 2016.

REVIEW PROCESS

In accordance with the Terms of Reference, the review panel for the external partial review of NAA was asked to focus on the way in which, and to what extent, NAA fulfils the following ENQA criteria:

1. Criterion 1, sub-criterion (ESG 2.4): Processes fit for purpose
2. Criterion 1, sub-criterion (ESG 2.5): Reporting
3. Criterion 5 (ESG 3.6): Independence
4. Criterion 6, (ESG 3.7): External quality assurance criteria and processes used by the agencies

The 2017 external partial review of NAA was conducted in line with the process described in the *Guidelines for ENQA Agency Reviews* and in accordance with the timeline set out in the Terms of Reference. The panel for the external partial review of NAA was appointed by ENQA and composed of the following members:

- Tue Vinther-Jørgensen, Chief Consultant, Ministry of Higher Education and Science, Denmark, Chair, Quality assurance professional (ENQA nominee)
- Mati Heidmets, Professor, head of Educational Innovation Center, Tallinn University, Estonia, Secretary, Academic (ENQA nominee)
- Beate Treml, Master's student at University of Graz, Austria, Student (ESU nominee)

The review was coordinated by Agnė Grajauskienė from the ENQA Secretariat.

NAA produced a self-assessment report, which provided a substantial portion of the evidence that the panel used to draw its conclusions, although the English translation of the names of the two accreditation boards did cause some initial confusion. The panel conducted a site visit to validate fully the self-assessment and clarify any points at issue. Finally, the review panel produced the present final report on the basis of the self-assessment report, site visit, and its findings.

Self-assessment report

The review was conducted in good cooperation with NAA. The agency provided an informative self-assessment report (SAR), which gave a good understanding of the developments since the 2014-review. The report was primarily descriptive, but also contained a SWOT-analysis of the agency's strengths, weaknesses, opportunities and threats. The SAR was delivered on time in November 2016. Subsequently and prior to the site visit, NAA delivered supplementary documentation as required by the panel.

Site visit

The review panel paid a site visit to NAA with interviews and meetings on the 23th and 24th of January. Prior to the interviews, the panel had a planning session on the 22nd of January. The programme for the site visit was well planned and coordinated, and the panel could meet with all the stakeholders that it found relevant. The programme of the site visit can be found in Annex 2 to this report

The programme included five interviews with:

- Management of NAA,
- Representatives of the Accreditation Boards of both NAA and Rosobrnadzor,
- NAA reviewers / experts (including students with task related to state accreditation),
- Representatives of higher education institutions, who have undergone NAA reviews in 2016,
- Representatives of Rosobrnadzor

The interviews were all conducted in an open and frank atmosphere, and the interviewees provided clear and valuable evidence about NAA and its activities to the review panel.

Review report

The review panel held a wrap up session at the end of the site visit outlining its review report on NAA. The panel discussed the progress made by NAA since the 2014-review and agreed easily on the agency's degree of compliance with selected standards. A draft of the review report was sent to NAA for comments on the 6th of March 2017, and the present final review report was sent to ENQA on the 4th of April 2017.

This report should be read in conjunction with the report on the review of NAA and its compliance with ENQA Criteria / 2005-ESG published after the review in 2014. This report does not re-iterate the current status of higher education in Russia, the range of activities and tasks undertaken by NAA nor the different types of accreditation in Russia. From the written evidence submitted, and the oral evidence supplied during the site visit, none of these elements seems to have altered in any significant way since the 2014-review. Likewise, the organisational structure of NAA has not changed significantly since 2014 nor has the range of external quality assurance activities undertaken by NAA. This report focusses exclusively on developments concerning the above mentioned selected ENQA Criteria / ESG's since 2014.

FINDINGS: EVALUATION OF THE IDENTIFIED CRITERIA FOR ATTENTION IN THE PARTIAL REVIEW

ENQA CRITERION 1 / SUB-CRITERION ESG-2005 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.

2014 review conclusion and ENQA Board conclusion

The finding of the review panel relating to this standard in the 2014 report was that NAA was substantially compliant.

In its decision on membership, the ENQA Board pointed at the following areas for development in relation to this standard, on which the partial review was to focus:

- NAA should include trained international experts in the panels, especially as there are no legal obstacles to do so. The Board notes NAA's intention to involve international experts in the future.
- NAA should include students in the panels. Involvement of student will be a requirement in the revised ESG.
- The Board notes that "experts mostly work alone during a site visit", and strongly supports the panel in recommending that experts work as a 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".

On this background, the ENQA Board concluded: *Some aspects or parts of the criterion/ESG standard are not met. The three reasons listed above lead to a finding of partial compliance.*

Evidence

According to Russian law, external reviews shall be conducted by experts who have the necessary qualification in the field of the core study programmes submitted for state accreditation, or by expert organizations which meet the established requirements.

Inclusion of international experts

Since the 2014-review, NAA has made a number of arrangements for recruiting international experts in the state accreditation procedure, including attending international seminars and signing agreements of cooperation with agencies from neighbouring countries. NAA has held training activities (seminars and webinars) for expert candidates with participation of academics from foreign universities. As a result, eight experts from Kyrgyzstan, Armenia, Moldova, Kazakhstan, and the United Kingdom have now been certified and included into NAA's pool of experts after training and successful completion of qualification tests.

Inclusion of students in panels

It is still not possible for students to act as members of expert panels in the state accreditation procedure. The requirement set by law that experts have a minimum of five years' working experience excludes students from being full members of the panels. However, NAA has made a number of arrangements to engage students in the accreditation process.

First, the non-governmental organization "Russian Union of Youth" (RUY) which is a non-profit, non-political youth organization was granted the powers of an expert organization for carrying out

external reviews. Certification of RUY has allowed students' participation in the state accreditation procedure, although still not as members of expert panels, but in different kinds of cooperative arrangements. The head of RUY is now chairing the Collegial Board of Rosobrnadzor responsible for making final accreditation decisions.

Second, NAA has paved the way for students to participate in the state accreditation procedure in other ways than as experts in the accreditation panels. For instance, NAA has carried out a pilot project where a group of students at a higher education institution under review was appointed to conduct a student survey and report on the results to the review panel in order to make the students' voice heard in the process of state accreditation. The group of students to whom this task was assigned, was supported by student colleagues from other HEIs in preparing their report. NAA actively involves RUY in these processes. As a certified expert organization, RUY has participated in organizing surveys with questioning of students during external reviews in a number of HEIs. The results have been presented to the expert panels, which are still without student members. The agency is currently evaluating the possibility to permanently include the practice of organizing surveys in the review process.

