

Prof. Dr. Ćemal Dolićanin
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Bern, 19 March 2018

Subject: Reconfirmation of membership of CAQA in ENQA

Dear Prof. Dr. Dolićanin,

I am writing to inform you of the decision taken by the ENQA Board on 22 February 2018 regarding the membership of CAQA in ENQA.

After a consideration of and discussion on the final review report, the ENQA Board concluded that the overall level of compliance with the ESG is not sufficient to renew CAQA's membership at this stage. The agency is showing progress in certain areas, while there are a number of areas of concern as detailed in the Annex to this letter. The Board therefore decided to designate CAQA as "Member under review" for a period of two years. The agency will need to undergo a partial review process at the end of this period and the Board recommends CAQA to fully utilise these two years given. The partial review will in particular focus on the weaknesses listed below and described in detail in the panel's report (all elements identified by the panel as partially compliant will need to be covered).

The Board is aware that some of the shortcomings discussed below may be amended in oncoming legislation that is announced in the panel's report. When undergoing the partial review in two years' time, the Board hopes to learn that the announced improvements are implemented.

The Board was especially concerned about the substantial shortcomings identified under the following three standards of the ESG:

ESG 2.2 Designing methodologies fit for purpose

The Board is concerned that the overall design of the external quality assurance system seems rather problematic, as CAQA acts as both the core group of peer-review experts conducting external quality assurance processes, with only limited involvement of external experts, and as the decision-making body in these processes.

ESG 2.4 Peer-review experts

The Board is especially concerned about the role of external experts in CAQA's external quality assurance processes, which currently seems to be limited to the minimum. The review report reads

that “external experts either only assess compliance with the standards based on documentation (academic experts whose identity should be protected, as required by law) or only participate in site visits together with CAQA members (students and employers)”. The panel concludes, “CAQA members have largely taken over the role of academic experts and are at the core of all EQA processes; the contribution of external academic experts is limited, with their job finished when they submit their reports based on the analysis of documentation.”

The evidence brought forward in the panel’s report raises a question on whether CAQA’s interpretation of this standard is correct. The Board supports the panel’s statement that “the ESG refer to external experts, including academics, students and employer representatives, as having a central role in EQA processes, and it is assumed that they are external not only to evaluated HEIs but also to the QA agency which takes decisions based on reports from experts”. In the Board’s view, this aspect is crucial and thus concerning this standard, the Board concludes that the findings lead to non-compliance and not partial compliance as recommended by the Panel.

ESG 2.6 Reporting

The Board is also concerned about the current arrangements for reporting. The panel states that “three types of reports are produced as part of CAQA’s processes: (1) individual academic experts’ reports (referred to as preliminary reports) based on the analysis of documentation from HEIs (all processes); (2) site visit reports (where a visit is undertaken) drafted by CAQA members involved, with comments on drafts from students and employer representatives integrated; and (3) what may be called overall / final reports, drafted by the CAQA sub-commissions concerned, which incorporate findings from the other ones [...] While it is expected in the ESG that a final report is written by a group of external experts, including a student and a labour market representative, their contributions are not really visible, and their views not necessarily reflected (for example, where academic experts’ opinions differ) in CAQA’s final reports.

The Board is of the opinion that focus should be given to the external experts’ findings directly in order to support the philosophy of a peer review. Thus, the Board emphasises the panel’s recommendation that CAQA should find a way to ensure, even within the current legal constraints, a more substantial contribution from external experts, including academic experts, students and labour market representatives, in its reports.

In addition to these three major concerns, the Board would like to emphasise the following items:

ESG 3.5 Resources

The Board would like to highlight the importance of ensuring a proper balance between the agency’s resources and the scope of its activities to enable the agency to organise and run its activities effectively. Also in this perspective, a position independent from the Ministry is considered to be important.

ESG 3.6 Internal quality assurance and professional conduct

Furthermore, the Board would suggest CAQA to pay specific attention to its internal quality assurance and put formal procedures and mechanisms in place, as recommended by the panel.

