



Follow up report

ENQA coordinated external review

March 2017

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1 Introduction

In March 2015 Fundación para el Conocimiento madri+d was granted full membership of ENQA for a period of five years, after a review process coordinated by ENQA.

This report provides information on the implementation of improvements based on the recommendations of the Evaluation Panel report issued in February 2015 and also to the request for further information about some subjects made by the ENQA Board in the Admission letter sent to FMID in March 2015.

Section 2 provides answers point by point to all the recommendations included in the evaluation report.

Section 3 provide further information or clarification to the requests made by ENQA Board. Reference to section 2 is provided when this further clarification has been previously provided.

2 Evaluation report recommendations

2.1 The Foundation should formalize its examination of assessment frameworks leading to accreditation decisions which are accepted as replacement of the Foundation's own accreditation renewal processes.

Regarding the acceptance of other international accreditations as replacement to own decisions pointed out in the Evaluation, some clarification is needed.

International accreditations are not a replacement for FMID accreditation decisions, but a relevant input to be considered within the process of Accreditation Renewal. With this and any other needed input, FMID issues its own evaluation reports: first the provisional and after the correspondent allegation phase the final report. These reports fulfil the same content requisites and formal aspects of all reports issued by FMID and are subject to the same follow up and appeal procedures.

The accreditation schemes used by the previously identified agencies with whom FMID has cooperation agreements are compatible and many of the criteria used are very similar, if not the same, to the ones FMID Accreditation Renewal. In this situation duplicating efforts (in time consumed and money employed by both the agency and the universities) and making redundant evaluations is considered of no-value.

At this point FMID has decided to revise its Accreditation Renewal protocol to clarify to which extend the accreditations from other agencies are accepted as an input to the process, and how to proceed in these cases. We have taken note of the recommendation of the ENQA Evaluation Report and have analysed the compatibility of externals models with FMID Accreditation Renewal, and formalised it in documents using correspondence tables, and identifying the needs for further evidence to

effectively assess each Accreditation Renewal criteria, in particular with ABET (www.abet.org) and NAAB (www.naab.org) accreditations.

2.2 The Foundation should make better use of stakeholders such as employer organisations in the operation and oversight of their review methods.

FMID is aware of the need to include all the relevant stakeholders in the quality assurance procedures. Due to the particular configuration of the Spanish Higher Education systems, the participation of the Social Councils in the Advisory Commission was considered the best way to operate at the time of the evaluation.

After receiving the recommendation by ENQA we have reinforced the activity to increase this participation of FMID stakeholders:

- The Articles of Association of FMID have been renewed, and the changed in the Board of Trustees appointment includes the participation of a representative of the Business Confederation of Madrid-CEOE (CEIM).
- The Advisory Committee on Higher Education Quality has recently incorporated new members. FUE, RedFUE (<http://www.redfue.es/index.php?lng=en>) and La Caixa (one of the biggest Spanish Banks) have representation in this committee.
- The definition of the new procedure (for FMID) ex-ante-Verification was developed by a Working Group with participation of Fundación Universidad Empresa, FUE (<http://www.fundacionuniversidadempresa.es>).
- Internal Working Groups to develop criteria to evaluate online internships as an element of Higher Education programmes has been created with participation of FUE experts.
- Also Working Groups to define specific evaluation criteria for certain professional oriented studies have been created, such as one on Law studies, with participation of experts from the Spanish Constitutional Court.
- It is foreseen that experts participate in evaluation panels if appropriate as a complement to the standard composition. These professional expert have participated in evaluations of some Engineering programmes and also in Arts programmes.
- The 5 ex-ante Verification commissions are composed also by a professional to guarantee the evaluation of new degrees incorporate the employers' approach.
- A professional has already been included in one of the Branches of the Evaluation and Accreditation Committee, and it is foreseen the participation of professionals in the other four.

- 2.3 The Foundation should involve panel members in the feedback procedure and should have the final report checked by the review panel before the Evaluation and Accreditation Committee finally publishes it.

FMID has taken note of the recommendation. Previously to the ENQA evaluation the panel members of FMID evaluations didn't have any notice about the reports after submitting their visit report.

SICAM, the information systems that supports the evaluations, has been updated in order to provide access to the panel members to the documents elaborated after the visit report: Provisional report issued by the corresponding branch of the Evaluation and Accreditation Committee, EAC, allegations received from the university and final report issued by the plenary of the EAC. Even a notification email is sent to the panel members when the final report is sent.

