Approval of the Application
by the Commission for Accreditation and Quality Assurance (CAQA)
for Inclusion on the Register

Application of: 15/10/2013
External review report of: December 2012
Review coordinated by: ENQA
Review panel members: Ossi Lindqvist (Chair), Maria Weber (Secretary), Liliana Duguleana, Andrée Sursock, Daniel Derricott
Decision of: 29 November 2014
Registration until: 31 December 2017
Absented themselves from decision-making: none

1. The application of 15/10/2013 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee considered the external review report of December 2012 on the compliance of CAQA with the European Standards and Guidelines (ESG).
3. The Register Committee further considered CAQA’s comments on the external review report as well as the clarification letter of 17/04/2014.
4. On the basis of the above-mentioned documentation the Register Committee was unable to conclude that CAQA substantially complies with the ESG and, therefore, invited the agency to make additional representation on the reasons for a possible rejection of its application.
5. CAQA made additional representation on 29/08/2014. The Register Committee considered the application taking into account the representation as well as a further update submitted on 30/10/2014.

Analysis:

6. With regard to the specific European Standards and Guidelines, the Register Committee considered the following:

   ESG 2.2: The Register Committee noted the review panel’s recommendation for a systematic involvement of external stakeholders in particular in regards to the involvement of students and labour market representatives in the development and revision of CAQA’s external quality assurance methods.
ESG 2.3: The Register Committee noted the review panel’s recommendation to revise the current decision-making processes addressing the division of labour between external reviewers and CAQA members. The review report also recommends a more structured feedback process that would improve the decision-making of the external reviewers.

ESG 2.5: The review report stated that CAQA has been publishing on its website the reports on external quality control procedures and has decided to make available the reports on institutional and study programme accreditation starting with the up-coming re-accreditation cycle (p. 22, 23).

The Register Committee sought and received clarifications from CAQA on the publication of institutional and study programme accreditation reports. As of April 2014, CAQA only published reports on external quality control procedures in full, while reports accreditation reports were available as summaries only.

In its additional representation response, CAQA stated that it now publishes full reports on accreditation at both institutional and study programme level as well as on external quality control procedures.

The Register Committee noted the new publication routine and the evidence of published reports as provided by CAQA. The Register Committee also noted the Review Panel’s recommendation that the quality of reports (structure, content, style) should be reviewed in the next review of CAQA.

7. ESG 2.6: The review panel underlined the need for a more structured and systematic follow-up procedure. In its comment to the external review report, CAQA pointed out a number of changes in its approach to external quality control e.g. institutions that do not substantially comply in some areas will have to design an action plan to follow-up on the recommendations. The revised approach has been submitted for approval by the NCHE.

In its additional representation, CAQA stated that the revised approach has been adopted by NCHE and has been implemented since March 2014. The agency further explained that it has changed its external quality control approach to include more structured and systematic follow-up procedures.

Based on the evidence provided the Register Committee considered that CAQA has taken steps in order to ensure compliance with the standard. The Register Committee was, however, unable to analyse the consistent implementation of the follow-up procedures. The issue has therefore been flagged.
8. **ESG 3.4**: The external review report expressed concerns with CAQA’s human resource capacity and its financial dependence on the Ministry of Education.

The Register Committee noted the recent changes in the legislation, according to CAQA’s update to the additional representation, allowing CAQA itself to decide on its accreditation fees with approval of the NCHE and the Ministry.

The Register Committee further noted that CAQA has taken steps to improve its human resource capacity.

While the Register Committee was satisfied that CAQA is equipped with sufficient resources currently, it found that the sustainability of its resources warrant attention, including the question whether the approval process in deciding on fees appropriately takes into consideration CAQA’s resource needs. The issue has thus been flagged.

9. **ESG 3.6**: The review panel noted that CAQA “might be seen as an extension of NCHE rather than as an independent body in charge of external quality assurance” (p. 32). In analysing the matter further the panel found that CAQA had operational independence in defining its processes and procedures, while NCHE only had competences with regard to appeals. The review panel, however, expressed in its recommendation that there was a need to clarify the role and relation of the agency towards NCHE.

Given that there were several other indications that NCHE was, in fact, involved in certain other areas in CAQA’s operation the Register Committee sought and received additional clarifications from CAQA on its relationship with NCHE.

CAQA explained in its additional representation that NCHE decides on the standards and procedures used by CAQA based on the agency’s recommendation. As regards appeals, CAQA stated that NCHE considers the documentation presented by institutions, which it then returns to CAQA for additional comments and afterwards makes a final decision. CAQA noted that NCHE had changed its decision only in a negligible number of cases.

The Register Committee concluded that some steps were taken to ensure the independence of the agency, while the relation between CAQA and NCHE remains an issue for careful attention with regard to CAQA’s independence. This includes NCHE’s double role of both being involved in defining CAQA’s procedures as well as functioning as the appeal instance. The issue has therefore been flagged.

10. **ESG 3.7**: The review report stated that students are part of the sub-commission for the accreditation of higher education institutions and external quality control, but it did not address the involvement of students in accreditation of programmes.
The Register Committee received clarification from CAQA, stating that students were involved in drafting the self-evaluation reports and that it did not consider the involvement of students feasible due to the large number of accreditations of programmes.

In its additional representation, CAQA explained that the accreditation of existing programmes is included in the institutional accreditation process, where students are involved in the review.

However, students remain not involved in the accreditation of new study programmes. The issue has therefore been flagged.

**Conclusion:**

11. Based on the external review report and the considerations above, the Register Committee concluded that CAQA complies substantially with the ESG and therefore approved the application for inclusion on the Register.

CAQA’s inclusion shall be valid until 31/12/2017\(^1\).

12. The following issues have been flagged for particular attention when considering a potential application for renewal of inclusion. CAQA is expected to address these issues specifically in its next self-evaluation report, setting out whether the issue has been resolved or indicating what progress has been made. CAQA is further responsible for informing the coordinator of the next external review and the review panel of the need to address these issues in the external review report.

**ESG 2.6: Implementation of follow-up**

It should be addressed whether the follow-up procedures were implemented consistently.

**ESG 3.4: Resources**

It should receive attention whether CAQA’s resources have been sustainable to ensure its effective operation.

**ESG 3.6: Relation between CAQA and NCHE**

It should receive careful attention how the relationship between CAQA and NCHE influences its independence, especially with regard to NCHE’s double role of being involved in the development of procedures and criteria as well as serving as appeals instance.

**ESG 3.7: Involvement of students in accreditation of new programmes**

It should be addressed whether CAQA has involved students as members of the expert groups for accreditation of new programmes.

---

\(^1\) Inclusion is valid for five years from the date of the external review report, see §4.1 of the EQAR Procedures for Applications.