Experts working as a team

During the site visit, the management of NAA explained that the instructions to expert panels going on site visits had been amended, so that expert panels are now urged to work more as a team in the accreditation process. The interview with experts showed that the basic mode of work is still the same where each expert in the panel is assigned the responsibility for the assessment of a number of programmes/fields of study. However, the collaborative aspects have been strengthened with more emphasis on joint preparation among panel members in the beginning of the site visit. There are also joint discussions of results in the end of the site visit, for instance of system wide requirements in the Federal State Education Standards and of evidence related to the reviewed programmes, especially in case of a critical or negative assessment of a programme. The experts are asked to do a SWOT-analysis of each programme as a basis for the discussions in the panel. These analyses do not have a formal character, and they are not published, though the individual expert might choose to communicate his or her results to the reviewed programme.

Better support for the experts in the management of the many documents involved in the state accreditation procedure has led to more effective use of time during the site visits. Where the experts earlier used an estimated 80 % of their time working with documents and only 20 % on contact with teachers, students, management and other stakeholders, this is now the other way around.

NAA has changed the regulations since the 2014-review, so that a panel always consists of at least two experts. Earlier, a site visit could be conducted by one expert alone, if he or she was able to cover the subject fields of the programmes to be assessed.

Analysis

The situation in 2014 with complete absence of international experts involved in state accreditation has now been replaced with a beginning – yet still small – inclusion of experts from outside the Russian Federation into the register of certified experts. As pointed out already in the 2014 review report, there are no legal obstacles to involve international experts in the state accreditation procedure, but earlier there was any tradition of doing so, and also hesitancy as to the added value of engaging foreign experts in the procedure. Since then, NAA has done a noteworthy effort in recruiting and training international experts. The agency has used its international contacts and networks to attract Russian speaking academics from the neighbouring countries and perhaps soon also from Great Britain. During the site visit, the management of NAA expressed a clear intention to

continue the effort in recruiting and training experts from abroad. One of the interviewed experts, who had experienced working with one of the international experts, emphasized the value of having someone from outside the Russian system in the panel as it gave a different and broader perspective. The panel feels confident that the use of international experts will be a feature of the state accreditation system in the years ahead, although the need for continuous and more extensive recruitment entails an extra workload on NAA.

NAA has also made a considerable effort in engaging students in the state accreditation procedure. The panel finds it very positive that NAA now seems to work much closer together with students and on a more permanent basis. NAA has shown creativity and commitment in defining new roles, where students can play an active role in the accreditation procedure. The pilot project of appointing a group of students of an institution responsible for part of the data collection prior to the site visit was inspiring to the panel. It is certainly a good practice to improve the involvement of an institution's students in a review process, especially considering the fact, that the students are supported by student experts with larger experience in the field of QA. The cooperation with "Russian Union of Youth" (RUY) in these arrangements seemed to be fruitful and positive.

The panel was less satisfied with the limited impact of RUY's new status as an expert organization. This is due to the fact that even though RUY has been granted the powers of an expert organization, students are still not eligible as experts in the accreditation panels. The panel finds it critical that no real progress has been made since the 2014 review when it comes to allow students to become full members of the panels. The panel is well aware that the current mode of work, where the assessment of one or more study programmes is assigned to one single expert in the panel, makes it difficult for a student to fulfil the task. However, it also became clear during the site visit that it would be possible to define other kinds of tasks for a student as a full member of an expert panel. For instance, the Federal State Educational Standards of Higher Education (FSSES) contain requirements and themes across study programmes of which the assessment would benefit from having a student's perspective. The panel has not made the lack of progress in this field crucial in the assessment of the ENQA criteria, as students' participation in panels is not an absolute requirement in the ESG-2005. The panel is conscious, though, that the new ESG-2015 is very explicit in its requirements to students' participation in panels.

The interview with management and experts during the site visit made it quite clear that the collaborative aspect had been strengthened in the work of expert panels during the site visits. The panel finds this very positive and sees it as a good platform for also including students into the panels. At the same time, it also became clear that the basic mode of work of the panels has not been changed. Only in the case where one single programme or field of study at a HEI is being reviewed, there has been a clear change in the procedure as it is no longer allowed for only one expert to go on a site visit alone. In these cases, two experts now assess the study programme together in order to protect the individual experts. However, the panel is satisfied that progress has been made in this area, and would urge NAA to further develop the frames around consistency testing and collaboration within the expert panels.

Panel commendations

The panel would like to commend NAA for its commitment to follow up on the recommendations of the 2014 review, especially when it comes to the inclusion of international experts, but also concerning the new ways to engage students in the state accreditation procedures, although they are still not permitted to act as full members of expert panels.

Panel recommendations

The panel recommends NAA to continue its effort to recruit and train international experts in order to allow for an international perspective on the quality of Russian higher education.

The panel recommends NAA to define a specific role for students as full members of expert panels, for instance with tasks regarding the general quality of the learning environment, students' involvement in internal quality assurance procedures at the institution, and students' satisfaction across the individual programmes. This is especially important with a view to the explicit requirement of the ESG-2015 that external quality assurance should be carried out by groups of external experts that include (a) student member(s).

Panel conclusion: Substantially compliant

ENQA CRITERION 1 / SUB-CRITERION ESG-2005 2.5: REPORTING

Standard:

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

2014 review conclusion and ENQA Board conclusion

The finding of the review panel relating to this Standard in the 2014 report was that NAA was substantially compliant.

In its decision on membership the ENQA Board pointed at the following areas for development in relation to this standard, on which the partial review was to focus:

In 2008, the panel recommended NAA to make the expert panels' reports publicly available. Not much progress has been made in this area. As stated in the review report: *"The state accreditation process is not documented in a single report, but in a number of documents with different purposes and different readerships". "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"*.

The outcomes of state accreditation are not easily accessible: only the expert panel's conclusions and positive decisions of the AB are published. Negative decisions can only be found in the annual analytical report made by NAA.

In addition to the lack of publication of full reports, HEIs do not have an opportunity *"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 Board concurs with the panel in finding it *"inappropriate that HEIs do not have an opportunity to correct factual misunderstandings with potential importance for the overall conclusions"*.

