

ENQA AGENCY REVIEW

NATIONAL AGENCY FOR QUALITY ASSURANCE IN EDUCATION AND RESEARCH (ANACEC)

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EXECUTIVE SUMMARY

This report analyses the extent to which the National Agency for Quality Assurance in Education and Research (ANACEC) fulfils the requirements of Parts 2 and 3 of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). The review was conducted following the methodology described in the Guidelines for ENQA Agency Reviews, for the purposes of ENQA membership application and registration in EQAR. The report is the result of a detailed procedure that consists of the following steps: a self-evaluation process by ANACEC that includes the preparation and publication of a self-assessment report (submitted in May 2023), an online preparatory meeting between the panel and ANACEC on 6 June 2023, and a site visit of the review panel to ANACEC (18 to 20 of June 2023).

The National Agency for Quality Assurance in Education and Research (ANACEC) was established in 2018, through the absorption of the National Agency for Quality Assurance in Professional Education, the National School Inspectorate (NSI), and the National Council for Accreditation and Attestation (NCAA).

ANACEC's motto is: "We promote quality culture". According to its Mission, ANACEC *implements state policies and contributes to the development oriented towards the best international standards in the areas of competence assigned*. The functions established by the legislative and normative framework are carried out in two major areas: (1) *general education, vocational education and training, higher education and continuous professional training, and (2) research and innovation*.

In order to carry out its mission, the agency ensures and performs the following processes:

- quality evaluation in general education;
- quality evaluation in vocational education and training;
- quality evaluation in higher education;
- external evaluation of continuous professional training programmes;
- external evaluation of organizations in the fields of research and innovation;
- evaluation of the scientific and scientific-teaching staff.

The panel considered the evidence given in the self-assessment report, additional evidence requested by the panel and provided by the agency on its own initiative, and performed a site visit at ANACEC office, where meetings with a wide range of audiences were held.

The panel thoroughly analysed all the evidence and concluded that ANACEC complies with the ESG as follows:

- ESG 3.1 ACTIVITIES, POLICY AND PROCESSES FOR QUALITY ASSURANCE – Compliant
- ESG 3.2 OFFICIAL STATUS – Compliant
- ESG 3.3 INDEPENDENCE – Partially compliant
- ESG 3.4 THEMATIC ANALYSIS – Partially compliant
- ESG 3.5 RESOURCES – Partially compliant
- ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT – Compliant
- ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES – Compliant
- ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE – Partially compliant
- ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE – Partially compliant
- ESG 2.3 IMPLEMENTING PROCESSES – Compliant
- ESG 2.4 PEER-REVIEW EXPERTS – Compliant
- ESG 2.5 CRITERIA FOR OUTCOMES – Compliant

ESG 2.6 REPORTING – Compliant

ESG 2.7 COMPLAINTS AND APPEALS – Compliant

The panel made three commendations, thirty recommendations and eighteen suggestions for improvement.

In light of the documentary and oral evidence considered by it, the ENQA review panel is satisfied that, in the performance of its functions, ANACEC is in compliance with the ESG.

INTRODUCTION

This report analyses the compliance of the National Agency for Quality Assurance in Education and Research (Agenția Națională de Asigurare a Calității în Educație și Cercetare, ANACEC) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* for the purposes of ENQA membership application and registration in EQAR. It is based on an external review conducted from November 2022 to December 2023.

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

BACKGROUND OF THE REVIEW

ENQA's regulations require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they act in compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

As this is ANACEC's first external review, the panel is expected to pay particular attention to the policies, procedures, and criteria in place, being aware that full evidence of concrete results in all areas may not be available at this stage. ANACEC is applying for EQAR registration and for ENQA membership for the first time; the agency has been an affiliated member of ENQA since January 2016.

SCOPE OF THE REVIEW

The following activities of the agency are subject to this review:

- External evaluation for the authorization of provisional operation of study programmes (cycle I - Bachelor, Integrated studies, cycle II – Master, cycle III – Doctorate)
- External evaluation for the accreditation/reaccreditation of study programmes (cycle I – Bachelor, Integrated studies, cycle II – Master, cycle III – Doctorate)
- External Evaluation for the authorization of provisional operation of higher education institutions
- External Evaluation for the accreditation/reaccreditation of higher education institutions
- External Evaluation for the authorization of joint study programmes (based on the European Approach for Quality Assurance of Joint programmes)
- External Evaluation for the accreditation of joint study programmes (based on the European Approach for Quality Assurance of Joint programmes)

While some activities, i.e., authorization of provisional operation and accreditation/reaccreditation of higher education institutions and joint study programmes, are not yet carried out, the activities are nevertheless covered and assessed in the self-evaluation report and external review on the basis of available processes and documentation.

The following activities are outside of the scope of the ESG and not relevant for the application for inclusion on EQAR:

- Quality assurance in general education
- Quality Assurance in vocational education and training
- Evaluation of continuous professional training programmes
- Evaluation of organizations in the field of research and innovation
- Evaluation of the scientific and scientific-teaching staff
- Evaluation of scientific publications and other evaluations

REVIEW PROCESS

The 2023 external review of ANACEC was conducted in line with the process described in the *Guidelines for ENQA Agency Reviews* and observing the requirements of the *EQAR Procedures for Applications*, in accordance with the timeline set out in the Terms of Reference (Annex 2 to the present report). The panel for the external review of ANACEC was appointed by ENQA and composed of the following members:

- Melita Kovacevic (Chair), Full Professor at the University of Zagreb, Croatia, nominee of EUA;
- Anca Prisacariu (Secretary), Quality Assurance Director at the American Institute of Applied Sciences (AUS), Switzerland, ENQA-nominated member;
- Aurelija Valeikienė, Deputy Director at Centre for Quality Assessment in Higher Education (SKVC), Lithuania, ENQA-nominated member;
- Adrian Korzeniowski, Bachelor Student in Electronics and Telecommunication, Lodz University of Technology, Poland, Member of the European Students' Union Quality Assurance Student Experts Pool.

Alexis Fábregas Almirall (ENQA Project Officer) acted as the review coordinator.

While drafting the present report, the panel also had in mind EQAR's *Policy on Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies* (Ref. RC/12.1; Ver. 3.0; September 2020).

Self-assessment report

The self-assessment process was organised at several levels. Firstly, a working group made of ANACEC staff was established for the writing of the SAR. Secondly, another group consisting of representatives of the Ministry of Education and Research (MER), academia, the ANACEC Profile Committee in Higher Education (PCHE), the business environment, and students was asked to provide feedback and suggestions for improvement. Thirdly, the SAR was posted on the ANACEC website for transparency purposes, which supported the engagement of higher education institutions (HEIs) representatives in the self-assessment process.

Finally, when developing the SAR, the opinions expressed by the European experts, co-opted within the Twinning project *Enhancing the quality and effectiveness of the VET system in the Republic of Moldova*, the project *Supporting European QA Agencies in meeting the ESG (SEQA-ESG)*, as well as the World Bank project, were taken into account.

The SAR provides a comprehensive critical analysis of the agency's compliance with the ESG; the review panel appreciates the honest and self-analytical approach of the agency, as well as the openness in reflecting on its own strengths, weaknesses, opportunities, and threats. The panel is also grateful for the additional materials that were requested and kindly provided.

Site visit

The programme of the visit (Annex 1) was prepared jointly by the ANACEC representatives and the panel. The site visit took place between 18 to 20 of June 2023 in Chişinău, where the head offices of the agency are. The site visit was preceded by an online preparatory meeting between the panel and ANACEC on 6 June 2023. During the site visit, the review panel met the different stakeholders linked to ANACEC's activities:

- representatives of the different agency governance levels: the Executive Management and the Governing Board;

- staff of the agency, including the technical staff of the Higher Education Evaluation department, the Profile Committee in Higher Education, and support functions of ANACEC;
- Ministry representatives;
- heads and quality assurance officers of HEIs reviewed by ANACEC;
- academics representatives from the reviewers' pool;
- external stakeholders, including students and representatives of employers, that are engaged in the governance and activities of the agency.

The panel is grateful for all interviewees it has met during the site visit who, in an open and honest self-reflective approach, have provided valuable inputs that have supported the panel in gaining a complex and accurate picture of the agency operations.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM

The Republic of Moldova has been part of the Bologna Process since 2005, which led to reforms in the higher education sector. The national education sector is regulated by the Education Code (in force since November 2014), which establishes the legal framework for its planning, organization, operation, and development, and the National Qualifications Framework, which ensures the transparency of HE, facilitates academic mobility and the recognition of diplomas at international level.

In alignment with the EHEA commitments, the general structure of higher education includes bachelor's, master's, and doctoral degrees. Bachelor's and master's degree studies can be organized as full-time, part-time, and distance education, and doctoral degree studies as full-time and part-time studies. Bachelor's and master's degrees studies can only be organized for the specialties provided in the *Nomenclature of professional training fields and specialties*. Doctoral degree studies can be organised as a scientific doctorate, which aims to produce original, internationally recognized scientific knowledge, and professional doctorate, which aims to produce original knowledge based on the application of the scientific method and systematic reflection on artistic creations or on high-level national and international sports performances.

The higher education sector is made up of universities, academies, and institutes; during the academic year 2022/2023 the number of HEIs was 21, of which 13 public and 8 private institutions, a significant decrease from the academic year 2010/2011 when there were 33 institutions, of which 19 were public and 14 private institutions. The number of students has likewise decreased for the past 10 years; in the 2010/11 academic year 109,363 students were enrolled in the higher education sector, compared to 56,700 students in the 2022/23 academic year. The main cause of this decrease relates to the general demographic decline also identified in most European countries, population migration, as well as competition from other European universities.

QUALITY ASSURANCE

With the adoption of the *Law on Education* in 2013, the establishment at the national level of an entity responsible for the external quality evaluation in education was regulated. An Interim Board was then formed in 2014 to prepare the normative and methodological basis for the establishment of the respective entity. Thus, in 2015, the National Agency for Quality Assurance in Professional Education (ANACIP) was established, with the status of an administrative authority of national interest with distinct responsibilities in the field of quality assurance in education, autonomous from the Government, independent in its decisions and organization.

In the context of the implementation of the *Strategy on the reform of public administration for 2016-2020 in the Republic of Moldova*, the national system of external quality assurance in education and research

was redesigned, including the legal status of a new entity responsible for the external quality evaluation at the national level - ANACEC.

THE NATIONAL AGENCY FOR QUALITY ASSURANCE IN EDUCATION AND RESEARCH (ANACEC)

The National Agency for Quality Assurance in Education and Research (ANACEC) was established in 2018, with the adoption of the *Regulation on the organization and operation of the National Agency for Quality Assurance in Education and Research*, defining the mission, functions, tasks, rights of the agency and the way of organizing its activity. The agency was established by the Government as a national administrative authority under the Ministry of Education and Research (MER). ANACEC absorbed the formerly known ANACIP, the National School Inspectorate (ISN), an administrative authority subordinate to MER, and the National Council for Accreditation and Attestation (NCAA), an autonomous administrative authority. According to the same regulation, ANACEC was granted additional evaluation tasks in general education and evaluation in the field of research and innovation, compared to the tasks of its predecessor ANACIP.

The mission of ANACEC is to implement state policies and contribute to the development oriented towards the best international standards in the areas of competence assigned.

ANACEC is a member of the following international organisations:

- Central and Eastern European Network of Quality Assurance Agencies in Higher Education (CEENQA);
- Standing International Conference of Inspectorates (SICI);
- Quality Assurance Forum in VET and Continuous Training (ETF), the Education Reform Initiative of South Eastern Europe (ERI SEE);
- affiliated member of ENQA since 2016.

ANACEC'S ORGANISATION/STRUCTURE

The Organisation Structure of ANACEC (Annex 5 of the present report) is decided at the national level and adopted by Government Decree. ANACEC is made up of departments, sections, and offices, with a maximum number of 55 staff. The main bodies of the agency are:

I. Governing Board of ANACEC (GB)

The Governing Board consists of 15 members: 13 academics with scientific-didactic and scientific titles, didactic and managerial degrees relevant for pre-school, primary and secondary education (general education), vocational education and training, higher education and research, a student representative and a business representative.

The appointment procedure is regulated by the *Regulation on the organization and conduct of the competition for selecting members of the Governing Board of ANACEC* adopted as a Ministerial Order. All interested parties can apply in an individual capacity, and their work is not based on a mandate from the institution they are coming from. The members of the Governing Board cannot hold positions of public dignity, a position of rector, member of the Institutional Strategic Development Council, or director of an educational or research institution. GB members are selected through an open competition organized by the Ministry of Education and Research, conducted by 5 international experts, delegated by the quality assurance agencies of the European Union states. GB members are selected for a term of 4 years. The outcomes of the competition are confirmed by the MER, which adopts the selected list of members.

The tasks of the Governing Board are regulated in the *Regulation on the Organization and Operation of ANACEC*, approved by the government, as follows:

- 1) establishes the strategic development directions of the Agency and approves the institutional strategy of thereof;
- 2) approves the expert evaluators selection methodology;
- 3) presents to the Ministry of Education and Research to be promoted for approval by the Government, after consultations with the Academy of Sciences of Moldova, the regulations on the organization and functioning of the profile committees, formed from the specialists with remarkable activity and experience in all fields of activity for which the committees are set up;
- 4) presents to the Ministry of Education and Research the normative acts, which are necessary for the realization of the functions and duties of the Agency to be promoted for approval by the Government;
- 5) approves the methodology provided in art. 83 para. (3) of the Education Code of the Republic of Moldova;
- 6) approves the authorization procedure of provisional operation and accreditation of joint programmes for higher education;
- 7) presents the national reference standards and the accreditation standards on areas of professional training in higher education to the Ministry of Education and Research to be promoted for approval by the Government;
- 8) presents to the Ministry of Education and Research the methodology of complex evaluation of the capacities of organizations in the fields of research and innovation and of their scientific and scientific-teaching staff to work in order to fulfil the assumed mission to be promoted for approval by the Government;
- 9) presents for approval to the Ministry of Education and Research the confirmation methodologies of the titles of the scientific and scientific-teaching staff;
- 10) approves the plan of evaluation and / or accreditation missions and the composition of the evaluator teams;
- 11) examines and adopts decisions on the profile committee reports on accreditation in general education;
- 12) examines external evaluation reports in higher education, adopts decisions about these and submits them to the Ministry of Education and Research to be promoted for approval by the Government;
- 13) examines the external evaluation reports in their areas of competence, other than those specified in this Regulation;
- 14) based on the relevant profile committee report, confirms scientific and scientific-teaching titles or rejects the decision of the institution organizing doctoral exams;
- 15) withdraws the confirmation of the title of doctor or doctor habilitate and initiates the procedures of titles withdrawal by the issuing institution;
- 16) examines and adopts decisions based on the profile committee reports on the organizations of evaluation in the fields of research and innovation;
- 17) approves the Professional Ethics Code within the Agency, including about expert evaluators;
- 18) approves the guides / manuals of internal quality evaluation, the good practices guide for the internal and external evaluation of the quality of studies and research, synthesis works, etc. carried out within the Agency;
- 19) monitors the activity of the administrative apparatus and makes proposals for improvement;
- 20) examines the activity report of the president of the Governing Board;
- 21) approves the annual activity report and the self-evaluation reports of the Agency;
- 22) carries out other tasks provided by the present Regulation and by the normative framework in the Agency's field of activity.

2. Executive Management

The executive management of the agency is carried out by the President, Vice-president and the Secretary-general of the Governing Board; they are elected from among its members, for a term of 4 years, following a public competition. The student representative and the business environment representative cannot be elected as president, vice-president and secretary-general of the Governing Board. The person who is designated as the winner of the competition for the president position is appointed by the Government.

3. The Profile Committees

The profile committees are organized for each field of activity of the agency, including one in higher education. The profile committees are made up of nine people, personalities with outstanding experience in the fields of activity of the committees, with professional achievements recognized at national and international levels. Persons holding positions of public dignity, rectors, vice-rectors, members of the councils for strategic institutional development, or directors of educational and/or research institutions during their term of office cannot participate in the competition.

The members of the profile committee are selected by public competition for a term of four years, having the possibility to be selected for a maximum of two terms. The competition is organized by the Governing Board of ANACEC.

According to the SAR, the tasks of the Profile Committee in higher education are as follows:

- 1) validates the results of the external evaluation of study programmes and higher education institutions;
- 2) organizes, jointly with the Department of Higher Education Evaluation (DHEE), the competition for the selection of expert evaluators and their inclusion in the Register of expert evaluators on the fundamental fields of science, culture, and technology;
- 3) participates in the elaboration/updating of the standards and methodologies necessary for the accomplishment of the quality assurance function in the field of higher education;
- 4) participates together with the members of the Department in the elaboration of thematic studies;
- 5) formulates proposals for drafting/completing the normative framework addressed to the competent structures.

ANACEC'S FUNCTIONS, ACTIVITIES, PROCEDURES

The functions of the ANACEC as determined by the relevant legislation, include general education, vocational education and training, higher education and continuous professional training, and research and innovation.

In order to carry out its mission, the Agency ensures and performs the following processes:

- quality evaluation in general education;
- quality evaluation in vocational education and training;
- quality evaluation in higher education;
- external evaluation of continuous professional training programmes;
- external evaluation of organizations in the fields of research and innovation;
- evaluation of the scientific and scientific-teaching staff.

The object of the present review and report will focus on the quality evaluation in higher education; in this regard, the *Regulation on the Organization and Operation of ANACEC* defines the following duties:

- a) development of the methodology and external evaluation criteria for the provisional authorization or accreditation of study programmes and higher education institutions and their presentation to the Ministry of Education and Research in order to be promoted for approval by the Government;
- b) development of the methodology for approving the right to conduct Ph.D. and its submission to the Ministry of Education and Research to be promoted for approval by the Government;
- c) approval of the methodology provided in art. 83 para. (3) of the Education Code of the Republic of Moldova;
- d) approval of the procedure regarding the provisional authorization and accreditation of joint programmes in higher education;
- e) external quality evaluation in higher education;
- f) evaluation of higher education institutions and study programmes for provisional authorization or accreditation;
- g) external evaluation of doctoral programmes and schools;
- h) approval or rejection of the application to become a Ph.D. supervisor as a result of evaluation of the files submitted by the interested candidates;
- i) carrying out other tasks, deriving from the provisions of the normative framework in the field of activity of the agency.

However, since its establishment, ANACEC only conducted the external evaluation of study programmes, for the authorization of provisional operation and accreditation/re-accreditation.

The authorisation and accreditation processes conducted to date by ANACEC are based on the *Methodology of external quality evaluation for the authorization of provisional operation and accreditation of vocational education and training, higher education and professional continuous training study programmes and institutions*. The operational and instrumental aspects of external quality evaluation are reflected in the *Guidelines of External Quality Evaluation*, developed for the evaluation of study programmes, as well as for institutional evaluation.

The legislative framework establishes that study programmes are subject to external quality evaluation every 5 years or at the expiry of their provisional authorization or accreditation period. The provisional authorisation and the accreditation aim to assess:

- 1) the institutional capacity;
- 2) the educational efficiency, including academic results;
- 3) the quality of initial and continuous professional training programmes;
- 4) the institutional quality management;
- 5) the results of scientific research and/or artistic creation;
- 6) the consistency between the internal evaluation and the real situation.

The agency has not yet conducted external evaluations of educational institutions and joint study programmes.

ANACEC'S FUNDING

ANACEC is an administrative authority under the MER, established by the Government, financed from the state budget, including collected revenues. Its funding comes from 3 different sources, as follows:

- I. Resources from the state budget cover:
 - Payment of employees' salaries.
 - Expenses for participation in continuous training courses and events.
 - Maintenance of the premises.
 - Development (repairs, equipment, office supplies, services, hygiene products, etc.).

2. Revenue from the provision of paid services, representing fee income from HEIs requesting external quality evaluation and covering the costs of external evaluations.
 - Remuneration of GB members, PCHE members, and expert evaluators for services rendered
3. Current grants received from international organizations for projects funded from external sources for the state budget
 - Capacity building of the agency

The total executed budget of ANACEC for the year 2022 was 14,076,380 lei (690,722.89 Euros), which is an increase of approx. 38.39% compared to 2019. Further information is available under Standard 3.5.