Feedback from the panel members is welcomed, and a specific question about how faithfully the final reports represents the information provided by the panel is included in every year improvement survey.

- 2.4 The Foundation should further invest in finding more students who would be willing to engage in external quality assurance processes.

Engaging students in Quality Assurance procedures is key activity for FMID as all the evaluation panels include one student, student's window as evaluators is of only a few years, and the activity of FMID has increased in the last years. In 2016 students where part of the following evaluation bodies:

- 174 panels were set up for the Accreditation Renewal
- 5 branches of the Evaluation an Accreditation Committee (Accreditation Renewal)
- The Plenary of the Evaluation an Accreditation Committee (Accreditation Renewal)
- 5 branches of the Evaluation and Certification Committee (ex-ante Verification) have been created.
- The Plenary of the Evaluation and Certification Committee (ex-ante Verification)
- 3 panels for the Monitoring process.

FMID has been very active establishing relations with the university representatives in order to foster the participation of students in the evaluations and providing training to student evaluators. A specific training action was scheduled at the end of 2015 (December), and students have been participated in other 3 actions directed to both faculty and students.

Also a cooperation agreement has been signed with ACPUA (Aragon's Agency) to cooperate in training actions specifically aimed to students. The first of this action took place in Zaragoza in October 2016.

The number of students trained in 2016 (and late 2015) is 75, and the total number of currently available students is 112.

FMID is organising a Summer School course in the Universidad Menendez Pelayo titled “The answer from the universities to the needs of the labour market in transformation” where a student will moderate one of the key sessions.

As explained in chapter 2.12 of this report, the composition of the Board of Trustees of FMI have been updated, including the participation of one student appointed by the Student Council of the Community of Madrid.

Also the participation of students have been reinforced in the Advisory Committee on Higher Education Quality, including up to 3 students in the current configuration.

2.5 The Foundation should develop procedures which encourage the participation of international experts in reviews.

We acknowledge the need to foster the participation of international experts in the evaluations performed by FMID.

There are some basic requirements to include international experts in the reviews:

- Language. As the working language for the majority of the HE programmes is Spanish, good knowledge of Spanish is required. Using translation would be complex, expensive and not effective.
- Knowledge of the Spanish HE legal framework. As some critical aspects of the evaluations have to do with legal requirements. In fact ex-ante verification is a process with strict requisites fixed in a Royal Decree.
- Financial issues. FMID has to find a compromise solution between desired participation of people from external Higher Education systems in the evaluation bodies and the available budget. As the participation of international experts is expected to require significantly higher resources related to training, travel, etc. cost is a key aspect to be taken into account.

According to these requirements we have made some effort to improve the international profile of our advisory and evaluation bodies.

We have translated into English the information on our webpage section where the information and requirements to enter the Pool of Experts, with link to the related formulary, is available.

In order to complement this action, we would like to (we plan to) ask for cooperation to other ENQA agencies in the coming future to find international experts in quality assurance that can participate in evaluation processes.

2.6 The Foundation should relate key findings to conclusions more explicitly in its reports, making the deliberation by the panel visible.

We have taken note of this recommendation by ENQA. SICAM, the information system that supports the evaluations, has been updated in order to guarantee that all the criteria are adequately evaluated and findings and conclusions are included in the reports. Specific drafting for the findings of the panel separated from the conclusions have been included in the tool.

Also the layout of all the reports of the process (visit report, provisional report, final report) has been improved in order to better identify the descriptive content and the conclusions drawn from the findings.

In 2016 a document with guidelines for the drafting of reports have been elaborated, approved and distributed to the Evaluation and Accreditation Committee members. Training actions for evaluators have been organised in order to promote richer reports, with clear drafting focused on useful information for the potential readers. In fact one of the fixed sections of the training program for evaluators is the drafting of reports.

2.7 The Foundation should consider the style of reports, to make them useful to a wider readership.

The work done to improve the relation between the findings and conclusions has been also taken into account this recommendation.

At the same time that findings and conclusions are drafted in a clearer way and that evaluators are encouraged to include all the relevant information, the focus on the potential readers has also been taken into account.

In the line of making information provided by the agency as useful as possible FMID is working in the inclusion of a feature in the information system and in the web page to show in an easily accessible indicator of the evaluations, based on the semi quantitative scale (ABCD) to evaluate the different criteria included in each report.