On this background, the ENQA Board concluded: *The lack of publication of full reports, the lack of easy accessibility of accreditation outcomes and the lack of opportunity for HEIs to comment experts' reports on factual accuracy lead to a finding of partial compliance. The Agency is advised to promptly address these weaknesses, as the revised ESG will be more challenging in terms of reporting.*

Evidence

Publication and easy accessibility of full reports

The report (conclusion) by an expert panel is now being published on NAA's website as well as sent to the HEI under review within six working days after the completion of the site visit. The chair of the expert panel has three days to draw up the conclusion based on the expert panel members' reports on the study programmes assigned to them with their assessments on compliance or non-compliance of each study programme with the federal state educational standards. Afterwards, NAA has three working days from the receipt of the conclusion to publish it and forward it to the HEI.

NAA does not publish the experts' reports on the individual programmes, although these reports are submitted to the agency together with the conclusion from the expert panel. However, it was clear from the documentation provided by NAA that all relevant information from the experts' reports on the individual programmes is contained in the conclusion, which is first and foremost a summary of the experts' reports.

The conclusion of the expert panel contains the following information:

- date of the expert panel's conclusion;
- full name of the educational organization or its branch subjected to external review;
- data on the materials and documents presented by the educational organization or its branch during the external review;
- description of the content and quality of students' training on the study programmes declared for state accreditation, conclusion on the compliance (or non-compliance) of the specified content and quality with the federal state educational standards on each study programme submitted for state accreditation.

In order to enhance transparency during the state accreditation process, NAA has established an information system that enables HEIs under review to monitor the stages of external review and the materials and documents used through their personal accounts.

Opportunity for HEIs to comment on expert panels' reports

After the 2014-review, NAA has introduced a possibility for the HEI under review to comment on the state accreditation process and its result in form of the conclusion from the expert panel. The purpose of this new procedure is to allow the HEI under review to provide overall comments to the process and outcomes of the state accreditation procedure. The documentation provided by NAA gave examples of such comment letters, which had a very positive and commending content in relation to the work of the expert panel.

The interview with experts showed, that representatives from the different programmes at the institution under review have a rather informal possibility to correct some factual errors and misunderstanding in the dialogue with the individual expert during the site visit. Once the site visit is finished and the conclusion has been published at NAA's website, the HEI under review does not have the possibility to correct errors in the report as a formal step of the procedure. However, the institution's comment letter is forwarded to the Accreditation Board of Rosobrnadzor so that comments can be taken into consideration together with the expert panel's conclusion when taking the final decision on state accreditation.

Analysis

The interview with experts confirmed the fact that individual expert reports as well as the panel's conclusion are very formal and standardized documents. Therefore, it is a quite simple task to include all the important content of the individual expert reports into the conclusion of the whole panel. NAA has even produced templates to facilitate uniformity and an easy transfer of information from the experts' reports to the conclusion. None of the two types of report contains any analytical content, only the lists of documents give an indication on what ground the assessments of

compliance or non-compliance of each study programme with the Federal State Educational Standards (FSES) have been made. The report template does not make it possible to present the experts' analyses and arguments behind the assessments, and the template does not give room for experts' recommendations for enhancements. Although the panel considers the lack of analytical content in the reports as an important weakness in the state accreditation procedure, the panel felt assured that expert reports are now being published, and that these are easily accessible for both HEIs under review and the general public.

The panel finds it positive that the HEI under review is now being invited to comment on the review process, and hence also the report with the conclusion of the panel. The purpose of the new procedure is not to detect the errors of fact in the text and amend the report if needed, and the HEI cannot as such correct any factual errors in the report before nor after it is published. The only possibility to correct factual errors is in the dialogue between the individual experts and the representatives of the programmes under review during the site visit. The panel considers this process too informal to have any significance in this context.

However, the panel does not consider this to be an important issue, as the reports have a very formal format with only very limited possibilities for errors. The panel finds it more important that the institutions can now formally submit a comment on the process as such to the decision-making body before the actual decision on accreditation is taken.

Panel recommendations

The panel recommends NAA to develop the report template so that the experts' analyses and arguments behind the assessments as well as recommendations for enhancements are presented in the reports and published. This would greatly ameliorate the transparency, the possibility to check consistency as well as the value of the state accreditation process for the HEIs in terms of enhancement orientation. (See also *Suggestions for further development.*)

Panel conclusion: Substantially compliant

ENQA CRITERION 5 / ESG-2005 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.

2014 review conclusion and ENQA Board conclusion

The finding of the review panel relating to this Standard in the 2014 report was that NAA was partially compliant.

In its decision on membership the ENQA Board pointed at the following areas for development in relation to this standard, on which the partial review was to focus:

- Rosobrnadzor, the official government authority, participates directly in the recruitment and certification of new experts for which NAA does not have full and formal responsibility.
- NAA selects experts from the database and does not have the authority to complete the composition of expert panels as the final composition of the panel, including the head of the panel, is approved by Rosobrnadzor.
- The Accreditation Board makes formal decisions *“to be considered as recommendations to Rosobrnadzor, who takes the final decision on accreditation. [...] Representatives from Rosobrnadzor are members of the Accreditation Board. The head of Rosobrnadzor is even chairing the board”*.

On this background the ENQA Board concluded: Independence is therefore not guaranteed from the evidence gathered in the review report. The three reasons listed above lead to a finding of non-compliance.

Evidence

Recruitment and certification of experts

Since the 2014-review, NAA has been given full responsibility for recruiting, training and certifying experts for state accreditation. A new Accreditation Board has been established within NAA with the task of assessing and certifying candidate experts and expert organisations. The Accreditation Board of NAA is composed of representatives of public bodies, non-governmental organizations, educational and scientific institutions, representatives of employers and student associations, as well as NAA staff. The director of NAA is chairing the board. NAA is responsible for establishing the Accreditation Board and approves the regulations of the board and its composition.

NAA has a very thorough process when training and testing future experts, and only around half of the candidates succeed in meeting the requirements established by the Ministry of Education of the Russian Federation.

Selection of experts for the panels

Once certified, the experts are entered into NAA's register of experts and expert organizations. The selection of experts or expert organizations for specific external reviews of named HEIs is done by automatic random selection based on the following two parameters:

- Subject field: Each expert or expert organization is certified to carry out external reviews within a specific integrated group of professions, specialties and fields of training;
- Geography: The expert's place of residence or the location of the expert organization.

NAA notifies the expert (expert organization) that this very expert (expert organization) is selected for carrying out an external review of a specific HEI. The expert (expert organization) then gives written consent confirming that there are no conflicts of interest.

