

Action plan for the external review of
The National Accreditation Bureau for Higher Education,
Czech Republic

Action plan for the external review of the National Accreditation Bureau for Higher Education, Czech Republic



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1. Introduction

This action plan has been developed as one of the outputs of the SEQA-ESG project, in which MEYS has been partner between 2020 and 2022. The document outlines the steps NAB plans to take in order to reach compliance with the ESG. Becoming a full member of ENQA and a registered agency in EQAR through ESG compliance has been a priority of NAB with the support of MEYS as the policy-maker in higher education. The action plan is largely based on the National Action Plan for Quality Assurance Development in the Czech Republic that had been created in the framework of the SEQA-ESG project by MEYS. In this document, the action lines directly related to the activities of NAB are further elaborated and translated into clear objectives, tasks, and timelines.

In the process of production of the action plan, a series of meetings between NAB's Chair, Vice-Chairs and senior staff members was conducted in September 2022 to identify outstanding issues and possible ways to effectively tackle them. Following those sessions, a draft of the action plan was prepared, and further discussions were held to fully develop the ideas put forward in the document. The final version of the action plan was approved by NAB's Chair on 30 September 2022 and will be presented to the Board of NAB at its October 2022 meeting.

2. History and profile of the agency

NAB has undergone one external review and one preliminary external review, both related to the recognition of the Czech accreditation system of basic medical education by the respective U.S. authorities.

In 2019, NAB was granted the recognition status by the U.S. National Committee on Foreign Medical Education and Accreditation for a six-year period. The Committee issued the recognition status to the Czech national system of quality assurance in higher education, i.e., to NAB, based on the compatibility with the U.S. system.

In September 2022, NAB successfully passed the preliminary review by the World Federation for Medical Education (WFME), which means it is eligible for the WFME Recognition of Accreditation Programme. The Programme evaluates accrediting agencies against internationally accepted criteria for accreditation of basic medical education.

3. Follow-up to the national action plan – Action lines

	Action line	Effort	Impact
1	Independence of NAB	5	5
2	Aligning external quality assurance processes with the ESG	5	5
3	Further development of the Pool of Evaluators	3	4
4	Thematic analysis	2	2
5	Revision of accreditation standards	3	3

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1	Title	Independence of NAB	
Objectives	<ul style="list-style-type: none"> • Achieve organisational independence from MEYS • Enhance operational independence • Establish a legal definition of the nature of NAB • Ensure NAB's autonomy in managing resources 		
Specific tasks		Responsible(s)	Timeline
1	Sign a NAB-MEYS memorandum on the independence of NAB	Robert Plaga, Chair of NAB	March 2023
2	Identify most suitable legal form and financing arrangements for NAB	Robert Plaga, Chair of NAB	December 2022
3	Propose a change to HEA regarding NAB's legal status	Robert Plaga, Chair of NAB	December 2023
Outcomes	<ul style="list-style-type: none"> • In the short term, written guarantees of non-interference of MEYS into NAB's operations by financial, administrative, or technical means • In the long term, establishment of NAB as a legal entity/personality in HEA • Greater organisational, financial, and administrative separation from MEYS 		
Risks		Mitigation actions	
Reluctance of political actors to create another public administration agency		Emphasize the ESG requirement as a precondition for admittance into ENQA and EQAR, gain support of large HEIs for this aim	
Reluctance of political actors to commit the financial resources needed for an independent agency		Impose fees on HEIs for external QA procedures; diversify financing (projects etc.)	
Length of the legislative process, unexpected bottlenecks		Once the legislative proposal is submitted to MEYS by NAB and subsequently to the government by MEYS, very little control can be exercised over further developments in the legislative process.	
Adverse impacts of new organisational hierarchy on NAB's operations, imbalance between bodies of NAB		Distribute competences within NAB in a suitable manner, implement checks and balances to the organisational set-up	
Effort		Impact	
Score	Comments	Score	Comments
5	Fully resolving the issue of independence requires creating a new government-funded public administration agency. The solution involves great effort of multiple actors politically, and also during execution of this political decision, if taken.	5	Establishment of NAB as an independent agency with its own staff and budget would mean a major change to a number of aspects of its operation. It would bring new challenges but also solve many current issues.
Additional comments			
Looking at other similarly placed public administration agencies, there are multiple legal forms that could be relevant for NAB in order to become a fully independent agency. They differ in a number of aspects and have their specific strengths and weaknesses that must be considered.			

