
ENQA AGENCY REVIEW: KOSOVO ACCREDITATION AGENCY (KAA)

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EXECUTIVE SUMMARY

This report analyses the compliance of the Kosovo¹ Accreditation Agency (KAA) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). The purpose of the review is to verify that KAA acts in substantial compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015. ENQA requires all member agencies to undergo an external cyclical review, at least once every five years. Substantial compliance with the ESG is a condition for membership.

KAA was established in 2004. It has operated as the formal accreditation body in Kosovo since 2009. Key-activities of KAA are:

1. initial accreditation of higher education institutions and their programmes (preliminary accreditation);
2. initial accreditation of programmes at an accredited higher education institution;
3. re/accreditation of programmes and higher education institutions.

KAA passed one previous ENQA review in 2014, and became a full ENQA member in that year. In 2015 EQAR accepted KAA in the Register. However, EQAR excluded KAA from the Register in 2017 as it was concluded that KAA, after the dismissal of the full Board by the Minister, was no longer able to act autonomously and no longer in a position to assume full responsibility for its operations. In 2018 ENQA assigned KAA the status “Member under review” for the same reason.

In light of the documentary and oral evidence, considered by the review panel, the review panel has the following judgements and recommendations on separate standards (F = Fully compliant; S = Substantially compliant, P = Partially compliant, N = Non-compliant):

ESG Standard	Compliance	Recommendation
3.1 Activities, policy, and process for quality assurance	P	<ol style="list-style-type: none"> 1. Find as soon as possible HE-wide consensus and consequently decide on a KAA Strategic Plan, including solid activity plans with performance indicators and well defined responsibilities, so as to prepare a sound basis for regular future activities. 2. Involve students in the daily activities and the decision making structure of KAA.
3.2 Official status	F	
3.3 Independence	S	In conducting evaluations according to the new procedures as described in the Accreditation Manual 2018 make sure that operational independence and independence of formal outcomes is guaranteed.
3.4 Thematic Analysis	P	Use data collected during accreditation processes and other activities to carry our thematic and system-wide analysis in order to support further development of the HE system in Kosovo.
3.5 Resources	P	Take all necessary actions in order to assure adequate human and financial resources needed for conducting the activities expected from KAA.
3.6 Internal quality assurance and professional conduct	P	In order to collect feedback KAA should increase and describe in documents the implementation of formal rather than informal mechanisms to create solid routines of internal quality assurance

¹ The designation ‘Kosovo’ is without prejudice to position on status, and is in line with United Nations Security Resolution 1244 and the International Court of Justice opinion on the Kosovo declaration of independence.

		based on principles like closed-loop practices and the four-eyes system.
3.7 Cyclical external review of agencies	F	
2.1 Consideration of internal quality assurance	S	Take care that in institutional and programme self-evaluations, in site visits and in review reports the ESG 2015 Standards Part I are addressed clearly.
2.2 Designing methodologies fit for purpose	S	Make sure that during accreditation activities the workability of the methodologies is guaranteed.
2.3 Implementing processes	P	1. Monitor and evaluate the implementation of accreditation activities from 2019 onwards thoroughly. 2. Concentrate on quality improvement, when monitoring the follow-up of recommendations to HEIs provided by expert panels.
2.4 Peer-review experts	P	1. Make sure that the level of degree-work can and will be judged properly by the expert panels. 2. Make sure that full students' participation in institutional reviews and program evaluations is guaranteed. 3. Build a network of national experts, including students, in order to participate in activities such as monitoring of the follow-up of recommendations provided in review reports.
2.5 Criteria for outcomes	S	Monitor how the existing rules for assessing standards and for decisionmaking work out in reality. If needed, improvements both in decision rules and by way of trainings, may have to be considered.
2.6 Reporting	P	Improve the quality of reports and make sure that they contain deeper analysis and a better connection with evidences and that the full reports are regularly published.
2.7 Complaints and appeals	F	

The review panel considers that, in the performance of its functions, KAA does not substantially comply with the ESG. The agency is recommended to take appropriate action to achieve at least substantial compliance in all standards at the earliest opportunity.

INTRODUCTION

This report analyses the compliance of the Kosovo Accreditation Agency (KAA) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted from December 2018 until July 2019 (from self-analysis by the agency until the finalisation of the review report).

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 substantial compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

As this is KAA's second review, the panel is expected to provide clear evidence of results in all areas and to acknowledge progress from the previous review. The panel has adopted a developmental approach, as the *Guidelines for ENQA Agency Reviews* aim at constant enhancement of the agencies.