After getting the expert's consent to participate in the external review, NAA forms an expert panel, appoints the expert panel chair from among the experts included in the expert panel; and sends a draft of the executive order on conducting the external review for formal approval to Rosobrnadzor. According to Russian law, the external review is to be launched by issuing an official executive order, which is not in powers of NAA to do. The automated selection of experts, however, ensures that Rosobrnadzor cannot influence the composition of expert panels.

Rosobrnadzor as member of the accreditation council

As already mentioned, there are now two accreditation boards in the state accreditation system: The Accreditation Board of NAA with the responsibility for certifying experts, and the Accreditation Board (or Collegial Body) of Rosobrnadzor responsible for decision making on state accreditation.

Rosobrnadzor is not represented in the accreditation board of NAA, but it delegates members to its own Collegial Body. The Collegial Body is currently chaired by the chairman of the non-governmental organization "Russian Union of Youth", which has also been certified as an expert organisation. The Collegial Body shall consider the expert panel's conclusion on external review and make a decision on compliance or non-compliance of the content and quality of students' training in the HEI and in its branches, with the Federal State Educational Standards (FSSES) at each level of education and integrated groups of professions, specialties and fields of training, that the study programmes declared for state accreditation refer to.

The final decision on state accreditation or refusal of it is taken by Rosobrnadzor based on the decision of the Collegial Body, which is again based on the expert panel's conclusion.

Analysis

The panel is satisfied that a much clearer division of responsibilities and tasks between NAA and Rosobrnadzor has been established since the 2014-review. The panel is confident that NAA can now recruit and certify new experts and decide on the composition of expert panels for specific accreditation processes without any potential risk of political interference. The only role left for Rosobrnadzor in this context is now to formally issue the executive order, which has been drafted by NAA. The panel therefore finds that NAA has full independence in its operations and full responsibility for the state accreditation procedure all the way from when the expert panel is appointed to the conclusion of the panel has been published.

The panel finds that it reduces transparency that NAA staffs are members of the Accreditation Board of NAA responsible for selecting and certifying experts and expert organisations. It would strengthen the value of the Accreditation Board as an independent decision making body, if NAA practiced an arms length principle in its relation to the board. NAA staffs could still attend the board meetings and support the work of the Accreditation Board as its secretariat and provide administrative assistance. The Accreditation Board could even be established as an advisory body, if NAA wishes to keep the authority to make the final decisions on certification and appointment of experts and expert organizations within the agency.

The responsibility for decision making about approval or non-approval of programmes in the state accreditation procedure lies with Rosobrnadzor, and thus outside NAA. The panel therefore does not consider this part of the procedure as within the scope of this external review of NAA. However, the panel did not find much progress in the transparency of this final part of the procedure of state accreditation. Although Rosobrnadzor as a follow up on the 2014-review does not chair the Collegial Body anymore, its employees are heavily represented among the members of the body. The panel finds that this arrangement blurs the role of the Collegial Body and makes less clear, what kind of criteria are used when discussing panel conclusions and making accreditation decisions. Although the panel got an impression that the discussions in the Collegial Body were guided by a strong will to make sound and just accreditation decisions, the panel finds that the direct membership of Rosobrnadzor in its own Collegial Body strongly limits its value as an independent and quality assuring element in the state accreditation procedure.

During the site visit it was estimated by several of the interviewees that around 99 % of the decisions of the Collegial Body and Rosobrnadzor follow the conclusions of the expert panels. The Collegial Body in practice primarily deals with cases, where the panel was not able to reach a unanimous decision, or where a complaint has been filed by the HEI under review. The panel finds that this fact does not remove the problem concerning Rosobrnadzor's membership in the Collegial Body. However, the panel was reassured that the implications of this construction are less problematic, because the conclusion of the expert panel in practice represents the final accreditation decision in that great majority of cases, where no additional issues are flagged.

Panel commendations

The panel would like to commend NAA and other relevant authorities of the Russian Federation for establishing a clear and transparent division between the tasks and responsibilities of NAA and those of Rosobrnadzor. It is now clear that NAA is fully and solely responsible for the selection and certification of new experts and expert organizations and for the process of state accreditation from selecting experts to the expert panels and organizing the site visit until the publication of the expert

panel's conclusion on its website. After this point, the responsibility for decision making on state accreditation lies with Rosobrnadzor in cooperation with the Collegial Body – and thus outside NAA.

Panel recommendations

The panel recommends that NAA staff should not be members of the Accreditation Board of NAA responsible for selecting and certifying experts and expert organisations.

Although outside the scope of this review, the panel also recommends Rosobrnadzor not to include its own staff as members of its collegial body.

Panel conclusion: Substantially compliant

ENQA CRITERION 6 / ESG-2005 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.

2014 review conclusion and ENQA board conclusion

The finding of the review panel relating to this Standard in the 2014 report was that NAA was partially compliant.

In its decision on membership the ENQA board pointed at the following areas for development in relation to this standard, on which the partial review was to focus:

- No student involvement as experts in panels. In addition, experts have to be approved by Rosobrnadzor.
- No publication of full reports and no permanent appeals procedure established as part of the state accreditation system. In addition, HEIs do not have an opportunity to correct factual errors in expert's reports.
- No follow-up procedure beside the reaccreditation processes after 1 or 6 years.

Evidence

The issues of student involvement, approval of experts, publication of full reports, and the HEIs possibility to correct factual errors have been discussed earlier in this report. Therefore, this section will focus on the issues connected with a permanent appeals procedure in the state accreditation system and the follow-up procedure.

Permanent appeals procedure

An HEI under review has the possibility to file a complaint against the conclusion of the expert panel with Rosobrnadzor. This should be done before the accreditation decision is taken by the Collegial Body of Rosobrnadzor. The institution can send additional documents and materials to support the

complaint, and this will be processed by the legal department of Rosobrnadzor together with the existing materials from the databases of the Ministry before the decision making process.

Once the decision is taken by Rosobrnadzor in cooperation with the Collegial Body, the HEI can no longer appeal, but HEIs have the possibility to challenge an accreditation decision in court.

In the 2014 review, an experiment with an appeals board inside NAA was presented by the agency. This board has not been made permanent, and none of the interviewees referred to it as an appeals mechanism in the state accreditation procedure.

