

Update 2020 to the *Internal Evaluation Report of NAB 2016–2019*

In compliance with the requirements of the European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), the Statute of the National Accreditation Bureau (NAB) and the Framework for Quality Assurance and Evaluation of NAB's Activities, NAB carries out regular internal evaluation of its activities. The Statute stipulates that NAB publishes an internal evaluation report every three years and that it is updated annually. The Board of NAB appointed several of its members to prepare the update in the period from January to August 2020.

NAB made a number of thematic and system-level recommendations to improve its activities in the Internal Evaluation Report 2016–2019. This presented update to it provides a reflection of how NAB has used the conclusions of the internal evaluation and what progress has been made in the concerned areas.

Thematic recommendations to the NAB's activities

1. **Recommendation:** To implement a feedback mechanism towards evaluation committees that will help develop a common assessment practice, will not constitute excessive administrative burden and will be realistic in technical and financial terms.

Current situation:

Regarding a feedback on the results of assessment in individual administrative proceedings, a single mechanism that would facilitate feedback between the Board and evaluation committees has not yet been implemented. It is still provided only ad hoc in individual cases and mainly on request of the members of evaluation committees. The information is sometimes mediated by the NAU office, which can be considered adequate only in terms of communicating what stage the activity of the evaluation committee is, or whether or not the accreditation has been granted. However, as the decision is taken by vote of the members of the Board (often after a reaction of the applicant to the preliminary assessment results), it is problematic to expect the Office to interpret the reasoning behind the adopted decision to the evaluators. Systematic provision of feedback from the Board to evaluators would be desirable especially in cases when the final decision of the Board differs from the standpoint of the evaluation committee as its advisory body.

In general, facilitation of feedback between evaluation committees and rapporteurs of the Board could be done by NAB's **permanent committees for evaluation methodology** that were introduced in spring 2020. These committees, appointed usually for each field of study¹, represent NAB's advisory bodies and are always chaired by a Board member who acts as a rapporteur for the given field of study. Permanent committees will meet to share their

¹ Government Regulation No. 275/2016 Coll., On Fields of Study in Higher Education.

experience with assessment and to possibly make recommendations to the Board. As of August 2020, permanent committees had been appointed in 14 fields of study.

2. Recommendation: To reconsider the current rules adopted by NAB in relation to remuneration of evaluation committees after they finish their activities.

Current situation:

The current regulation on remuneration of members of evaluation committees is tied to the moment of finalization of the committee's activities (i.e. after the Board has taken the respective decision, which can be delayed from the actual completion of the committee's activities for various procedural reasons). NAB has assessed this model **in general as satisfactory**. It makes it possible to request a new assessment of the application by the committee in cases when the applicant has significantly revised the application prior to decision-making of the Board. The problem of long delays between the completion of the committee's standpoint and the Board's decision concerns only individual cases (typically when the applicant requests a temporary suspension of the proceedings).

3. Recommendation: To adopt measures leading to harmonization of assessment practice in evaluation committees, for example through seminars and other forms of experience sharing; in the medium term to assess experience with the current model of ad hoc appointed evaluation committees.

Current situation:

NAB has tackled the issue of experience sharing by establishing **permanent committees for evaluation methodology**. This model paves the way for the harmonization of administrative practice because their members appointed from the Pool of Evaluators will also serve in evaluation committees for assessment of applications for accreditation, often as their chairs. It should lead to an effective transfer of information between the Board and the evaluators as well as sharing of experience in each field of study.

The Board will also consider an electronic form of training for new evaluators, given that the Pool of Evaluators was already established in the first years of the NAB's operation and is now supplemented irregularly and to a lesser extent. A general guideline outlining the steps of the evaluation process and their sequence as well as the method of application of existing regulations and methodical documents in an electronic, remotely accessible form would be generally beneficial and usable not only for training of new evaluators.

4. Recommendation: To revise methodical guidelines for preparation and assessment of applications for accreditation and related procedures on the basis of the experience to date.

Current situation:

Revision of NAB's methodical guidelines should **follow after obtaining feedback and exchanging experience with evaluators** through the permanent committees for evaluation methodology and possibly with higher education institutions (HEIs). It is also anticipated that the revision will incorporate the amendment of the Higher Education Act that is currently in the legislative process and a possible revision of the Statute related to it. Due to the complexity of the approval process for revision of methodical guidelines (discussions with bodies of representation of HEIs, etc.) and the significant impact on administrative processes at HEIs (the need to start preparing applications for accreditation according to new guidelines), it is desirable to prepare a

comprehensive amendment to the NAB's Statute. The aim of the revision of the methodical guidelines will be to simplify and adjust them to current administrative practice.

5. Recommendation: To create and implement follow-up procedures for quality assurance of HEIs with institutional accreditation.

Current situation:

The introduction of follow-up procedures in quality assurance of HEIs with institutional accreditation is complicated under the current legal regulation of the NAB's competences. According to it, follow-up procedures can be conducted only in the form of external evaluation of the activities of HEIs. However, the Higher Education Act requires special reasons or an initiative of the Minister for launching the evaluation. **The currently discussed amendment of the Higher Education Act** should change this particular provision and facilitate the implementation of follow-up procedures.