MAIN FINDINGS OF THE 2014 REVIEW

Summary of the 2014 review

The 2014 review panel was of the firm opinion that *"KAA has done a very good job since its start in 2008. Kosovo is developing fast to fit its higher education (HE) into European frameworks. KAA has played an important role as regards quality assurance of higher education by adhering to strict procedures of external quality assurance based on European standards. It is also fulfilling a widely appreciated role in harmonizing the field of higher education in the country. In doing so it has benefitted from the support role of external development agencies, in particular from Austria, Great Britain, and the USA. The fact that both institutional and programme evaluations have been carried out entirely by experts from abroad has contributed to its international orientation. KAA serves as an example of good practice in the field of higher education in Kosovo"* (KAA external review 2014, p4).

Compliance

The 2014 review panel conclusions on compliance with ESG 2005 Standards are :

Full compliance:

Standards: 3.2 Official Status, 3.3 Activities, 3.5. Mission Statement, 3.6 Independence, 3.8 Accountability procedures, 2.3 Criteria for decisions and 2.7 Periodic reviews.

Substantial compliance:

Standards: 3.1 Use of External QA procedures, 3.4 Resources, 3.7 External QA criteria and processes, 2.1 Use of internal QA procedures, 2.2 Development of External QA processes, 2.4 Processes fit for purpose, 2.5 Reporting, 2.6 Follow-up procedures.

Partial compliance on Standard 2.8 System wide-analysis.

For an overview of compliance and a link with the ESG 2015 Standards see Table 1.

Table 1: Overview of findings by the 2014 review panel

ESG 2005	Topic	Compares with ESG 2015	Compliance
3.1	Use of external quality assurance procedures for higher education	Now partly ESG 2015 Standard 3.1 'Activities, policy, and processes for quality assurance'	S
3.2	Official status	Now ESG 2015 Standard 3.2, 'Official status'	F
3.3	Activities	Now partly ESG 2015 Standard 3.1 'Activities, policy, and processes for quality assurance'	F
3.4	Resources	Now ESG 2015, Standard, 3.4 'Resources'	S
3.5	Mission Statement	Now partly ESG 2015 Standard 3.1 'Activities, policy, and processes for quality assurance'	F
3.6	Independence	Now ESG 2015, Standard 3.3 'Independence'	F
3.7	External QA criteria and processes	Now partly ESG 2015 Standard 2.3 'Implementing processes', ESG 2015 Standard 2.4 'Peer-review experts', and ESG 2015 Standard 2.7 'Complaints and appeals'	S
3.8	Accountability procedures	Now partly ESG 2015 Standard 3.6 'Internal quality assurance and professional conduct', and ESG 2015 Standard 3.7 'Cyclical external review of agencies'	F
2.1	Use of Internal QA processes	Now ESG 2015 Standard 2.1 'Consideration of internal quality assurance'	S
2.2	Development of External QA processes	Now partly ESG 2015 Standard 2.2 'Designing methodologies fit for purpose'	S
2.3	Criteria for decisions	Now ESG 2015 Standard 2.5 Criteria for outcomes'	F
2.4	Processes fit for purpose	Now partly ESG 2015 Standard 2.2 'Designing methodologies fit for purpose'	S
2.5	Reporting	Now ESG 2015 Standard 2.6 'Reporting'	S
2.6	Follow-up procedures	Now partly ESG 2015 Standard 2.3 'Implementing processes'	S
2.7	Periodic reviews	Now ESG 2015, Standard 1.10 'Cyclical external quality assurance'	F
2.8	System-wide analysis	Now ESG 2015 Standard 3.4 'Thematic analysis'	P

F = full compliance, S = substantial compliance, P = partial compliance

Recommendations in the 2014 review

In the 2014 review the panel provided nine recommendations to KAA as listed below.

1. KAA is recommended to ensure that the international, non-Albanese speaking evaluation experts are able to gain sufficient insight in the effectiveness of the internal quality assurance of student assessment.
2. In view of the rapidly changing needs of the Kosovo society and HE, KAA is recommended to involve all relevant stakeholders, including students, teachers and employers, in the process

- of further developing the QA procedures.
3. Students should take part in panels on the (re-)accreditation of study-programmes.
 4. KAA is recommended to be more strict on the coverage and acceptance of the self-evaluation reports as provided by HEIs, in order to facilitate the work of the external evaluators.
 5. KAA is recommended to be more critical at the reports produced by the evaluation experts, and compare the standards of report writing with those of established external evaluation agencies.
 6. KAA is recommended to further develop the follow-up procedures, in particular the follow-up on improvement plans and the length of re-accreditation cycles, and to become more specific on conditional (re-)accreditations.
 7. KAA is recommended to carry out regular in-depth system-wide analyses, eventually also with help of independent outsiders.
 8. KAA is recommended to act according its strategic plans and at the same time regularly monitor the workload of its staff in view of the many activities that it intends to carry out.
 9. KAA is recommended to revise the composition of the Appeals Committee in the direction of committee members being without links to the KAA Board.