No follow-up in six years if an institution passes the accreditation

NAA still does not arrange any kind of follow-up activities that engage the reviewed HEIs in continuous quality development of their provisions. However, NAA has an extensive training activity involving the HEIs. The training activities aim among other things to keep the HEIs updated about changes in regulations and new requirements in the state accreditation procedures. During the site visit, it was estimated that around 3.000 representatives from HEIs had attended NAA training activities in 2016.

Since 2015, NAA tracks the changes in the reviewed HEIs. HEIs in Russia are by law obliged to openly and publicly provide information on their activities on their websites. NAA monitors this information during the period until the HEIs are up for a new accreditation. NAA uses the monitoring results in training activities for HEIs where typical violations of the rules are presented to the institutions.

Analysis

NAA does not make any formal quality assurance decisions as this power lies with Rosobrnadzor in cooperation with the Collegial Body. Therefore, it is not relevant for NAA to have in place an appeals procedure. Although the panel would have preferred to see the experiment with an internal appeals board (which in practical terms would be considered as a complaints mechanism), the panel finds the current arrangement sufficient. The panel finds it positive that a HEI under review has the possibility to file a complaint against the conclusion of the panel with Rosobrnadzor. In the view of the panel, this possibility to file a complaint in practice works as both a complaints and an appeals procedure, as the HEI under review can question the conclusion of the expert panel, which under normal circumstances will lead directly to an accreditation decision. The panel finds, however, that the procedure and the criteria used when processing a complaint are not sufficiently transparent. For instance, the possibility of filing a complaint is not described on NAA's website.

The panel finds it positive that NAA now tracks the changes in the reviewed HEIs, but the panel does not consider monitoring of information provided on the HEIs websites as a development oriented follow-up activity in the spirit of the ESG. The current nature of state accreditation with its focus on whether programmes at HEIs under review comply with the Federal State Education Standards or not, and with reports containing conclusions without any analyses, reflection and recommendations, makes it difficult to envisage on what background NAA should try to engage the HEIs in a more comprehensive and enhancement-led follow-up. This would require a different kind of reporting with genuine feedback to the institutions. The interview with the institutions showed that a lot of development actually happens at the institutions before and after an accreditation process, but there isn't any basis in the current procedure for a systematic follow up on this.

Panel recommendations

The panel recommends NAA and Rosobrnadzor to make the complaints procedure more transparent, for instance with explicit and predefined criteria for assessing a complaint. The panel

also recommends that the possibility to complain against the conclusion of the panel be described on NAA's website.

The panel recommends NAA to create a basis for a follow-up in the form of genuine feedback to HEIs in the review reports and subsequent contact with the institutions about their progress.

Panel conclusion: Partially compliant

CONCLUSION

SUMMARY OF COMMENDATIONS

ENQA CRITERION 1 / SUB-CRITERION ESG-2005 2.4: PROCESSES FIT FOR PURPOSE

The panel would like to commend NAA for its commitment to follow up on the recommendations of the 2014 review, especially when it comes to the inclusion of international experts, but also concerning new ways to engage students in the state accreditation procedures although they are still not permitted to act as full members of expert panels.

ENQA CRITERION 5 / ESG-2005 3.6: INDEPENDENCE

The panel would like to commend NAA and other relevant authorities of the Russian Federation for establishing a clear and transparent division between the tasks and responsibilities of NAA and those of Rosobrnadzor. It is now clear that NAA is fully and solely responsible for the selection and certification of new experts and expert organizations and for the process of state accreditation from selecting experts to the expert panels and organizing the site visit until the publication of the expert panel's conclusion on its website. After this point, the responsibility for decision making on state accreditation lies with Rosobrnadzor in cooperation with the Collegial Body – and thus outside NAA.

OVERALL FINDINGS AND RECOMMENDATIONS

ENQA CRITERION 1 / SUB-CRITERION ESG-2005 2.4: PROCESSES FIT FOR PURPOSE

The panel recommends NAA to continue its effort to recruit and train international experts in order to allow for an international perspective on the quality of Russian higher education.

The panel recommends NAA to define a specific role for students as full members of expert panels, for instance with tasks regarding the general quality of the learning environment, students' involvement in internal quality assurance procedures at the institution, and students' satisfaction across the individual programmes. This is especially important with a view to the explicit requirement of the ESG-2015 that external quality assurance should be carried out by groups of external experts that include (a) student member(s).

ENQA CRITERION 1 / SUB-CRITERION ESG-2005 2.5: REPORTING

The panel recommends NAA to develop the report template so that the experts' analyses and arguments behind the assessments as well as recommendations for enhancements are presented in the reports and published. This would greatly ameliorate the transparency, the possibility to check consistency as well as the value of the state accreditation process for the HEIs in terms of enhancement orientation.

ENQA CRITERION 5 / ESG-2005 3.6: INDEPENDENCE

The panel recommends that NAA staff should not be members of the Accreditation Board of NAA responsible for selecting and certifying experts and expert organisations.

Although outside the scope of this review, the panel also recommends Rosobrnadzor not to include its own staff as members of its collegial body.

ENQA CRITERION 6 / ESG-2005 3.7: EXTERNAL QUALITY ASSURANCE CRITERIA AND PROCESSES USED BY THE AGENCIES

The panel recommends NAA and Rosobrnadzor to make the complaints procedure more transparent, for instance with explicit and predefined criteria for assessing a complaint. The panel also recommends that the possibility to complain against the conclusion of the panel be described on NAA's website.

The panel recommends NAA to create a basis for a follow-up in the form of genuine feedback to HEIs in the reports and subsequent contact with the institutions about their progress.

In light of the documentary and oral evidence considered by it, the review panel is satisfied that, in the performance of its functions, NAA is in substantial compliance with the ESG.

The ESGs where full compliance has not been achieved are:

- ENQA criterion 1 / sub-criterion ESG-2005 2.4: Processes fit for purpose
- ENQA criterion 1 / sub-criterion ESG-2005 2.5: Reporting
- ENQA criterion 5 / ESG-2005 3.6: Independence
- ENQA criterion 6 / ESG-2005 3.7: External quality assurance criteria and processes used by the agencies

The agency is recommended to take appropriate action, so far as it is empowered to do so, to achieve full compliance with these standards at the earliest opportunity.

SUGGESTIONS FOR FURTHER DEVELOPMENT

The panel would like to make a general suggestion, extending beyond strictly interpreting the ESG, which NAA may wish to consider when reflecting on its further development. The suggestion has already been touched upon in the previous sections.