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Selection of the legal form and financial arrangements for NAB is a heavily loaded question both politically and practically. A number of organisational and operational aspects have to be thought through and agreed on before the full independence of NAB can become a reality.

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2	Title	Aligning external quality assurance processes with the ESG	
Objectives		<ul style="list-style-type: none"> • Adjust the procedures to make better use of the evaluators' and staff capacities • Incorporate site visits as a fixed part of the peer-review method in programme accreditation • Make the review reports more comprehensive • Ensure publication of peer review reports 	
Specific tasks		Responsible(s)	Timeline
1	Propose a legal provision to HEA to enable publication of full review reports, overriding the Administrative Procedures Act	Robert Plaga, Chair of NAB	In progress – this provision is already part of a HEA amendment that is being prepared by MEYS
2	Set up a mechanism to group programmes into single assessments, i.e. by faculties	Robert Plaga, Chair of NAB	March 2023
3	Adjust programme accreditation procedure in the Statute to incorporate obligatory site visits	Robert Plaga, Chair of NAB	March 2023
4	Issue new guidelines for writing review reports in line with ESG 2.6	Jiří Smrčka, Director of Office	June 2023
5	Redefine staff roles in supporting evaluation committees and build capacities in the Office	Jiří Smrčka, Director of Office	June 2023
6	Introduce briefing of evaluation committees into each procedure	Jiří Smrčka, Director of Office	June 2023
7	Redefine the role of rapporteurs (Board members) in the Statute	Robert Plaga, Chair of NAB	March 2023
8	Revise the mechanism for dealing with HEIs' comments to draft review reports	Jiří Smrčka, Director of Office	June 2023
Outcomes		<ul style="list-style-type: none"> • Increased efficiency of programme accreditation procedures for HEIs, evaluators, NAB Office and the Board • More comprehensive, consistent and contextualized assessment, increased relevance of the report for the respective HEI and the public • Capacity building among the evaluators • More transparency and access to information on the quality of HE 	
Risks		Mitigation actions	
Failure of the amendment to HEA during the legislative process		Once the legislative proposal is submitted to the MEYS by NAB and subsequently to the government by MEYS, very little control can be exercised over further developments in the legislative process.	
Lack of willingness of HEIs to adhere to the time		Intensively negotiate, put emphasis on	

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windows created for submission of applications in order to group them	explaining the purpose and the benefits to HEIs (single procedure)
Lack of capacities to carry out site visits for all programmes in the cases when NAB is unable to group programmes	Amend HEA by incorporating site visits to programme accreditation procedure (amendment in progress), expand NAB's resources accordingly, react flexibly to incoming applications for accreditation
Excessively prolonged procedures due to multiple programmes to be assessed and possible scheduling issues (briefings, meetings, site visits etc.)	Plan events well in advance, implement good communication with HEIs and evaluators, ensure time management by NAB staff, use online format of meetings as needed
Overburdening of NAB Office, lack of time capacities to adequately support evaluation committees	Separate roles in NAB Office between administrative support of committees and support in expert assessment, better plan ahead thanks to the periodic windows for submission of applications, adjust the timing of other activities, hire more staff (if the conditions of the civil service structure permit)
Refusal of evaluators to participate in procedures due to the increased requirements on their work	Give maximum support from NAB staff, communicate effectively with evaluators, improve procedures based on their feedback, relieve evaluators from formal control and tasks that do not require their specific expertise, identify motivating factors and support recognition of evaluators by their HEIs, foster the added value of procedures for evaluators (their own capacity building and development as QA experts)
Accreditation fatigue on the side of HEIs and evaluators	Improve procedures based on their feedback, encourage HEIs to plan ahead and submit grouped applications whenever possible
Effort	
Score	Comments
5	Achieving the abovementioned objectives involves adapting the entire programme accreditation procedure as well as applying new requirements on evaluators and NAB staff. Several regulations need to be amended and new guidelines must be developed to support this change.
Impact	
Score	Comments
5	If successful, the changed procedure will bring a number of benefits to HEIs and the public. It will be aligned with the ESG, significantly increasing the chances of NAB to become internationally recognized.
Additional comments	
Task 2 – Currently, NAB is bound by the Administrative Procedures Act in that HEIs may submit applications for accreditation in any number and at any time at their own discretion. NAB intends to negotiate with HEIs to agree on establishing periodic windows of time when HEIs may submit applications that NAB will then group together to be assessed in a single procedure. NAB will still be obliged to assess applications that are submitted outside those agreed time frames but will aim to gradually establish this mechanism as the new practice accepted across the sector. In the	

