



## Internal Evaluation Report of NAB 2016–2019

August 2019

### 1. The Context of Internal Evaluation of NAB

In compliance with the European Standards and Guidelines for Quality Assurance in Higher Education (ESG), the Statute of NAB and the Framework for Quality Assurance and Evaluation of NAB's Activities, NAB conducts regular internal evaluation of its activities. The Statute of NAB stipulates that NAB publishes an internal evaluation report every three years and that this report is updated annually. The drafting of the internal evaluation report is always preceded by an internal evaluation process that in this case was led by designated members of the Board of NAB between January and June 2019, following the approval of the Framework for Quality Assurance and Evaluation of NAB's Activities in December 2018. This is the first internal evaluation of NAB and began in the third year of its operation. Therefore, this report constitutes the first reflection on selected aspects of the implementation of the new quality assurance system in higher education introduced by the Higher Education Act Amendment in 2016.

### 2. Brief Analysis of NAB's Compliance with the ESG

The ESG represent widely accepted principles for the operation of European accreditation agencies. Demonstrating compliance with these standards in a rigorous external review by a panel of international experts is a precondition for registration in The European Quality Assurance Register for Higher Education (EQAR) as well as membership in The European Association for Quality Assurance in Higher Education (ENQA). The registration and membership would represent international recognition of the Czech quality assurance system in the European Higher Education Area (EHEA), and are thus in the interest of all stakeholders in higher education and should be a priority in the NAB's strategy.

As a part of the internal evaluation of NAB, a basic analysis of compliance with the ESG (<https://enqa.eu/index.php/home/esg/>) has been made. It has revealed a number of points to be considered and resolved. Problem areas are mainly related to the following standards:

#### Standard 2.3 Implementing Processes

The proceedings of accreditation of degree programmes do not include all required elements, primarily a site visit and consistent follow-up procedures. A follow-up report is requested only in some cases. In a number of EHEA countries that accredit or evaluate degree programmes ex post during their implementation, the site visit constitutes an important and indivisible part of quality assurance. In an ex ante model (accreditation prior to the start of the degree programme) however, the site visit does not have such practical value. It is clear that in the current accreditation system, it is not possible in terms of human resources, administrative and financial capacities to carry out a site visit for all degree

programmes. On the other hand, it would be worth considering different ways of expanding the role of site visits or making them a part of the procedures for extending accreditation of the existing degree programmes.

The proceedings of institutional accreditation involve a site visit as a fixed part of the assessment. However, consistent follow-up procedures have not yet been developed. A follow-up report is typically requested but it aims at subsequent verification of specific issues rather than a comprehensive evaluation of how recommendations have been implemented or how quality has improved in the HEI's operations. Due to the fact that institutional accreditation is an entirely new element in the Czech quality assurance system, it would be particularly useful to focus on monitoring its effectiveness for HEIs over the 10 years of its validity.

A site visit should always be a part of external evaluation of HEIs but in the only two cases of external evaluation the evaluation process has just been started.

#### Standard 2.4 Peer-review Experts

NAB has practically not engaged international experts with the exception of a small number of evaluators from Slovakia and Czech evaluators living abroad. International experts are not a crucial requirement of the ESG but experience in the EHEA has clearly shown that involvement of international experts makes a great contribution not only to the assessed HEIs but also to accreditation agencies and the quality assurance system. It would therefore be desirable to seek ways to remove legislative, administrative, financial and technical barriers to the involvement of international experts and to enhance their representation in accreditation procedures.

#### Standard 2.6 Reporting

The requirement to publish full reports by experts is problematic to apply to the Czech context. It is not clear what should be considered as the report by experts in the national quality assurance system. The concept could be interpreted as the final accreditation decision or as the standpoint of the evaluation committee, or possibly as the report of a Board member.<sup>1</sup> NAB does not publish any of these documents at present; only the statements of decisions that have entered into force and their brief substantiations are published; it is done in bulk with significant delay from their entering into force. In proceedings that do not end with a decision but are terminated by a simple resolution<sup>2</sup>, the reasons are not published at all. Moreover, in the proceedings of degree programme accreditation, neither the decision nor the standpoint of the evaluation committee include all the elements listed in the ESG (i.e. description of context, identification of good practice).