FINDINGS: COMPLIANCE OF ANACEC WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG)

ESG PART 3: QUALITY ASSURANCE AGENCIES

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

Standard:

Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.

Evidence

In its Strategy 2018 - 2023, the agency has defined the following strategic objectives:

- to contribute to the development and promotion of quality culture in general, professional, technical, higher education and continuous training, in institutions in the field of research and innovation;
- to evaluate the study programmes and the capacity of organizations providing general, professional, technical, higher education and continuous training in order to achieve quality standards;
- to evaluate the capacity of organizations in the fields of research and innovation;
- to ensure the application of national quality standards in general education;
- to ensure the application in higher education in the Republic of Moldova of the ESG;
- to ensure the application of the standards promoted at the European/international level in professional technical education and continuous training;
- to ensure access to information of public interest about the quality of general, professional, technical, higher and training education
- continues, as well as the quality in organizations in the fields of research and innovation in the Republic of Moldova;
- to propose strategies and policies to partners in order to ensure and develop quality in general, professional, technical, higher education and continuous training, in research and innovation processes;
- to promote the competitiveness of general, technical professional, higher education and continuous training in the Republic of Moldova;
- to obtain international recognition of the agency.

At the time of the site visit, ANACEC had not yet commenced the process of drafting its new Strategy, for which the agency representatives declare that the engagement of the new Governing Board (to be elected at the end of 2023) is of utmost importance. Moreover, according to the representatives of the agency, the upcoming Strategy Plan will also need to reflect the outcomes of the present ENQA review, which will determine some of the future priorities of the agency.

In order to plan its activities, the agency is developing Annual Activity Plans, made publicly available on the website of ANACEC (<https://www.anacec.md/en>), structured based on the following headings:

- I. Organizational activities;

2. Development of the methodological and normative framework to ensure the functionality of ANACEC;
3. Quality assurance in the agency's activity;
4. Quality assessment in general, professional, technical, higher education, and continuous training, in the field of research and innovation;
5. Strengthening the capacities of the staff (expert evaluators, members of the GB, members of the profile commissions, the administrative apparatus of ANACEC);
6. International collaboration;
7. Ensuring transparency in the activity. Communication and public relations;
8. Activity of the GB of ANACEC.

The policies, processes, and activities implemented by ANACEC for the external quality assurance of higher education are aligned with the purpose, objectives, functions, tasks, and responsibilities of the agency established by the Education Code.

The mission statement of the agency, its functions, and tasks defined by the legislative framework, as well as its strategic priorities and goals are made publicly available on the institutional website. The website of the agency is generally informative, with extensive legislation, reports and public announcements being published up to date. The website is offered in Romanian and English languages, however, the latter is less complex and developed. The agency also has an extensive presence on social media, including Facebook, LinkedIn, Instagram, and Twitter.

According to the Regulation on the Organization and Operation of ANACEC, the agency has the following duties:

- a) development of the methodology and external evaluation criteria for the provisional authorization or accreditation of study programmes and higher education institutions and their presentation to the Ministry of Education and Research in order to be promoted for approval by the Government;
- b) development of the methodology for approving the right to conduct Ph.D. and its submission to the Ministry of Education and Research to be promoted for approval by the Government;
- c) approval of the methodology provided in art. 83 para. (3) of the Education Code of the Republic of Moldova;
- d) approval of the procedure regarding the provisional authorization and accreditation of joint programmes in higher education;
- e) external quality evaluation in higher education;
- f) evaluation of higher education institutions and study programmes for provisional authorization or accreditation;
- g) external evaluation of doctoral programmes and schools;
- h) approval or rejection of the application to become a Ph.D. supervisor as a result of evaluation of the files submitted by the interested candidates;
- i) carrying out other tasks, deriving from the provisions of the normative framework in the field of activity of the agency.

The agency has not yet conducted external evaluations of educational institutions, in spite of this responsibility being assigned to ANACEC by law. According to the meetings conducted by the panel, all HEIs have been through institutional evaluations through different methods and methodologies, some through the government, some by the ministry, and some by foreign agencies. However, the accreditation period has expired in most cases. In 2016, the agency developed the Methodology of External Evaluation (MEE) and the Guidelines for the external evaluation of HEIs, both of which represent the framework for institutional evaluations. The panel learned during the site visit that there are a number of international projects that are currently supporting the revision of the framework

and, once that stage is concluded in the autumn of 2023, ANACEC will conduct the institutional evaluations during 2024.

ANACEC has not yet conducted external evaluations of joint study programmes, but, in 2022 developed and adopted the *Procedure on the authorization of provisional operation and accreditation of joint study programmes*.

The agency has not yet conducted external evaluations of the doctoral programmes, in spite of this responsibility being assigned to ANACEC by law. In 2016, the agency developed the Guidelines for the external evaluation of doctoral study programmes, which represent the framework for the evaluations. According to the meetings conducted by the panel, all doctoral programmes in Moldova have been evaluated by ANACEC for authorisation purposes; no records of these reviews could be located by the panel on the agency website. Similarly to the institutional evaluations, an international project is scheduled to be concluded in the upcoming year, which will lead to the revision of the evaluation framework. The agency plans to conduct reviews of the doctoral schools in 2025.

Since its establishment, ANACEC only conducted the external evaluation of study programmes for the authorization of provisional operation and accreditation/re-accreditation, as follows:

Decision	2018	2019	2020	2021	2022
Accreditation for a period of 5 years	55	68	30	144	85
Conditional accreditation for a period of 3 years	34	-	-	-	-
Suspension of the external evaluation process for one year	2	-	-	-	-
Non-accreditation	1	-	-	-	7
Impossibility to formulate decisions/post evaluation	-	9	2	4	26
Authorization of provisional operation	32	32	3	12	14
Non-authorization	-	-	-	-	-

All evaluation reports are publicly available on the ANACEC website. The results of the evaluations conducted by ANACEC have a direct impact on funding and are mandatory by law. Additionally, according to the SAR, the agency associated a few other motivations with the commitments of the HEIs to undergo external quality assurance processes: completing the authorization process is mandatory before starting to deliver study programmes in HE. Given that the authorization expires after the first batch of graduates, HEIs are motivated to apply for accreditation. The fact that HEIs cannot obtain authorization or accreditation for master's and doctoral degree study programmes (cycles II and III) if the study programmes in the same field from cycle I and cycle II, respectively, are not accredited, is also a stimulus.

The authorisation and accreditation of the study programmes conducted to date by ANACEC are based on the *Methodology of external evaluation (MEE)*. The operational and instrumental aspects of external quality evaluation are reflected in the *Guidelines of External Quality Evaluation*. The design and implementation of processes are further detailed under Standard 2.3.

The legislative framework establishes that study programmes are subject to external quality evaluation every 5 years or at the expiry of their provisional authorization or accreditation period.

The agency developed the *Post-evaluation monitoring procedure of study programmes and educational institutions*, which is applied in the monitoring process (follow-up) and aims to track and observe the progress regarding the implementation of the improvement areas/recommendations proposed by ANACEC as a result of the external evaluation process. This is further detailed under Standard 2.3.

Stakeholders are involved in the activity of the agency at different levels, as follows:

1. Governance

- Governing Board: According to the *Regulation on the Organization and Operation of ANACEC*, the Governing Board consists of 15 members: 13 academic/scientific members, a student representative, and a business environment representative. This is confirmed by the nominal composition of the Governing Board as posted on the ANACEC website.
- Profile Committee on Higher Education: According to the *Regulation of the profile committees of ANACEC*, the criteria for committee membership are exclusively academic. Consequently, the nominal composition of the committee as posted on the ANACEC website only includes academic members, and no other stakeholders are represented.

2. Working groups and consultations

- The SAR confirms stakeholder engagement in several consultations conducted by the agency, whether that is for the drafting of the SAR, or the MEE and relevant Guidelines. This is further detailed under Standard 2.2.

3. External evaluation panels, where they have equal rights with the rest of the members, including in terms of reporting, voting, and compensation. This is further detailed in Standard 2.4.

No international members are included in the Governing Board or Profile Committees of the agency, however, certain representation is ensured at the level of external evaluation panels, as elaborated in Standard 2.4.

Analysis

When analysing the goals and priorities that the agency defined for itself, the panel could observe that the role of internationalisation, as reflected in the Strategic Plan, is only evidenced through the ENQA membership and registration in EQAR. ANACEC should consider expanding the internationalisation understanding and complexities, and ensure that the goals defined in this direction are aligned with the EU and EHEA membership, including prioritising the English language development amongst its staff.

From a methodology perspective, even though the Annual Activity Plans are theoretically started from the objectives defined in the Strategy, in practice, they are structuring their activities based on several categories that do not appear connected to the Strategy. Therefore, it is not evident how either of the two documents is cascading in the de-facto activities of the agency. Furthermore, neither the Strategy nor the Annual Activity Plans are targeted in nature. The panel is therefore concerned that, given the lack of measurability, the agency is not able to determine if they are heading in the right direction, with the right speed or even know when the destination has been reached.

It is very clear to the panel that the agency could benefit from adding more structure, clarity, and capacity building in its strategic planning process.

According to the *Regulation on the organization and conduct of the competition for selecting members of the Governing Board of ANACEC*, to the position of member of the Governing Board of the agency can apply student representatives who have an academic achievement of at least 9.5. on the 10 point grading scale. Similarly, according to the Methodology for the selection of expert evaluators, the

competition for the selection of expert evaluators in the field of external evaluation of the quality of study programmes can be attended by student representatives who have *good academic results*. The panel found this system being very meritocratic and would therefore encourage more openness, inclusion and a more democratic mindset. The panel strongly believes that ANACEC should revisit these provisions that may represent a challenge to the openness of student representation. According to the *Pillars of the Student Movement* published by the European Students Union (ESU, 2008), the only quality required from a student representative is the capacity to represent the population it represents. Any academic performance or other discriminatory criteria does not reflect the student's ability to speak on behalf of their peers.

ANACEC should also reflect on what is the best way of ensuring representation of external stakeholders in its decision-making body. As indicated in the results of the ESQA project (*Effective Involvement of Stakeholders in External Quality Assurance Activities*), a project that ANACEC was a part of, when it comes to governing body roles, it is a best practice amongst European QA agencies that the recruitment of external stakeholders is done through a nomination by a relevant stakeholder organisation, a representative of the national unions of students or trade unions of employers/business sector. Even though it is in the spirit of the ESG that members of the decision-making bodies nominated by a third party are not representing their constituent organisations, but they are acting in a personal capacity, it is of key importance for external stakeholders to share views that reflect the diversity of the population they represent rather than an individual profile.

ANACEC could also consider working with a wider range of stakeholders which would represent the three sectors – public, private (reflecting the structure of the local economy and international investors interested in the country) and NGOs.

Furthermore, the agency should consider ensuring the representation of international experts in the membership of the Governing Board. The agency can find a format that accommodates language compatibility and contextualisation by co-opting a Moldovan member of the diaspora or another profile of a Romanian speaker.

Panel commendations

The panel was genuinely impressed with the commitment and dedication of the GB and PCHE members towards external quality assurance, particularly given the relatively young history of the concept in Moldova where many practices and processes are new and require changes of paradigm.

Panel recommendations

1. Add more structure, clarity, and capacity building in the processes relating to strategic planning, implementation, monitoring, and reporting.
2. Revisit the methodology for the representation of stakeholders on the GB in order to ensure their nomination by legitimate and recognised national bodies representing the state sector, private sector and/or the civil society.

Panel suggestions for further improvement

1. Explore ways of including an international member/diaspora in the composition of the GB.
2. Expand on the internationalisation understanding in its strategic approach, including through the development of English language proficiency.
3. Remove the student selection criteria in order to demonstrate openness towards student engagement.

Panel conclusion: Compliant

ESG 3.2 OFFICIAL STATUS

Standard:

Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.

Evidence

ANACEC has been established by the Government as an administrative authority under the Ministry of Education and Research, as documented through The Education Code no. 154/2014 of the Republic of Moldova, The *Regulation on the Organization and Operation of ANACEC* is approved by a Government Decree no. 201/2018, and the *Methodology of External Evaluation* is approved by a Government Decree no. 616/2016.

The organisation of ANACEC is regulated through the *Regulation on the Organization and Operation of ANACEC*, according to which the agency performs functions in the following areas:

- 1) quality evaluation in general education, vocational education, and training, higher education;
- 2) external evaluation of continuous professional training programmes;
- 3) external evaluation of organizations in the fields of research and innovation;
- 4) evaluation of the scientific and scientific-teaching staff;
- 5) control of quality in general education, vocational education and training, and continuous training, compliance with the accreditation and authorization requirements of the entities offering educational programmes and services.

However, for purposes of ESG compliance, the object of this evaluation refers strictly to the quality assurance of higher education, whereas references to the other functions will be made only in relation to the capacity and resources of the organisation.

According to the *Regulation on the Organization and Operation of ANACEC*, the duties of the agency (in regards to the quality assurance of higher education) are the:

- a) development of the methodology and external evaluation criteria for the provisional authorization or accreditation of study programmes and higher education institutions and their presentation to the Ministry of Education and Research in order to be promoted for approval by the Government;
- b) development of the methodology for approving the right to conduct Ph.D. and its submission to the Ministry of Education and Research to be promoted for approval by the Government;
- c) approval of the methodology provided in art. 83 para. (3) of the Education Code of the Republic of Moldova;
- d) approval of the procedure regarding the provisional authorization and accreditation of joint programmes in higher education;
- e) external quality evaluation in higher education;
- f) evaluation of higher education institutions and study programmes for provisional authorization or accreditation;
- g) external evaluation of doctoral programmes and schools;
- h) approval or rejection of the application to become a Ph.D. supervisor as a result of the evaluation of the files submitted by the interested candidates;
- i) carrying out other tasks, deriving from the provisions of the normative framework in the field of activity of the agency.

The most substantial part of the work conducted by ANACEC is represented by the contracts assigned by the Ministry for the authorisation and accreditation of study programmes; the role of the agency in this regard has been significant.

Analysis

ANACEC is an administrative authority under the Ministry of Education and Research, established by the Government with the mission to implement state policies and contribute to the development oriented towards the best international standards in the assigned areas of competence. It is clear to the panel that the agency is recognized for its work by the government, institutions, and stakeholders and has a clearly established legal basis.

As reflected in the legislative framework, the outcomes of the external evaluation processes conducted by ANACEC generally form the basis for the decisions of the Ministry of Education and Research and are therefore accepted within their higher education system, by the state, the stakeholders, and the public. The exceptions where the work of the agency did not inform the final decisions made by the Ministry are further detailed under Standard 3.3.

A very small number of EQAR-registered agencies have operated in Moldova, justified by the language compatibility and costs accessibility; such activities were rather project-based and/or institutional reviews, an activity that ANACEC was not yet organising, at the time of the site visit. With these in mind, it is fair to say that ANACEC does not yet face any national competition.

Panel conclusion: Compliant

ESG 3.3 INDEPENDENCE

Standard:

Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.

Evidence

According to the Education Code of the Republic of Moldova, Art. 115, *ANACEC is an administrative authority under the Ministry of Education and Research, established by the Government, financed from the state budget and from its own revenues.*

As was already mentioned, the ANACEC decision-making body, the Governing Board, consists of 15 members: 13 academics with scientific-didactic and scientific titles, didactic and managerial degrees relevant for preschool, primary and secondary education (general education), vocational education and training, higher education and research, a student representative and a business representative.

The appointment procedure is defined in the *Regulation on the organization and conduct of the competition for selecting members of the Governing Board of ANACEC* defined by the Ministry. The competition itself is also organized by the Ministry. According to the Regulation, all interested parties can apply in an individual capacity, and their work is not based on a mandate from the institution they are coming from. The members of the Governing Board cannot hold positions of public dignity, a position of rector, member of the Institutional Strategic Development Council, or director of an educational or research institution. GB members are selected through an open competition organized by the Ministry of Education and Research, conducted by 5 international experts, delegated by the quality assurance agencies of the European Union states. The outcomes of the competition are confirmed by the MER, which adopts the selected list of members.

GB members are selected for a term of 4 years; in regards to the maximum number of mandates, there is an inconsistency between the different regulations, as follows:

- according to the *Regulation on the organization and conduct of the competition for selecting members of the Governing Board of ANACEC* adopted as a Ministerial Order, the members of the Governing Board are selected for a term of 4 years, with the possibility of re-election for maximum one more term;
- according to the *Regulation on the Organization and Operation of ANACEC*, adopted as a Governmental Decree, the same person may run repeatedly for membership of the Governing Board, but not more than for 2 consecutive terms.

The nominal composition of the GB of ANACEC is confirmed by the Ministry, while the President and Vice-president of ANACEC are confirmed by a decree of the Prime Minister.

The ANACEC Governing Board is the body that establishes the agency's strategic development directions and approves its institutional strategy, approves the Methodology for the selection of experts, approves the plan of evaluation and/or accreditation missions and the composition of teams of evaluators, approves the Code of Professional Ethics within the agency, including with regard to experts, as well as approves the agency's annual activity report and SAR.

The Regulation on the organization and operation of ANACEC, its structure, organizational chart, and the Methodology for external evaluation based on which all external quality assurance processes are conducted, are all determined at the national level and adopted by Government Decree.

According to the *Regulation on the organization and operation of ANACEC*, the final decision regarding the authorization of provisional operation/accreditation, non-accreditation or the withdrawal of the right to organize a study programme or activity of a HEI belongs to the Ministry, usually based on the decision proposed by the ANACEC Governing Board. Formal decisions enter into force after the issuance of the MER order. According to the SAR, during the entire existence of ANACEC, no cases of changing GB decisions by MER/Government have occurred. Nevertheless, the MER decided not to issue non-accreditation decisions proposed by the GB for bachelor's degree study programmes. The SAR notes that the agency notified MER about the possible negative effects of not issuing non-accreditation decisions for the system and potential beneficiaries. At the same time, according to its procedures and to inform society, the agency published the respective GB decisions on its website.

One measure developed by the agency to ensure the independence of its decision-making is to exclude any conflict of interest from its external evaluation processes. In this regard, each evaluator signs a Confidentiality Agreement, as well as a Declaration of the lack of conflict of interest. These two documents are also signed by all members of the GB and PCHE.

According to the *Regulation on the organization and operation of ANACEC*, the revocation of a GB member is ascertained by the Ministry in the following cases:

1. impossibility to carry out his/her tasks for a period of at least 4 months, including from health reasons;
2. non-compliance with the provisions of the Professional Ethics Code and/or the provisions of this Regulation;
3. appointment/election to a position of public dignity, rector, member of the institutional strategic development council or director of an educational institution;
4. unjustified absence at 4 consecutive meetings of the Governing Board.

The so-called Administrative Apparatus is the permanent staff of the agency. The maximum number of staff is capped by the Ministry at 55 individuals, and the salaries themselves are also capped due to the civil servant status of the agency staff.

ANACEC recruits experts following the launch of public calls for applications. The specialized departments of ANACEC are responsible for selecting expert evaluators for the areas of expertise and evaluation they manage. The agency defined the Methodology for selecting the expert evaluators and has full autonomy of its implementation. The list of all experts can be found on the agency's website.

According to the ANACEC Activity Report, the agency faced some difficulties and challenges during 2022; in relation to its decisional and operational independence specifically, the agency lists:

- The non-competitive salary, which is capped, given the civil servant status of the agency staff;
- Difficulties in managing the agency's budget, given that approval from the MEC is required;
- The insistence of the decision-makers to assign ANACEC state control functions of the entrepreneurial activity, improper attributions, and responsibilities, which contravene the mission of the entity, described in the Education Code, but also the good practices developed and promoted at the European level in the field of quality assurance in education;
- Partial consideration by the decision-makers of the agency's proposals in order to improve the legal framework.