Further to the review panel’s report the Board of ENQA decided to confirm KAA’s full membership at its meeting of 15 September 2014. This was communicated to KAA in a letter dated 25 September 2014, asking for a follow-up report within one year of the decision and based on the recommendations in the review report, as well as an update about new legislation concerning higher education in Kosovo and its implications on KAA. This Progress Report (PR2015) was sent to ENQA on 26 August 2015.

After an application by the KAA-Board to EQAR, dated 13 September 2014 EQAR decided to include KAA in the Register on 4/5 June 2015, with a validity until 30 April 2019.

In 2017, EQAR excluded KAA from the Register as it was concluded that KAA, after the dismissal of the full Board by the Minister, was no longer able to act autonomously and no longer in a position to assume full responsibility for its operations. In 2018 ENQA assigned KAA the status “Member under review” for the same reason.

In the present review report the follow-up of the recommendations in the 2014 review report will be discussed under the ESG 2015 Standards mentioned below:

Recommendation	1	2	3	4	5	6	7	8	9
ESG 2015 Standard	2.4	2.2	2.4	2.3	2.6	2.2	3.4	3.5	2.7

REVIEW PROCESS

The 2019 external review of KAA was conducted in line with the process described in the Guidelines for ENQA Agency Reviews and in accordance with the timeline set out in the Terms of Reference.

The Terms of Reference

In the Terms of Reference for the review (dated October 2018) the background of the review and the purpose and scope of the evaluation were explained clearly. In doing so it was also mentioned that the review should provide information to the ENQA-Board to aid its consideration whether membership of KAA should be reconfirmed and to EQAR to support the KAA application to be included in the Register.

In the Terms of Reference no mention was made of specific 'flags' that EQAR would want to have addressed. However, in EQAR's eligibility letter of 27 September 2018 EQAR mentioned, that with KAA's initial inclusion on the Register in June 2015 four flags were identified:

ESG 2.4: Peer-review experts [formerly ESG 2005 standard 3.7].

It should be addressed whether KAA has systematically included student experts on all panels for programme accreditation.

ESG 2.7: Complaints and appeals [formerly ESG 2005 standard 3.7]

It should receive attention whether KAA's appeals procedure has been changed in a way to ensure that appeals are considered independently of those who made the decision.

ESG 3.3: Independence [formerly ESG 2005 standard 3.6]

It should receive attention how KAA has progressed in consolidating its independence. In particular, the arrangements for the appointment of the Executive Director and KAA's further staff should be addressed.

ESG 3.4: Thematic analysis [formerly ESG 2005 standard 2.8]

It should be analysed how KAA has carried out additional system-wide analyses.

In the present review report these 'flags' are addressed under the respective ESG 2015 Standards.

In EQAR's eligibility letter to KAA it was also mentioned that the Self-Assessment Report (SAR) and the external review report should specifically address the question 'whether KAA is able to operate independently without any third party influence and whether the appointment of the KAA Board is made in a transparent and independent manner'. This issue is addressed under ESG 3.3 Independence.

The panel

The panel for the external review of KAA was appointed by ENQA and composed of the following members:

- Jacques Lanarès (Chair, academic), professor and former Vice Rector for Quality, HR and Development of Teaching; Professor at the Faculty of Social & Political Sciences, University of Lausanne, Switzerland (European University Association - EUA - nominee)
- Obe de Vries (Secretary, quality assurance professional), independent consultant, previously Inspector of Higher Education The Netherlands (ENQA nominee)
- Sandra Bezjak, assistant Director for Higher education, Agency for Science and Higher Education Croatia (ENQA nominee)
- Arus Harutyunyan, student of project management, Armenia State University of economics, Armenia (European Student Union - ESU - nominee)

Goran Dakovic (staff member of ENQA), not member of the panel, acted as the coordinator for the review.

Review panel activities before the site visit

On 20 December the panel received the SAR and from then on work on the review took place. On 12 February 2019 the panel had a zoom-mediated video-conversation in which practical details of the review, the proposed time schedule for the site visit, preliminary impressions and wishes for additional documents were discussed. Following preferences by individual review panel members specific standards were allocated to the panel members as focus points for their attention.

Meanwhile exchanges between KAA and the panel had taken place as regards the agenda for the site visit. The agenda and time schedule were finalized on 6 March. After the zoom-conversation KAA was also asked to supply a number of additional documents, which were sent on time.

On the basis of suggestions made by all panel members the secretary and chair prepared a mapping grid and a briefing note for the review panel. The review panel held its first meeting on Sunday-afternoon 17 March in Prishtina, Kosovo, a day before the site visit. On the same day the review panel also had a clarification meeting with the KAA process coordinator on specific topics.