With respect to audit and evaluation activities of NAB, a specific policy of publishing the outputs has not yet been established. There is a requirement to publish final external evaluation reports, but no external evaluation has been carried out so far.

#### Standard 2.7 Complaints and Appeals

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<sup>1</sup> Article 13 of the Statute of NAB.

<sup>2</sup> Such as in the case of withdrawal of the application by the HEI.

In contrast with the appeals process, which is by law the responsibility of the Appeals Committee and subject to the Administrative Procedure Code, NAB does not have a policy for filing and handling complaints.

#### Standard 3.1 Activities, Policy and Processes for Quality Assurance

NAB has neither formulated or published a mission statement, nor has it carried out external evaluation of HEIs, which is one its tasks stipulated by the Higher Education Act and an integral part of quality assurance. The quality assurance role cannot be fulfilled by assessment of received applications for accreditation alone. It is therefore necessary to focus on expanding the activities of NAB in the area of external evaluation and audit and to carry them out regularly.

#### Standard 3.2 Official Status

The position of NAB is not adequately determined in the current legislation. It has been established by the Higher Education Act but the Act does not clearly specify its position. It is not a legal entity or an organizational unit of the state or its directly managed organization.

#### Standard 3.3 Independence

In terms of the requirement for independence of accreditation agencies, a possible problem can be the NAB's financial dependence on the Ministry of Education, Youth and Sports (MEYS) and the administrative support of its activities through MEYS. It is common for the EHEA agencies to be entirely separate organizations (legal entities) that have their own financial resources, may be recipients of funds from European projects, etc. In order to justify the current situation in the Czech context, it is recommended to consider additional mechanisms and rules to enhance the NAB's independence from MEYS.

The position of the Board members is also ambiguous from the point of view of legislation (for example they are not subject to the law on conflict of interests and the duty to publish their property declarations even though they take decisions in administrative proceedings).

#### Standard 3.4 Thematic Analysis

NAB does not conduct this activity, the aim of which is to use the collected knowledge to carry out and publish analyses of specific system-level topics and thus contribute to the transparency of the system and the dissemination of knowledge on higher education.

#### Standard 3.5 Resources

NAB lacks sufficient capacities and resources for regular qualitative analyses (thematic analyses), their publication and dissemination. While the available human resources are adequate in terms of expertise, time capacities are severely lacking. NAB's expert capacities are overloaded with demands on administration and personnel necessary to secure its basic functioning.

With regard to financial resources, the remuneration for evaluators is significantly lower than the remuneration granted in most EHEA countries, which practically excludes recruitment of international experts. The current system of operations however does not realistically allow for a significantly higher remuneration due to the number of ad hoc appointed evaluation committees and the number of their members.

#### Standard 3.6 Internal Quality Assurance and Professional Conduct

NAB has published The Framework for Internal Quality Assurance and Evaluation of the NAB's Activities, thus formally fulfilling the requirement for the adoption of internal quality assurance policy. However, a number of the set procedures and activities have not been implemented so far. Therefore, NAB does not fully comply with this framework that it has set in order to ensure the quality of its own activities.

An internal evaluation has been conducted for the first time in the third year of the NAB's operation. It will be necessary to ensure its regular implementation and annual updating in the future. Attention should especially be paid to conceptualizing the internal evaluation in such a way to make it a useful reflection on NAB's activities that would help identify deficiencies and adopt effective measures. NAB requires the internal mechanisms of HEIs to operate in this way in accordance with the legislation; therefore, it is crucial to apply the same requirements and criteria on its own conduct.