The agency then concludes that the degree of independence ensured by the regulatory framework that regulates ANACEC's activity remains a challenge. The subordination of the agency to the Ministry of Education and Research, as well as uncorrelated and often unfounded interventions in the methodological documents applied by ANACEC, without consulting and taking into account the entity's opinion, creates, on the one hand, difficulties in the agency's activity, and on the other hand, undermines the entity's authority from the perspective of European requirements regarding organizational and operational independence for an agency responsible for quality assurance in education.

Furthermore, in the Strategy 2018 - 2023, the agency notes the following possible risks in the process of implementing the Strategy:

1. Frequent restructuring causing instability and lack of continuity in the agency's work;
2. Changing the status of the agency, including the level of autonomy and independence, with all possible consequences;
3. Limited level of organizational and operational independence;
4. Structural and content reforms carried out by state bodies without consulting the agency;
5. Allocation of responsibilities inappropriate to the entity's mission;
6. Allocation of new responsibilities without adequate capacity building (human resources, materials, etc.) of the agency.

Finally, the SAR notes that during the reporting period, the agency faced several difficulties and challenges, given the restructuring of the entity by the Government in February 2018.

It is the view of the agency that the Government's regulation of various aspects of ANACEC's activity minimizes the possibilities of rapid intervention at the entity level, in case of necessity. Such examples include the pandemic period, and the regulation of staffing, including positions and functions; ANACEC being a structure under the MER, which implies the capping of salaries, is negatively influencing the level of attractiveness of open positions. Thus, the agency intends to prepare and submit to the Government proposals for amending the current regulatory framework, including changing the agency's status.

Analysis

The panel spent significant time exploring the topic of independence in interviews and carefully considering the documentation made available by the agency. In this regard, three aspects of independence were considered, as follows.

Organisational independence

The official documentation clearly indicates that ANACEC is not independent of the government and Ministry of Education, as evidenced in the status of the agency as subordinate to the Ministry - the Ministry defining the rules for the election of the Governing Body, organising the competition, and formally approving the membership of the GB, the authority of the Ministry to adopt the Methodology for External Evaluation, the fact that the structure, organization chart, staffing and activity of ANACEC are regulated at the national level and last but not least the fact that all ANACEC decisions gain formal value only after being issued by the Ministry (which was not always followed accordingly).

The fact that the agency itself underlines this challenge through its SAR, Activity Report, Strategy, and during the site visit, is another confirmation that ANACEC's organizational independence is at risk, which determined the agency to start working on proposals for amending the current regulatory framework, including changing the agency's status, as confirmed in the SAR and during the site visit. Throughout the present review, both in documentation, as well as in meetings conducted by the panel, the agency left no doubt that most of the indicators of organisational independence sit outside of its control.

Operational independence

The *Regulation on the Organization and Operation of ANACEC* is approved by Governmental Decree. According to the SAR, in 2018 the Ministry of Education expanded the remit of the agency responsibilities by adding more education sectors to be covered. This was perceived by the agency not only as unfit for ANACEC's mission but these changes were operated without consulting and taking into account the agency's opinion. According to the representatives of the Ministry the panel has met, the restructuring was not necessarily good in the sense that the merged institutions did not actually work better. The panel learned that the view for the future is to remove general education from ANACEC remit, which should keep only the HE, research, and professional education. During the same meeting, the panel learned that the Ministry is willing to provide other formats of division of responsibilities so that ANACEC is better equipped to handle the remaining of its duties. Finally, there is a general view of the international experts previously engaged in the work of ANACEC that the palette of what ANACEC does is too high and the ministry is just too close, which is evident given the wide spectrum of education evaluations entrusted. As the higher education system is too small where all institutions know each other, the dynamics are much bigger.

ANACEC defined the Methodology for selecting the expert evaluators and has full authority in the nomination and appointment of external experts. The selection of the expert evaluators, based on the applications to the public calls issued by the agency, is progressed through the DHEE and the PCHE, eventually being approved by the GB.

Finally, the current arrangement for financial management, as detailed in Standard 3.5. prevents the agency from acting autonomously in relation to governmental institutions.

Independence of formal outcomes

The final decision regarding the authorization of provisional operation/accreditation, non-accreditation or the withdrawal of the right to organize a study programme or activity of a HEI belongs to the Ministry, usually based on the decision proposed by the ANACEC Governing Board. According to the

SAR, there were instances when MER decided not to issue non-accreditation decisions proposed by the GB for bachelor's degree study programmes. Furthermore, the very fact that the ANACEC decisions do not have legally binding value unless enforced by the Ministry gives an indication of challenges in the independence of the formal outcomes. At the same time, the fact that the agency published the respective GB decisions on its website anyway indicates that ANACEC understands its public accountability role and that the current situation with the Ministry subordination is outside of its control.

Furthermore, in spite of the regulatory provisions as well as aspirations of the agency that the GB members are acting in an individual capacity, and not based on a mandate from the institution they are coming from, the panel learned during the site visit that there were cases where GB members consulted the management of the institution they were coming from, or making committees in their home institution to discuss specific matters. The panel, therefore, underlines that one indicator of independence, according to the ESG, is independence from the higher education institutions themselves. The agency should therefore consider establishing an onboarding/handover procedure for the GB members to ensure that the meaning of *acting in an individual capacity* is understood and followed in practice.

Panel recommendations

1. Revisit the relevant regulations so as to allow the GB to elect the President, Vice-President, and Secretary General by the GB members.
2. Reconsider the current organisation structure in the sense of adding a permanent administrative structure to safeguard institutional memory.
3. Ensure the financial sustainability of the agency and adjust the relevant legislation accordingly; this would ensure a more autonomous financial management in order to enable the agency to act independently.
4. Enhance the agency efforts to trigger the relevant changes that would enable it to organise its own structure and work, including organisation chart and allocation of human resources.
5. Drive changes in the relevant legislative framework so as to remove decision-making interference from the Ministry and enable ANACEC to make accreditation decisions.
6. Ensure that GB members are acting in an individual capacity and not based on a mandate from the institution they are coming from.

Panel conclusion: Partially Compliant

ESG 3.4 THEMATIC ANALYSIS

Standard:

Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.

Evidence

ANACEC publishes Annual Activity Reports that describe and analyse the general findings of their external quality assurance activities, providing data illustrating the achievements per structural unit, the dynamics of different processes over time, and brief analyses of the evaluation results of study programmes. These reports are made publicly available on the agency's institutional website.

Regarding the thematic analysis specifically, the agency conducted and published a study titled “External evaluation of the quality of bachelor’s degree study programmes in the fundamental field of science, culture and technology 02 Arts and Humanities”. It included a list of general findings per each accreditation standard, the strengths and weaknesses identified by the EEP, the development trends of the field, and a list of recommendations for various categories of stakeholders. There is no evidence of other similar studies by the agency.

Analysis

The activity reports published by the agency, where the developments, trends, and areas of good practice or persistent difficulty are presented, are quite lengthy in nature: between 100 and 200 pages of technical language that may not be perceived as very attractive for all categories of audiences, such as students, parents, prospective students and the society at large. Furthermore, the activity reports tend to have certain sections that are looking identical every year.

The panel considers that the ANACEC yearly activity reports do not qualify as thematic analysis, as also demonstrated in the study *ESG 2015–2018 ENQA Agency Reports: Thematic Analysis*. In this regard, the agency should consider a more strategic view over the thematic analysis, starting from definitions of what they are, allocating clear yearly responsibilities to staff, ensuring regular implementation, dissemination to target audiences in order to achieve the desired impact.

According to the SAR, the agency is publishing thematic studies per general fields of study since 2020; however, upon requesting supplementary documents, and based on the meeting conducted during the site visit, the panel concluded that the study in Arts and Humanities was not repeated in other fields and represents the only instance of a thematic analysis produced by ANACEC.

The agency presented, as evidence of compliance with this Standard, two more publications authored by two of its staff members. Still, it was clear to the panel that they represented individual initiatives rather than institutional activities (one of them even represented the Master's thesis of the author). The panel did not consider these materials as thematic analyses produced by ANACEC.

ANACEC should consider revisiting the size and structure of the Annual Activity Reports, including adding more eye-catching statistical visuals, in order for the documents to better serve their purpose and reach their target audience effectively.

Panel recommendations

1. Continue the practice of conducting and publishing thematic analysis, and give a strategic reconsideration of their scope and implementation.
2. Formally define the agency’s commitment regarding the regularity of publication of thematic analysis.

Panel suggestions for further improvement

1. Explore international best practice such as ENQA’s study on implementation of thematic analysis by agencies, titled “ESG 2015–2018 ENQA Agency Reports: Thematic Analysis.” <https://www.enqa.eu/wp-content/uploads/ESG-2015-ENQA-Thematic-Analysis-final.pdf>.
2. Considering the use of report findings, including commendations and recommendations, towards thematic analysis which could present a learning opportunity for improvement of practices across the system.

Panel conclusion: Partially compliant

ESG 3.5 RESOURCES

Standard:

Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.

Evidence

According to the *Regulation for the Organisation and Operation of ANACEC*, the agency is financed from the state budget, collected revenue from the provision of paid services, representing fee income from HEIs requesting external quality evaluation and covering the costs of external evaluations, and finally, resources related to projects financed from external sources namely current grants received from international organizations for projects funded from external sources for the state budget.

According to the SAR, the expenditures of ANACEC are divided into several budget lines:

- the resources from the state budget were purposed for the payment of employees' salaries, expenses for participation in continuous training courses and events, maintenance of the premises, and development (repairs, equipment, office supplies, services, hygiene products, etc.);
- the collected revenue from the provision of paid services, representing fee income from HEIs requesting external quality evaluation and covering the costs of external evaluations, were purposed for the remuneration of GB members, PCHE members, expert evaluators for services render
- the resources coming from projects financed from external sources namely current grants received from international organizations for projects funded from external sources for the state budget were purposed for the capacity building of the agency.

The financial resources granted from the state budget for the years 2019, 2020 and 2021 were more or less similar, in 2022 registering an increase of 50.61% or 3,203,692 lei more than the previous year (the amounts are reported for all activities managed by ANACEC, not only HE). The share of expenses for HE in total expenses per institution was approx. 21% in 2019, approx. 10% in 2020, approx. 23% in 2021, and approx. 12% in 2022. The agency believes that the available financial resources, except for staff costs, are sufficient for the operation and continuous development of ANACEC.

ANACEC carries out its activity in a nice historic building rented from a public education institution based on a lease contract renewed annually; the agency equipped the building to fit its current activities and number of personnel. According to the SAR, ANACEC considers that it has sufficient space in order to ensure an optimal working environment for the entire team.

In regards to human resources, ANACEC conducts higher education-related activities with several categories of staff:

1. Governing Board - 15 members, of which the Executive Management (President, Vice-President, and Secretary General) are based on appointment as civil servants.
2. Profile Committee in Higher Education - 9 members.
3. Full-time administrative staff - 9 individuals: 2 are the members of the DHEE acting as coordinators of the external evaluation activities, and 7 support staff shared with the other non-HE functions of the agency.
4. Short-term cooperation contracts - expert evaluators representing teaching staff, business representatives, students, and international evaluators. Currently, there are 262 expert evaluators for higher education part of the Registry.

At the time of the site visit, there were 3 evaluation specialist roles vacant. According to the SAR generally, ANACEC has difficulties filling out their vacancies due to the regulated and capped salary implied by the status of the agency, which impacts negatively the attractiveness of the advertised positions. Secondly, the agency finds that identifying trained specialists, and also with a proper level of English, is difficult considering the variety and complexity of the tasks as well as the increased degree of responsibility.

Analysis

The panel finds that the matter of the agency status, impacting the attractiveness of the positions within ANACEC, has a very concerning consequence. Specifically, considering the number of programme-level external evaluation processes the agency has reported for the latest years which is likely comparable to current and upcoming years, the panel cannot state with certainty that ANACEC is equipped to handle its activities in an effective and efficient manner. Currently, the DHEE has only 2 staff members who are supposed to act as coordinators for up to approximately 100 external evaluation processes; this projection does not include the institutional evaluations or the evaluation of doctoral schools, both of which ANACEC has not yet commenced but which would be very resource demanding.

Currently, the agency is very well endowed, but the nature of the building lease contract poses a question of reliability, reduced predictability, and, of course, sustainability for the future.

Taking into consideration the source of the funds dedicated to the capacity building of the agency, the panel is also raising the concerns of continuity; international organisations and projects have rather low predictability and continuity.

The lack of attractiveness of civil servant roles has also determined that ANACEC is facing in challenge in its ability to retain its staff. Certain functions, such as the DHEE, have a high turnover and the agency never managed to fill all its vacancies.

The panel also noted, during the site visit, the rather low foreign language proficiency amongst all groups it met (as an indication, it should be noted that none of the meetings on the agenda were conducted entirely in English, as they were all dependent on translation to and from Romanian). Particularly considering the plans of Moldova regarding EU accession, the agency should ensure, through both its recruitment practices as well as professional development opportunities for existing staff, that all employees have foreign language capabilities. The panel also learned during the site visit that, as part of the hiring process, successful candidates must be proficient in languages of international circulation. However, the representatives of the agency acknowledged that in the hiring process, due to the limited applications, ANACEC cannot disqualify candidates that do not meet this criterion.

Language capabilities are not tested in writing, but, according to the meetings conducted by the panel, they *might* do so in the oral interview. However, the panel is unsure by whom the language capabilities might be tested in an interview considering that most of those engaged in the hiring process do not possess such abilities either.

According to the meetings conducted by the panel, ANACEC representatives state that all staff speak 1-2 foreign languages; the examples given of such foreign languages were Russian, Gagauzian, and Bulgarian, none of which are considered to be of wide international circulation in the EU arena. The panel learned that ANACEC organises and funds language courses for the existing staff, and encourages the agency to continue this practice and even intensify it, given the current poor language proficiency of the majority of interviewees.

Panel commendation

The panel was genuinely impressed with the dedication and commitment of the staff of ANACEC. The high volume of work, together with the increased responsibility attached to impactful processes, makes it commendable that all staff the panel has met understand a true commitment to quality enhancement and to conducting their work to the best of their abilities, within the given limitations and resources.

Panel recommendations

1. Reconsider and enlarge the human resource capacity to equip the agency for the upcoming work, including the institutional and doctoral school evaluations, as well as the developmental work in supporting quality culture at the HEI level.
2. Ensure the funding to enable human resources that are stable and qualified to meet their roles, including language proficiency.

Panel conclusion: Partially compliant

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

Standard:

Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.

Evidence

The agency defined in 2018 the *President's Statement on ANACEC Quality Policy* which is published on the institutional website. The document defines the fundamental elements of ANACEC's quality policy as follows:

- Strategic planning of its activities, duly expressed in a strategic plan and in the annual activity plans;
- Development of an internal quality assurance system, part of the institutional management, in accordance with European quality assurance policies and relevant national legislation;
- Design, organization, implementation, monitoring and improvement of appropriate standards, processes, criteria and indicators to evaluate the quality of educational institutions and study programmes;
- Ensuring an objective, transparent, efficient and effective external evaluation process, adapted to the requirements of a knowledge-based society, in accordance with the provisions of the Standards and Guidelines for Quality Assurance in the European Higher Education Area, the European Research Area, the European Education Area;
- Encouraging the participation of all members of the ANACEC community in the development and implementation of good quality assurance practices in the field of education, scientific research and institutional management;
- Systematic organization of consultations with educational institutions and other stakeholders to establish priorities in the field of quality assurance;
- Observance of the norms of professional ethics and deontology by all ANACEC members and collaborators;
- Cooperation at national and international level with various structures for quality assurance in education;

- Development, at institutional level, of an information technology environment that would allow a more efficient collection, analysis and use of information relevant for a more effective management of ANACEC activities;
- ANACEC's international external evaluation, every five years, in accordance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015) and integration in ENQA and EQAR.

In the SAR, the agency included a graphic which depicts the elements of the internal quality system, including strategic management, HR management, financial and material resource management, document management, management of external evaluations, as well as monitoring and improvement. Requirements of the beneficiaries/stakeholders appear as input factors; the output expected is framed as satisfaction of those groups. Further in the SAR, references to multiple relevant documents (both internal to the agency and external), supporting implementation of the system, were given. However, the panel could not identify any single consolidated document (a Quality Manual or similar) that is aligned with the guidelines under Standard 3.6. and meets the goal of defining and describing the internal quality assurance system of the agency, which is made of principles, procedures, instruments, division of responsibilities, and accountability relationships.

The Regulation on the organization and operation of ANACEC (approved by the Government and countersigned by the Ministry of Education and Research and the Minister of Finance), among others, describe the organisational structure, including tasks and subordination between the GB, PCHE, and the administrative apparatus of ANACEC. According to it, the GB is defined as the overall collective management body of the agency, to whom PCHE are subordinate in their decision making. Among others, the task of organization of the internal managerial control system, as well as the internal audit is delegated to the President of the agency, who also presides over the work of the GB. In addition, the President is charged to establish the tasks of the Vice-President and the Secretary-General whose primary role is to provide secretarial function to the GB. Annex 2 of the Regulations under the *Structure of ANACEC* contains an Internal audit service. The panel learned that internal audits are done annually based on the National Internal Control Standards in the public sector, their results are public. Financial reports of ANACEC are also verified annually as required by the normative framework.

Recently, in spring 2022, a second issue of the Internal Regulation of ANACEC was approved by the GB. This document contains descriptions of duties of the President, Vice-President and Secretary General (albeit the latter two – very brief), also rights and obligations of civil servants and other employees.

According to the *Managerial Responsibility Statement*, signed by the President, the internal managerial control system and measures to increase its effectiveness are based on risk management. As quoted earlier, in the Strategic Plan 2018-2023, there is a separate chapter X which lists six possible risks in the process of implementing the Strategy; yet, measures to address those risks are not further elaborated.

The entire applicable legislation and regulatory framework - laws, decisions, orders of MER, and the general normative acts of ANACEC - are published on the institutional website in an intuitive location. As part of the understood accountability to its stakeholders, ANACEC publishes extensive Annual Activity reports, made publicly available on the institutional website, which, according to the agency representatives, also meet the purpose of reporting on the progress in the implementation of the Strategic Plan. While the topic of strategic planning in a general sense is further elaborated under Standard 3.4, we address under the current standard the matter of strategic planning monitoring and reporting, as an accountability mechanism included in the internal quality assurance arrangements of the agency.

There is a clear training system for the expert evaluators; effort and investment done in training of the ANACEC administrative staff (especially debutant civil servants) and executive management, however, there is no specific training/induction/onboarding provided to the Governing Board, and the PCHE; according to the agency representatives, they are prepared for their roles through a *learning-by-doing* strategy and they get formed through *exposure to international projects, and fora*. The system relies on the individuals themselves being fair and professional, which is what typically formal procedures are in place to avoid. Furthermore, the fact that the GB membership is elected all at once prevents any form of institutional memory from being passed on to the next Board, and prevents a modicum of know-how transfer.

The agency does not engage in regular evaluations of the effectiveness of its governance - of its GB, Executive Management, and the PCHE aside from the annual reporting and feedback gathering.

In order to ensure that all persons involved in its activities are competent and act professionally and ethically, the agency defined and adopted in 2019 the *Code of Professional Ethics*. The document aims to establish the general values and principles, the rules of professional conduct that constitute deontological benchmarks for carrying out the internal and external activities, and it applies to:

- 1) ANACEC employees;
- 2) Members of the Governing Board of ANACEC;
- 3) members of the Ethics Commission, the Profile Committees and the Expert Commissions;
- 4) members of the external quality evaluation panels;
- 5) evaluators from the Register of expert evaluators.

The Code also includes an extended definition of conflict of interest that aims to cover all instances of incompatibility.

To enforce the provisions of the Code, from September 2021, all evaluators must sign the *Declaration on the lack of conflict of interest* and the Confidentiality Agreement. For the purpose of ensuring confidentiality and excluding the possibility of conflicts of interest, the Confidentiality Agreement and Declaration on the lack of conflict of interest are also signed by all members of the GB and PCHE.

ANACEC conducts, once a year, surveys with the representatives of the institutions and the experts engaged in its activities in order to assure and enhance the quality of their operations. Consolidated results were published in 2020 in a study with the title *Survey results - The opinion of institutional representatives from higher education*. No other study, consolidated or otherwise, was published since then, nor was there a version of the study reflecting the opinion of the ANACEC experts. In addition to the surveys, there are a lot of avenues where all concerned parties can provide informal feedback to the agency representatives; there is a generalised feeling that suggestions are listened to and improvements are being made.