Self-assessment report

The SAR is a 77-page document with ten Annexes and various references to other documents throughout the text. The SAR was produced in a collaborative effort of KAA staff and the Board (also referred to as State Council of Quality or SCQ). On 19 November 2018 a final consultative meeting with stakeholders took place. The Board approved of the SAR on 21 November. After scrutiny of formal aspects by the ENQA-panel-coordinator and further adjustments the final version was distributed to the panel on 20 December 2018. A then missing table of past accreditation activities was sent to the panel on 12 February 2019. The SAR follows the ENQA Guidelines strictly and it addresses the recommendations of the 2014 review and the issues mentioned by EQAR.

Site visit

The site visit took place from 18 to 20 March in Prishtina, Kosovo, according to the time schedule as presented in Annex 1.

There were all in all 16 interview-sessions: with the SAR team, KAA President and General Board, the Minister and representatives of the Ministry of Education, Science and Technology (MEST), KAA Director and staff, the KAA Appeals and Complaints Committee, expert panel members, heads of HEIs, quality assurance (QA) officers, teachers, students and other stakeholders. In the agenda presented in Annex 1 session 8 is left out. This session was meant to have an interview with members of working groups, which according to the SAR were currently being organised by MEST to work on a new Law for KAA. However, it appeared that members of these groups would already be interviewed in other sessions.

The list of interviewees was sent to the review panel well before the site visit, but there were some last minute changes with the interviewees due to unexpected circumstances. Unfortunately the student-representative from ESU could not attend the session with experts (session 9), but she communicated with the review panel during the site visit by e-mail. The review panel had suggested an 'open hour' (session 16) for stakeholders, who were not invited to be interviewed, but still had a wish to speak with the review panel about the functioning of KAA. This open hour was announced at the KAA-website well before the site visit. Representatives from three HEIs made use of this open hour.

In the course of the site visit various additional documents were supplied on request of the review panel. During the whole site visit translators were available to the panel, who were helpful in translating additional documents and in one interview session.

Apart from the lunch-breaks and 15-minute-breaks in between the sessions review panel members had a number of internal, consensus-forming discussions: on each day before the beginning of the interviews and at the end of the day. The final meeting of the review panel on the last day of the site visit was used for the initial formulation of recommendations.

The report

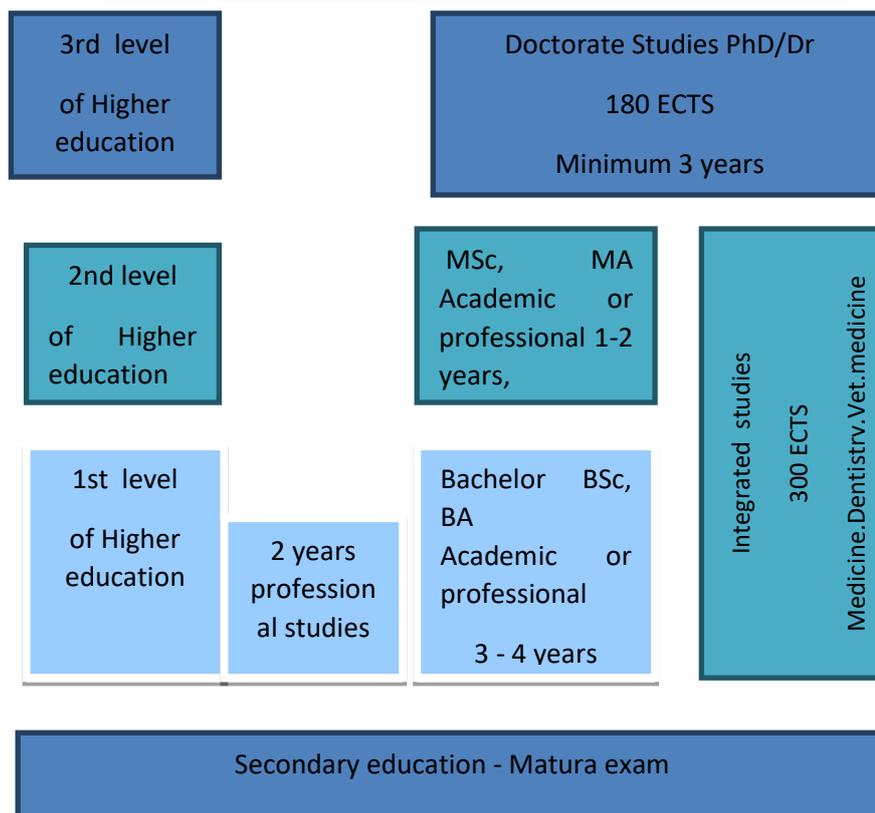
After the site visit panel members sent individual notes on specific standards to the secretary, who then compiled a first draft of the review report. After scrutiny by the chair and other panel members a final version of this draft was sent to the ENQA coordinator by 22 May 2019. After further refinements the report was sent to KAA for a check on factual details at 17 June. The final external review report was discussed by the ENQA Board on 19 September 2019.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM

According to the SAR the first HEI in Kosovo, was a teacher training institution, established in 1959. For around 40 years Kosovo the only university was the University of Prishtina (established in 1970). Today, Kosovo has nine public HEIs, of which seven are universities, one is an Academy, and one is a Faculty. In addition, there are 23 private HEIs, most of which are colleges. Together, all HEIs offer 353 study programmes, encompassing the three Bologna cycles and four European Qualifications Framework for Lifelong Learning (EQF) levels (5-8), with around 130.000 enrolled students. 90.000 students are enrolled in public institutions, whereas 40.000 at private institutions.