### **3. Analysis of the Activities of NAB to Date: Evaluation Committees and Institutional Accreditation**

The first internal evaluation of NAB's activities focused on new elements introduced by the Higher Education Act Amendment in 2016 that had not been a part of the previous quality assurance system, specifically evaluation committees as advisory bodies to NAB and institutional accreditation. In order to identify strengths and weaknesses in their implementation, NAB conducted a survey among evaluators who had participated in evaluation committees for assessment of degree programmes and for institutional accreditation.

#### Evaluation Committees for Degree Programmes

The survey has revealed a missing feedback mechanism regarding the final decision on accreditation by NAB. An evaluation committee releases a standpoint to an application for accreditation but there is not a mechanism to inform its members about the final accreditation decision. Feedback is essential for the formation of administrative practice already at the level of evaluation committees. Harmonization of the applied criteria currently takes place mainly at the level of the Board due to the model of ad hoc appointed committees. Although the Board's final decision can be found on the NAB's website (with several months' delay, after the decision has entered into force), it cannot be considered as adequate feedback mechanism towards evaluation committees. Finding the decision on the website requires significant effort on the part of the evaluator, and moreover, it does not provide any explanation for cases when the Board's decision differs from the committee's standpoint. It also provides no explanation for cases when the proceedings had been terminated.

The responses of evaluators also pointed to a time lag between finalization of the committee's work and their remuneration. It is largely due to the provision in the Rules of Procedure for Evaluation Committees, according to which the members can be remunerated only after the Board's decision on the concerned application for accreditation. Nevertheless, it is sometimes released with a longer delay after receipt of the committee's standpoint for various procedural reasons.

Another finding has shown that the model of ad hoc appointed evaluation committees with different composition for every application for accreditation carries the risk (actually confirmed in practice) that individual committees apply different criteria and interpret the standards for accreditation in different ways. The existence of NAB's methodical guidelines, which further explain and specify the standards for accreditation, can influence this fact only to a limited extent, because it is primarily a matter of

expert assessment (not a mechanical box-ticking exercise for all standards) that considers the specific context of each degree programme.

#### Evaluation Committees for Institutional Accreditation

The most significant shortcomings or problematic areas identified in the survey are the overly formal nature, generality, opacity and complexity of standards for accreditation. A related issue is the problem of the content and structure of the received applications for accreditation; the committees must in some cases request additional information needed for the ad hoc assessment.

It is necessary to improve feedback mechanisms towards evaluators with regards to the final accreditation decision of the Board, especially in cases when the Board takes a decision different to the committee's standpoint.

The lack of a functional follow-up mechanism for HEIs with institutional accreditation is no less significant a finding. Even though a HEI with institutional accreditation is entitled to accredit its own degree programmes in the relevant fields of study, NAB still has the duty to continuously care for its quality.

*Detailed outputs from the survey conducted among evaluators enrolled in the Pool of Evaluators are attached to this report.*

#### **4. Conclusions and Recommendations**

The Board of NAB adopts the following recommendations on the basis of the findings and evaluation.

Recommendations related to the analysis of evaluation committees and accreditations:

- 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.
- To reconsider the current rules adopted by NAB in relation to remuneration of evaluation committees after they finish their activities.
- To adopt measures leading to harmonization of assessment practice in evaluation committees, for example through seminars and other forms of good practice sharing; in the medium term to assess experience with the current model of ad hoc appointed evaluation committees.
- To revise methodical guidelines for preparation and assessment of applications for accreditation and related procedures on the basis of the experience to date.
- To create and implement follow-up procedures for quality assurance of HEIs with institutional accreditation.

System-level recommendations:

- To support and initiate further discussion with evaluators and other stakeholders about experience with the activities of NAB and possible changes to its operations, and possibly also to legislation, in order to improve the external quality assurance system in higher education and to make it more effective.
- To open discussion on changes in the Statute that would make the operations of NAB simpler and more flexible; considering and incorporating the existing experience with respect to application of the Statute and the ESG.

- 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.
- 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 yet fully implemented.
- To commence preparation for external review of compliance with the ESG with a detailed analysis of the level of compliance and also identification of steps to achieve full compliance as soon as possible.