Analysis

The *Quality Policy* of ANACEC is a policy statement or a statement of intent, and it does not reflect the internal quality assurance system of the agency made of principles, procedures, instruments, division of responsibilities, and accountability relationships. The document is of broad and general nature. The panel wishes the agency revisits formulations of the text to more clearly convey the commitment to implement the full PDCA cycle in internal quality management, while engaging with internal and external stakeholders.

When inquiring about the agency practices for monitoring the progress against the strategic objectives, as well as the reporting practices in this regard, the panel learned that this strategic planning stage is achieved through the publication of the Annual Activity Reports. However, the panel finds that even the Annual Activity Reports are not specifically focused on the Strategy or the Annual Activity Plans. Furthermore, the panel was unable to find processes such as evaluation, monitoring of performance

indicators, strategy implementation review and reporting, as part of the strategic planning process. Finally, the accountability lines are very unclear for all those involved in the strategic planning process. As a civil servant under the Ministry, the President theoretically reports to the Minister, however, the President is appointed by the Prime Minister. The President in his capacity as Executive Management proposes the Strategic Plan to the Governing Board, which approves it, but the GB is chaired by the same President with a different hat. Similar blurred lines apply in terms of accountability for the implementation of the strategic plan as the interviewees the panel met during the site visit were not clear about who is accountable to whom, and who reports to whom regarding the progress of the strategy. The confusing accountability caused by different individuals wearing different hats propagates in other areas of governance beyond strategic planning but expands to the decision-making process and executive management.

The provisions included in the *Code of Professional Ethics* regarding conflict of interest are not sufficiently elaborated on an operational level to cover certain types of incompatibilities that the panel observed during the site visit:

- The President, Vice-President, and Secretary General are wearing multiple hats by serving as Governing Board members and Executive Management members, therefore having to meet the decisional and executive powers, which may pose situations of conflict of interests. According to the meetings conducted by the panel, the agency would find it more fit for a director to separate the decisional from the executive powers.
- There are no provisions regarding the engagement, during a meeting, of individuals when their home institution is being discussed, nor is there an indication of whether they will abstain from voting in such instances. Based on the meetings conducted by the panel, only if *discussions are heated*, individuals would leave the room when the HEI they are coming from is the object of a decision, which is described as an *unwritten rule*.

In relation to the surveys conducted by the agency, the panel learned that the questionnaires are sent to the institutions that were reviewed in the academic year that had just concluded, as well as to the experts engaged throughout the year. During the meetings conducted by the panel, two different versions regarding the process of data collection and analysis were provided, two different chains of responsibility that contradicted each other in regard to who does what. The process of what happens to the survey data, assigning actions, and monitoring improvements is not clear and predictable, nor is it formally defined in any policy of the agency. The agency published the consolidated results of the survey conducted in 2020; however, the questionnaire has been answered only by 9 respondents coming from 5 HEIs even though the agency has conducted 35 external quality assurance processes during the respective year. Even if the results were not extracted, analysed, and published, the panel could observe that the response rates of the surveys have increased in the subsequent years (2022 and 2021) across both higher education institutions representatives, as well as ANACEC experts.

Besides the 2020 study, there is no other evidence that the survey results are published or discussed in a unit or forum beyond individual interactions or actions taken being monitored. None of the members of the Registry the panel interviewed were able to confirm that the survey results were discussed with them in a way that is improvement-oriented and contributes to a better quality of their work in the field.

The panel was surprised to find “compliance with work discipline” as one of the basic obligations of employees listed in the *Internal Regulation of ANACEC*. This appeared as a legacy from the past, in a stark contrast to agency’s aspirations to promote and consolidate quality culture in the fields of education and research in its external quality assurance activities. The panel advises to revisit formulations in internal documentation, departing from compliance thinking, in order to better reflect the work culture and values of the EHEA which ANACEC lists as guiding their work, and follow this spirit in a daily practice.

According to the meetings conducted by the panel, ANACEC uses a number of other informal mechanisms (meetings, events, phone calls) to listen to the concerns raised by stakeholders (academics, students, professionals, staff members of higher education institutions, expert members of the Registry) and to update procedures and materials where necessary. According to the interviewees, the panel has met *surveys are important because they are anonymous, but equally important are the private talks because, in private conversations, people can open up differently.* While fully understanding the need to complement quantitative quality assurance tools with qualitative tools of feedback collection, the panel is concerned that informal systems are unregulated, unpredictable, and dependent on personal relationships and therefore prone to be discontinued with a change in staff. The agency should therefore consider a more structured and formalised approach to the tools it has in place in order to ensure the quality of its operations.

There is no other document equivalent to a Quality Policy that outlines the appropriate communication channels to be used with the relevant authorities or that allows the agency to establish the status and recognition of the institutions with which it conducts external quality assurance processes. In fact, based on the meetings conducted by the panel, it was clear that there is a tendency for informal communication - via phone calls, messages, Viber, or Whatsapp - both with the Minister, Secretary of State, other Ministry representatives, as well as with the Rectors and Vice-Rectors of the Moldovan HEIs. The panel once again raises a concern regarding the challenges a system based on personal connections can have in terms of reliance on individuals, the likeliness of double standards, reduced accountability, and the risk of discontinuity, among others.

Panel recommendations

1. Revisit the internal quality assurance policy to align it with similar, best practice, documents of this kind and more clearly convey the commitment to implement the full PDCA cycle, while engaging with internal and external stakeholders.
2. Formalise a mechanism for the training/induction/onboarding of the Governing Board, and the PCHE in order to ensure that they are equipped and act professionally in undertaking their roles.
3. Remove conflicting distribution of powers between different roles and units, particularly on the individuals that sit both on the GB and EM.
4. Conduct an evaluation process that addresses the effectiveness of the agency governance systems.
5. Ensure the closing of the feedback loop in relation to internal quality assurance tools in order to confirm that surveys results are acted upon and actions of improvement are monitored.

Panel suggestions for further improvement

1. Define more structure in the division of responsibilities regarding the monitoring and reporting of progress in the strategic planning process.
2. Revisit/formalise the relevant provisions to ensure the avoidance of conflict of interest in all instances of decision-making.

Panel conclusion: Compliant

ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES

Standard:

Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.

Evidence

This is the first review of ANACEC against the ESG. According to the Education Code of the Republic of Moldova, ANACEC takes the necessary steps to be registered in the EQAR within no more than 3 years after its establishment. As ANACEC is considered established in 2018, the timeline for EQAR application was 2021, which has also been determined as a timeline for implementation, as per the ANACEC Strategy 2018 - 2023.

Analysis

The current review against the ESG provided an opportunity for ANACEC to reflect on its policies and activities and the evidence available demonstrates that the agency has done so with honesty and meaningful critical analysis.

Panel conclusion: Compliant

ESG PART 2: EXTERNAL QUALITY ASSURANCE

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

Standard:

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part I of the ESG.

Evidence

According to the SAR, the external quality evaluation for the authorization of provisional operation and accreditation of study programmes and educational institutions is carried out on the basis of accreditation standards, criteria and performance indicators, established in the annexes to the MEE, as well as evaluation standards and mandatory minimum evaluation standards set out in the *Guidelines of external evaluation*. The SAR further states that the 10 accreditation standards, criteria and performance indicators, as well as evaluation standards are developed in accordance with ESG 2015, Part I and based on national standards in the field of education, promoted through various documents (laws, regulations, Government decisions and decisions of the MER). The table below reflects how the accreditation standards applied by ANACEC in both the authorization of provisional operation and the accreditation of study programmes and educational institutions reflect the ESG provisions; exceptions regarding performance indicators not applied regarding provisional authorisation are marked by star *:

Accreditation standard	Standards, criteria and performance indicators for the external evaluation of bachelor's degree, master's degree and integrated higher education study programmes (revised, 2022)		Standards, criteria and performance indicators for the external evaluation of joint study programmes (2022)		Standards, criteria and performance indicators for the external evaluation of doctoral degree study programmes (2016)		Standards, criteria and performance indicators for the external evaluation of higher education institutions (2016)	
	Criterion	Performance indicator	Criterion	Performance indicator	Criterion	Performance indicator	Criterion	Performance indicator
1. Policy for quality assurance	1.1	1.1.1	1.1	1.1.1	1.1	1.1.1	1.1	1.1.1
	1.2	1.2.1, 1.2.2, 1.2.3*	1.2	1.2.1, 1.2.2, 1.2.3*	1.2	1.2.1, 1.2.2*, 1.2.3*	1.2	1.2.1, 1.2.2, 1.2.3
							1.3	1.3.1, 1.3.2*, 1.3.3*, 1.3.4, 1.3.5
							1.4	1.4.1*, 1.4.2*
2. Design and approval of programmes	2.1	2.1.1, 2.1.2	2.1	2.1.1, 2.1.2	2.1	2.1.1, 2.1.2	2.1	2.1.1, 2.1.2
	2.2	2.2.1, 2.2.2, 2.2.3, 2.2.4	2.2	2.2.1, 2.2.2, 2.2.3, 2.2.4	2.2	2.2.1, 2.2.2, 2.2.3, 2.2.4		
3. Student-centred learning, teaching and assessment	3.1	3.1.1, 3.1.2*, 3.1.3*, 3.1.4*	3.1	3.1.1, 3.1.2*, 3.1.3*, 3.1.4*	3.1	3.1.1, 3.1.2*, 3.1.3*, 3.1.4*	3.1	3.1.1*, 3.1.2*, 3.1.3*
	3.2	3.2.1*, 3.2.2	3.2	3.2.1*, 3.2.2	3.2	-	3.2	3.2.1*, 3.2.2*, 3.2.3*, 3.2.4*
	3.3	3.3.1*, 3.3.2*	3.3	3.3.1*, 3.3.2*	3.3	3.3.1* 3.3.2 -		
4. Student admission, progression, recognition and certification	4.1	4.1.1*, 4.1.2*	4.1	4.1.1*, 4.1.2*	4.1	4.1.1*, 4.1.2*	4.1	4.1.1*, 4.1.2*
	4.2	4.2.1*, 4.2.2*	4.2	4.2.1*, 4.2.2*	4.2	4.2.1*, 4.2.2*	4.2	4.2.1*, 4.2.2*, 4.2.3*
	4.3	4.3.1*	4.3	4.3.1*	4.3	4.3.1*	4.3	4.3.1*
5. Teaching staff	5.1	5.1.1, 5.1.2	5.1	5.1.1, 5.1.2*	5.1	5.1.1, 5.1.2	5.1	5.1.1, 5.1.2, 5.1.3*

	5.2	5.2.1*, 5.2.2*, 5.2.3*	5.2	5.2.1*, 5.2.2*	5.2	5.2.1*, 5.2.2*, 5.2.3*	5.2	5.2.1*, 5.2.2*
	5.3	5.3.1*, 5.3.2*, 5.3.3*	5.3	5.3.1*	5.3	5.3.1*, 5.3.2*, 5.3.3*	5.3	5.3.1*, 5.3.2*
6. Learning resources and student support	6.1	6.1.1	6.1	6.1.1, 6.1.2, 6.1.3*	6.1	6.1.1	6.1	6.1.1
	6.2	6.2.1, 6.2.2, 6.2.3, 6.2.4*	6.2	6.2.1, 6.2.2*	6.2	6.2.1, 6.2.2, 6.2.3, 6.2.4*	6.2	6.2.1, 6.2.2, 6.2.3*, 6.2.4
	6.3	6.3.1, 6.3.2*	6.3	6.3.1*	6.3	6.3.1, 6.3.2*	6.3	6.3.1*, 6.3.2
	6.4	6.4.1*			6.4	6.4.1*	6.4	6.4.1*, 6.4.2*
							6.5	6.5.1, 6.5.2
7. Access to information	7.1	7.1.1	7.1	7.1.1	7.1	7.1.1	7.1	7.1.1*, 7.1.2*
	7.2	7.2.1*			7.2	7.2.1*	7.2	7.2.1*, 7.2.2*
8. Transparency of information of public interest regarding the study programme	8.1	8.1.1, 8.1.2*	8.1	8.1.1	8.1	8.1.1, 8.1.2*	8.1	8.1.1, 8.1.2*
9. On-going monitoring and periodic review of programmes	9.1	9.1.1, 9.1.2*, 9.1.3, 9.1.4*	9.1	9.1.1*, 9.1.2, 9.1.3*	9.1	9.1.1*, 9.1.2*, 9.1.3, 9.1.4*	9.1	9.1.1*, 9.1.2*, 9.1.3*, 9.1.4*
	9.2	9.2.1*, 9.2.2*	9.2	9.2.1*	9.2	9.2.1*, 9.2.2*	9.2	9.2.1*, 9.2.2*
10. Cyclical external quality assurance	10.1	10.1.1*, 10.1.2*	10.1	10.1.1 *	10.1	10.1.1 *, 10.1.2 *	10.1	10.1.1*, 10.1.2*

The Education Code establishes that the internal evaluation of the educational process in higher education is carried out by the institutional quality assurance structures, based on an institutional regulation and that the public accountability of the higher education institution consists in applying the regulations in force regarding the assurance and evaluation of quality in higher education.

The MEE clearly states that the external evaluation procedures are based on principles such as responsibility which implies that quality assurance is the responsibility of each educational institution, which is publicly responsible for its results and performance, the information provided in the Self-Evaluation Reports and other documents that are subject to the quality evaluation and is obliged to correct within a reasonable time the shortcomings found within the external quality evaluation; responsibility is deontological, normative and social; and continuous improvement of quality meaning that the activities of the education system are systematically reported to the national reference standards and to the national and international best practices in the field of quality assurance and promotion of quality culture.

According to the SAR, in the process of developing the accreditation standards, the provisions of the standards stated in the ESG were taken into account, and the criteria, performance indicators and evaluation standards transpose the ESG guidelines for each standard, adapted to the national context. Specifically in the case of the Guidelines developed by the agency for the external evaluation of study programmes and institutions, the structure followed resembles specifically the 10 Standards included in the ESG Part I. Each standard is reflected in the ANACEC regulatory framework as follows:

1.1 Policy for quality assurance

The MEE defines the expectation that institutions should have a policy for quality assurance that is made public and forms part of their strategic management. Internal stakeholders should develop and implement this policy through appropriate structures and processes while involving external stakeholders. The evaluation framework then defines performance indicators relating to the continuous quality assurance and improvement policy, the organization and effectiveness of the internal quality assurance system, and the application of internal quality assurance procedures.

At institutional level, the evaluation standards assess whether the institution has a quality assurance policy that is linked to national and international requirements in the field; the programme standards evaluate if the study programme provisions are aligned with the institution educational strategies and policies for quality assurance, as well as if the institutional quality assurance structures are functional and efficient at programme level.

1.2 Design and approval of programmes

At institutional level, the evaluation standards assess whether the institution complies with the normative framework for designing and approving study programmes, and if the structure of the study programmes corresponds to the normative requirements and the objectives are in accordance with the documents of strategic development of the institution and with the realities and tendencies in the field; the programme standards evaluate if the study programme is designed and approved in accordance with the requirements of the regulatory framework in force; if the study programme is connected to the National Qualifications Framework and European Qualifications Framework; if the mission and objectives of the study programme are linked to the national strategies, realities and trends in the field, to the strategic development plan of the institution, department / chair; the contents of the syllabus and curricula, as well as the relevance of the programme

According to the SAR, this Standard, together with Teaching Staff, hold the most important weight in the authorisation/accreditation decision making process.

1.3 Student-centred learning, teaching and assessment

This standard is assessed through evaluation standards defined at both institutional and programme levels aimed to assess whether the teaching-learning methods are student centred; if ICT tools are used in the teaching-learning-assessment process; the content of the assessment process and the procedures for its organisation.

1.4 Student admission, progression, recognition and certification

The evaluation criteria defined at both institutional and programme levels include compliance assessment of admission, progression, and recognition. Additional standards refer to student attendance and mobility, awarding the titles and issuing the diplomas, as well as access of disadvantaged groups. A strong perspective in all standards defined in this area is the compliance assessment of whether the provisions are in strict accordance with the normative-regulatory documents in force.

1.5 Teaching staff

This standard is evaluated at both institutional and programme levels through compliance assessment of recruitment and administration, professional development, and research and innovation of teaching staff. According to the SAR, this Standard, together with the Design and approval of programmes, hold the most important weight in the authorisation/accreditation decision making process.

1.6 Learning resources and student support

The evaluation criteria defined at both institutional and programme levels include compliance assessment of the provision of administrative and auxiliary staff, material, learning and financial resources, as well as the social insurance for students. The former makes specific references to the endowment and accessibility of educational and research facilities, of the institution's library collection and the students access to curricular support.

1.7 Information management

This standard is evaluated at both institutional and programme levels through compliance assessment of access to information and provision of databases. No specific references are included to analysing and acting on various sources of data.

1.8. Public information

Provisions in this area are assessed through the evaluation of the type and extent of public information provided by the institution and programme.

1.9 Ongoing monitoring and periodic review of programmes

At programme level, this standard is reflected through provision regarding the regular monitoring of the educational offer, the study programme and the teaching-learning-assessment processes, the engagement of students, graduates and employers in the evaluation of the programme, as well as the existence and application of self-evaluation procedures of the study programme. Additionally, at institutional level, a standard is defined for the public accountability of the institution.

1.10 Cyclical external quality assurance

The regulatory framework ANACEC operates under includes provisions regarding the cyclical external quality assurance processes, as well as processes relating to monitoring and follow-up. Additionally, the evaluation standards for both institution and programme assess the implementation of the observations, recommendations and decisions formulated during the previous external evaluation.

Analysis

Following the panel's analysis of the mapping exercise conducted by ANACEC, as well as the summary assessment included above, the panel was able to verify a strong link between the provisions defined by the agency for both the institutional and programme evaluations and the framework provided by the ESG part one. However, the panel observes a large extent of duplication between the institutional and programme provisions and suggests that the agency reflects on this aspect, particularly from the workload generated for the evaluated institutions, the fitness for purpose of both frameworks and the long-term added value of the outcomes of these processes which assess, basically, the same aspects.

Furthermore, in spite of the stated principles and alignment of Standards to institutional accountability for internal quality assurance development, implementation, and enhancement, it transpired from the meetings conducted by the panel that the institutional preoccupation for quality assurance across HEIs is rather externally driven, triggered by the periodic processes conducted by ANACEC, as opposed to being attached to an intrinsic motivation for quality values and development of quality culture for which everyone across the institution understands their responsibility (ESG I.1.).

The panel has read several external evaluation reports, which follow the structure of the MEE and Guidelines, indicating compliance with ESG I.1. The reports indicate that the link between external and internal quality assurance is there, which confirms that the procedures implemented by ANACEC do address internal quality assurance across institutions. However, this appears to be done rather at a formal, superficial level; the panel finds that the level of implementation of policy for quality assurance is underdeveloped across the HEIs, which do not appear to see themselves in charge of the institutional quality development, but instead, stemming from external obligations. According to the meetings conducted by the panel, due to the relatively young quality assurance system, most HEIs do not yet have a culture of self-assessment very well developed, ANACEC is the institution that assesses all institutions based on the same standards, a level of uniformity that is very much needed. Taking into consideration this interface between the internal and external QA, the trust that can be placed in the institutions to understand their accountability for internal quality assurance and lead its development remains a concern to the panel. This is also confirmed by the distrust on behalf of some stakeholders in the overly positive results of the external QA processes, which do not seem to reflect the accurate reality of the institutional capacity and capability at the HEI level.

The panel found the same challenge in regard to the institutional practices at the HEI level for the monitoring and periodic review of quality, which is rather reduced to externally-led QA processes and is in need of development. According to the meetings conducted by the panel, institutions seem to rely on the processes conducted by ANACEC to monitor and periodically review the quality of their programmes and ensure their continuous improvement (ESG I.9). This becomes particularly challenging considering the reduced focus on the follow-up procedures conducted by ANACEC. This is further detailed in Standard 2.2.