The scheme of Higher Education in Kosovo



According to the Law on Higher Education (2011), higher education degrees are organized as follows:
– First level : three (3) to four (4) years of studies by which the student obtains 180, respectively, 240 ECTS, and obtains a Bachelor's Diploma.

- Second level: one (1) to two (2) years of studies after completion of the first level by which the student obtains 60, respectively, 120 ECTS and the student obtains a Master’s Diploma.
- Third level: a programme of doctoral studies with an academic and independent research-scientific character.
- Any other post-secondary education in the levels 5, 6, 7 and 8 of the EQF, for which credits may be given (ECTS).

Pursuant to the Law, public HEIs in Kosovo may be established by a decision from MEST, subsequently ratified in the Kosovo Assembly. Under the Law, private HEIs may be *‘founded by a private company, foundation or trust, situated in Kosovo and having a registered office in Kosovo’*. However, the Law allows the operation of a HEI only after it has been granted accreditation and is licensed by the relevant authorities in Kosovo under the conditions of HE Law in force at the time.

In July 2017 the 2017-2021 Kosovo Education Strategic Plan and its Action Plan were adopted. The strategy covers participation and inclusion, management of education system, quality assurance, teacher development, early and preschool education, vocational education and training, adult education, and higher education. The strategy and action plan now need to be implemented and the necessary resources allocated.

According to the Commission Staff Working Document Kosovo (2018) from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions 2018 (Strasbourg 17 April 2018) public spending on education and training amounts to 4,7% of GDP. Enrolment rates in primary and lower secondary educations are almost universal, and upper secondary gross enrolments stand at 85 %. However, only 18 % of children aged 0-5 years attend licensed pre-school institutions. Around half of all students in upper secondary education choose vocational education. Vocational education and training (VET) programmes lack practical and applied courses, with only a few being accredited by the National Qualifications Authority. Overall, the link to the labour market remains weak.

According to the Working Document mentioned above, the number of students in higher education compared to population is nearly double the EU average. During the panel briefing on 17 March 2019, before the start of the site visit, the review panel was informed that the relatively high percentage of students in higher education could be explained by the recent history of Kosovo, which had given rise to a certain degree of catching up after a low participation rate in higher education before. The Working Document continues by stating that the completion rate is low and that there is a high unemployment rate among university degree holders (25%), suggesting a mismatch between higher education programmes and labour market needs. It is also mentioned that of January 2018, Kosovo can participate in all of Erasmus+ and can join platforms and networks. So far, more than 2000 students and staff have been involved in the International Credit Mobility strand, out of which two-thirds are from Kosovo and one third went to Kosovo. Institutions from Kosovo participated in 14 Capacity Building in Higher Education projects, three of them as coordinating partners.

QUALITY ASSURANCE

Understanding of quality assurance

In Kosovo’s national understanding accreditation is seen as a formal acknowledgement that a higher education institutions and their programmes fulfill internationally recognized quality standards and that a qualification confers on his/her holder a number of rights in accordance with applicable law. In Kosovo accreditation is a means of certifying that quality assurance standards for the operation of

the education provider and the study programmes are met. No higher education award can be issued by the providers and be considered valid unless it has been accredited by KAA.

Types of accreditation

Three types of accreditation are distinguished:

1. initial accreditation of higher education institutions and their programmes (preliminary accreditation);
2. initial accreditation of programmes at an accredited higher education institution;
3. re/accreditation of programmes and higher education institutions.

The accreditations formally establish that institutions are accepted by Kosovo Government to provide study programmes. Degree-certificates issued after completion of an accredited programme are recognized by the Kosovo Government. The validity of accreditations normally lasts 3-5 years after which re-accreditation should take place.

Higher education providers are subject to initial accreditation (at institutional or/and program level) and to re-accreditation (at institutional or/and program level) on a periodic basis. The duration is decided by the Board.

All HEIs, regardless of their size in terms of the number of study programs they offer or the number of students they enrol, undergo both institutional and programme re/accreditation. The standard procedure of external quality assurance is applied regardless if there is initial accreditation or re/accreditation.