The suggestion concerns the formal purpose of state accreditation, where the panel would urge NAA and the relevant Russian authorities to seriously strengthen the development-oriented element in the process.

Today, the purpose of state accreditation in the Russian Federation is first and foremost control-oriented. According to the legislation, state accreditation is aimed at confirming the compliance of educational activities on basic study programmes and students' training in educational organizations (HEIs) with the federal state educational standards (FSES). The FSES specify the requirements to educational programmes on a number of dimensions, e.g. student learning outcomes, programme structure, staffing, financial provision of the programme etc. The task of an expert panel is to assess to which extent each study programme submitted for state accreditation comply with the FSES. The individual expert reports as well as the conclusion of the entire panel only state to what extent the programmes comply with the standards or not. The report format for these two types of reports do not allow for any analyses identifying strengths and weaknesses of each programme or the institution as a whole. And the experts do not have the possibility to give any formal written recommendations on how the quality of the provision can be enhanced. Therefore, the written material produced by the expert panel does not give the HEI under review any substantial feedback on its practices or any help as to how these practices can be developed to the advantage of the students. Considering the huge effort laid in the state accreditation process by the HEI under review and the entire expert panel before and during the site visit, the current formal output of the process is too limited.

Luckily, the informal output of the process seems much richer. In spite of the clear control-oriented purpose of state accreditation, it was quite evident from the interviews during the site visit, that the procedure entails a considerable amount of development for the HEI under review. The HEIs that had been under review described how the preparation before the site visit as well as the dialogue with the experts during the site visit lead to discussions, reflection, and various forms of enhancements concerning the content and delivery of the programmes. The site visit made it clear that experts during the site visit actually do SWOT-analyses of each programme considering

strengths and weaknesses, but it also became clear that these are only occasionally communicated to the HEI and then only in an informal manner.

The panel is aware of the historical background for the current purpose of the state accreditation procedure. During the transformation from the Soviet Union to the new Russian Federation, the number of HEIs and HE programmes grew dramatically. Far from all new HEIs and programmes had a satisfactory quality level, and therefore it became urgent to establish a better external regulation and control of the provision of HEIs in order to safeguard the quality of Russian HE. State accreditation was introduced as a means for that, and it has been successful in considerably reducing the number HE providers as well as ensuring an acceptable minimum level of quality. However, the situation today is different with a more stable HE community, and a need to not only focus on minimum standards but also on enhancing quality.

The panel is therefore convinced that state accreditation needs to be taken into a new phase with quality development as a parallel purpose. It would be of much greater value to the HEI under review, if the experts as part of the process should account for their assessments and produce recommendations for enhancement in a formal way as part of the written reporting, for instance by integrating a SWOT-analysis in the expert reports on the individual programmes. The panel is aware that such a change in the procedure would entail a number of challenges, especially in the light of the enormous number of programmes and institutions accredited each year and the time needed for quality assurance of the experts' feedback. Never the less, the panel finds it pivotal that NAA in cooperation with other authorities takes new steps in this direction, if state accreditation is to maintain its role as the most important mechanism for external quality assurance of higher education in the Russian Federation.

ANNEXES

ANNEX 1: 2014 AND 2017 EXTERNAL REVIEWS: A COMPARATIVE OVERVIEW OF THE FINDINGS

ENQA Criterion/ESG	2014 review		2017 review	
	Level of compliance	Recommendation(s)	Level of compliance	Recommendation(s)
ENQA CRITERION 1 / SUB-CRITERION ESG-2005 2.4: PROCESSES FIT FOR PURPOSE	Substantially compliant (Considered as Partially compliant by the ENQA Board)	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.	Substantially compliant	The panel recommends NAA to continue its effort to recruit and train international experts in order to allow for an international perspective on the quality of Russian higher education. The panel recommends NAA to define a specific role for students as full members of expert panels, for instance with tasks regarding the general quality of the learning environment, students' involvement in internal quality assurance procedures at the institution, and students' satisfaction across the individual programmes. This is especially important with a view to the explicit requirement of the ESG-2015 that external quality assurance should be carried out by groups of external experts that include (a) student member(s).
ENQA CRITERION 1 / SUB-CRITERION ESG-2005 2.5: REPORTING	Substantially compliant (Considered as Partially compliant by the ENQA Board)	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).	Substantially compliant	The panel recommends NAA to develop the report template so that the experts' analyses and arguments behind the assessments as well as recommendations for enhancements are presented in the reports and published. This would greatly ameliorate the transparency, the possibility to check consistency as well as the value of the state accreditation process for the HEIs in terms of enhancement orientation.
ENQA CRITERION 5 / ESG-2005 3.6: INDEPENDENCE	Partially compliant (Considered as non-compliant by the ENQA Board)	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.	Substantially compliant	The panel recommends that NAA staff should not be members of the Accreditation Board of NAA responsible for selecting and certifying experts and expert organisations. Although outside the scope of this review, the panel also recommends Rosobrnadzor not to include its own staff as members of its collegial body.

<p>ENQA CRITERION 6 / ESG-2005 3.7: EXTERNAL QUALITY ASSURANCE CRITERIA AND PROCESSES USED BY THE AGENCIES</p>	<p>Partially compliant</p>	<p>NAA and the responsible authorities should see to that a formal appeals procedure be established as part of the state accreditation system.</p>	<p>Partially compliant</p>	<p>The panel recommends NAA and Rosobrnadzor to make the complaints procedure more transparent, for instance with explicit and predefined criteria for assessing a complaint. The panel also recommends that the possibility to complain against the conclusion of the panel be described on NAA's website. The panel recommends NAA to create a basis for a follow-up in the form of genuine feedback to HEIs in the reports and subsequent contact with the institutions about their progress.</p>
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ANNEX 2: PROGRAMME OF THE SITE VISIT