Furthermore, it is evident that ANACEC does not, both in the standards included in the MEE and Guidelines, as well as in its reports, sufficiently reflect the principles of the Lisbon Recognition Convention (ESG I.4) for the recognition of qualifications from abroad, and the cooperation with other institutions with a view to ensuring coherent recognition. The panel, therefore, believes that there are further actions, within the reach of ANACEC, in order to promote cooperation with national bodies active in the recognition sphere, to better enforce the relationship between QA and recognition, to organise joint events, and promote the Lisbon Recognition Convention principles, share best practices in recognition, and promote the European tools, including EAR and EAR-HEI Manuals, LIREQA recommendations on linking internal and external quality assurance with recognition and others.

Panel recommendations

Enhance the development of quality culture and support the institutional capacity and capability so that quality assurance at the HEI level is not an externally driven preoccupation, but an internally understood responsibility.

Panel suggestions for further improvement

The agency should consider aligning its standards to ensure compliance with the Lisbon Recognition Convention principles, as well as enhance its efforts to promote recognition practices and best practices.

Panel conclusion: Partially compliant

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

Standard:

External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.

Evidence

According to the Regulation on the organization and operation of ANACEC, the main mission of the agency is to *implement state policies and contribute to the development oriented towards the best international standards in the assigned areas of competence.*

As established by the legislative and normative framework in order to carry out its mission, the agency ensures and performs the following processes:

- quality evaluation in general education;
- quality evaluation in vocational education and training;
- quality evaluation in higher education;
- external evaluation of continuous professional training programmes;
- external evaluation of organizations in the fields of research and innovation;
- evaluation of the scientific and scientific-teaching staff.

The regulatory framework for the external quality assurance of higher education is represented by:

1. Methodology of external quality evaluation for the authorization of provisional operation and accreditation of vocational education and training, higher education, and professional continuous training study programmes and institutions;
2. Guidelines for the external evaluation of bachelor's degree (cycle I) and integrated higher education study programmes;
3. Guidelines for the external evaluation of master's degree (Cycle II) study programmes;
4. Guidelines for the external evaluation of doctoral degree (Cycle III) study programmes;
5. Procedure on the authorization of provisional operation and accreditation of joint study programmes;
6. Guidelines for the external evaluation of higher education institutions.

To fulfil its mission, as already mentioned in this report, ANACEC has undertaken to date processes related to programmes only: authorisation for provisional operation, accreditation, and re-

accreditation. The results of the programme evaluations conducted by the agency have formal effects on accreditation and a direct impact on funding.

Based on the current provisions, an accreditation process can have 3 potential outcomes:

- accreditation for 5 years;
- non-accreditation;
- a remedial period of 6 months for the institution to address red flags, at the end of which, based on the outcomes, any of the first two decisions can be made.

According to the SAR, the legislative reorganisation operated by the Ministry in 2018 without the consultation of ANACEC led, amongst others, to the removal of two intermediary decisions which were amongst the potential outcomes for decisions that the GB could make in the case of (re)accreditation of study programmes:

- accreditation for 3 years;
- suspension of the process for one year.

The stakeholders (HEIs representatives, students, labour market representatives) are involved in ANACEC's activities at different levels: Governing Board, Working Groups, or evaluation panels. Thus, they permanently contribute to procedures design and continuous improvement of the activities and processes.

Analysis

Whilst it is only the higher education activities that are within the scope of the ESG and, therefore, the object of the present review, the wide range of functions assigned to the agency are relevant in the context of capacity, independence, and fitness for purpose. According to the SAR, in 2018 the Ministry of Education expanded the remit of the agency's responsibilities by adding more education sectors to be covered. This was perceived by the agency not only as unfit for ANACEC's mission but these changes were operated without consulting and taking into account the agency's opinion. Furthermore, the SAR, the Activity Report, and the Strategy note the ANACEC subordination to the Ministry as a risk and a challenge at decisional and operational levels, peaked at the legislative reorganisation in 2018 when the scope of ANACEC was expanded. According to the meetings conducted by the panel, ideally, the agency should not sit under the ministry but be independent of the state.

When assessing the regulatory framework ANACEC operates under, the panel was able to observe a lot of similarities with the provisions of the Romanian Quality Assurance Agency (ARACIS). For example, the principles, aims, and scope of the MEE are either copied in their entirety, reshuffled, or have a very high similarity between the two agencies; likewise, documents such as the Methodology for the selection of experts or the Code of professional ethics have a very high similarity score. This also applies to the titles of documents such as the full title of the MEE or the very notion of the Visit record sheet. When inquiring during the visit how ANACEC views these similarities, it was confirmed that when the MEE, for example, was drafted, the HAKA (formerly EKKA), AQAS, and ARACIS models were used as benchmarks, but most stakeholders agreed that it was a comfortable situation to refer to ARACIS more due to language and cultural compatibilities. The panel understands that, particularly in a resource-scarce system. However, there does not exist sufficient evidence of contextualisation that ANACEC ensured to confirm if the higher education systems in Moldova and Romania have the same features, face the same challenges, and, more importantly if they are at a similar level of development of the quality assurance system. Therefore, the panel strongly argues that the matter of adapting to the national specifics of Moldova should be better ensured in the development of upcoming procedures and in the revision of the existing ones in order to ensure the fitness for purpose of the regulatory framework the agency operates under.

According to the representatives of the Ministry the panel met during the site visit, two types of decisions were removed from those available to ANACEC allegedly because the decision referring to the accreditation for 3 years did not speak of the quality of the study programmes in Moldova. The agency representatives were not consulted when this decision was made.

Many of the stakeholders interviewed by the panel argued that the agency misses a wider spectrum of decision possibilities as the old provisions used to be more flexible. Based on the meetings that took place during the site visit, the current restrictions not only limit the options for decision-making but also have a negative effect on the quality improvement in higher education. There was a quite generalised impression that the current decision options do not reflect the general impression of those engaged in the decision-making chain about the level of quality of study programmes in Moldova, the results being overly positive. For reference, the panel assessed the distribution of decisions in the evaluations conducted by ANACEC and those conducted by foreign agencies in Moldova and there is a big discrepancy between the positive decisions percentage granted by ANACEC in comparison to the foreign agencies. This matter, coupled with the reduced engagement of international experts at the expense of inbreeding of local panels in a system otherwise small, poses a red flag in terms of the system's ability to reflect an accurate quality barometer of Moldovan higher education study programmes.

Furthermore, the panel is concerned about the fitness for purpose of the 5-year accreditation cycle when the agency clearly does not have the resources to support it. As determined in Standard 3.5, the limited resources created significant challenges in enabling the agency to conduct its work, this includes the limited focus on follow-up activities, the absence of doctoral programmes evaluation, and the institutional reviews. In this regard, the agency should consider either extending the accreditation cycle or looking at different formulas of risk-based approaches which would give more autonomy to institutions that have successfully progressed through a number of successful programme-level EQA processes and have therefore demonstrated their capacity to manage the quality of their operations and, on the other hand, would support the agency in adapting its workload to its available resources, where possible. According to the meetings conducted with the representatives of the agency, it is one of the ideas for the future to increase the timeframes and, after 2 positive accreditation outcomes, to increase the accreditation cycle to maybe 7 years.

The stakeholders interviewed by the panel (HEIs representatives, students, labour market representatives) felt generally positive about their opportunities and actual impact to contribute to procedures design and continuous improvement of the activities and processes. Numerous examples were provided during the site visit in this regard, such as the merging of programme evaluations to capture a group of programmes from the same field, or conducting the accreditation processes even if the programme might not have had graduates every year in the last 5 consecutive years since its authorisation.

The agency has established some tools for permanent monitoring of the way the procedures are applied, however, improvements are needed to ensure that these are statistically valid and based on a clear, formal process that ensures division of responsibilities, preferably decentralised, discussion of results and, more importantly, the closing of the feedback loop to ensure that data is made use of. This is further detailed in Standard 3.6.

Panel recommendations

- I. Ensure that the scope of activities assigned to the agency and the methodologies designed for them are supported by the capacity of ANACEC to implement it.

2. Safeguard the contextualisation aspect in the development of upcoming procedures and in the revision of the existing ones in order to ensure the fitness for purpose of the regulatory framework the agency operates under.
3. Revisit the spectrum of decision possibilities available for the Governing Board in order to ensure that they reflect the real quality levels across the study programmes.
4. Ensure consideration for proportionality and adaptation in the case of positive decisions, identifying ways of reducing the workload of the agency, where possible, to correspond to its resources.

Panel conclusion: Partially compliant

ESG 2.3 IMPLEMENTING PROCESSES

Standard:

External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include:

- a self-assessment or equivalent
- an external assessment normally including a site visit
- a report resulting from the external assessment
- a consistent follow-up

Evidence

The following external quality assurance processes rest within the responsibility of ANACEC according to the role the agency was assigned by law:

- authorisation and accreditation of bachelor and master programmes;
- external evaluation of doctoral programmes and schools;
- authorisation and accreditation of joint programmes;
- institutional evaluations.

Of these, ANACEC has, by the time of the site visit, only conducted the first category - external evaluation for the purpose of authorisation, accreditation, and re-accreditation of study programmes at cycles I and II.

The operational and instrumental aspects of external quality evaluation are reflected in the *Guidelines of External Quality Evaluation*, developed for the evaluation of study programmes, as well as for institutional evaluation.

The external quality assurance processes of ANACEC are based on the following consecutive steps, in alignment with the ESG provisions:

- a) submitting an application
- b) setting up the external evaluation panel;
- c) analysis of the self-evaluation report;
- d) carrying out the evaluation visit;
- e) development of the external evaluation report;
- f) presenting the results of the evaluation and making the decision by the Governing Board of the agency.

In regard to the follow-up activities, the agency developed and adopted in 2022 a post-evaluation monitoring procedure, which aims to track/observe the progress of the evaluated educational

institutions regarding the implementation of the improvement areas/recommendations proposed by ANACEC, as a result of the external evaluation process.

According to the SAR, all these stages of the external quality evaluation process are predefined, made publicly available on the agency website, applied constantly and coherently, and the reliability of the process is ensured by the detailed documentation of all stages and the coordination of external evaluation activities by an employee of ANACEC. The agency publishes a process diagram for the external quality evaluation, from its initiation to its completion, showing all the stages of the process, their consecutiveness, as well as the regulatory deadlines established for each and the responsible structures.

Analysis

All types of evaluations ANACEC conducts or plans to conduct in the near future include all stages as reflected in the ESG 2.3, as follows:

- a self-assessment report;
- an external assessment through a site visit;
- a report resulting from the external assessment;
- a follow-up report.

As previously mentioned under Standard 3.1, the agency has not yet conducted external evaluations of educational institutions, in spite of this responsibility being assigned to it by law and even if the accreditation period has expired in most cases. Likewise, ANACEC has not yet conducted external evaluations of joint study programmes. Finally, the agency has not yet conducted external evaluations of the doctoral schools, in spite of this responsibility being assigned to ANACEC by law. An international project is scheduled to be concluded in the upcoming year, which will lead to the revision of the evaluation framework for both doctoral schools and institutional evaluations. Therefore, the agency is planning to start conducting these activities during 2024/2025.

In order to increase the effectiveness of its evaluations, as well as to conduct them with a smaller amount of resources, the agency changed its procedures to conduct evaluations of groups of study programmes in the same field of study, as opposed to evaluations of individual programmes. For the past years, ANACEC chose to approach the study domains one by one across the entire higher education sector. In this regard, at the beginning of the academic year, the agency announces which field of study will be evaluated in the respective academic year and opens the applications from HEIs. This also gives the agency the opportunity to forecast its workload by anticipating the number of evaluations that might be conducted in the respective academic year. However, this system lacks predictability to the HEIs as they do not know what field of study will be chosen next and the notice they receive is rather short, a few months is a rather reduced time for an institution to organise an engaging self-evaluation process.

Through the provisions of the MEE and the Guidelines, the agency supports the institutions through the self-evaluation process by providing very specific guidance regarding the structure and features of the SER application, both the report, as well as annexes.

The composition of the expert panel tries to ensure diverse professional experience (academics, students, representatives of the labour market) and ensure knowledge about the functioning of the education system and the legislation of the Republic of Moldova in the field, to have work and/or managerial experience in the field, to know about the education trends in the European Union, to be trained in the field of external quality evaluation, to have, preferably, teaching experience in an educational institution, and to know the working language during the evaluation. An international member of the panel is preferred, though not mandatory, in panels nominated for the evaluation of bachelor and master's study programmes, but it is mandatory in the case of doctoral programmes and

institutional evaluations. Considerations such as gender, age, and institutional representation are not specifically regulated in the procedures of the agency.

According to the guidelines, the institution has the right, one time, to *present its position regarding the composition of the External Evaluation Panel, within 5 working days from the date when the institution was informed of its composition.* However, the provisions are not clear as to what are the exact circumstances under which an institution may request for a certain panel member to be removed, such as having evidence to suspect that there is a conflict of interest or any reason to suspect that they might not act professionally. Not having specifically regulated such conditions to change a panel composition, leaves room for double standards and inconsistency. Secondly, the fact that the institution is limited to objecting to the panel composition only once might not provide sufficient reassurance of the effective nomination. The external evaluation panel is accompanied by a member of the DHEE which coordinates administratively the review process and ensures consistency in the implementation of the procedure. However, the panel is concerned that the availability of human resources in the DHEE does not create the premises to cover the needs of coordination in evaluation processes, particularly with the anticipated increase in workload with the upcoming doctoral and institutional reviews. This is further detailed in Standard 3.5.

The site visit proposes meetings with different stakeholders and the panel assessing the correspondence between the data, information, and conclusions of the self-assessment and the real situation in the institution. One of the recent changes in the provisions of the agency was to regulate the possibility of carrying out online site visits (in exceptional cases, conditioned by external factors, which limit the access of people within the institutions to be evaluated) on remote communication platforms, established by mutual agreement with the educational institution. Having merged the evaluation of individual programmes into groups of programmes also allows the institution and the panel to merge several items in the site visit agenda, such as the visit of the facilities and the meeting with the leadership of the institution.

The findings are concretized in an external evaluation report, based on a template produced by the agency. Institutions have the right to submit certain comments in response to the external evaluation report draft, but it was not clear to the panel what such comments can refer to and if the institution has the possibility to introduce further evidence into the process. This matter is further detailed in Standard 2.6.

With the finalisation of the EER, the PCHE examines the content of the EER to ensure the compliance with the requirements of the Methodology and the applicable Guidelines. PCHE members can formulate recommendations and mandatory improvement areas for the performance indicators in the EER and may communicate to the EEP in this regard. Based on the meetings conducted by the panel, it is reasonable to say that the PCHE is doubling the work of the EEP, by retracing the judgments of the panel, re-examining the available evidence and the contents of the EER. The agency should therefore consider revisiting the scope of work of the panel and the PCHE with the intention to avoid overlaps in their tasks and ensure that there are different oversight mechanisms to ensure the consistency and quality of reviews that are less resource and time-consuming.

The work of the agency in regard to follow-up processes is regulated by the provisions of the *Post-evaluation monitoring procedure.* According to this, institutions are obliged to submit action implementation plans in response to the contents of the EER. According to the meetings conducted by the panel, the agency acknowledges that it does not always have the capacity and human resources to analyse the implementation plans. Furthermore, even if the procedure states that within one month of receiving the Report on the Implementation of the Plan of Corrective Measures, the ANACEC representative(s) carry out a post-evaluation monitoring visit to the educational institution, this has

not happened in practice. As it stands now, the follow-up work of the agency stops with the submission, by the institution, of the action implementation plans.

Panel recommendations

1. Ensure the cycles of evaluations are implemented as per the designed methodologies for all types of activities assigned to ANACEC.
2. Revisit the current provisions for follow-up to external evaluation processes in order to ensure their fitness for purpose.

Panel suggestions for further improvement

1. Consider giving longer notice to institutions about the calendar of the external evaluation processes.
2. Revisit the provisions of the Guidelines to clarify under what circumstances an institution can object to the composition of the panel member; ensure that the step can be repeated until the institution and the agency trust the professionalism of the team.
3. Consider revisiting the scope of work of the panel and the PCHE with an intention to avoid overlaps in their tasks and ensure that there are different oversight mechanisms to ensure the consistency and quality of reviews that are less resource and time-consuming.

Panel conclusion: Compliant

ESG 2.4 PEER-REVIEW EXPERTS

Standard:

External quality assurance should be carried out by groups of external experts that include (a) student member(s).

Evidence

In conducting its work, ANACEC engages several categories of expert evaluators, as follows:

- a) academics
- b) representatives of employers
- c) student representatives
- d) foreign experts.

According to the *Methodology for selecting the expert evaluators*, the status of the expert evaluator can be obtained by registering in the Register. In line with the same document, in order to become a member of the Register, one has to have a scientific title, which is not the case for students and business representatives. Currently, there are 262 expert evaluators for the higher education part of the Registry; the composition of the Registry is made publicly available on the ANACEC website.

The requirements for the selection of expert evaluators, from different categories of stakeholders, include the following aspects:

- teaching staff in higher education - holding a scientific/scientific-teaching title, experience in the field of quality assurance or management in higher education, work experience in the field of expertise, compliance with professional ethics, knowledge of the Romanian language and/or a foreign language and the lack of criminal record;
- employers' representatives - having experience in the field of quality assurance or management, having work experience in the field of expertise, compliance with professional ethics, knowledge of the Romanian language and/or a foreign language and lack of criminal

record. When selecting expert evaluators in this category, the agency co-opts representatives of the professional area from different sectors: private, public, and non-governmental;

- student representatives cover the following aspects: being a student in one of the three cycles of higher education (bachelor's, master's or doctorate), having good academic results/record, knowledge of the Romanian language and/or a foreign language and the lack of criminal record;
- international experts - holding a scientific/scientific-teaching title, experience in the field of quality assurance or management in higher education, work experience in the field of expertise, compliance with professional ethics, knowledge of the Romanian language. For situations where there is a need for expert evaluators from specific fields or international expert evaluators, ANACEC requests their recommendation or designation by the partner quality assurance agencies.

The agency issues periodical calls for experts on the institutional website. The DHEE is responsible for selecting the expert evaluators, which then submit their proposals to the PCHE. The profile committee analyses the proposals of DHEE, validating or rejecting the respective candidate. In case of rejection, the candidate shall be notified of the rejection decision at the correspondence address. In case of validation, the proposal of the profile committee shall be submitted to the Governing Board of ANACEC.

The PCHE is responsible for the proposal of the external evaluation panel composition to the GB: the panel consists of at least 3 members (the number and category of experts in the panels depend on the number of evaluated programmes and the education cycle). Specifically, in the external evaluation process for the authorization of provisional operation/accreditation of programmes, the panel would include teaching staff with scientific/scientific-teaching titles, student representatives, and employer representatives; international experts are not mandatory to be included. In the case of external quality evaluation for the accreditation of doctoral programmes and HEIs, in addition to the categories of experts stated above, the involvement of an international expert is mandatory.

According to the SAR, the scope for co-opting international experts remains limited, given the need for them to know the Romanian language. The SAR also notes that the number of international experts involved in the external quality evaluation process is increasing, from 0 in 2019 to 24 in 2022. With two exceptions of international experts co-opted as observers in a panel supported by project funds, all foreign experts ANACEC engaged in its evaluations are Romanian, due to language compatibility.

The panel observed, during the site visit that most of the experts that represent the category of employers/professional practitioners are coming from the public sector - public institutions, ministries, governmental agencies. The agency should consider expanding on the profile of its employers in order to reflect the diversity of all sectors – public, private, nongovernmental – where higher education graduates are progressing to.

