



European Association for  
Quality Assurance in Higher Education

Ms Lemka Izmailova  
Director  
National Accreditation Agency of the Russian Federation (NAA)  
33 Shabolovka Str., 115162 Moscow  
Russia

Bern, 15 March 2021

**Subject: Reconfirmation of membership of NAA in ENQA**

Dear Ms Lemka Izmailova,

I am pleased to inform you that, at its meeting of 4 March 2021, the Board of ENQA agreed to reconfirm the NAA membership of ENQA for five years from that date. The Board concluded that NAA is in compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015) and thus fulfils the membership criteria according to article 6, paragraph 1 of ENQA's rules of procedure.

The Board would like to use this opportunity to provide an articulation regarding standard 3.3 Independence, where their judgement differs from that of the panel. The Board seconds the critical remark of the panel on the dependency and interconnectedness of the agency's activities with Rosobrnadzor and the Ministry (e.g. appointment of the Director, procedure for selection of experts and approval of panels, monitoring of panels' work). Following this, in the opinion of the Board, the standard can be considered only as partially compliant with the ESG.

In regard to ESG 3.6 Internal Quality Assurance and Professional Conduct, the Board shares the panel's concern that internal quality assurance of the agency is not implemented in a systematic and optimal manner due to weakly formulated internal procedures. In the opinion of the Board, the standard can thus be considered only as substantially compliant with the ESG.

All in all, the Board critically notes that the agency should be proactive in reaching compliance with the ESG regardless of legal restrictions. The agency is urged to showcase in the follow-up report the efforts it has taken to change or adapt normative legal acts and fully manage its external quality assurance activities.

The Board would like to receive a follow-up report within two years of its decision, i.e. by March 2023.



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The Board also encourages NAA to take advantage of the voluntary progress visit – an enhancement-led feature in the review process. The visit would take place in about two years' time from this decision. The ENQA Secretariat will be in touch with you in about a year's time to discuss this possibility. The costs of this visit have already been included as part of the review fee and are non-refundable except for the travel costs of the experts. More information about the progress visit can be found in the Guidelines for ENQA Agency Reviews.

If you have any further queries, please do not hesitate to contact the ENQA Secretariat.

Please accept my congratulations for the re-confirmation of membership of NAA.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'C. Grolimund', is written over a light blue horizontal line.

Dr Christoph Grolimund  
President

Annex: Areas for development

## **Annex: Areas for development**

As outlined by the review panel, NAA is recommended to take appropriate action, so far as it is empowered to do so, on the following issues:

### **ESG 3.1 Activities, policy and processes for quality assurance**

In the development of future strategic documents, the agency is recommended to make the participation of HEIs and students more visible.

Even within the present legal situation, NAA is recommended to look for more systematic ways of holding a dialogue between NAA and the specific stakeholders (HEIs, students, professional organisations), which would be beneficial for the agency's governance and work. The agency is additionally encouraged to involve the international experts more actively in its activities, using the international connections.

### **ESG 3.3 Independence**

The agency is recommended to reconsider the adequacy and purpose of establishing an institute of additional control through a member of the Accreditation body being responsible for monitoring the expert panel's activity and for reviewing the experts' conclusions, as this interferes with and threatens the independence of the agency.

### **ESG 3.4 Thematic analysis**

The agency is recommended to re-evaluate its current understanding of the philosophy of thematic analysis as required by the ESG 3.4. The agency may consider exploring best practices of thematic analysis in the international context and establish a review group to strategize thematic analysis activities. For this the agency could involve stakeholders from the Ministry, HEIs (staff and students) as well as the labour market representatives.

To agency is recommended to explore the conclusions of expert panels in order to understand trends within the national context of higher education in Russian Federation.

To agency is recommended to regularly publish the reports on thematic analysis in order to ensure their proper dissemination.

### **ESG 2.1 Consideration of internal quality assurance**

To agency is recommended to integrate the concept of student-centred learning in a more systematic approach, including consideration of this part in future endeavours to revise the FSES, or in addition to compliancy structures (ESG 1.3).

### **ESG 2.2 Designing methodologies fit for purpose**

The agency is recommended that NAA's digital support to all users should become one of the key aspects of their methodology design, in order to improve efficiency and decrease the workload for the applicants; the submitting and processing of applications in a solely digital manner should be also considered.

### **ESG 2.3 Implementing processes**

To agency is recommended to urgently amend the FSES in a way that recommendations are provided in the conclusions of the accreditation expert panels. Although this does not fall directly under the agency's remit, the very absence of an appropriate follow-up mechanism (in the form of written recommendations) to help HEIs improve and not just monitor their compliance with the FSES is a necessary condition for compliance of NAA with the ESG 2.3.

The agency is responsible for training and selection of experts and for preparation of the accreditation methodology, therefore the agency is recommended to redesign this methodology (in cooperation with the external stakeholders) in such a way that it would eliminate the possibility of subjective decision-making by only one expert.

### **ESG 2.4 Peer-review experts**

To agency is recommended to review and increase accessibility of student cohorts into expert panels through collaboration with RUY and the Ministry of Higher Education.

To agency is recommended to consider paying for all student experts and to make them equal stakeholders in a consistent manner.

To agency is recommended to share and collaborate on training student experts between the agency and RUY, with special consideration given to student-centred learning.

To agency is recommended to focus its efforts to increase internal experts to ensure greater diversity in expertise in the external quality assurance process of HEIs.

To agency is recommended to work with international agencies to explore means in improving best practices in peer-review group composition and procedures.

### **ESG 2.6 Reporting**

To agency is recommended to be proactive in initiating changes to the template of the expert's reports in order to include an adequate evidence basis, analysis and findings as well as recommendations for improvement. This would facilitate development of the follow-up process and provide an additional value for HEIs.



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To agency is recommended to send all draft reports to HEIs for correction of factual errors.

To agency is recommended to assure that outcomes of state accreditation can be accessed from their webpage in a user-friendly manner. The decisions and the reports could be supported with a simple search engine.

### **ESG 2.7 Complaints and appeals**

To agency is recommended to establish a clear and transparent complaints procedure and publish it on the website of the agency.

To agency is recommended to provide information about possibilities to lodge an appeal and the order of its review to all involved parties of state accreditation.