KAA

KAA was established in 2004 by the Kosovo Government. It has operated as the formal accreditation body since and became operational in 2009. KAA passed a previous ENQA review in 2014 and was registered in EQAR since 2015. In September 2017 the full Board and the then Acting-Director of KAA were dismissed by the Minister of Education, Science and Technology (hereafter the Minister). On 2 October 2017 EQAR was informed of this dismissal, after which EQAR contacted the Minister to find out about the issue. As it appeared the dismissal was based on 'classified' information, regarding 'irregularities', which however did not relate to all members of the Board. EQAR was unable to find out about the nature of these irregularities, not from the Minister, nor from KAA, which had no access to the 'classified' information either.

On 27 February 2018 the EQAR Register Committee decided to exclude KAA from the Register, effective from 25 September 2017 onwards, as the Register Committee concluded that, after the dismissal of the full Board, KAA was no longer able to act autonomously and no longer in a position to assume full responsibility for its operations. By letter of 26 February 2018 the ENQA Board informed KAA that the dismissal had caused concerns regarding the independence of KAA, and thus with its compliance with ESG. On 19 April 2018 ENQA's General Assembly decided to assign KAA 'Member under review' until the next full review.

The result of this was that in 2018 no re/accreditations by KAA took place.

KAA'S ORGANISATION/STRUCTURE

KAA Board

The provisions on the appointment and election of members of the Board are laid down in the Law on Higher Education, which stipulates that members of the Board should be nominated by the Minister and shall be approved from the Assembly. The Board consists of nine members. In the

Board three members are international. No decisions will be taken if not at least one international member is present.

Refusal by the Assembly, Autumn 2017, to grant the establishment of a new Board under the then prevailing conditions led to a new Administrative Instruction (AI, March 2018) with procedures guaranteeing more transparency in the election and appointment of the Board. The new Board was installed in April 2018 and held its first meeting in May 2018.

Current KAA organization

Presently the KAA-organization (or KAA-secretariat, or KAA-office) consists of an Acting-Director and four members of staff. The four members are an officer for evaluation and accreditation, a legal officer, an officer for budget and finances, and one for personnel. A number of vacancies are to be filled in during the first half of 2019, among them an officer for monitoring and evaluation and an officer for IT.

KAA'S FUNCTIONS, ACTIVITIES, PROCEDURES

Functions and aims

KAA functions as a the sole accreditation agency for higher education in Kosovo. Apart from the accreditation activities as mentioned above KAA also applies monitoring of quality assurance of accredited institutions and their programmes. This is in line with KAA's mission which is aimed at quality assurance of teaching and learning and support to the development of quality among HEIs.

Related to this mission KAA's aims are:

- to open the higher education sector in Kosovo;
- to assure quality among all institutions of higher education in Kosovo;
- to promote, encourage and develop quality in the sector of higher education;
- to create transparency and facilitate comparability for providers, students and the labour market;
- to encourage innovative content and means of delivery of higher education;
- to ensure comparability of Kosovo diplomas with international ones; and support Kosovo's objectives for integration into EHEA.

Accreditation activities

Accreditation takes place in a 2-step process: formal application and full application.

Formal application

Only institutions that meet formal criteria, e.g. in terms of staff numbers, full time employment and qualifications, will have the right to submit a full application for re/accreditation. HEIs are requested to submit their engagements of academic staff no longer than 31st October of the respective year.

Full application and site visits

A full application includes submission of a Self-evaluation Report (SER) which forms the basis for the review by external evaluators. Depending on the size of the institution, site visits for re/accreditation for institutional level and for program level can be organized separately or combined, depending on the workload of external experts and of KAA coordinators. If the HEI is a relatively small institution with two to five study programs, institutional evaluation is always organized together with the evaluation of the study programs. When HEIs are big institutions with more than 35 study programs, and the number of study programs under evaluation is more than 10 or 15, site visits for institutional level are organized separately.

Follow-up procedures/ monitoring

Until 2016, KAA conducted monitoring of HEIs through external evaluators and accreditation experts who evaluated, whether HEIs, after receiving accreditation, had fulfilled the recommendations within the preliminary assessment and accreditation reports. However, a shortage of staff has limited KAA's ability to undertake field monitoring of HEIs on a regular basis.

At the end of each academic year, all accredited HEIs are obliged to submit to KAA an Implementation Plan of Recommendations, which in principle allows for desk-monitoring by KAA. However, the analysis of these plans is limited due to shortage of staff.

The accreditation activities over the past years, as presented in the SAR, are shown in Table 2.

In 2017 the Board decided to suspensions of a considerable number of programmes for one year. This practice was not used before, nor will it be used according to the newly accepted Accreditation Manual 2018 (AM2018). The 2017 suspensions were meant to allow programmes to continue, but not to admit new students until the suspension had ended.