The provision of training is mandatory for all expert evaluators to be engaged in the ANACEC processes. In this regard, the agency has developed the *Methodology for training the expert evaluators of ANACEC* which provides guidance on how the training should be organised. The agency also developed the training course „External evaluation in higher education”, of 90 hours (3 ECTS credits), which contains 3 modules: The first module of the course aims at the individual examination by the participants of the normative framework on external evaluation. The second module is focused on the training, development, and consolidation of external evaluation skills in the training sessions. In this module, trainees familiarize themselves with the provisions of the European normative framework regarding the external quality evaluation, the national normative framework on the quality evaluation of study programmes, the external evaluation procedure of study programmes, the role of the expert evaluator in the external evaluation process and the tools used in this process. In the third module, trainees develop individually/or in groups a portfolio. The agency conducts an additional examination

at the end of the training; only those that pass the test will be nominated to take part in external evaluation processes. The test assesses the practical skills acquired during the training, such as analysing a piece of the SAR and assessing if it is aligned with the assessment guide or formulating questions for interviews for certain indicators.

Upon appointment in external evaluation panels, all experts have to sign a *Declaration on their own responsibility on the lack of conflicts of interest*.

The quality of the panel experts is assessed by the institution under review through a survey conducted by ANACEC once a year, globally for all external quality assurance processes that have taken place during the respective academic year.

Analysis

The agency should align its provisions for the Registry and Profile Committee membership to allow for non-academic profiles to be represented and therefore, be able to formally incorporate students and representatives of the employers, especially from private sector and NGOs, in the formal membership of the Registry of Evaluators and the PCHE.

As mentioned under Standard 3.1, the panel once again raises the matter of academic meritocracy in the selection of student experts which has no relevance to the responsibility of their role. The student representatives that are engaged in the external evaluation processes should be reflecting the diversity of the student population; the agency should ensure that multiple profiles of student representatives are reflected in the composition of its Registry. The panel makes reference that, according to the Prague Ministerial Communique (EHEA, 2001) *student representatives are competent, active, and constructive partners in the establishment and shaping of higher education policy*, as there is no reference that only students with a certain academic track record qualify to be considered partners.

In regard to the engagement of international experts, the ESG guidelines to the standard note that the *involvement of international experts in external quality assurance, for example as members of peer panels, is desirable as it adds a further dimension to the development and implementation of processes*. While the guideline is based on the understanding that the participation of international experts in the external evaluation process is indeed optional, the agency should consider reflecting on the profiles of its international experts, which are almost exclusively Romanian. It is in the spirit of the ESG that quality assurance exercises can benefit from adding a diverse dimension, educational and cultural, to such processes; however, there is a question of applicability of that diversity if the experts are coming from a country that has very few cultural and educational differences. The panel is confident that, in cooperation with its partner European agencies, ANACEC can address the matter of language compatibility in order to better integrate non-Romanian speakers in its exercises and benefit from the true spirit of internationalisation of QA. This is applicable especially given the small size of the higher education system in Moldova and with the view of more active involvement in EHEA and the aspirations for EU membership.

The performance of the reviewers is assessed upon completion of each evaluation by the institution under review. However, there is very little evidence that the feedback loop is closed and that the surveys conducted by the HEIs about the quality of ANACEC experts is used for quality improvement purposes. This is further elaborated under Standard 3.6.

Panel commendations

The panel wishes to commend the commitment of the agency in regard to the training and testing of its experts in order to ensure the quality of the panels.

Panel recommendations

Remove any meritocracy in the selection criteria and demonstrate openness in co-opting student experts engaged in the external quality assurance processes.

Panel suggestions for further improvement

1. Revisit the regulatory framework in order to allow the representatives of the labour market, as well as students, to become members of the registry of experts, a status currently reserved for experts holding an academic/scientific title.
2. Expand on the profile of employer representatives in order to reflect the diversity of all sectors where higher education graduates are progressing to.
3. Increase the representation of international experts in the composition of the external evaluation panels.
4. Consider diversifying the profiles of international experts engaged in quality assurance processes in order to truly benefit from different perspectives and angles coming from countries that are educationally, culturally, and systemically diverse.

Panel conclusion: Compliant

ESG 2.5 CRITERIA FOR OUTCOMES

Standard:

Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.

Evidence

The decisions made by ANACEC respect the following chain of approval:

1. The external evaluation panel draft the external evaluation report which includes their recommended outcome;
2. The EER is submitted for examination to the PCHE, which decides on the validation/non-validation of the results. According to the SAR, the PCHE examines the content of the EER in accordance with the requirements of the Methodology, the Guidelines, and the provisions of the Regulation on the organization and operation of the profile committee in higher education. PCHE members formulate, as appropriate, recommendations and mandatory improvement areas for the performance indicators in the EER. The EEP examines the recommendations made by the PCHE and completes, as appropriate, the EER of the evaluated study programmes/HEI.
3. The GB shall make a decision based on the proposal presented by the Profile Committee, the External Evaluation Panel, the comments made by the educational institution received within up to 10 working days of the completion of the Report, as well as the additional materials submitted at the request of the Governing Board of the agency, if applicable;
4. The decisions of the Governing Board shall be sent to the educational institution within up to 5 days from the date of adoption of the decision. The procedure for appeals detailed under Standard 2.7 shall enter into effect, if applicable.
5. ANACEC sends the decision on the external evaluation to the Ministry of Education and Research, as well as publishes the decision on the agency's website.

According to the *Guidelines for the external evaluation of bachelor's degree (cycle I) and integrated higher education study programmes*, as well as the *Guidelines for external evaluation of master's degree programmes* the evaluation of performance indicators is conducted as follows:

- a. points are awarded for each evaluation standard: 1,0 point, 0,5 points or 0 points;
- b. each of these values (points awarded) is multiplied by the weighted value of the score (the calculation is made up to hundreds of points). For example, if the evaluation standard was awarded 1.0 points and the weight of the score is 2.0, then the final value of the performance indicator will be $1.0 \times 2.0 = 2.0$ points;
- c. if two evaluation standards correspond to a performance indicator, the final value is calculated as the sum of the score values obtained by each evaluation standard. For example, if the first evaluation standard was awarded 1.0 points and the weight of its score is 2.0; the second evaluation standard was assessed with 0.5 points, its weight being 3.0, then the final value of the performance indicator will be $1.0 \times 2.0 + 0.5 \times 3.0 = 3.5$ points;
- d. the sums of all values, obtained for the performance indicators, are entered in a synthetic table, these representing the value of the score per accreditation standard;
- e. the level of achievement of the accreditation standard, expressed in %, is calculated with rounding up to hundredths, by reporting the sum obtained to the maximum value of the score. For example: if 14.5 points have been accumulated for the accreditation standard and its maximum value is 17 points, it results that the standard is achieved at a level of: $14.5 \div 17 \times 100\% = 85.29\%$.

In order to increase the transparency of its procedures and decision-making, the agency has taken the following steps:

- the procedures and criteria are publicly available on the agency's website;
- there is a very exact, predictable, and mathematical mode of calculation of compliance levels, which is understood by both panels and institutions;
- the experts are trained appropriately, to ensure consistent treatment across all evaluated programmes and institutions;
- the DHEE representatives coordinating the review processes ensure consistency between different teams visiting institutions;
- the PQHE ensure thorough verification of the external evaluation report as well as the evidence it is grounded on, and ensure that the guidelines are followed.

According to the MEE, the following decisions may be made based on the external evaluation processes:

1. In regard to the authorisation of provisional operation of the study programme:
 - if the share of the level of achievement of each accreditation standard is at least 50%, and the accreditation standard 2. *Design and approval of programmes* has 100% level of achievement, the Governing Board of the agency proposes the authorization of provisional operation of the study programme or educational institution;
 - if the share of the level of achievement of at least one accreditation standard is less than 50%, and the accreditation standard 2. *Design and approval of programmes* does not have a 100% level of achievement, the Governing Board of the agency proposes the non-authorization of provisional operation of the study programme or educational institution.
2. In regard to the accreditation of the study programme
 - if the share of the level of achievement of each accreditation standard is at least 90%, and the accreditation standard 2. *Design and approval of programmes*, and the accreditation standard 5. *Teaching staff*, respectively, have a 100% level of achievement,

the Governing Board of the agency proposes the accreditation of the study programme or educational institution for a period of 5 years;

- if the share of the level of achievement of accreditation standards is 60-90%, and the accreditation standard 2. *Design and approval of programmes*, and the accreditation standard 5. *Teaching staff*, respectively, have a 100% level of achievement, the Governing Board of the agency proposes the accreditation of the study programme or educational institution only after the removal of detected non-conformities, within up to 6 months, demonstrated by an exhaustive report.

If at the end of the granted term, the educational institution demonstrates the achievement of each accreditation standard to a share of at least 90%, and the accreditation standard 2. *Design and approval of programmes and the accreditation standard 5. Teaching staff*, respectively, have a 100% level of achievement, the Governing Board of the agency proposes the accreditation of the study programme or educational institution for a period of 5 years.

If at the end of the granted term, the educational institution does not demonstrate the achievement of each accreditation standard to a share of at least 90%, and accreditation standard 2. *Design and approval of programmes and accreditation standard 5. Teaching staff*, respectively, do not have a 100% level of achievement, the Governing Board of the agency proposes the non-accreditation of the study programme or educational institution.

- if the share of the level of achievement of at least one accreditation standard is less than 60%, and the level of achievement of the accreditation standards 2 and 5 is less than 100%, the Governing Board of the agency proposes the non-accreditation of the study programme or educational institution.

Analysis

The panel finds that the agency has put in place procedures and practices designed to ensure that the EERs are as consistent as possible. The evaluation standards, criteria, and performance indicators used by ANACEC for programme external evaluations are clearly defined and publicly available on the agency's website. Experts are trained before taking part in evaluation processes, and they are comfortable with the criteria made available to them which they find clear and effective in supporting their work. At the same time, the agency's framework for programme external evaluations, including the MEE and the Guidelines, is accessible to all stakeholders and is particularly well-known by the HEI representatives. Low numbers of complaints and appeals also speak towards support of that argument.

The agency invests considerable efforts to ensure alignment between the proposals made by experts, the considerations by the PCHE, the GB, and lastly the Ministry, which the panel believes is very relevant in speaking about the quality of work done by each of the instances.

On the other hand, some of the stakeholders engaged in the decision-making chain interviewed by the panel argued that the current decision options, which are basically binary, are forcing the balance towards more positive outcomes than the level of quality of study programmes in Moldova actually is. Specifically, if the share of the level of achievement of each accreditation standard is at least 90%, the programme is accredited, if the share of the level of achievement of at least one accreditation standard is less than 60%, the programme is not accredited. There is no in-between because, if the share of the level of achievement of accreditation standards is 60-90%, a decision is not actually being made and the educational institution is given the chance to remove the detected non-conformities within up to 6 months, after which the case is re-submitted for the attention of the GB.

Panel recommendation

Revisit and eliminate the gap in the percentages that lead to a formal decision, which currently leaves an empty room where decision-makers are pushed to an end of the range that might be less connected to reality.

Panel conclusion: Compliant

ESG 2.6 REPORTING

Standard:

Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.

Evidence

All reports resulting from external quality assurance processes conducted by ANACEC to date - authorisation and accreditation of study programmes - are elaborated based on the template provided by the agency to the experts' panels, respecting the structure of the MEE, on which the HEI conducts the self-assessment. The template includes information about the institution and the external evaluation process, the expert team is clearly identified, and judgments and evidence with analysis leading to them are elaborated. In some instances, though not all, commendations, recommendations, and areas in need of improvement, are identified.

All external quality assurance processes conducted by ANACEC to date - authorisation and accreditation of study programmes - result in published reports. The reports bear the logo of ANACEC. The agency does not include, either in the body of the report template or as a separate document, a summary of the procedure that is easier to read and understood by non-professionals.

According to the Methodology of External Evaluation (Art. 53), upon the conclusion of the external evaluation, the report is sent to the educational institution subject to the external evaluation procedure. The educational institution has the right, within 10 working days of receiving the report, to make certain written comments, on paper, regarding the report. The external evaluation panel shall analyse the comments made by the educational institution within 7 working days, finalize the external evaluation report, and submit it to the agency, in electronic and paper format, signed by the members of the external evaluation panel. However, as per the SAR, within 3 working days of receiving the EER, institutions have the right to make comments regarding the report; the comments are submitted by institutions to the Department for Higher Education Evaluation. The EEP analyses the comments/additional evidence submitted by the HEI within up to 5 working days, finalizes the EER and presents it to the PCHE. The evidence presented in the comments, the minutes, and the EER are analysed by the PCHE, and the results regarding the validation/non-validation of the results of the external evaluation are submitted to the GB for approval.

The published reports are located in an intuitive, user-friendly place on the agency website, and can be searched by procedure, by provider, by education cycle, and by name of the programme. Reports are published exclusively in Romanian language.

Analysis

The expert teams are primarily responsible for the report contents for the programmatic evaluations and the role of agency staff is to ensure that the language is clear and consistent.

The panel notes that there is a rather reduced focus on commendations, recommendations, and areas in need of improvement in the body of the reports, with the largest priority being given to the compliance component of the process. The agency staff that coordinates the external quality assurance procedures could encourage the expert teams in ensuring that the enhancement role of these procedures is also safeguarded in order to support the continuous improvement of quality and, eventually, contribute to the capacity building of the higher education sector.

The reports published by the agency are normally lengthy and rather technical in nature, following the structure of the MEE. However, ANACEC should consider including, either within the body of the report or as an additional document produced as part of the procedure, a summary of the report that is easier to read and understand by non-professionals. It is within the scope of quality assurance, as a concept, to contribute to the transparency of the higher education sector, and provide reliable, transparent, and accurate data to support decision-making processes for students, candidates, parents, or other external stakeholders. This would imply, however, addressing such populations in a language they can understand.

The panel also notes the inconsistency between the SAR and the MEE regarding the timeline the reviewed institution has available in order to submit its comments; this should be identified and clarified by the agency. More importantly, however, there is a lack of clarity regarding the scope of the comments the institution can submit, which may pose a challenge to the agency implementing this stage with consistency. Specifically, in the first phase, where the institution has the right to submit comments regarding the EER is not clear what exactly the remit of the institutional reaction may be. There is no reference if this is a factual accuracy stage or what is the spectrum of the comments that the institution can submit as the only reference in the MEE is that the institution can *make certain written comments*. Moreover, the SAR refers to this stage as *the comments/additional evidence submitted by the HEI*. The panel is especially concerned that this phrasing might allow HEIs to introduce evidence that had not previously made available during the site visit, challenge the judgments of the expert panels without having to demonstrate any procedural wrongdoing, or, generally, allow for any reaction that goes beyond the factual accuracy of the report. According to the meetings conducted by the panel, it is the PCHE who decides whether those comments should be taken into account or not, which the panel underlines is a risk of discretionary judgements when there is a lack of formal description regarding what qualifies as acceptable or not.

Taking into consideration ANACEC and the national goals regarding internationalisation, not only related to the EHEA but generally referring to the EU accession, the panel would find it beneficial for the agency to consider publishing reports, or at least summaries, in English language.

Panel recommendations:

Revisit the applicable regulatory framework in order to clarify the scope of the comments a HEI can submit in relation to the review reports and ensure that this stage provides an opportunity for the institution to point out errors of fact before the report is finalised, but not introduce additional evidence.

Panel suggestions for further improvement

1. Revisit the current focus on the enhancement component of the evaluations by giving further attention to commendations, recommendations, and areas in need of improvement in the body of the reports.
2. Ensure consistency regarding the timeline available for institutions to submit their comments in relation to the review reports.
3. Publish summary reports on the evaluations that are easier to read and understood by non-professionals.

Panel conclusion: Compliant

ESG 2.7 COMPLAINTS AND APPEALS

Standard:

Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.

Evidence

The agency developed the *Regulation on the settlement of petitions submitted to ANACEC* which separates petitions into:

- complaints - petitions that are made before or during the external evaluation processes of the quality of study programmes/educational institutions;
- appeals - petitions challenging the decisions of the ANACEC Governing Board regarding the results of the external evaluation of the quality of study programmes/educational institutions. The object of the appeal may be the violation of the procedures of external evaluation of the quality of study programmes/educational institutions;
- notifications - petitions by which ANACEC is informed about a problem of personal or public interest, but which does not refer to the process and/or the result of the evaluation.

By petition is meant any complaint, appeal, notifications addressed to ANACEC. The general deadline for resolving the petition is 30 working days from its registration. According to the same regulation, the President of ANACEC approves the petition and forwards it to the appropriate department of the Agency for examination.

Complaints can refer to the incompatibility of the experts to participate in the external evaluation process due to the conflict of interests; violation by the experts and/or ANACEC staff, in the external evaluation process, of the external evaluation procedure, of the rules of conduct and of the rules of professional ethics. The complaints regarding the conflict of interest is examined by the DHEE within 3 working days; the Department proposes whether or not to exclude the expert from the external evaluation process. The complaints regarding the violation by the experts and/or the ANACEC staff of the rules of professional conduct and deontology are examined within a maximum of one working day from the receipt of the complaint, by the specialized Department. If the complaint is reasonable, the external evaluation visit is suspended and the complaint is forwarded for resolution to the Ethics Commission of ANACEC, approved by order of the President. The complaints filed after the external evaluation visit are forwarded to the Ethics Commission for resolution. If the Ethics Commission finds that the alleged violations are real, the President of ANACEC orders the exclusion of the expert evaluator and/or ANACEC employee from the external evaluation process and the resumption of the evaluation process.

As reflected in the SAR, since the entry into force of the Regulation, no complaints were registered regarding the violation by the experts and/or the ANACEC staff, in the external evaluation process, of the rules of conduct established in the Methodology for the selection of expert evaluators and the rules of professional ethics stipulated in the Code of Professional Ethics of ANACEC. 2 complaints were registered regarding the impossibility of the evaluator's participation in the external evaluation process due to the conflict of interests. In both cases, the experts were replaced by other experts by order of the ANACEC President.

According to the *Methodology of External Evaluation*, the external evaluation procedures and the decision of the Governing Board of the agency on the authorization or non-authorization of provisional operation, accreditation or non-accreditation of the study programme/educational institution may be appealed if they do not correspond to the Methodology. The educational institution subject to the external evaluation process lodges the appeal to the agency within 10 working days from the date of sending the decision to the educational institution.

The *Regulation on the settlement of petitions submitted to ANACEC* mentions that, in the case of appeals, the specialized department which shall propose 3 members of the Appeals Commission, competent in the field to which the appeal refers, selected from the Register of expert evaluators, which are finally appointed by the President. Members of the Appeals Commission cannot be appointed from among the members of the GB, the expert evaluators who are in a conflict of interest or who have been involved in the evaluation or attestation process in the case examined. The general deadline for resolving the petition is 30 working days from its registration. For justified reasons related to the complexity of the subject matter of the petition, the general deadline may be extended by a maximum of 15 working days.

During the year of 2018, 4 appeals were registered at ANACEC and 6 appeals were submitted in 2022. No appeals were submitted between 2019-2021.

Analysis

As noted above, the provisions for complaints and appeals are distributed in two sources: the MEE and the *Regulation on the settlement of petitions submitted to ANACEC*. However, when exploring the two documents, a few contradictions or inconsistencies should be pointed out:

- the MEE states that the object of the appeal can be *the external evaluation procedures and the decision of the Governing Board of the agency*. However, the *Regulation on the settlement of petitions submitted to ANACEC* defines the appeals as petitions challenging the decisions of the ANACEC Governing Board only. It is therefore unclear, between the two documents, what can be the object of an appeal.
- furthermore, the definition of the grounds that enable an institution to submit an appeal might not be sufficiently elaborated and articulated in order to support ANACEC in the consistent implementation of its provisions. The MEE states that procedures/decisions may be appealed if they do not correspond to the Methodology; the *Regulation on the settlement of petitions submitted to ANACEC* states that the object of the appeal may be the violation of the procedures of external evaluation of the quality of study programmes/educational institutions.
- finally, the procedure stating that the President is the one appointing the Appeals Committees places him in a conflict of interest in the case of appeals that challenge the decisions of the Governing Board, which is chaired by the President himself. Also, according to the meeting conducted by the panel, it is the President who validates the decisions of the Appeals Committees, even if the object of the decision can be against the GB which is chaired by the President.

Generally, the panel finds that the number of complaints and appeals is not a reason of concern; however, the absence of appeals between 2019-2021 seems to be coupled with the fact that changed options for decisions render overly positive outcomes that HEIs are naturally satisfied with.