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longer term, NAB will attempt to incorporate the mechanism into HEA, overriding the Administrative Procedures Act.

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3	Title	Further development of the Pool of Evaluators	
Objectives		<ul style="list-style-type: none"> • Achieve high expertise of the evaluators • Solidify a core of reliable, involved, and experienced evaluators • Provide contextualized assessment sensitive to the specifics of disciplines • Ensure a meaningful role of students and their active engagement in external QA procedures 	
Specific tasks		Responsible(s)	Timeline
1	Create a comprehensive introductory briefing and training compulsory for all evaluators	Jiří Smrčka, Director of Office	In progress – a set of briefing materials have been developed, to be supplemented by training materials by March 2023
2	Implement feedback mechanisms towards evaluators regarding their engagement in procedures	Jiří Smrčka, Director of Office	March 2023
3	Introduce briefing of evaluation committees into each procedure	Jiří Smrčka, Director of Office	June 2023
4	Use the potential of permanent committees for evaluation methodology in peer mentoring and for transfer of experience between evaluation committees and the NAB Board	Robert Plaga, Chair of NAB	September 2023 (piloting of several permanent committees)
5	Systematically monitor quality of evaluators, identify, and cultivate a core group of most reliable and experienced evaluators	Jiří Smrčka, Director of Office	Ongoing
6	Define and enhance the role of student evaluators through the student member of the NAB Board	Robert Plaga, Chair of NAB	September 2023
Outcomes		<ul style="list-style-type: none"> • Capacity building among the evaluators • Closer relationship and increased trust among the Board, evaluators and NAB staff • Increased trust of HEIs in external QA procedures • More active involvement of students in external QA procedures 	
Risks		Mitigation actions	
Lack of interest of evaluators in introductory training/briefing		Make training/briefing compulsory, use a variety of flexible tools (e-learning, webinars, recordings), communicate with evaluators individually to ensure their participation, focus on practicality of sessions	
Excessive delays in external QA procedures due to scheduling issues related to committee		Plan and inform (potential) committee members about dates in advance, use online	

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briefing		tools and good communication for scheduling	
Lack of systematic approach to work of permanent committees because they have different chairs (always the respective rapporteur-Board member for the discipline)		Designate one coordinating supervisor to the activities of permanent committees (Chair or a Vice-Chair of NAB), discuss the outcomes at Board meetings	
Lack of interest of students to participate in external QA procedures or only passive involvement		Involve the student member of the NAB Board as facilitator of communication, clearly define role/tasks of students in assessment, show the benefits of participating in QA, incentivize HEIs to acknowledge student participation in QA	
Effort		Impact	
Score	Comments	Score	Comments
3	Compared to previous action lines, this action does not require an overarching change but rather building on work that has already started in this area.	4	If executed properly, these activities could have a significant positive impact on the quality of the Pool of Evaluators as well as on the work of NAB overall.
Additional comments (optional)			
Task 6 – The aim is to start by establishing a good communication mechanism with the student community through the student member of the NAB Board (a new person replaced the previous student member as of 1 September 2022). Thanks to his connections in the student organizations and community, he is well positioned to pass on feedback between the Board and the students and to play a key role in activating the student evaluators.			