Table 2. KAA accreditation activities 2014-2018

Activity	2014	2015	2016	2017	2018
Initial accreditation of HEIs	4	1	0	1	0
Initial accreditation of programmes at initial accreditation of HEIs (=preliminary accreditation)	37	10	0	3	0
Initial accreditation of programmes at accredited HEIs	44	11	20	19	0
Re-accreditation of HEIs	3	5	5	4	0
Re-accreditation of programmes	58	109	163	57	0
Suspension of programmes for one year	0	0	0	92	0

International activities

KAA is engaged in a number of international networks and activities:

- KAA is member of CEENQA, the Central and Eastern European Network of Quality Assurance and hosted in 2014 CEENQA's annual meeting in Prishtina
- In 2018 KAA presented its accreditation practices at the national conference of the Macedonian Accreditation Agency. There is an informal agreement with the Albanian Accreditation Agency to increase the exchange of international peer reviewers
- KAA is member of INQAAHE, the International Network of Quality Assurance Agencies in Higher Education.
- In 2014 KAA became member of ENQA; since 2018 it is member under review.
- KAA became registered with EQAR in 2015, but it lost its registration in 2017.

KAA has benefited from various outside donors as regards trainings, workshops, realisation of ENQA recommendations etc.

In the accreditation processes KAA relies exclusively on international experts. For accreditation purposes English is the working language.

KAA'S FUNDING

Sources of funding of KAA are a Government grant and own source revenue. The Government grant is mainly for wages and salaries. The own source revenue is generated from the revenues that HEIs pay for the process of accreditation and is mainly spent on the expenditure on the accreditation process (experts, travels etc.).

The total approved budget and the expected revenues for 2019 are provided in Table 3:

Table 3: KAA-budget and expected revenue in 2019 (in EURO)

	Source of Funding		Total
	Kosovo/Gov. Budget	Own Source Revenue	
Wages and Salaries	75,595.56	9,312.00	84,907.56
Goods and Services	10,000.00	417,510.00	427,510.00
Utilities	1,500.00		1,500.00
Total	87,095.56	426,822.00	513,917.56

The 2019 budget compares with expenditure over the years 2016-2018 as shown below:

	2016	2017	2018	2019
Expenditure (2016-2018) and budget (2019)	508,908.79	410,591.72	187,498.17	513,917.56

In this time-perspective the downturn from 2017 onwards and the intended restart in 2019 are obvious.

FINDINGS: COMPLIANCE OF KAA 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.

ENQA review 2014

ESG 2015 Standard 3.1 contains elements of the former ESG 2005 Standards 3.1, 3.3 and 3.5. On these standards the review panel concluded:

- **ESG 2005 Standard 3.1** ('Use of external quality assurance procedures for higher education'): **substantially compliant**
- **ESG 2005 Standard 3.3** ('Activities'): **fully compliant**
- **ESG 2005 standard 3.5** ('Mission Statement'): **fully compliant**.

The review panel's conclusion on **ESG 2005 Standard 3.1** was partially based on the assessment of **ESG 2005 Standards 2.1 - 2.8**, which were described and analysed under ESG 2005 Standard 3.1. For the judgements on these standards see Table 1 (p. 6).

Evidence

Mission statement

External Quality Assurance is the main activity of KAA as stated in Article 7 of the Law on Higher Education as well as in Article 3, al 1 in the AI on Accreditation. The mission statement of the agency is published on its website and explains that *"Through the accreditation process KAA supports development of the quality in HEIs and at the same time assures the Kosovo society that the quality of teaching and learning is at the level of international standards"*. The current aims as described on KAA's website mention the double purpose of compliance as well as enhancement orientation. A new law specifically on KAA is in preparation and should, according to interviewees, follow an accelerated process.

Strategic plan

In November 2018 the Board and KAA management have started working on a strategic plan (2019-2023), which presently still is a draft version and not fully elaborated. Four strategic objectives are listed in the strategic plan, globally related to the mission (Draft Strategic Plan, p9/10):

1. To provide effective accreditation processes and monitoring of quality in higher education by enhancing coordination and management capacity of KAA staff and experts.
2. To provide quality assurance policies and guidelines that will help the higher education institutions in preparing for accreditation and follow-up quality assurance activities.

3. To build human and institutional capacity that will result in high quality accreditation and monitoring activities.
4. To provide full transparency and active participation of relevant stakeholders in the processes of quality assurance and accreditation in higher education.

The Draft Strategic Plan includes a SWOT analysis. However, so far no action plan or responsibilities or specific indicators of success are defined.

Activities

Two main activities for External Quality Assurance are explained in Article 7 of the Law on Higher Education:

- *Performing periodic audits of the quality of licensed providers of higher education and taking decisions on accreditation or their re-accreditation including the right to award titles and diplomas;*
- *Undertaking periodic quality assessment of programs offered by accredited providers of higher education.*

These tasks are also reflected in the AI on KAA. Accreditations and directly related activities such as monitoring, training, workshops and international contacts are the only activities carried out by KAA. The review panel was provided with a 'things to do'-checklist, but no detailed plan of activities.

Involvement of stakeholders

Stakeholders are involved in the governance of KAA, in consultative processes and in the accreditation processes.