Finally, it should be noted that in the process of drafting the site visit agenda, the panel has requested that representatives from institutions that have submitted appeals in the past be included in the meeting with HEIs, which the representatives of ANACEC have confirmed. However, during the meeting, none of the representatives interviewed by the panel confirmed having submitted appeals but, instead, made comments regarding the external evaluation reports. As it stands now, it was not clear to the panel if these two processes (submission of comments - see Standard 2.6. - and appeals) are delimited and if both the agency and the HEIs understand the operational difference between their object and scope. Further evidence in this regard is the fact that the agency sometimes uses the notions of comments and appeals interchangeably in the body of the SAR (in 3 instances on page 63).

Panel recommendations:

1. Revisit the applicable regulations to avoid contradictions in terms of the object for appeals.
2. Clarify and formally regulate the specific grounds based on which an appeal can be submitted so that these are more articulated and enable ANACEC to ensure the consistent implementation of the rights to appeal and complain.
3. Revisit the division of responsibilities in terms of the channel of approval for appeals to avoid a position of conflict of interest on behalf of the President.

Panel conclusion: Compliant

ADDITIONAL OBSERVATIONS

The panel is particularly concerned with the politization of accreditation decisions, which should be trusted to the agency in their entirety, especially given the independent method of selection of the GB members. While the panel fully understands the political considerations and far-reaching consequences that accreditations may have, those concerns can be addressed in other ways. To use quality assurance for political decisions defeats trust in it, and trust is essential, both from within the system, but also from the international perspective looking at the Moldovan higher education. This aspect is particularly applicable in cases where low quality of programmes is tolerated for political reasons, evidences in the instances where the Ministry chose not to issue the negative accreditation decisions proposed by ANACEC.

CONCLUSION

SUMMARY OF COMMENDATIONS

The panel made the following commendations:

- ESG 3.1. The panel was genuinely impressed with the commitment and dedication of the GB and PCHE members towards external quality assurance, particularly given the relatively young history of the concept in Moldova where many practices and processes are new and require changes of paradigm.
- ESG 3.5. The panel was genuinely impressed with the dedication and commitment of the staff of ANACEC. The high volume of work, together with the increased responsibility attached to impactful processes, makes it commendable that all staff the panel has met understand a true commitment to quality enhancement and to conducting their work to the best of their abilities, within the given limitations and resources.
- ESG 2.4. The panel wishes to commend the commitment of the agency in regard to the training and testing of its experts in order to ensure the quality of the panels.

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

The panel found that ANACEC complies with the ESG as follows:

ESG 3.1 ACTIVITIES, POLICY AND PROCESSES FOR QUALITY ASSURANCE – Compliant

ESG 3.2 OFFICIAL STATUS – Compliant

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT – Compliant

ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES – Compliant

ESG 2.3 IMPLEMENTING PROCESSES – Compliant

ESG 2.4 PEER-REVIEW EXPERTS – Compliant

ESG 2.5 CRITERIA FOR OUTCOMES – Compliant

ESG 2.6 REPORTING – Compliant

ESG 2.7 COMPLAINTS AND APPEALS – Compliant

The panel found that ANACEC partially complies with the ESG as follows:

ESG 3.3 INDEPENDENCE – Partially compliant

ESG 3.4 THEMATIC ANALYSIS – Partially compliant

ESG 3.5 RESOURCES – Partially compliant

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE – Partially compliant

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE – Partially compliant

The panel made the following recommendations:

ESG 3.1.

- Add more structure, clarity, and capacity building in the processes relating to strategic planning, implementation, monitoring, and reporting.
- Revisit the methodology for the representation of stakeholders on the GB in order to ensure their nomination by legitimate and recognised national bodies representing the state sector, private sector and/or the civil society.

ESG 3.3.

- Revisit the relevant regulations so as to allow the GB to elect the President, Vice-President, and Secretary General by the GB members.
- Reconsider the current organisation structure in the sense of adding a permanent administrative structure to safeguard institutional memory.

- Ensure the financial sustainability of the agency and adjust the relevant legislation accordingly; this would ensure a more autonomous financial management in order to enable the agency to act independently.
- Enhance the agency efforts to trigger the relevant changes that would enable it to organise its own structure and work, including organisation chart and allocation of human resources.
- Drive changes in the relevant legislative framework so as to remove decision-making interference from the Ministry and enable ANACEC to make accreditation decisions.
- Ensure that GB members are acting in an individual capacity and not based on a mandate from the institution they are coming from.

ESG 3.4.

- Continue the practice of conducting and publishing thematic analysis, and give a strategic reconsideration of their scope and implementation.
- Formally define the agency's commitment regarding the regularity of publication of thematic analysis.

ESG 3.5.

- Reconsider and enlarge the human resource capacity to equip the agency for the upcoming work, including the institutional and doctoral school evaluations, as well as the developmental work in supporting quality culture at the HEI level.
- Ensure the funding to enable human resources that are stable and qualified to meet their roles, including language proficiency.

ESG 3.6.

- Revisit the internal quality assurance policy to align it with similar, best practice, documents of this kind and more clearly convey the commitment to implement the full PDCA cycle, while engaging with internal and external stakeholders.
- Formalise a mechanism for the training/induction/onboarding of the Governing Board, and the PCHE in order to ensure that they are equipped and act professionally in undertaking their roles.
- Remove conflicting distribution of powers between different roles and units, particularly on the individuals that sit both on the GB and EM.
- Conduct an evaluation process that addresses the effectiveness of the agency governance systems.
- Ensure the closing of the feedback loop in relation to internal quality assurance tools in order to confirm that survey results are acted upon and actions of improvement are monitored.

ESG 2.1. Enhance the development of quality culture and support the institutional capacity and capability so that quality assurance at the HEI level is not an externally driven preoccupation, but an internally understood responsibility.

ESG 2.2.

- Ensure that the scope of activities assigned to the agency and the methodologies designed for them are supported by the capacity of ANACEC to implement it.
- Safeguard the contextualisation aspect in the development of upcoming procedures and in the revision of the existing ones in order to ensure the fitness for purpose of the regulatory framework the agency operates under.
- Revisit the spectrum of decision possibilities available for the Governing Board in order to ensure that they reflect the real quality levels across the study programmes.

- Ensure consideration for proportionality and adaptation in the case of positive decisions, identifying ways of reducing the workload of the agency, where possible, to correspond to its resources.

ESG 2.3.

- Ensure the cycles of evaluations are implemented as per the designed methodologies for all types of activities assigned to ANACEC.
- Revisit the current provisions for follow-up to external evaluation processes in order to ensure their fitness for purpose.

ESG 2.4. Remove any meritocracy in the selection criteria and demonstrate openness in co-opting student experts engaged in the external quality assurance processes.

ESG 2.5. Revisit and eliminate the gap in the percentages that lead to a formal decision, which currently leaves an empty room where decision-makers are pushed to an end of the range that might be less connected to reality.

ESG 2.6. Revisit the applicable regulatory framework in order to clarify the scope of the comments a HEI can submit in relation to the review reports and ensure that this stage provides an opportunity for the institution to point out errors of fact before the report is finalised, but not introduce additional evidence.

ESG 2.7.

- Revisit the applicable regulations to avoid contradictions in terms of the object for appeals.
- Clarify and formally regulate the specific grounds based on which an appeal can be submitted so that these are more articulated and enable ANACEC to ensure the consistent implementation of the rights to appeal and complain.
- Revisit the division of responsibilities in terms of the channel of approval for appeals to avoid a position of conflict of interest on behalf of the President.

In light of the documentary and oral evidence considered by it, the review panel is satisfied that, in the performance of its functions, ANACEC is in compliance with the ESG.

SUGGESTIONS FOR FURTHER IMPROVEMENT

The panel made the following suggestions:

ESG 3.1.

- Explore ways of including an international member/diaspora in the composition of the GB.
- Expand on the internationalisation understanding in its strategic approach, including through the development of English language proficiency.
- Remove the student selection criteria in order to demonstrate openness towards student engagement.

ESG 3.4.

- Explore international best practice such as ENQA's study on implementation of thematic analysis by agencies, titled "ESG 2015–2018 ENQA Agency Reports: Thematic Analysis." <https://www.enqa.eu/wp-content/uploads/ESG-2015-ENQA-Thematic-Analysis-final.pdf>.
- Considering the use of report findings, including commendations and recommendations, towards thematic analysis which could present a learning opportunity for improvement of practices across the system.

ESG 3.6.

- Define more structure in the division of responsibilities regarding the monitoring and reporting of progress in the strategic planning process.
- Revisit/formalise the relevant provisions to ensure the avoidance of conflict of interest in all instances of decision-making.

ESG 2.1. The agency should consider aligning its standards to ensure compliance with the Lisbon Recognition Convention principles, as well as enhance its efforts to promote recognition practices and best practices.

ESG 2.3.

- Consider giving longer notice to institutions about the calendar of the external evaluation processes.
- Revisit the provisions of the Guidelines to clarify under what circumstances an institution can object to the composition of the panel member; ensure that the step can be repeated until the institution and the agency trust the professionalism of the team.
- Consider revisiting the scope of work of the panel and the PCHE with an intention to avoid overlaps in their tasks and ensure that there are different oversight mechanisms to ensure the consistency and quality of reviews that are less resource and time-consuming.

ESG 2.4.

- Revisit the regulatory framework in order to allow the representatives of the labour market, as well as students, to become members of the registry of experts, a status currently reserved for experts holding an academic/scientific title.
- Expand on the profile of employer representatives in order to reflect the diversity of all sectors where higher education graduates are progressing to.
- Increase the representation of international experts in the composition of the external evaluation panels.
- Consider diversifying the profiles of international experts engaged in quality assurance processes in order to truly benefit from different perspectives and angles coming from countries that are educationally, culturally, and systemically diverse.

ESG 2.6.

- Revisit the current focus on the enhancement component of the evaluations by giving further attention to commendations, recommendations, and areas in need of improvement in the body of the reports.
- Ensure consistency regarding the timeline available for institutions to submit their comments in relation to the review reports.
- Publish summary reports on the evaluations that are easier to read and understood by non-professionals.

ANNEXES

ANNEX I: PROGRAMME OF THE SITE VISIT

NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
05.06.2023 - Review panel's kick-off meeting and preparations for site visit				
1	120 min	Review panel's kick-off meeting and preparations for site visit		
06.06.2023 - Online meeting with the agency's resource person				
2	16.30-17.30 (Brussels time)	An online clarifications meeting with the agency's resource person regarding the specific national/legal context in which an agency operates, specific quality assurance system to which it belongs and key characteristics of the agency's external QA activities	1. President of ANACEC 2. Vice-President of ANACEC	
18.06.2023 – Day 0 (pre-visit)				
3	60 min	Review panel's pre-visit meeting and preparations for day 1		
4	As necessary	A pre-visit meeting with the agency's resource person to clarify any remaining questions after the online clarifications meeting	1. President of ANACEC 2. Vice-President of ANACEC	
19.06.2023 – Day 1				
	09:00 – 09:10	Tour of the ANACEC premises	1. President of ANACEC 2. Head of Public Relations and International Cooperation Office	
	09:10 – 09:30	Review panel's private meeting		
5	09:30 – 10:30	Meeting with the Executive Management	1. President of ANACEC	

NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
			2. Vice-President of ANACEC 3. Secretary General of ANACEC	
	10:30 – 10:45	Review panel's private discussion		
6	10:45 – 11:30	Meeting with the Governing Board (<i>excluding the Executive Management, student and employer</i>)	1. ULIM 2. Former Tiraspol State University (merged with UPSIC) 3. USM 4. UPSIC 5. Former Tiraspol State University (merged with UPSIC) 6. Independent expert 7. USMF 8. USMF	
	11:30 – 11:45	Review panel's private discussion		
7	11:45 – 12:30	Meeting with the department of Higher Education Evaluation	1. DHEE 2. DHEE	
	12:30 – 13:30	Lunch (panel only)		
8	13:30 – 14:15	Meeting with the Profile Committee in Higher Education	1. PCHE 2. PCHE 3. PCHE 4. PCHE 5. PCHE 6. PCHE 7. PCHE 8. PCHE	
	14:15 – 14:30	Review panel's private discussion		
9	14:30 – 15:15	Meeting with support staff: Public Relations and International Cooperation, Human Resources, TBD	1. Head of Public Relations and International Cooperation Office 2. Head of Institutional Management Section	

NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
			3. Chief Accountant, Financial - Administrative Office 4. Main Specialist, Legal and Human Resources Office 5. Main Specialist, Public Relations and International Cooperation Office	
	15:15 – 15:30	Review panel's private discussion		
10	15:30 – 16:15	<i>(Slot available for any additional meetings)</i>		
	16:15 – 16:30	Review panel's private discussion		
11	16:30 – 17:30	Wrap-up meeting among panel members and preparations for day 2		
		Dinner (panel only)		
20.06.2023 – Day 2				
	08:30 – 09:00	Review panel's private meeting		
12	09:00 – 09:45	Meeting with representatives of the Ministry of Education and Research	1. Minister 2. General Secretary of State	
	09:45 – 10:30	Review panel's private discussion		
13	10:30 – 11:15	Meeting with the leadership of HEIs reviewed by ANACEC (including representatives of institutions that submitted appeals in 2022)	1. Vice-rector TUM 2. Rector UPSC 3. Rector UCCM 4. Rector USPEE 5. Vice Rector USEM 6. Rector USARB 7. Rector ASEM	
	11:15 – 11:30	Review panel's private discussion		
14	11:30 – 12:15	Meeting with QA officers of HEIs reviewed by ANACEC (including representatives of institutions that submitted appeals in 2022)	1. Head of Department, UTM 2. Deputy Head of Department USMF	

NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
			3. Head of Quality Management Section, UPSIC 4. Deputy Head of the Quality Management Section, USM 5. Head of Quality Management and Curricular Development Section, AMTAP 6. Head of the Academic Support Office, Free International University of Moldova	
	12:15 – 12:30	Review panel's private discussion		
15	12:30 – 13:15	Meeting with members of the Experts Registry (academics)	1. USM 2. USM 3. UTM 4. US Comrat 5. USPEE 6. ASEM 7. UPSIC 8. SUM	
	13:15 – 14:15	Lunch (panel only)		
16	14:15 – 15:00	Meeting with student representatives (including the member of the Governing Board and members of the Experts Registry)	1. Governing Board 2. League of Students Originating from the Republic of Moldova 3. USFM 4. USFM 5. UPSIC 6. UPSIC 7. USM	
	15:00 – 15:15	Review panel's private discussion		

NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
17	15:15 – 16:00	Meeting with representatives of labour market (including the member of the Governing Board and members of the Experts Registry)	<ol style="list-style-type: none"> 1. Governing Board 2. Manager e-Car Logistics srl 3. Ministry of Finance 4. Director of High School 5. "Alexei Mateevici" College From Chisinau 6. State Agency for Intellectual Property 7. Center For Continuing Training in the Electoral Field 8. Ministry of Justice 	
	16:00 – 16:15	Review panel's private discussion		
18	16:15 – 17:00	International experts involved in ANACEC external evaluations	<ol style="list-style-type: none"> 1. ARACIS 2. ARACIS 3. Sorbonne University 4. European Parliament, Belgium 5. MICs Learning Agenda Gavi, Switzerland 6. Finnish Education Evaluation Centre (FINEEC) 	
19	17:00 – 18.00	Wrap-up meeting among panel members: preparation for day 3 and provisional conclusions		
21.06.2023 – Day 3				
20	09:00 – 10:00	Meeting among panel members to agree on final issues to clarify		
21	10:00 – 11:00	Meeting with the President to clarify any pending issues	President of ANACEC	
22	11:00 – 12:30	Private meeting between panel members to agree on the main findings		

NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
23	12:30 – 13:00	Final de-briefing meeting with agency representatives to inform about preliminary findings	1. President of ANACEC 2. Vice-President of ANACEC 3. Secretary General of ANACEC 4. Head of Department	
	13:00 – 14:00	Lunch (panel only)		

List of abbreviations

- USMF - State University of Medicine and Pharmacy "Nicolae Testemițanu", (Public Institution, Chisinau)
- UTM – Technical University of Moldova (Public Institution, Chisinau)
- USM - State University of Moldova (Public Institution, Chisinau)
- UPSIC - State Pedagogical University "Ion Creangă" (Public Institution, Chisinau)
- US Cahul - State University from Cahul (Public Institution, Cahul)
- UCCM - Cooperative - Commercial University of Moldova (Private Institution, Chisinau)
- USPEE - University of European Political and Economic Studies "Constantin Stere" (Private Institution, Chișinău)
- USEM - University of European Studies from Moldova (Private Institution, Chisinau)
- AMTAP - Academy of Music, Theater and Fine Arts (Public Institution, Chisinau)
- USARB - State University from Balti "Alec Russo" (Public Institution, Balti)
- ASEM - Academy of Economic Studies of Moldova (Public Institution, Chisinau)
- US Comrat - State University from Comrat (Public Institution, Comrat)

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

External review of the National Agency for Quality Assurance in Education and Research (ANACEC) by ENQA

Annex I:

TRIPARTITE TERMS OF REFERENCE BETWEEN ANACEC, ENQA AND EQAR

November 2022

Amended May 2023

I. Background and context

ANACEC is an administrative authority under the Ministry of Education and Research of the Republic of Moldova. It was established by Government Decision in 2014 as the *National Agency for Quality Assurance in Professional Education (ANACIP)*. Following a reform initiated in 2017, that included a series of organizational and content changes for many structures from various fields of public interest, including quality assurance, by GD no. 201/2018, the name of the ANACIP was changed to National Agency for Quality Assurance in Education and Research (ANACEC), the mission, functions, tasks, rights of the Agency and the way of organizing its activity being detailed in the [Regulation on the organization and operation of the National Agency for Quality Assurance in Education and Research](#).

The Agency is financed from the state budget, from collected revenues and resources related to projects financed from external sources.

ANACEC's **mission** is to implement state policies and contribute to the development oriented towards the best international standards in the areas of competence assigned by promoting the quality culture in pre-university education, vocational education and training, higher education and continuous training, as well as in research and innovation organizations.

ANACEC's **vision** is:

- Recognition by society in general and, in particular, by general education, vocational education and training, higher education, continuous training institutions and organizations in the fields of research and innovation of the role of the Agency as an important player in promoting and ensuring quality in the system;
- Achieving the role of interlocutor between educational institutions of different levels, organizations in the fields of research and innovation, employers, public authorities in the Republic in its capacity as promoter of quality in education and research;
- Recognition of ANACEC at international and European level, including through registration in EQAR, becoming ENQA member, to support the processes of internationalization in education.

ANACEC's **motto** is: "We promote quality culture".

The main **strategic objectives** of the Agency are:

- Promoting and ensuring quality in education and research;
- Ensuring the sustainable development of the external quality evaluation system in education and research;
- Capacity building of ANACEC as a structure responsible for quality assurance in education and research;
- Achieving the recognition of the Agency at national and international level.

In its areas of activity, the Agency collaborates with central and local public authorities, as well as with international bodies.

The Agency aims at ensuring the quality of services provided by institutions in the field of education and research, thus contributing to the fulfillment of the requirements of society and the labour market in the training of competent staff. The Agency stimulates the increase of the level of responsibility of the institutions in the fields of education and research towards the quality of the services provided.

The agency covers several **fields of activity**, such as:

- quality evaluation in general education;
- quality evaluation in vocational education and training;
- quality evaluation in higher education;
- external evaluation of continuous professional training programmes;
- external evaluation of organizations in the fields of research and innovation;
- evaluation of the scientific and scientific-teaching staff.

Quality evaluation in higher education consists in the fact that ANACEC externally evaluates the quality of study programmes and higher education institutions for the purpose of their *authorization of provisional operation, accreditation, and/or reaccreditation*, these being the two successive stages with different purposes, in terms of the rights granted to the institutions. *Authorization of provisional operation* represents the act of establishment of the institution/initiation of the study programme and grants the right to carry out the educational process, and to organize admission to studies. *Accreditation/reaccreditation* grants the right to carry out the educational process, to organize admission to studies, to organize the final examination, and to issue diplomas, certificates and other study documents recognized by the Ministry of Education and Research.