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4	Title	Thematic analysis	
Objectives		<ul style="list-style-type: none"> • Play a greater role in shaping higher education policy • Share NAB's expertise and data with the public and stakeholders • Improve NAB's activities on the basis of impact analysis 	
Specific tasks		Responsible(s)	Timeline
1	Create a plan for thematic analyses detailing topics, data sources, methods, teams, timeframes, dissemination strategies	Robert Plaga, Chair of NAB	September 2023
2	Explore possibilities for and secure collaboration of possible external partners	Robert Plaga, Chair of NAB	December 2023
3	Carry out first thematic analysis project(s)	Jiří Smrčka, Director of Office	March 2024
Outcomes		<ul style="list-style-type: none"> • Profiling of NAB as a source of analytical knowledge on HE • Greater impact on the HE sector and policy • In the longer term, feedback on the NAB's external QA activities through tracking of developments in HE 	
Risks		Mitigation actions	
Lack of time capacities inside NAB to carry out thematic analysis		Make effort to expand the size of NAB Office, use existing data as much as possible, have new data collected by an external partner	
Dominant role of external partner and reduced role of NAB in the case of collaboration		Clearly divide tasks and contributions to the project, ensure ownership of the results by NAB, prefer expansion of NAB Office rather than outsourcing	
Low outreach of thematic analysis		Ensure high quality and relevance of thematic analysis, focus on dissemination	
Effort		Impact	
Score	Comments	Score	Comments
2	This score presumes that NAB Office will either be expanded, or thematic analysis will be carried out in collaboration. Carrying out thematic analysis, along with handling all the other upcoming changes, solely in the currently sized NAB Office would be very challenging.	2	The impact of thematic analysis will continue to increase in the long term as larger volume of thematic analyses is gradually created.
Additional comments (optional)			

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5	Title	Revision of accreditation standards	
Objectives	<ul style="list-style-type: none"> • Update the government regulation on accreditation standards • Incorporate the accumulated experience with application of the standards in external QA procedures • Make standards easier to read and more relevant for every-day use 		
Specific tasks		Responsible(s)	Timeline
1	Collect feedback on the current standards and input for changes from external and internal stakeholders	Jiří Smrčka, Director of Office	June 2023
2	Draft a revision of the standards	Robert Plaga, Chair of NAB	September 2023
3	Discuss the draft revision with stakeholders and agree on final version	Robert Plaga, Chair of NAB	December 2023
4	Submit draft regulation to MEYS for submission to the government	Robert Plaga, Chair of NAB	January 2024
Outcomes	<ul style="list-style-type: none"> • Inclusion of recent trends and developments in HE in the standards (distance learning etc.) • Incorporation of NAB's experience and current assessment practice into the government regulation • Ensured full coverage of ESG Part 1 • Clearer, consistent, more comprehensible standards • Greater ownership of the standards by NAB (current government regulation was adopted prior to the establishment of NAB) 		
Risks		Mitigation actions	
Lack of consensus on necessary changes in standards among stakeholders		Embed the changes in current assessment practice as much as possible, place emphasis on explaining the reasoning behind changes, allow sufficient time for discussions and exchange of opinions, strive for consensus	
Lack of willingness of MEYS to submit the draft to the government		Maintain good communication with MEYS, make clear that the revision of standards is a priority, incorporate topics/issues that MEYS has been developing policy on	
Effort		Impact	
Score	Comments	Score	Comments
3	The score reflects the fact that the majority of changes will build on existing practice and on work already done (e.g. a past project on distance learning standards).	3	The medium score is related to the fact that the intention is not a revolutionary change but rather inclusion of the assessment practice up-to-date into the government regulation.
Additional comments (optional)			

4. Preparatory steps for the agency's self-assessment and SWOT

The aim of becoming a member of ENQA and being registered on EQAR has been set as a priority of both NAB and MEYS and supported by relevant HE stakeholders in the Czech Republic.

