

Update 2021 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 September to December 2021.

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:

As of January 2021, a **unified feedback mechanism** between the Board of NAB and the evaluation committees on the outcomes of assessment in individual administrative proceedings has been introduced. The chairs of evaluation committees receive information about the Board's decision that concern the administrative proceedings previously assessed by their committee. They are also provided with the report(s) of the respective rapporteur(s). In case of any questions, the chairs can contact the respective rapporteur and ask for further clarification on the Board's decision. The chairs receive the information on the results following each Board meeting after the minutes from the meeting are published. The feedback mechanism is facilitated by the Office of NAB. Reactions of the chairs to this new mechanism have been mostly positive so it can be concluded that the mechanism has proved useful so far. However, further improvements should be considered.

On the general level, **the permanent committees for evaluation methodology**, introduced in spring 2020, also partly serve to facilitate feedback between evaluation committees and rapporteurs. These committees are usually appointed in individual fields of study and constitute advisory bodies of NAB. They are always chaired by a member of the Board who acts as the rapporteur for the given field of study. Members of the permanent committees are selected evaluators who are expected to be frequently appointed as chairs of regular evaluation committees. The permanent committees for evaluation methodology meet to exchange experience with assessment in the accreditation process and to discuss more general issues arising from the activities of evaluation committees. It is assumed that members of the permanent committees will transfer their knowledge gained through the permanent committees to the individual evaluation committees and thus contribute to unification of the

administrative practice. However, it will be necessary to verify whether these assumptions have been confirmed and, if needed, to steer the activities of the permanent committees accordingly.

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 set-up of remuneration of evaluation committees' members is tied to the finalization of the committee's activities (i.e. after the Board has made the respective decision, which may be delayed from the actual completion of the committee's activities for various procedural reasons). NAB assessed this model **as generally satisfactory**. It makes it possible to ask the committee to reassess the application in cases when the applicant has significantly revised it prior to the Board's decision. 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).

The amendment to the Statute of NAB effective from 11 December 2021 provides for an **increase in the remuneration base for evaluators by 100%**. The list of activities where the base for remuneration is multiplied by a coefficient was adjusted and the coefficients were also changed. Despite the increase, the remuneration of evaluators still cannot compare with the expert fees paid in most EHEA countries and it should be consistently monitored (also with respect to the fact that it is a significant motivating factor that impacts the willingness of evaluators to be involved in evaluation committees). It is desirable to aim for comparable fees as in other EHEA countries if the state budget allows.

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:

The possibility to organize workshops for evaluators as well as other forms of meetings was heavily impacted by restrictive measures related to COVID-19 in 2021. Nevertheless, initial meetings of permanent committees for evaluation methodology took place. By December 2021, permanent committees covering 36 fields of study had been appointed and committees in 22 fields of study held their first meetings, which provided platforms for **discussions of a number of specific issues related to the activities of evaluation committees. Application and interpretation of accreditation standards** as well as methodical guidelines of NAB were discussed **with respect to the specifics of individual fields of study**.

In view of the fact that enrolments to the Pool of Evaluators have taken place irregularly and to a lesser extent in recent years than in the years following the NAB's establishment, NAB started work on preparing an electronic form of training for evaluators. **The electronic training of evaluators** will be based on self-study of training materials and a test to assess the acquired knowledge. By completing this training, evaluators should gain comprehensive and clear information necessary for their roles, including a general step-by-step manual to the assessment process and the method of applying established regulations and methodical guidelines. The electronic mode will also enable greater flexibility in training than the current face-to-face mode. The launch of the e-training is planned for the first quarter of 2022.