2.8 The Foundation should consider to focus more on quality within the monitoring process, rather than on implementation of the original plans.

As it was explained to ENQA's evaluation panel Spanish legal framework comprises three phases of evaluation for official degrees:

- Ex-ante verification. Where the project of the programme is evaluated previously to its implementation.
- Monitoring. Where the fulfilment of the commitments made (in the project of programme) are checked after few years of the start of the program.
- Accreditation Renewal. Where the full deployment of the programme is evaluated.

Regarding the Monitoring, the requirements established in the Law include quality assurance criteria that a previously verified programme must meet and an evaluation of the quality management and outcomes of the programme can be done at a certain extend. However, there is not much room to change of the focus of this evaluation as it is prescribed by Law.

It is the Accreditation Renewal the phase that is devoted to the Quality of the programme assessed once there is enough data, after a certain number of years after the implementation, to evaluate all the relevant aspects.

However all procedures of FMID are subject to continuous improvement, so further revisions of the Monitoring procedure, the focus on the quality of the programmes will be present in order to include these aspects at the maximum possible extend.

2.9 The Foundation should implement a follow-up procedure within one year at most following a positive accreditation renewal decision.

Taking into account the recommendation made by ENQA, a revision of the Accreditation Renewal procedures has been made and it has been included a requirement for a follow-up of all the reports with recommendations, even for those with a positive decision.

As in the Accreditation Renewal there is an allegation phase between the provisional report and the final report, where the University has to provide in addition to allegations, an improvement plan for all weaknesses detected, the time given for the follow up is adjusted to the extent of the improvement plan.

Furthermore, Spanish agencies network, REACU, where all the Spanish Quality Agencies participate, 8 of them ENQA members, is working in the establishment of common criteria for the follow up of the Accreditation Renewal. The outcomes of this work will be implemented in next revisions of the Accreditation Renewal Guide.

2.10 The Foundation should use the general findings of its external quality assurance processes more as a basis for system-wide analyses on the higher education system in the Region of Madrid.

FMID acknowledges that improvement in this area needed to be done.

After ENQA review a detailed analysis on the outcomes of Monitoring process has been commissioned to INAECU (<http://www.inaecu.com/inaecu/?lang=en>), Research Institute for Higher Education and Science. The works are still ongoing and intermediate drafts of this analysis have already been elaborated. The reason to choose this evaluation process, and no other such as Accreditation Renewal, is de availability of enough data to reach effective conclusions.

Further studies will be done when enough data can be collected. The work to provide an easily accessible indicator based on semi quantitative calcifications of the accreditation reports criteria is considered as an starting point for further studies.

FMID is also cooperating in other studies and reports, such one on the competences more demanded by employers for each Higher Education programme using Big Data and Artificial Intelligence technics, another one on the employment rates of university graduates and the annual Spanish Higher Education Quality Report elaborated in cooperation with all the Spanish Agencies.

2.11 The Foundation should consider its internal communications strategy, to ensure the active involvement of all staff within the organization.

FMID recognise the importance of effective internal communication as a base to guarantee a smooth operation of all the processes. According to the implemented Internal Quality Management System on a quarterly basis revision meetings are held, plus biweekly coordination meeting with the participation of all the responsables of the different lines of activity of FMID are held. Any relevant communication is issued by email sent to all the staff. FMID organise its activity in small work groups and all relevant information is speedily and easily communicated.

The recommendation by the evaluation panel has been identified to come from a punctual misinformation about a specific aspect (the ISO 9001 certification of FMID) by non-FMID outsourced personnel. The inclusion of this outsourced personnel, at the appropriate level of participation, in the information channels of FMID has been improve to avoid this kind of problems in a future.

2.12 The Foundation might reconsider the appointment procedure of the Board of Trustees in order to achieve greater formal independence from the Regional Government.

Following the recommendation of the ENQA evaluation the Articles of Association of the Foundation were renewed and the appointment procedure changed to guarantee formally the independence from the Regional Government.

The current articles of association were approved on 2th November 2015. In the article 16, Composition and appointment, it is stated the composition of the Board of Trustees.