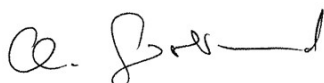
According to ENQA's Rules of Procedure, following a successful partial review at the end of a period of two years, CAQA's membership in ENQA would extend to a five-year term starting from the date of the Board's initial decision (22 February 2018). I would like to point out that members under review maintain their membership rights and duties during the period of membership under review (maximum of two years). You may find the full listing of benefits here:

<http://www.enqa.eu/index.php/enqa-agencies/enqa-membership-benefits-and-services/>

If CAQA is dissatisfied with the decision of the ENQA Board, it may file an appeal according to the procedures outlined in article 24 of ENQA's Rules of Procedure.

If you have any further queries, please do not hesitate to contact the ENQA Secretariat.

Yours sincerely,



Christoph Grolimund
President

Annex: Areas for development

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As outlined by the review panel, CAQA is recommended to take appropriate action, so far as it is empowered to do so, on the following issues:

ESG 3.1 Activities, policy and processes for quality assurance

CAQA is recommended (1) to revise its mission so that it clearly defines the range of its responsibilities, principles underlying its work and the nature of its interaction with stakeholders; (2) to put in place mechanisms for effective forward planning and reviewing progress towards its objectives; and (3) to take action, insofar as it is possible within its remit, to ensure that students and employers have their representatives in CAQA governance.

ESG 3.4 Thematic analysis

CAQA is recommended to produce regularly thematic analysis focusing on quality and internal quality assurance, in addition to those already available and planned which address quantitative aspects.

ESG 3.5 Resources

CAQA is recommended to enhance its resource planning and management to ensure that it makes best possible use of the resources available.

ESG 3.6 Internal quality assurance and professional conduct

CAQA is recommended (1) to devise an action plan for the development of its internal quality system; and (2) to put in place formal mechanisms for gathering external feedback after each accreditation review and audit and internal feedback on a regular basis, and for following up on internal and external feedback collected.

ESG 2.1 Consideration of internal quality assurance

CAQA is recommended (1) to amend slightly its audit standards so that they embrace all aspects of ESG 1.1, 1.3, 1.4 and 1.7, and to have a discussion with academic experts, students and employers participating in processes to arrive at a common understanding of how student-centred learning and recognition should be addressed; (2) to refocus audits more towards the effectiveness of internal quality assurance; and (3) to provide greater support for HEIs to take the primary responsibility for quality.

ESG 2.2 Designing methodologies fit for purpose

CAQA is recommended (1) to devise, in cooperation with the national authorities, arrangements where its members do not combine the role of a body taking decisions with the role of key external experts, and where they focus on the former role in line with the spirit of the ESG; (2) to place a stronger

emphasis on quality improvement in its processes; and (3) to amend its internal regulations to ensure full clarity and consistency.

ESG 2.3 Implementing processes

CAQA is recommended (1) to revise its procedures to include a site visit as part of each periodic programme review; and (2) to devise a way for HEIs to report on progress in the implementation of its recommendations as part of existing or new arrangements; (3) to consider developing guidelines on scoring for academic experts to ensure greater consistency in their approach to assessment.

ESG 2.4 Peer-review experts

CAQA is recommended (1) to ensure the involvement of external experts as playing a central role in EQA processes, in line with the ESG; (2) to ensure the involvement of students and labour market representatives in all periodic programme accreditation reviews; (3) to provide space for students to contribute to its EQA processes beyond a range of aspects considered to be strictly student matters; (4) to ensure much wider involvement of international experts, not only in periodic programme accreditation reviews but also in audits; (5) to provide regular training and feedback on reports to academic experts.

ESG 2.5 Criteria for outcomes

CAQA is recommended to define more explicitly in its internal regulations the benchmarks for its decisions (an ‘act of warning’ as opposed to refusal of accreditation, and approval as opposed to follow-up in audits) which are consistently used in practice.

ESG 2.6 Reporting

CAQA is recommended (1) to devise a way for ensuring, even within the current legal constraints, a more substantial contribution from external experts, including academic experts, students and labour market representatives, to its final reports; (2) to devise, in collaboration with the Ministry of Education, an arrangement for CAQA to publish its initial accreditation opinions / reports on newly accredited institutions and their programmes; (3) to define more clearly the rules for the publication of reports in its internal regulations; and (4) to consider providing drafts of its reports to HEIs for a factual accuracy check.

ESG 2.7 Complaints and appeals

CAQA is recommended to put in place (1) a procedure for HEIs to file a complaint as it is defined under ESG 2.7; and (2) to establish a separate appeals body within CAQA (or within a new quality assurance body to be set up by the newly enacted Law on Higher Education).