Approved by the Board of NAB at its meeting No. 8/2019 on 29 August 2019.

## **Attachment to Internal Evaluation Report of NAB 2016–2019**

### **Analysis of the Evaluators Survey Outputs**

#### Degree Programmes

The survey addressed over 80 people enrolled in the Pool of Evaluators in various fields of study and from various spheres (HEIs, research, employers, public administration, students). 32 evaluators (37%) returned the completed questionnaire. The questions focused on the opinion and experience of evaluators with individual aspects of evaluation committees and their activities: the overall evaluation committees model (with specific questions about the process of their establishment, deadlines, the expert report element, feedback about the Board's decision on accreditation), content and form of standards for accreditation, methodical guidelines for assessment of application, methodical guidance and cooperation with the Office of NAB and comparison with the previous assessment procedures in the Accreditation Commission until 2016. The evaluators used a four-point grading scale (excellent – good – weak – unsatisfactory) with the exception of questions on standards for accreditation and comparison with the Accreditation Commission that used a three-point scale. At the same time, they had the opportunity to give written comments and suggestions for improvement to each question.

With respect to individual aspects of the activities of evaluation committees, the majority of evaluators gave a positive evaluation (predominance of “excellent”, “good”) in almost all areas. An exception is the feedback on the final decision of the Board towards evaluation committees that had assessed the concerned application for accreditation (a half of the evaluators consider it weak or unsatisfactory). According to a number of respondents, there is generally no feedback or information about the final decision. Criticism was also targeted at the process of establishment of evaluation committees, methodical guidelines of NAB and the current model of evaluation committees. The survey showed that evaluators consider the current system as functional within what is possible (the majority graded it positively), but at the same time they are aware of a number of deficiencies and weaknesses (lengthy comments describing a number of issues).

The Office of NAB has been evaluated highly positively in terms of methodical guidance and communication with evaluation committees. Negative comments were mainly aimed at remuneration of committee members and the related administrative burden on the evaluators' part as well as the time lag in receiving the remuneration. It was also recommended to improve coordination in appointing individual evaluators to committees in order to prevent overload of some evaluators.

Some critical remarks were made to the fact that standards for accreditation are not conceived differently for various areas of study and do not respect the differences between scientific fields or fields of study. The standards should reflect international standards in individual fields and expert from the respective fields should be involved in their development. In addition, they are confusing and duplicate in some parts. Certain ones are too general and unclear while others go into too much detail. According to the survey results, criteria for determining the fields of study that a degree programme belongs to are also not clearly defined, which complicates the assessment of applications.

Methodical guidelines are generally considered as appropriate, but according to some responses they do not support harmonized assessment across evaluation committees with regards to application of

the standards and the depth of analysis of applications. The MS Excel format of the expert report was seen as user unfriendly.

Regarding the activities of evaluation committees, many evaluators responded that it is not clear in the current system what significance or role the standpoint of the evaluation committee has in relation to the respective member of the Board and the Board itself. That can be perceived very negatively by the evaluators especially when the final accreditation decision of the Board differs from the standpoint of the committee. An idea was suggested to create smaller permanent “advisory groups” to each Board member, which should induce greater direct engagement of evaluators and harmonization of assessment practice.

The evaluators also frequently mentioned specific issues related to the operation of a large number of ad hoc appointed evaluation committees for individual proceedings, i.e. expertise of committee members (connected to frequent refusals of members to draw up the expert report) that does not correspond to the degree programme, different criteria in terms of interpretation and compliance with standards for accreditation, inadequate remuneration, formal nature and administrative burden of assessment (excessive length of applications), passivity and lack of cooperation of committee members other than the author of the expert report, lack of capacity to hold face-to-face meetings of committees. Special attention should be paid to the training of evaluators from among students and employers, whose participation in assessment is often merely formal. One response suggested offering special trainings or establishing a mentor/guarantor who would systematically work with these evaluators. There was also a proposal to make better use of the so-called committee’s minority standpoint<sup>3</sup>. Respondents also suggested harmonizing the views on application of standards for accreditation through workshops and trainings beyond the introductory training. Some evaluators commented positively on the diversity in composition of evaluation committees.