"1. The Board shall consist of the following ex officio Trustees:

- *The head of the ministry responsible for universities of the Madrid Region Government.*

- *The head of the Directorate General for Universities and Research the Madrid Region Government.*
- *The holder of the relevant Sub-Directorate General for Universities of the Madrid Region Government.*
- *The head of the competent Sub-Directorate General in Research of the Madrid Region Government.*
- *A representative of the Ministry responsible for innovation of the Madrid Region Government designated by the head of the Ministry.*

In case of disappearance or change of the name or the organizational structure, head of higher departments of head of equivalent bodies having jurisdiction in the respective subjects will assume the corresponding roles.

2. The Board will also consist of the following Trustees:

- *Four Rectors of public universities based in the Region of Madrid appointed by the Conference of Rectors of Public Universities in Madrid (CRUMA).*
- *Two representatives of the private universities based in the Region of Madrid, appointed by the representatives of all the private universities in Madrid*
- *One member appointed by the Business Confederation of Madrid-CEOE (CEIM), according to its internal rules.*
- *The Director of one of the IMDEA Foundations, appointed by the directors of the foundations IMDEA.*
- *A student, appointed by the Student Council of the Community of Madrid.*
- *A representative of the Social Councils, appointed from among its members by the Conference of the Social Councils of the Community of Madrid*
- *A trade union representative, part of the teaching and research (PDI) staff of the public universities of Madrid, appointed by the most representative trade union among the PDI of the Madrid's public universities.*
- *A representative of the Superior Council for Scientific Research, appointed by this body.*

3. In addition to the Trustees mentioned in the preceding two paragraphs, a maximum of three Trustees, experts in university matters, may be appointed by the Board. Expert Trustees should come from other than Autonomous Regions than Madrid.

The conditions for incorporation of experts shall be established by the Board.”

The independence of the evaluators from the Board is guaranteed by the Articles of Association of FMID, as ENQA Board noted in the Annex to the letter of admission. It was in the previous Articles, and also in the current ones it is explicit in the Article nº24:

“Evaluation Committees

1. The evaluation committees are the bodies through which the Foundation develop its evaluation, accreditation and certification activity.

2. The Board will regulate the composition of these committees on the basis of competence and Independence criteria, and in accordance with internationally accepted standards.

3. The results of the evaluations of the Evaluation Committees cannot be modified by any other body of the Foundation.”

2.13 The Foundation should use the Advisory Committee on Higher Education Quality better.

After the ENQA evaluation two meetings of the International Advisory Committee on Higher Education Quality have been held and another one has been scheduled before 2017 ends.

The Composition of the Committee has been reinforced, adding up to 5 new members, with more members from the EHEA, more students and also the participation of Spanish employer’s representatives.

Relevant information about the activity of FMID is shared with the Committee and advice and information on key subjects for FMID is asked.

It is worth to note that FMID has another advisory body, the Advisory Council in University Quality of the Region of Madrid, composed mainly by Madrid University representatives and Quality in Higher Education experts with an advice and feedback function. FMID is going to propose to the Board of Trustees a change in the composition of this Committee in order to include representatives of the Madrid 6 public universities and 8 private universities (so far there is a rotating system limited to 3 representatives of the Madrid public universities and 2 representatives of the Madrid private universities). The goal is to foster the universities’ participation into the FMID activities, to provide them with first-hand information and establish a closer relationship between the FMID and the Madrid universities.

2.14 The Foundation should clearly communicate the appeal procedures.

The different evaluation programmes documentation has been updated to better describe the whole process including the allegation phase before the issuing of the final report and the further claims procedure.

The information regarding the appeal procedures available for all the evaluation models has been explained in detail to all the people involved in the processes, including FMID staff, panel members, commissions, universities vice-rectors, universities quality units and coordinators of evaluated programmes.

A Claim Commission composed by experts that don't participate in the evaluations has been set. Up until now 3 claims referred to Accreditation Renewal and 4 referred to ex-ante Verification of programmes have been submitted to this Commission.

3 ENQA Board clarification requirements

3.1 ESG 2.1 Use of internal quality assurance procedures

On page 12, the report reads that “the foundation plans to accept the decisions of international accreditation agencies with which it has cooperation agreements as replacement for its own accreditation decisions”.

International accreditation agencies with which FCM cooperates are not ENQA members or registered in EQAR and have thus not demonstrated compliance with the ESG. It is therefore of utmost importance that, as stated by the panel, the Foundation conducts a thorough preliminary analysis and formalises in a written document the conformity of the international accreditors' frameworks with both the Spanish assessment frameworks and the ESG Part 1 before accepting accreditation decisions from these bodies. This written document should provide assurance that the ESG are respected in the accreditation process and should notably provide information on essential features, such as the publication of reports, the follow-up mechanism, appeals procedure, etc. It is advisable that the Agency takes part in the accreditation processes to ensure that the Spanish and European frameworks are applied.