JANUARY 22, 2017		
15.30-19.30 Hotel Warszawa	Review panel's kick-off meeting and preparations for Day 1	
JANUARY 23, 2017		
TIMING	TOPIC	PERSONS FOR INTERVIEW
9.30-9.45	Review panel's private meeting	
9.45 – 10.45	Meeting with the management (directorate and department heads) of the NAA	Ms. Lemka Izmailova – Director Ms. Larisa Davydova – Deputy Director, Chief Accountant Ms. Elena Efimova – Deputy Director Mr. Mikhail Petropavlovski – Deputy Director Mr. Pavel Katenev – Deputy Director Ms. Tatyana Bibik – Head of Innovative development dep-t Ms. Elena Zabolotskaya – Head of expert relations dep-t; Mr. Vladimir Karpenko – Head of accreditation procedure support dep-t; Ms. Liudmila Kapralova – Head of Information and analytical dep-t; Mr. Vladislav Drobot – Head of database support dep-t; Ms. Ekaterina Shvedova – Head of regulatory and personnel support dep-t; Elena V. Avtenjeva – Head of automated data processing dep-t
10.45-11.00	Break	
11.00-12.00	Meeting with the representatives of the two Accreditation Boards	Ms. Lemka Izmailova Mr. Vladimir Grebenjov Mr. Vladimir Karpenko Mr. Vladimir Selin Mr. Vadim Petrov Mr. Michail Petropavlovski
12.00-12.15	Break	
12.15-13.15	Meeting with NAA reviewers / experts (including student experts)	Experts: Mr. Dmitry Sinjkov Ms. Marya Balova Mr. Dmitry Dzigua Ms. Irina Kharagurgieva Student reviewers: 1. Eugeny Varganov 2. Alexander Vorobiev 3. Martha Sakhelashvili
13.15-14.15	Lunch (panel only)	
14.15-15.15	Meeting with representatives of three Higher Education Institutions, whose Programs have undergone NAA reviews in 2016	Ms. Natalya Drobotya – Rostov State Medical University Ms. Irina Mirokhorova – National University of Science and Technology (MISiS) Ljubov Karavaeva – Financial University (Moscow)
15.15-15.30	Break	
15.30-16.00	Transfer from NAA building to RON building	
16.00-17.30	Meeting with the representatives of Rosobrnadzor	Mr. Sergey Bannikov – Head of State services department

		Ms. Olga Yakimchuk– Deputy head of state accreditation section
JANUARY 24, 2017		
TIMING		PERSONS FOR INTERVIEW
9:30-10:30	Meeting with the NAA's Directorate to explore any remaining questions (if any).	Ms. Lemka Izmailova Ms. Elena Efimova Mr. Mikhail Petropavlovski Mr. Pavel Katenev
10:30-11:00	Review panel's final wrap up session to agree on the final issues to clarify. Preparation for the final feedback and debriefing meeting.	
11:00 – 11:45	Final de-briefing meeting with NAA's Directorate to inform about preliminary findings.	Ms. Lemka Izmailova Ms. Elena Efimova Ms. Larisa Davydova Mr. Mikhail Petropavlovski Mr. Pavel Katenev Ms. Tatyana Bibik Ms. Elena Zabolotskaya Mr. Vladimir Karpenko Ms. Liudmila Kapralova Mr. Vladislav Drobot Ms. Ekaterina Shvedova Ms. Elena Avtenieva

ANNEX 3: TERMS OF REFERENCE OF THE REVIEW

External partial review of the National Accreditation Agency of the Russian Federation (NAA) by the European Association for Quality Assurance in Higher Education (ENQA)

Annex I: TERMS OF REFERENCE

July 2016

1. Background and Context

The National Accreditation Agency of the Russian Federation (NAA) was awarded the status “full member under review” in 6 March 2015 and was informed of the decision by a letter on 18 March 2015. The agency was given two years to undergo a new review process, allowing them to opt for a new review at an earlier stage. On 30 April 2015 NAA submitted an appeal to the ENQA Board against the Board’s decision. Following this, the Board took a decision at its meeting on 15 September 2015, to stand with its initial decision to designate NAA as a Full Member under review following the statement of the Appeals and Complaints Committee. In its letter of 5th of May 2016 NAA informed ENQA Secretariat that necessary enhancements have been already made and the agency is now ready to undergo an additional partial review.

Regarding the status of “member under review” the ENQA rules of procedure state the following:

(2) A further, partial review shall be carried out by the Board, or its nominated reviewers, at the end of the two-year period (or sooner, if the member agency so requests) and shall focus on the deficiencies mentioned in the report of the first review. The details of the partial review process are detailed in the ENQA procedure for partial reviews.

(3) The Board will take a decision regarding the renewal of membership based on the outcomes of the partial review. Should the outcome of the partial review be positive, membership shall be valid for five years from the date of the Board’s decision in which the status of member under review was granted.

(4) An agency that, in the opinion of the Board, following the further review, still does not comply with the ESG and thus ENQA’s criteria for membership shall, by confirmation of the General Assembly, be debarred from ENQA.

(ENQA Rules of Procedure, Article 7)

This partial review is carried out to assess the eligibility of NAA to the renewal of membership of ENQA. Should the partial review be successful, **NAA’s membership would expire 5 years after the completion of the full review (i.e. in March 2020).**

2. Purpose and Scope of the Evaluation

All elements identified as causes of concern by the ENQA Board as well as all elements identified by the panel as partially or non-compliant will be covered by the partial review. The Board decided in March 2015 to award NAA the status of “full member under review” expressing its concerns for the elements in which the agency had demonstrated non-compliance or partial compliance with the following specific mentions:

ENQA Criterion 1 – Activities (ESG-2005 3.1, 3.3)

ESG 2.4 Processes fit for purpose

- NAA should include trained international experts in the panels, especially as there are no legal obstacles to do so. The Board notes NAA's intention to involve international experts in the future.
- NAA should include students in the panels. Involvement of student will be a requirement in the revised ESG.
- The Board notes that "experts mostly work alone during a site visit", and strongly supports the panel in recommending that experts work as a 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".

→ Some aspects or parts of the criterion/ESG standard are not met. The three reasons listed above lead to a finding of partial compliance.

ESG 2.5 Reporting

In 2008, the panel recommended NAA to make the expert panels' reports publicly available. Not much progress has been made in this area. As stated in the review report: *"The state accreditation process is not documented in a single report, but in a number of documents with different purposes and different readerships". "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".* The outcomes of state accreditation are not easily accessible: only the expert panel's conclusions and positive decisions of the AB are published. Negative decisions can only be found in the annual analytical report made by NAA. In addition to the lack of publication of full reports, HEIs do not have an opportunity *"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 Board concurs with the panel in finding it *"inappropriate that HEIs do not have an opportunity to correct factual misunderstandings with potential importance for the overall conclusions"*.

→ The lack of publication of full reports, the lack of easy accessibility of accreditation outcomes and the lack of opportunity for HEIs to comment experts' reports on factual accuracy lead to a finding of partial compliance. The Agency is advised to promptly address these weaknesses as the revised ESG will be more challenging in terms of reporting.