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:

The submitted proposal for amendment to the Higher Education Act was not discussed by the Parliament in 2021, so NAB could not build on it, as intended, with a thorough revision of its methodical guidelines for preparation and assessment of applications for accreditation and related procedures based on the experience gathered so far. On 11 December 2021, however, **an amendment to the Statute of NAB came into force**, prepared on the basis of past experience with the functioning of NAB, that enabled to at least partially update its procedures. The amendment mainly eliminated unsystematic or unpractical rules and codified existing administrative practice (e.g. it explicitly codifies the possibility to ask the evaluation committee to reassess the application adjusted by the HEI before the Board's decision). Following the amendment to the Statute, NAB has also updated its internal procedures to increase the flexibility of decision-making and effectiveness of operation. However, these adjustments will need to be evaluated again after a certain period of time. As the amendment to the Statute requires partial modifications in NAB's regulations and methodical guidelines, NAB used this opportunity to initiate a comprehensive revision of a large part of its methodical guidelines related to accreditation and evaluation.

The methodical documents produced by NAB in 2021 mainly responded to the impact of the COVID-19 pandemic. NAB extended its **Methodical Guideline on the Use of Distance Learning Tools in Full-Time and Combined Studies in the Academic Year 2020/2021** to cover also the academic year 2021/2022.

Aside from the above-mentioned processes, NAB should **initiate a revision of the government regulation on standards for accreditation** in the upcoming period and incorporate the experience gathered so far with its application. If successful, NAB should proceed to revise its methodical guidelines accordingly.

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 NAB's competences. According to it, comprehensive follow-up procedures can be implemented only by means of external evaluation of activities of HEIs. However, the Higher Education Act requires specific reasons or an initiative of the Minister of Education, Youth and Sports for launching the evaluation. Another option is an audit of compliance with legal regulations, which is, however, significantly bound by the Code of Inspection. **The currently proposed amendment to the Higher Education Act** was supposed to change this provision and facilitate the implementation of follow-up procedures, but it was not discussed by the Parliament in 2021.

Despite the above-mentioned obstacles, NAB has completed **two external evaluations of HEIs with institutional accreditation** in 2021 that it launched in the previous year on the basis of the Minister's initiative to evaluate the experience with institutional accreditation to date. During 2021, NAB started external evaluations of three more HEIs with institutional accreditation to be completed in the first half of 2022.

Regarding the follow-up procedures, **the Board of NAB discussed 14 follow-up reports** (and their amendments) **on institutional accreditation** that had been requested as a part of the

decision that granted institutional accreditation to the respective HEI. The follow-up reports focus on specific aspects of implementing the institutional accreditation, in relation both to the design of internal rules and procedures and to the practical exercise of institutional accreditation in individual fields of study. The reports serve NAB mainly to verify the HEIs' compliance with the Board's recommendations given when granting institutional accreditation.

Furthermore, **the Presidium of NAB** paid visits to several selected HEIs and, accompanied by other Board members, **engaged in discussions with the HEIs' managements**. The meetings focused on exchange of experience with implementation of institutional accreditation by these HEIs.

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 2021, **multiple visits of the Presidium and Board members to individual HEIs** took place. Their aim was, among other things, to exchange experience with accreditation process that could be used in future revisions of the external quality assurance system in higher education.

At the regular Board's meeting in September 2021, **discussion on current issues in higher education** with the Deputy Minister of Education, Youth and Sports and members of the representative bodies of HEIs was held.

Through the Ministry of Education, Youth and Sports, NAB was involved in the **SEQA-ESG project (Supporting European QA Agencies in meeting the ESG)** funded by the European Commission, which will run until late 2022. Its aim is to support NAB and other European accreditation agencies that are not yet full members of ENQA to fully implement the ESG standards and prepare for external evaluation of compliance with these standards in order to achieve full membership in ENQA and registration in EQAR. In November 2021, NAB, along with the Ministry of Education, Youth and Sports, hosted a virtual **Thematic Peer Learning Workshop on national criteria and the ESG** for participants from all involved countries. Representatives of ENQA and international experts presented their views on the interpretation of the ESG in relation to national standards for internal quality assurance systems and provided good practice examples. Representatives of NAB also actively participated in other meetings and workshops organized within the project, mainly the other **Thematic Peer Learning Workshop on procedures and methods of external quality assurance**.