The Board would like to receive clarifications on the conditions upon which the Foundation will accept the accreditation outcomes by international accreditors.

This issue is addressed in section 2.1 of this report.

Regarding to evaluations performed by EQAR agencies in Madrid Region, we inform that currently the Law of the Madrid Higher Education Area is in process of approval by the Madrid Parliament. This Law makes explicit reference to the acceptance of evaluations by EQAR agencies, when current status only foresees evaluations made by FMID.

3.2 ESG 2.5 Reporting

The Board noted in the panel's report that “in the accreditation renewal processes, three different panels or committees are involved consecutively before issuing the final report. [...] this system bears some risks. As reports are adapted by committee members who have not been involved in the peer review itself, errors could be introduced during the process. The panel therefore suggests that the Foundation involve the panel members in the feedback procedure and has the final report checked by the review panel before the Evaluation and Accreditation Committee finally publishes the report”.

Furthermore, the panel deliberation leading to the conclusions should be made explicit in all reports. Efforts should also be made to improve accessibility of reports.

As mentioned earlier under ESG 2.1, the conditions of publication of reports issued by international accreditors should be clearly stated in a written document.

The Agency is advised to promptly address these weaknesses as the revised ESG will be more challenging in terms of reporting.

This issue is addressed in section 2.6 and section 2.7 of this report.

3.3 ESG 2.6 Follow-up procedures

The Board noted the criticism expressed by the panel on the way the follow-up procedure is conducted: “The panel is not convinced that the external quality assurance procedures as they are designed do guarantee that areas for improvement are dealt with speedily. Lack of follow-up ensuing accreditation renewal is the review panel’s major area of concern”.

The Board supports the panel recommendation in this regard. In addition, the Board would like to receive further information as to the panel’s statement that the focus within the monitoring process is more on mere implementation of the verification report and improvement measures rather than on quality. In particular, is it due to the legal framework? Also, the Board would like to receive clarification as to how the Agency intends to ensure the follow-up in case of accepting accreditation decisions by other bodies (see comment above under ESG 2.1).

This issue is addressed in section 2.1 and section 2.9 of this report.

3.4 ENQA Criterion 3 – Resources (ESG 3.4)

On page 26 the report reads that “from 2015 on, most programmes will need accreditation renewal. This will lead to a strong growth of the work load with consequent increased expense. The Regional Minister of Education has promised an increase in the budget for the assessment and accreditation activities of the Foundation for 2015.”

The Board would appreciate receiving further information as to how much the budget will be increased by the regional government and about the Agency’s planning of activities for the coming years.

FMID plans to maintain the portfolio of activities that has been developing in during last years, adding also new activities.

During year 2016 FMID started the implementation of an ex-ante Verification procedure for official programmes in Higher Education in the Region of Madrid.

The Spanish legal framework, Royal Decree 1393/2007, establishes three different stages for the accreditation of official programmes: Ex-ante Verification, Monitoring and Accreditation Renewal. The requirements for the agencies performing the Ex-Ante Verification, include the condition to undergo an external review, according to ESG, and being registered in EQAR.

On 11th June 2015, FMID received the approval letter from EQAR informing of the approval of its application to the Registry. Therefore, from that date FMID fulfils all the Spanish legal requirements to perform Ex-Ante Verification of official programmes in Higher Education in the Region of Madrid.

Prior to the implementation of this evaluation procedure by FMID, the required Ex-Ante Verification of official programmes of the universities in the Madrid Region, was developed by national scope agency ANECA, which is one of the seven first European agencies member of ENQA and also one of the first three EQAR registered agencies. The Ex-Ante verification procedure of ANECA has been working for several years, and has been embedded in ENQA periodical reviews since year 2007.

The procedure implemented by FMID is the transposition of ANECA's, with some minor changes due to the organization specificities. In fact in the first months of 2016 Ex-Ante Verification processes was performed in coordination of both FMID and ANECA.