Those evaluators that have experience with the Accreditation Commission through participation in working groups described the current assessment model in roughly equal numbers as comparable or worse than the previous one. Only 2 out of 13 respondents ranked it as better. It seems to be the comparison with a system different both in design and function that is key for this outcome of the survey. The written comments repeatedly mentioned high administrative burden, clumsiness and tediousness of the present model of ad hoc appointed evaluation committees for individual accreditation proceedings. This workload then leads to frequent discussions about the applications via e-mail only, which minimizes or entirely eliminates a scholarly debate in the committee. Referring to the Accreditation Commission, the evaluators largely emphasized better guarantees of consistency in assessment and comparability of decisions in comparable cases, supporting also harmonization of assessment practice and criteria thanks to permanent working groups. The model of ad hoc appointed committees also lacks the possibility of keeping knowledge about the history of a degree programme when it is assessed again after several years. Positive remarks were given to the current good cooperation within evaluation committees and to the objectivity, flexibility and independence of assessment (while other evaluators believe that the objectivity of assessment compared to the Accreditation Commission is not higher – it is still a peer review).

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<sup>3</sup> Used as a part of the committee standpoint in case of different opinions within a committee to enable voicing of these opinions to the Board.



To summarize, the survey on the operation of evaluation committees for assessment of accreditation of degree programmes revealed primarily the following problematic areas that NAB should pay attention to:

- missing functional mechanism of feedback about final accreditation decision towards the evaluation committee that assessed the concerned application;
- suggestions resulting from comparison of the current evaluation committees to permanent working groups of the Accreditation Commission – administrative burden and clumsiness of the current system, low consistency in assessment;
- lack of harmonization in assessment across committees;
- mismatched expertise of committee members in relation to the assessed programme, ineffective process of establishing evaluation committees;
- merely formal involvement of students and evaluators from among employers in the committees' work;
- excessive workload of some evaluators, administrative burden related to assessment;
- lacking standards specific for study fields and opacity of the current standards;
- format of the expert report.

### Institutional Accreditation

The survey addressed over 80 people enrolled in the Pool of Evaluators in various fields of study and from different spheres (HEIs, research, employers, public administration, students); not all of whom have experience in the procedure of institutional accreditation. 25 evaluators (29%) returned the completed questionnaire. The questions focused on the opinion and experience of evaluators with individual aspects of institutional accreditation: introduction of institutional accreditation to the quality assurance system in higher education, the overall evaluation committees model (with specific questions targeted at the activities of subcommittees, organization and course of site visits, mode of operation of the large committee), content and form of standards for accreditation, methodical guidelines for assessment of applications, methodical guidance and cooperation with the Office of NAB and comparison with the previous assessment procedures in the Accreditation Commission until 2016. The evaluators used a four-point grading scale (excellent – good – weak – unsatisfactory) with the exception of the questions on standards for accreditation that used a three-point scale. At the same time, they had the opportunity to give written comments and suggestions for improvement to each question. Apart from the survey, NAB also incorporated the feedback received from evaluators engaged in institutional accreditation outside the framework of this internal evaluation.

Regarding the above-mentioned areas, evaluators responded mostly positively in all of them (predominance of “excellent”, “good”), but the proportion of negative evaluation (“weak”, “unsatisfactory”) was generally higher than in the feedback to the evaluation committees for degree programmes. The most negative opinions concerned the introduction of institutional accreditation, the mode of operation of the large committee and the standards for accreditation. On the other hand, cooperation with the Office of NAB, activities of subcommittees and methodical guidelines seem to be the least problematic.