The following steps are foreseen in preparation of NAB's self-assessment and SWOT analysis:

- Decision by the NAB's Board to apply for ENQA membership and for registration on EQAR, approval of a timeline
- Appointment of (a) Board's member(s) to supervise the process and report to the Board
- Appointment of a working group to carry out SWOT analysis and elaborate the draft of the SAR
- Identification of and contacting stakeholders who could contribute to the SWOT analysis and the content of the SAR
- Development of a plan by the working group in cooperation with senior NAB staff to prepare the SAR; distribution of tasks; setting up a timeline
- Collection of internal and external feedback to feed into the SWOT analysis and the SAR
- Elaboration of the draft, specification of supporting documentation / annexes
- Review of the draft and of the choice of supporting documentation by the appointed member(s) of the Board, senior NAB staff and relevant stakeholders
- Based on the feedback, a joint discussion leading to consensus on the final version of the SAR
- Submission to the Board for approval
- Translation into English

5. Calendar

Approximated date for requesting an agency review

June 2024

Approximated date for the site visit

April 2025

Action line	Specific tasks/steps	Responsible	Timeline
Aligning external quality assurance processes with the ESG	Propose a legal provision to HEA to enable publication of full review reports, overriding the Administrative Procedures Act	Robert Plaga, Chair of NAB	In progress
Further development of the Pool of Evaluators	Systematically monitor quality of evaluators, identify, and cultivate a core group of most reliable and experienced evaluators	Jiří Smrčka, Director of Office	Ongoing
Independence of NAB	Identify most suitable legal form and financing arrangements for NAB	Robert Plaga, Chair of NAB	December 2022
Independence of NAB	Sign a NAB-MEYS memorandum on the independence of NAB	Robert Plaga, Chair of NAB	March 2023
Aligning external quality assurance processes with the ESG	Set up a mechanism to group programmes into single assessments, i.e., by faculties	Robert Plaga, Chair of NAB	March 2023
Aligning external quality assurance processes with the ESG	Adjust programme accreditation procedure in the Statute to incorporate obligatory site visits	Robert Plaga, Chair of NAB	March 2023
Aligning external quality assurance processes with the ESG	Redefine the role of rapporteurs (Board members) in the Statute	Robert Plaga, Chair of NAB	March 2023
Further development of the Pool of Evaluators	Create a comprehensive introductory briefing and training compulsory for all evaluators (supplement briefing materials with training materials)	Jiří Smrčka, Director of Office	March 2023
Further development of the Pool of Evaluators	Implement feedback mechanisms towards evaluators regarding their engagement in procedures	Jiří Smrčka, Director of Office	March 2023
Aligning external quality assurance processes with the ESG	Issue new guidelines for writing review reports in line with ESG 2.6	Jiří Smrčka, Director of Office	June 2023
Aligning external quality assurance processes with the ESG	Redefine staff roles in supporting evaluation committees and build capacities in the Office	Jiří Smrčka, Director of Office	June 2023
Aligning external quality assurance processes with the ESG / Further development of the Pool of	Introduce briefing of evaluation committees into each procedure	Jiří Smrčka, Director of Office	June 2023

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Evaluators			
Aligning external quality assurance processes with the ESG	Revise the mechanism for dealing with HEIs' comments to draft review reports	Jiří Smrčka, Director of Office	June 2023
Revision of accreditation standards	Collect feedback on the current standards and input for changes from external and internal stakeholders	Jiří Smrčka, Director of Office	June 2023
Further development of the Pool of Evaluators	Use the potential of permanent committees for evaluation methodology in peer mentoring and for transfer of experience between evaluation committees and the NAB Board	Robert Plaga, Chair of NAB	September 2023
Further development of the Pool of Evaluators	Define and enhance the role of student evaluators through the student member of the NAB Board	Robert Plaga, Chair of NAB	September 2023
Thematic analysis	Create a plan for thematic analyses detailing topics, data sources, methods, teams, timeframes, dissemination strategies	Robert Plaga, Chair of NAB	September 2023
Revision of accreditation standards	Draft a revision of the standards	Robert Plaga, Chair of NAB	September 2023
Independence of NAB	Propose a change to HEA regarding NAB's legal status	Robert Plaga, Chair of NAB	December 2023
Thematic analysis	Explore possibilities for and secure collaboration of possible external partners	Robert Plaga, Chair of NAB	December 2023
Revision of accreditation standards	Discuss the draft revision with stakeholders and agree on final version	Robert Plaga, Chair of NAB	December 2023
Revision of accreditation standards	Submit draft government regulation to MEYS for submission to the government	Robert Plaga, Chair of NAB	January 2024
Thematic analysis	Carry out first thematic analysis project(s)	Jiří Smrčka, Director of Office	March 2024