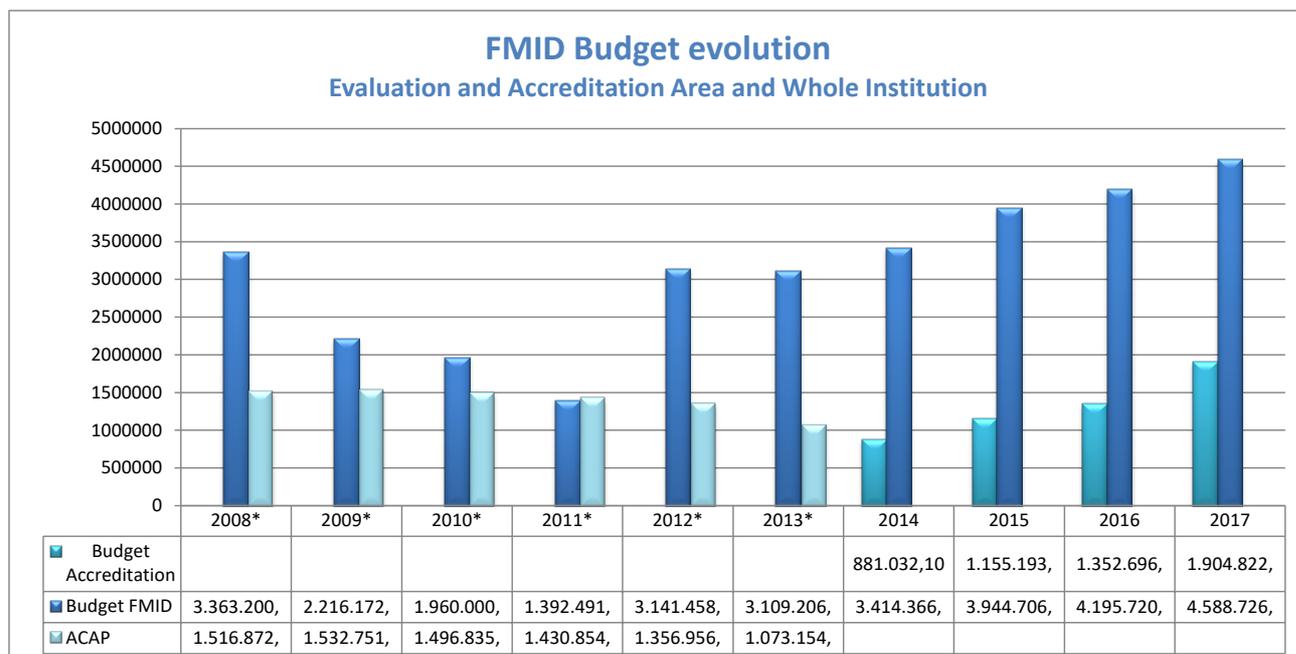
In the same line FMID plans to incorporate other different evaluation activities foreseen in the Spanish legal framework, as long as FMID fulfils all the requirements to perform them, such as the certification of Internal Quality Assurance Systems on Higher Education Centres.

Also other evaluation activities requested by the Universities such as the evaluation of the research activity of the faculty for certain positions have been done punctually and could become a regular program in the future.

The volume of resources employed in each activity varies depending on the demand by de universities, but the global activity since 2014 shows a continuous increase.

Regarding the budget increase related to the activities, as it was explained the current financial scheme of FMID works with annual budgetary plans, so no multiannual budget is available.

However the commitment of the Government of the Region of Madrid to provide sufficient resources for the Quality Assurance activity of the Foundation expressed to ENQA’s evaluation panel is clear. This commitment is supported by the sustained increase of the budget of the Evaluation and Accreditation area since 2014 in opposition to the previous years’ decrease that can be seen in the following graphic:



* In first years of the series the budget of Evaluation and Accreditation corresponds to the extinct ACAP, which was merged to FMID in 2014.

3.5 ENQA Criterion 5 – Independence (ESG 3.6)

The Board notes the greater independence of higher education institutions. However, the Board shares the panel’s concern about the “important role the Government plays in the composition of the Board of Trustees and the funding of the Foundation”.

The Agency is encouraged to reconsider the appointment procedure of the Board of Trustees so as to achieve better formal independence from the government. Also, in order to achieve an even more balanced composition of the Board of Trustees, FCM may consider involving students as well. As for the role and missions of the Board of Trustees, they should be stated in a written document which should clearly mention that the Board of Trustees cannot influence the results of the evaluation and accreditation processes. The Board could not find such information in the review report. This is probably included in the Articles of the Foundation, but they seem not to be published in the website of FCM.

This issue is addressed in section 2.12 of this report.