Despite the above-mentioned obstacles, NAB launched **two external evaluations of HEIs with institutional accreditation** in 2020 (on the basis of the Minister's initiative to evaluate the experience with institutional accreditation). It is anticipated that NAB will continue with these evaluations at other HEIs with institutional accreditation. They will provide an opportunity not only to assess the impact of institutional accreditation on the quality of activities of HEIs but also to analyse more general knowledge about the role of institutional accreditation in the quality assurance system in higher education.

Regarding the follow-up procedures, NAB also applies the previously adopted procedure that follow-up reports requested by NAB in relation to degree programmes prior to granting institutional accreditation to the HEI will be assessed by the HEI itself (if the degree programmes fall within the granted institutional accreditation²). The HEI subsequently informs NAB in bulk about the outcomes of assessment of follow-up reports and about any measures taken in consequence. NAB has published information on this procedure on its website.

System-level recommendations

1. Recommendation: To support and initiate further discussion with evaluators and other stakeholders about experience with the activities of NAB and possible changes to its operations, or legislation, in order to improve the external quality assurance system in higher education and to make it more effective.

Current situation:

In 2020, NAB organized a **seminar on the topic of institutional accreditation**. It was attended by members of the Internal Evaluation Boards and other representatives of HEIs with institutional accreditation. Apart from this event, experience is shared with stakeholders mainly through personal relations of the members of the Board and other NAB's representatives. NAB will also use the permanent committees for evaluation methodology to hold discussions with the evaluators.

² Institutional accreditation is granted for specific types of degree programmes (Bachelor's, Master's, Doctoral) and fields of study (as listed in the Government Regulation No. 275/2016 Coll., On Fields of Study in Higher Education).

2. Recommendation: To open a discussion on changes in the Statute that would make the operations of NAB simpler and more flexible; when amending the Statute, to take into account and incorporate the existing experience with its application and the requirements of the ESG.

Current situation:

A comprehensive revision of the Statute has not yet been discussed within NAB. It will be possible to open this discussion after the adoption of the amendment to the Higher Education Act, which will have an impact on some activities regulated by the Statute.

3. Recommendation: To draft proposals to amend standards for accreditation and possibly the Higher Education Act with the aim to make legislation clearer and more comprehensible and to correct ambiguous, contradictory or unsuitable provisions.

Current situation:

NAB submitted **proposals for amending the Higher Education Act** in the process of preparation of the current amendment. However, only several were accepted to further discussion. The submitted proposals related mainly to the right of the applicant to make specific actions in the administrative proceeding after the Board has adopted a resolution on the application, the publication of the Board's resolutions, the Pool of Evaluators and appointing evaluation committees, and conditions for initiating external evaluation of the activities of HEIs. Possible incentives to adjust the standards for accreditation³ may arise from the activities of the NAB's permanent committees for evaluation methodology.

4. Recommendation: To take measures leading to a full implementation of the Framework for Quality Assurance and Evaluation of NAB's Activities that NAB has set itself but has not fully implemented yet.

Current situation:

Implementation of the Framework for Quality Assurance and Evaluation of NAB's Activities has not yet been systematically evaluated or ensured. It has not yet been implemented in some areas, for example the provisions related to thematic analysis on the system level, continuous seeking and assessing of feedback within NAB and among stakeholders, taking necessary measures to tackle any discovered shortcomings, or analysis of compliance of NAB's operation with the ESG.

5. Recommendation: To commence preparations for external review of compliance with the ESG by a detailed analysis of their fulfilment and outlining steps to achieve full compliance as soon as possible.

Current situation:

NAB has not yet taken specific steps to prepare an external review or a detailed assessment of compliance with the ESG. However, the Ministry of Education, Youth and Sports (MEYS) in cooperation with NAB, joined the application for **the Erasmus+ project called SEQA-ESG** that aims to ensure compliance of national quality assurance systems with the ESG and prepare quality assurance agencies for the external review needed for full membership in ENQA and registration in EQAR. The two-year project, which involves partners from five other European

³ Government Regulation No. 274/2016 Coll., On Standards for Accreditation in Higher Education.

countries, was approved for funding and started in June 2020. Although the partner on behalf of the Czech Republic is MEYS (NAB is not a legal entity), NAB's representatives will participate the focus of activities within the project will also lie on NAB. Peer counselling workshops,

thematic seminars and staff mobilities in agencies that have undergone the external review of compliance with the ESG will take place within the project that is based on the principles of *peer counselling* and *peer support*. The main outcomes of the project will include a national action plan to achieve full compliance with the ESG and a plan for preparing the external review.

The Board of NAB approved this document at its 8th meeting on 27 August 2020 as an update to the Internal Evaluation Report according to Article 25 (1) of its Statute and instructed the Presidium to draw up an implementation plan with regards to the recommendations and to submit it to the Board at its closest possible meeting.