Preparatory steps for the SAR

Decision to apply for ENQA membership and for registration on EQAR, approval of a timeline	Board of NAB	May 2024
Appointment of (a) Board's member(s) to supervise the process and report to the Board	Board of NAB	May 2024

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Appointment of a working group to carry out SWOT analysis and elaborate the draft of the SAR	Presidium of the Board	May 2024
Identification of and contacting stakeholders who could contribute to the SWOT analysis and the content of the SAR	Presidium of the Board	May 2024
Development of a plan by the working group in cooperation with senior NAB staff to prepare the SAR; distribution of tasks; setting up a timeline	Working group	May 2024
Collection of internal and external feedback to feed into the SWOT analysis and the SAR	Working group	July 2024
Elaboration of the draft, specification of supporting documentation / annexes	Working group	September 2024
Review of the draft and of the choice of supporting documentation	Appointed Board's member(s), senior NAB staff, stakeholders	October 2024
Based on the feedback, a joint discussion leading to consensus on the final version of the SAR	Board, working group, other relevant Office members	November 2024
Submission to the Board for approval	Working group	November 2024
Translation into English	Agency	December 2024
Submission of the SAR, along with supporting documentation, to the review coordinator	Robert Plaga, Chair of NAB	December 2024

6. Conclusions

The action plan outlines the main challenges of NAB in reaching compliance with the ESG and presents foreseen actions to solve these challenges. It serves as a detailed plan for action with indicative timelines while leaving room for adaptation of the action lines according to developments in the higher education sector and on the policy-making level. Importantly, this documents also accounts for risks associated with the foreseen actions and provides ways to tackle them. As one of the main outcomes of the SEQA-ESG plan for the Czech external quality assurance system, it is a key reference document for NAB's path to ESG compliance.

Participation in the SEQA-ESG project gave NAB the impetus to make major changes in the legal framework as well as in its internal processes. The national counselling visit and the progress visit brought great value by providing in-depth expert opinions on the Czech external quality assurance system in comparison to other ESG-compliant systems in the EHEA. This external perspective helped NAB to critically reflect on its own operations and regulations. The exploration of possible solutions and good practices was greatly enhanced by peer learning workshops. The format of the workshops ensured constructive exchange between ENQA representatives, ESG-compliant agencies and project participants but also between the project participants from different institutions and systems.

NAB considers the key value of the project to be the peer approach that fosters an open and supportive yet critical environment for discussion and reflection on all quality assurance-related matters. The willingness of all participants and experts to openly share their experience and good practice as well as concerns and risks has been greatly appreciated throughout the project and beyond.

List of acronyms

EHEA	The European Higher Education Area
ENQA	The European Association for Quality Assurance in Higher Education
EQAR	The European Quality Assurance Register for Higher Education
ESG	The Standards and Guidelines for Quality Assurance in the European Higher Education Area
HE	higher education
HEA	The Higher Education Act (law governing higher education and quality assurance in the Czech Republic)
HEI	higher education institution
MEYS	Ministry of Education, Youth and Sports, Czech Republic
NAB	National Accreditation Bureau for Higher Education, Czech Republic
SAR	Self-Assessment Report (for the purposes of ENQA external review against the ESG)
SEQA-ESG	Supporting European QA Agencies in meeting the ESG (project funded by the European Commission under Erasmus+)