NAB engaged in **discussions on the introduction of online elements in teaching** outside the Covid-19-related extraordinary circumstances. In the light of the relaxation of emergency measures during the year, NAB issued a **statement on the use of online teaching methods** with its opinion on the benefits as well as the limits of online teaching. In addition, individual Board members participated through their universities in the central development project **The Development of Standards for Quality Assurance of Teaching and Learning for Various Forms of Study with Respect to Current Methods and Experience with Distance Education**, coordinated by Charles University. This project aims to revise and define standards for quality of education so that they are comprehensible and can be effectively evaluated. They should also reflect the requirements on high-quality and flexible learning for current and future generations of students and the need for their employability and quality of life in the 21st century. These

aims are based on an extensive methodological and practical reflection not only of current experience with distance education in extraordinary circumstances but also of longstanding experience with forms of teaching and learning. Several seminars and workshops were held in 2021 in the framework of the project (online, hybrid as well as face-to-face). The outcomes of the project activities focused on the classification of forms of teaching and the possibility of their inclusion in accredited forms of study.

Regarding discussions with evaluators enlisted in its Pool, NAB started to use the permanent committees for evaluation methodology.

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:

The Board of NAB discussed and approved a comprehensive revision of the Statute. The amendment was approved by the Government on 6 December 2021 and came into force on 11 December 2021. The amended Statute has considered the gathered experience with its application into NAB's operations and enables at least partial adjustment of procedures. In particular, it eliminated unsystematic or unpractical rules and codified existing administrative practice. Another benefit is the Statute's simplification and greater comprehensibility. Overall, the amendment should contribute both to increasing the flexibility of decision-making and to making the functioning of NAB more efficient. Requirements of the ESG were incorporated only to the limited extent that the procedural nature of the document allowed. Some key issues related to compliance with the ESG can only be solved by amending the law, particularly in the area of publication of reports from external quality assurance. Likewise, the issue of the NAB's independence cannot be addressed 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** as part of the preparation of its amendment, but only some were accepted for further discussion. The proposals related mainly to the right of the applicant to make specific actions in the administrative proceedings after the Board's resolution on the matter, to publication of the Board's resolutions, setting up of the Pool of Evaluators and establishment of evaluation committees, and conditions for initiating external evaluation of the activities of HEIs. However, the amendment was not discussed by the Parliament in the past legislative period.

During 2021, first meetings of permanent committees for evaluation methodology took place in 22 fields of study. In some cases, **members of the permanent committees proposed adjustments or clarifications of standards** (e.g. specification of requirements for distance learning, involvement of experts from practice in teaching, etc.). NAB will consider these proposals for possible future revision of the government regulation on standards in higher education, or for the planned revision of its methodical guidelines.

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:

The 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 in regard to conducting a broader analysis on the system level, continuous seeking and assessing feedback within NAB and among stakeholders, taking necessary measures to tackle any discovered shortcomings.

Some progress has been made in relation to **the analysis of NAB' compliance with the ESG that was carried out** as a part of the National Action Plan for Development of Quality Assurance in the Czech Republic adopted in the framework of the SEQA-ESG project.

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:

The SEQA-ESG project included the preparation of the **National Action Plan for Development of Quality Assurance in the Czech Republic** in collaboration with the Ministry of Education, Youth and Sports. The action plan assesses the current system from the point of view of key areas covered by the ESG, identifies priority areas for future steps and proposes concrete measures to achieve compliance with the ESG. NAB will also develop an action plan to prepare for the external agency review, setting out concrete steps and measures leading to the review.

The Board of NAB approved this document at its 1st meeting on 22 January 2022 as an update to the Internal Evaluation Report according to Article 25 (1) of its Statute.