The introduction of institutional accreditation as a new element of quality evaluation is perceived by some evaluators as a desired enhancement of the HEIs' autonomy, support to their development and simplification of the accreditation system. According to others, it has brought an increase in

administrative burden for HEIs. At the same time, they point out the risk that institutional accreditation will also be granted to HEIs that do not have sufficiently well-developed internal quality assurance systems, which will subsequently lead to decline in the overall quality of higher education. There is a worry that HEIs will internally accredit degree programmes that NAB would not accredit through degree programme accreditation. Evaluators also expressed their impression of a rather formal nature of assessment during the institutional accreditation procedure and pointed to the importance of follow-up mechanisms and continuous monitoring of carrying out educational activities. One suggestion pointed out that the general criteria do not consider specifics of individual fields of study, which has a negative impact on decision making by the Board. In this opinion, the Board does not sufficiently consider standpoints of subcommittees composed of experts in the given field of study and applies criteria that have not been officially codified and do not reflect the specifics of individual fields of study. It can be summarized that institutional accreditation as an idea is viewed positively, but concerns about its implementation and possible consequences of the current model on quality of higher education prevail. One of the respondents even recommended to abandon institutional accreditation altogether and to return to the former accreditation system (prior to the Higher Education Act Amendment in 2016).

Apart from stating the good functioning of the evaluation committees, the respondents raised suggestions in regard their activities of to the inadequate content of submitted applications that leads to the necessity to request additional information. They also proposed to work towards harmonization of the subcommittees' approaches within the large committee through more intensive communication or face-to-face meetings. Criticism was also raised with respect to the role of evaluation committees in institutional accreditation procedures; the evaluators perceived very negatively situations when the Board decides contrary to the committee's recommendation. For some evaluators, the outcome of assessment by the large committee, which can comprise many dozens of people, is too much of a compromise. In addition, this model forces committee members to vote on a resolution in fields of study that are entirely foreign to them even though they have the opportunity to familiarize themselves with all materials. However, in comparison to evaluation committees for degree programmes, evaluations committees for institutional accreditation were evaluated as functioning better.

The feedback provided by evaluators continuously aside from the survey pointed to, in addition to the above, the issue of too short a timeframe for the committee's work, the necessity to focus on follow-up mechanisms, the need for more detailed information about the assessment process and the procedures of committee's work including a recommended schedule for site visits, and the need for a more easy-to-follow system of exchange of constantly updated and extensive amount of documents between the committee, NAB and the HEI.

Most evaluators did not give specific comments on the content and form of standards for accreditation. The few comments that were made however showed that the standards do not sufficiently reflect the specifics of individual scientific disciplines and allow for differing interpretations by each committee or evaluator. Moreover, a number of standards are duplicate, which makes them confusing and complicated.

Methodical guidelines have not been subject of extensive written feedback either. The opinions that were voiced reacted to inappropriate structure of submitted information in applications for

accreditation (does not correspond with the structure of the expert report) and low user-friendliness of the expert report template in MS Excel.

Office of NAB was evaluated very positively in terms of methodical guidance and communication with evaluation committees. Some minor negative comments related to remuneration of evaluation committees. A recommendation was made to improve coordination in recruiting potential committee members.

To summarize, the survey on the operation of evaluation committees for assessment of institutional accreditation revealed primarily the following problematic areas that NAB should pay attention to:

- the risk of predominantly formal nature of evaluation that will not allow differentiation between HEIs with a sufficiently developed and functional internal quality assurance system and those that do not fulfil the requirements for institutional accreditation;
- the need to create and implement functional mechanisms for follow-up of quality;
- overly formal, general, confusing and complicated standards for accreditation;
- the perceived inadequate level of communication with evaluation committees by the Board, particularly in cases when the Board decides contrary to the committee's (or subcommittee's) standpoint, despite the theoretical existence of an informal feedback mechanism;
- a clumsy operation of committees that consist of a high number of people, different application of standards by individual subcommittees, approval of standpoints exclusively per rollam;
- the content and structure of applications that do not correspond to the needs of evaluation committees;
- the need to make organization of site visits more effective, to clarify procedures and requirements both to committee members and to HEIs;
- the format of the expert report.