ENQA Criterion 5 – Independence (ESG 3.6)

- Rosobrnadzor, the official government authority, participates directly in the recruitment and certification of new experts for which NAA does not have full and formal responsibility.
- NAA selects experts from the database and does not have the authority to complete the composition of expert panels as the final composition of the panel, including the head of the panel, is approved by Rosobrnadzor.
- The Accreditation Board makes formal decisions *"to be considered as recommendations to Rosobrnadzor, who takes the final decision on accreditation. [...] Representatives from Rosobrnadzor are members of the Accreditation Board. The head of Rosobrnadzor is even chairing the board"*.

→ Independence is therefore not guaranteed from the evidence gathered in the review report. The three reasons listed above lead to a finding of non-compliance.

ENQA Criterion 6 – External quality assurance criteria and processes used by the agencies (ESG-2005 3.7)

The following deficiencies should be addressed:

- No student involvement as experts in panels. In addition, experts have to be approved by Rosobrnadzor.
- No publication of full reports and no permanent appeals procedure established as part of the state accreditation system. In addition, HEIs do not have an opportunity to correct factual errors in expert's reports.
- No follow-up procedure beside the reaccreditation processes after 1 or 6 years.

The focus of the review shall be therefore the following:

1. Criterion 1, sub-criterion (ESG 2.4): Processes fit for purpose
2. Criterion 1, sub-criterion (ESG 2.5): Reporting
3. Criterion 5 (ESG 3.6): Independence
4. Criterion 6, (ESG 3.7): External quality assurance criteria and processes used by the agencies

The Agency shall also indicate in the SAR should there have been significant changes regarding any other standards since the last full review, and also these elements will be included in the partial review process.

3. The Review Process

The process is designed in the light of the *Guidelines for ENQA Agency Reviews*, the evaluation procedure consists of the following steps:

- Formulation of the Terms of Reference and protocol for the partial review;
- Nomination and appointment of the review panel;
- Self-assessment by NAA including the preparation of a self-assessment report (focusing only on the criteria and sub-criteria indicated in the article 2);
- 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 ENQA Review Committee;
- 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.

3.1 Nomination and appointment of the review team members

A review panel of 3 people will be employed for the task. The panel will include at least one academic, one student, and a representative of a QA agency. Wherever possible, one or more of the panel members will have participated in the previous full review, in order to facilitate the acquisition of a comprehensive picture of NAA. Reviewers will come from the ENQA pool of trained reviewers. In addition to the three members, the panel will be supported by the ENQA Secretariat review coordinator who will monitor the integrity of the process and ensure that ENQA expectations are met throughout the process. The ENQA staff member will not be the Secretary of the review and will not participate in the discussions during the site visit interviews.

ENQA will provide NAA with the names of the nominated reviewers 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-assessment by NAA, including the preparation of a self-assessment report

NAA is expected to produce a self-assessment report focused on the criteria and sub-criteria listed in the article 2, indicating in particular the changes that have taken place since the last full review (in 2015), and addressing specifically to concerns raised in the letter of the ENQA Board of 18th of March 2015. In addition, the agency will indicate any eventual changes and developments beyond those listed under the criteria under scrutiny.

The report by the reviewers will concentrate on the same criteria and assess how the compliance has evolved since the last full review (in 2015). It will also assess any eventual changes that have been brought to the attention of the panel in the self-assessment report.

3.3 A Site Visit by the Review Panel

The duration and the programme of the site visit will depend on the number of elements to be looked at by the review panel. In practice this is likely to mean a visit of 1-2 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. A draft will be first submitted to the ENQA review coordinator who will check the report for consistency, clarity and language and it will be then submitted to NAA 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.

4. Publication of the Report

NAA will consider the expert panel's report and will publish it on its website once the ENQA Board has made its decision. The report will also be published on the ENQA website, regardless of the review outcome and decision by the ENQA Board. This review report will be annexed to the latest full review report.

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 used by the Board of ENQA for the purpose of reaching a conclusion on whether NAA can be reconfirmed as a member of ENQA. However, the review report is to be considered final only after being approved by the ENQA Board. Once submitted to NAA and ENQA and until it is approved by the Board 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 has approved of the report. The approval of the report is independent of the decision on membership.

The Chair of the panel shall remain available to respond to questions of clarification or further information from the EQAR Register Committee provided that the ENQA Secretariat is copied in all such requests.

6. Budget

NAA shall pay the following partial review related fees:

Fee of the Chair	2,000 EUR
Fee of the 2 other panel members	3,000 EUR (1,500 EUR each)
Administrative overhead for ENQA Secretariat	1,500 EUR
Approximate travel and subsistence expenses ¹	2,500 EUR
TOTAL	9,000 EUR

This gives a total indicative cost of 9,000.00 EUR VAT excl. for a review team of 3 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.

7. Indicative Schedule of the Review

Terms of Reference and agreement with NAA	By August 2016
Appointment of partial review panel members and agreement on reviewer contracts, setting date for the site visit	August/September 2016
Completion of partial review SAR	November 2016
Site visit	Mid-January 2017
Draft of report to NAA	Late February 2017
Completion of report and submission to ENQA	March 2017
Consideration of the report by ENQA Board and decision	April 2017

¹ Calculation is based on four European return flights, and two nights in a hotel for each expert and ENQA coordinator.

ANNEX 4: GLOSSARY

EHEA	European Higher Education Area
ENQA	European Association for Quality Assurance in Higher Education
ESG	Standards and Guidelines for Quality Assurance in the European Higher Education Area
ESU	European Students' Union
EUA	European University Association
FSES	Federal State Educational Standards of Higher Education
HE	Higher education
HEI	Higher education institution
INQAAHE	International Network for Quality Assurance Agencies in Higher Education
NAA	National Accreditation Agency
QA	Quality assurance
Rosobrnadzor	Federal Service of Supervision in Education and Science
SAR	Self-assessment report

ANNEX 5. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY NAA

- Experts' reports of 5 universities
- List of experts
- Comments on evaluation reports, received from 10 universities
- List of members of the Accreditation Board of NAA and Accreditation Board (Collegial Body) of Rosobrnadzor.

OTHER REFERENCE SOURCES USED BY THE REVIEW PANEL

- NAA's website: www.nica.ru



THIS REPORT presents findings of the ENQA Agency Review of the National Accreditation Agency (NAA), undertaken in 2017.



2017 ENQA AGENCY REVIEW