ANACEC has been an affiliate of the European Association for Quality Assurance in Higher Education (ENQA) since 2016 and is applying for ENQA membership for the first time.

ANACEC is also applying for inclusion on EQAR.

2. Purpose and scope of the review

This review will evaluate the extent to which ANACEC (the agency) complies with each of the standards of Parts 2 and 3 of the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* and support the agency in its efforts to continually review and enhance its work. Such an external review is a requirement for agencies wishing to apply for ENQA membership and/or for EQAR registration.

2.1 Activities of the agency within the scope of the ESG

To apply for ENQA membership and EQAR registration, this review will analyse all of the agency's activities that fall within the scope of the ESG, e.g., reviews, audits, evaluations or accreditations of higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation). All activities are reviewed irrespective of geographic scope (within or outside the EHEA) or whether they are obligatory or voluntary in nature.

The following activities of the agency must be addressed in the external review:

- External evaluation for the authorization of provisional operation of study programmes (cycle I - Bachelor, Integrated studies, cycle II – Master, cycle III – Doctorate)
- External evaluation for the accreditation/reaccreditation of study programmes (cycle I – Bachelor, Integrated studies, cycle II – Master, cycle III – Doctorate)

- External Evaluation for the authorization of provisional operation of higher education institutions
- External Evaluation for the accreditation/reaccreditation of higher education institutions
- External Evaluation for the authorization of joint study programmes (based on the European Approach for Quality Assurance of Joint programmes)
- External Evaluation for the accreditation of joint study programmes (based on the European Approach for Quality Assurance of Joint programmes)

While some activities, i.e. authorization of provisional operation and accreditation/reaccreditation of higher education institutions and joint study programmes, are not yet carried out, the activities should nevertheless be covered and assessed in the self-evaluation report and external review on the basis of available processes and documentation.

The following activities are outside of the scope of the ESG and not relevant for the application for inclusion on EQAR:

- Quality assurance in general education
- Quality Assurance in vocational education and training
- Evaluation of continuous professional training programmes
- Evaluation of organizations in the field of research and innovation
- Evaluation of the scientific and scientific-teaching staff
- Evaluation of scientific publications and other evaluations

Should any substantive changes occur in ANACEC between now and the review (e.g. organisational changes, the introduction or changes of activities within or outside of the scope of the ESG), the agency should inform EQAR at its earliest convenience.

3. The review process

The review will be conducted following the methodology of ENQA Agency Reviews. The process is designed in line with the *Guidelines for ENQA Agency Reviews* and the requirements of the *EQAR Procedures for Applications*.

The review procedure consists of the following steps:

- Formulation of, and agreement on the Terms of Reference for the review between ANACEC, ENQA and EQAR (including publishing of the Terms of Reference on ENQA's website¹);
- Nomination and appointment of the review panel by ENQA;
- Notification of EQAR about the appointed panel;
- Self-assessment by the agency, including the preparation and publication of a self-assessment report;
- A site visit of the agency by the review panel;
- Preparation and completion of the final review report by the review panel;
- Scrutiny of the final review report by ENQA's Agency Review Committee;
- Publication of the final review report;
- A decision from the EQAR Register Committee on the agency's registration on EQAR;
- A decision from the ENQA Board on ENQA membership;
- Follow-up on the panel's recommendations to the agency, including a voluntary progress visit.

3.1 Nomination and appointment of the review panel

¹ The agency is encouraged to publish the ToR on its website as well.

The review panel consists of four members: one or two quality assurance experts (at least one of which is currently employed by an ENQA member agency), an academic employed by a higher education institution, a student member, and potentially a labour market representative (if requested). One of the members serves as the chair of the review panel, and another member as a review secretary. For ENQA Agency Reviews at least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE), and the student member is always selected from among the ESU-nominated reviewers. If requested, the labour market representative may come from the Business Europe nominees or from ENQA. An additional panel member may be included in the panel at the request of the agency. In this case, an additional fee is charged to cover the reviewer's fee and travel expenses.

The panel will be supported by the ENQA Review Coordinator (an ENQA staff member) who will monitor the integrity of the process and ensure that ENQA's requirements are met throughout the process. The Review Coordinator will not be the secretary of the review and will not participate in the discussions during the site visit interviews.

Current members of the ENQA Board are not eligible to serve as reviewers.

ENQA will provide the agency with the proposed panel composition and the curricula vitarum of the panel members to establish that there are no known conflicts of interest. The reviewers will have to agree to a non-conflict of interest statement that is incorporated in their contract for the review of this agency.

3.2 Self-assessment by the agency, including the preparation of a self-assessment report

The agency is responsible for the execution and organisation of its own self-assessment process and must adhere to the following guidance:

- Self-assessment is organised as a project with a clearly defined schedule and includes all relevant internal and external stakeholders;
- The self-assessment report is expected to contain:
 - a brief description of the HE and QA system;
 - the history, profile, and activities of the agency;
 - a presentation of how the agency addresses each individual standard of Parts 2 and 3 of the ESG for each of the agency's external QA activities, with a brief, critical reflection on the presented facts;
 - opinions of stakeholders;
 - reference to the recommendations provided in the previous review and actions taken to meet those recommendations;
 - a SWOT analysis;
 - reflections on the agency's key challenges and areas for future development.
- All the agency's external QA activities (as defined under section 2.1) are described and their compliance with the ESG is analysed in the SAR.
- The report is well-structured, concise, and comprehensive. It clearly demonstrates the extent to which the agency performs its tasks of external quality assurance and meets the ESG.

The self-assessment report is submitted to the ENQA Secretariat, which has two weeks to carry out a screening. The purpose of a screening is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The Secretariat will not judge the content of information itself but rather whether or not the necessary information, as outlined in the *Guidelines for ENQA Agency Reviews*, is present. If the self-assessment report does not contain the necessary information and fails to respect

the requested form and content, the ENQA Secretariat reserves the right to ask for a revised version within two weeks.

The final version of the agency's self-assessment report is then submitted to the review panel a minimum of eight weeks prior to the site visit. The agency publishes the completed SAR on its website and sends the link to ENQA. ENQA will publish this link on its website as well.

3.3 A site visit by the review panel

The review panel will draft a proposal of the site visit schedule which must be submitted to the agency at least six weeks before the planned dates of the visit. The schedule is to include an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit, the duration of which is usually 2,5 days. The approved schedule must be given to the agency at least one month before the site visit to properly organise the requested interviews.

In advance of the site visit (ideally at least two weeks before the site visit), the panel will organise an obligatory online meeting with the agency. This meeting is held to ensure that the panel reaches a sufficient understanding of:

- The specific national/legal context in which the agency operates;
- The specific quality assurance system to which the agency belongs;
- The key characteristics of the agency's external QA activities.

The review panel will be assisted by the ENQA Review Coordinator during the site visit. The review coordinator will act as the panel's chief liaison with the agency, monitor the integrity of the review process and its consistency, and ensure that ENQA's overall expectations of the review are considered and met.

The site visit will close with a final debriefing meeting in which the panel outlines its general impressions and provides an overview of the judgement on the agency's ESG compliance. The panel will not comment on whether or not the agency would be granted/reconfirmed membership with ENQA or registration on EQAR.

3.4 Preparation and completion of the final review report

Based on the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will follow the purpose and scope of the review as defined under sections 2 and 2.1. It will also provide a clear rationale for the panel's findings concerning each standard of Parts 2 and 3 of the ESG. When preparing the report, the review panel should also bear in mind EQAR's *Policy on Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies*² to ensure that the report contains sufficient information for the Register Committee to consider the agency's application for registration on EQAR.

A draft will first be submitted to the ENQA Review Coordinator who will check the report for consistency, clarity, and language, and it will then be submitted to the agency – usually within 10 weeks of the site visit – for comment on factual accuracy and grave misunderstandings only. The agency will be given two weeks to do this and should not submit any additional material or documentation at this stage. Thereafter, the review panel will take into account the agency's feedback on possible factual errors and finalise and submit the review report to ENQA.

² Available at: <https://www.eqar.eu/about/official-documents/#use-and-interpretation-of-the-esg>

The report should be finalised within three months of the site visit and will normally not exceed 40-50 pages in length.

3.5. Publication of the report and a follow-up process

The agency will receive the review panel's report and publish it on its website once the Agency Review Committee has validated the report. The report will also be published on the ENQA website together with the statement of the Agency Review Committee validating external review reports by assessing the integrity of the review process and checking the quality and consistency of the reports. Importantly, during this process, and prior to final validation of the report, the Agency Review Committee has the option to request additional (documentary) evidence or clarification from the review panel, review coordinator or the agency if needed. The review report will be published on ENQA website regardless of the review outcome.

As part of the review's follow-up activities, the agency commits to react on the review recommendations and submit a follow-up report to ENQA within two years of the validation of the final external review report. The follow-up report will be published on the ENQA website.

The follow-up report may be complemented by an optional progress visit to the agency performed by two members of the original panel (whenever possible). The visit, which normally takes place 2-3 years after the verification of the final external review report (and after submission of the follow-up report), aims to offer an enhancement-oriented and strategically driven dialogue that ordinarily might be difficult to truly integrate in the compliance-focused site visit. The progress visit thus does not have the objective of checking the agency's ESG compliance or how the agency has followed up on the recommendations, but rather provides an arena for strategic conversations that allow the agency to reflect on its key challenges, opportunities, and priorities. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator about this.

4. Use of the report

ENQA will retain ownership of the report. The intellectual property of all works created by the review panel in connection with the review contract, including specifically any written reports, will be vested in ENQA.

The report is used as a basis for the Register Committee's decision on the agency's registration on EQAR. In the case of an unsuccessful application to EQAR, the report may also be used by the ENQA Board to reach a conclusion on whether the agency can be admitted/reconfirmed as a member of ENQA. The review process is thus designed to serve two purposes. In any case, the review report should only be considered final after validation by the Agency Review Committee. After submission to ENQA but before validation by the ARC, the report may not be used or relied upon by the agency, the panel, or any third party and may not be disclosed without ENQA's prior written consent. The approval of the report is independent of the decision on EQAR registration or ENQA membership.

For the purposes of EQAR registration, the agency will submit the review report (once validated by the Agency Review Committee) to EQAR via email. The agency should also include its self-assessment report (in a PDF format), a Declaration of Honour, and any other documents that may be relevant for the application (i.e., annexes, statement to the review report, updates). EQAR is expected to consider the review report and the agency's application at its Register Committee meeting as stipulated in the indicative review schedule below and before the decision on ENQA membership by the ENQA Board.

To apply for ENQA membership, the agency is also requested to provide a letter addressed to the ENQA Board outlining its motivation for applying for membership and the ways in which the agency expects to contribute to the work and objectives of ENQA during its membership. This letter will be considered by the Board together with the confirmation of EQAR listing when deciding on the agency's membership. Should the agency not be granted the registration in EQAR or the registration is not renewed, the decision on ENQA membership will be taken based on the final review report, the application letter, and the statement from the Agency Review Committee. The decision on membership will be published on ENQA's website.

5. Indicative schedule of the review

Agreement on Terms of Reference	April 2023
Appointment of review panel members	May 2023
Self-assessment completed	May 2023
Screening of SAR by ENQA Review Coordinator	May 2023
Preparation of the site visit schedule and indicative timetable	May 2023
Briefing of review panel members	May 2023
Review panel site visit	June 2023
Draft of review report and its submission to ENQA Review Coordinator for verification of its compliance with the Guidelines	August 2023
Draft of review report to be sent for a factual check to the agency	September 2023
Agency statement on the draft report to the review panel (if necessary)	September 2023
Submission of the final report to ENQA	October 2023
Validation of the review report by the Agency Review Committee	December 2023
Publication of report	January 2024
EQAR Register Committee meeting and initial consideration	February 2024
Decision on ENQA membership by the ENQA Board	March 2024

ANNEX 3: GLOSSARY

ANACEC	Agencia Națională de Asigurare a Calității în Educație și Cercetare/National Agency for Quality Assurance in Education and Research
ARACIS	Agencia Română de Asigurare a Calității în Învățământul Superior/Romanian Agency for Quality Assurance in Higher Education
AQAS	Agency for Quality Assurance through Accreditation of Study Programmes
DHEE	Department for Higher Education Evaluation
EEP	External Evaluation Panel
EER	External Evaluation Report
EHEA	European Higher Education Area
EKKA/HAKA	Estonian Quality Agency for Higher and Vocational Education (EKKA) to the Estonian Quality Agency for Education (HAKA)
ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register for Higher Education
ESG	<i>Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015</i>
EU	European Union
GB	Governing Board
HE	higher education
HEI	higher education institution
MEE	<i>Methodology of External Evaluation</i>
MER	Ministry of Education and Research
PCHE	Profile Committee in Higher Education
QA	quality assurance
SAR	self-assessment report

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY ANACEC

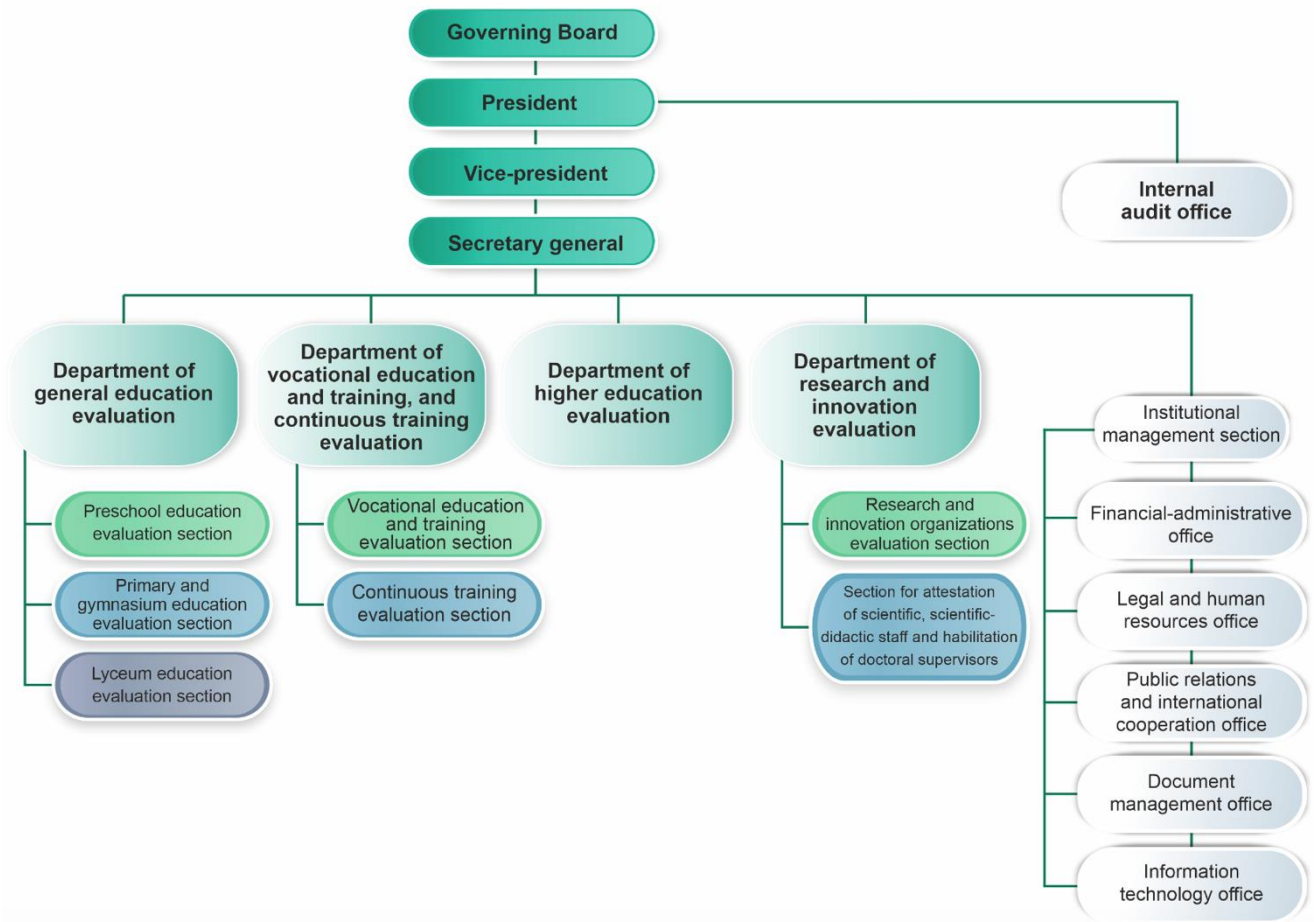
1. Self-Assessment Report
2. Methodology of external quality evaluation for the authorization of provisional operation and accreditation of vocational education and training, higher education, and professional continuous training study programmes and institutions.
3. Guidelines for the external evaluation of bachelor's degree (cycle I) and integrated higher education study programmes.
4. Guidelines for the external evaluation of master's degree (Cycle II) study programmes.
5. Guidelines for the external evaluation of higher education institutions.
6. Self-evaluation report (example in English).
7. Site visit record sheet (example in English).
8. External evaluation report (example in English).
9. Declaration on the lack of conflict of interest.
10. Curriculum of the training course for expert evaluators.
11. Code of Professional Ethics of ANACEC.
12. Post-evaluation monitoring (follow-up) procedure of study programmes and educational institutions.
13. Projected workload (numbers of procedures for quality assurance that fall under the scope of the present review) matched with staff capacity for 2023 and 2024;
14. Summary financial tables on income (state budget allocations, collected revenue; projects, etc.) – for the last 5 years
15. Summary financial tables on expenditure per major categories (staff salaries and related taxes; financing of activities; equipment (software, hardware); business travel; training; maintenance; purchase of goods; etc.) – for the last 5 years
16. A projected budget broken down by categories for 2024;
17. Any further budgetary projections for the future (i.e. the next 3 years) – if available
18. The annual non-financial employee motivation programme
19. List of student experts along with their field of study, HEI they are associated with, and the date of their appointment.
20. Minutes from the last 10 (chronological) meetings of the Profile Committee in Higher Education, and also at least one meeting minute per year for the past 5 years;
21. Minutes from the last 10 (chronological) meetings of the Department of Higher Education Evaluation;
22. Minutes from the last 10 (chronological) meetings of the Governing Board. Additionally, please add minutes that provide information on:
 - Discussions regarding yearly activity plans and reports, the strategy, and any internal work organization (at least 1 minute per year for the last 5 years);
 - Discussions where decisions on evaluation/accreditation were taken – at least 2 minutes per year for the last 5 years covering different procedures which are subject to the present review.
23. Reports summarising the results of the two most recent calls for student experts and representatives of employers, respectively.
24. Records of the last two elections of the Governing Board - candidacies, meeting minutes, interview records, etc.
25. A translation into English of the quality assurance-related pages from the Education Code.

26. A translated summary or an outline of the one thematic analysis that ANACEC produced - “External evaluation of the quality of bachelor’s degree study programmes in the fundamental field of science, culture and technology 02 Arts and Humanities”
27. Templates of the online surveys conducted with the representatives of the evaluated institutions and the members of the EEP (SAR p34);
28. Consolidated studies of the results of the online surveys for the past 3 academic years (SAR p34);
29. CVs of all ANACEC support staff;
30. The test conducted at the end of the training for expert reviewers;
31. The nominal composition of the entire Governing Board + institutional affiliations.
32. Mission Report of the Twinning Project MD: 15 ENI SO 01 18 (MD/34) Enhancing the quality and effectiveness of the Vocational Education and Training (VET) system

OTHER SOURCES USED BY THE REVIEW PANEL

- I. Reports produced by HAKA (formerly EKKA) of its processes conducted in Moldova (accessed on DEQAR)

ANNEX 5. ORGANISATION STRUCTURE OF ANACEC



ENQA AGENCY **REVIEW 2023**

THIS REPORT presents findings of the ENQA Agency Review of the National Agency for Quality Assurance in Education and Research (ANACEC) undertaken in 2023.

enqa.

European Association for
Quality Assurance in Higher Education