Governance

According to the Law on Higher Education, Article 7, paragraph 4, it is stipulated that *"The KAA shall be governed by a Board consisting of not less than five and not more than nine persons appointed by the Ministry for a fixed term from among persons of both genders active in academic work in higher education and/or the professions within and outside of Kosovo, such that there are at least three persons ('international experts') not employed by any higher education provider in Kosovo..."*

Accreditation decisions are taken after a majority vote, providing that at least one international member is present.

There is no student member in the Board and no legal text requires student involvement in governance of KAA. Some interviewees mentioned that students were not very responsive so far. The student representatives met by the review panel were claiming willingness for a stronger involvement, but recognize that students' engagement still has to find a structural framework.

Consultative processes

According to the SAR several stakeholders representing HEIs and socio-economic partners have been consulted on draft versions of the strategic plan of KAA and the new guidelines for accreditation, known as the Accreditation Manual (AM2018). This was confirmed during the sessions with representatives from HEIs and students. These stakeholders could describe some examples of modifications following consultation. The consultation was done mainly through workshops and surveys. The report *"Development of QA in Kosovo HE – systemic and institutional approaches. Research Report"* (SR 2017) contains a survey of stakeholder opinions on HE in Kosovo and quality assurance. To support these consultation processes, draft documents are made available either through emails or on KAA website.

Accreditation processes

Only international experts (academics) are solicited for accreditations (institutions and programmes), no employers are involved. International students are involved in institutional accreditation, but only to evaluate students matters. As regards support for accreditation processes KAA benefits from input by outside donors like HERAS (Higher Education, Research and Applied

Science) and ADA (Austrian Development Agency) which sponsor activities such as trainings, workshops and follow-up of recommendations.

Regularity of activities

The volume of KAA activities has been significantly influenced by the organisational difficulties described earlier. The statistics indicate that during the period 2014-2016 regular external quality assurance was a key activity of the agency. In this period an average of six procedures at institutional level (including public and private, accreditation and re-accreditation) and 150 at programme level have been conducted per year. In 2017 the numbers dropped to five procedures at institutional level and 79 at programme level. In 2017 also 92 suspensions for one year took place. No procedures were conducted in 2018. New requests for accreditation have been introduced since the new Board has been set up (April 2018) and new guidelines (AM2018) entered into force. Currently 139 requests are pending: 120 programmes (of which 47 new programmes and 73 re-accreditation of programmes) and 19 re-accreditation of institutions. These requests have been accepted by the Board and procedures should start during Spring 2019. The interruption of activities from September 2017 till April 2018 obliged the Board in May 2018 to extend all accreditations with one year.

Quality assurance as defined in ESG Part 2

The judgements of the review panel on ESG Standards Part 2 are summarized in table 4. For further explanation see the respective standards.

Table 4: Judgements by the review panel on ESG Standards Part 2

ESG Standard	Compliance
2.1 Consideration of internal quality assurance	S
2.2 Designing methodologies fit for purpose	S
2.3 Implementing processes	P
2.4 Peer-review experts	P
2.5 Criteria for Outcomes	S
2.6 Reporting	P
2.7 Complaints and appeals	F

Analysis

Considering the evidence provided in the Law of Higher Education, combined with the AI on KAA, the review panel concludes that external quality assurance is the core activity of KAA. Their goals as well as objectives are defined and are reflected in the relevant documents. The activities were processed on a regular basis between 2014-2016. After the interruption of accreditation activities in 2017, the operations started again at the end of 2018 / beginning of 2019. No reviews had been conducted yet at the time of the panel visit, and various processes are starting up again. More time is required to achieve regularity of operations again.

The mission statement of KAA clearly states its role in accreditation and development of quality in HE. However, analysis of documentation and interviews during the site visit showed that currently the focus is mainly on control and that the support role of the agency in enhancement is weak. Even though all activities of the agency are related to its mission, the mission of the agency does not fully translate yet in an operational action plan. The panel believes this may be due to the difficulties met by KAA in 2017 and 2018.

Since the 2014 ENQA-review stakeholders have been involved regularly. Interviews with the stakeholders indicated that they were happy to be consulted and could give inputs which were taken into account by the agency. The involvement of students is still minimal, mainly limited to student matters in institutional evaluations. They are not equal members of the system, particularly since they are not members of the Board. During the interviews some resistance to greater involvement of

students was expressed, though no clear reason could be identified that would speak against student involvement at this point.

Panel recommendations

1. Find as soon as possible HE-wide consensus and consequently decide on a KAA Strategic Plan, including solid activity plans with performance indicators and well defined responsibilities, so as to prepare a sound basis for regular future activities.
2. Involve students in the daily activities and the decision making structure of KAA.

Panel conclusion

Partially 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.

ENQA Review 2014

ESG 2015 Standard 3.2 was in **ESG 2005 Standard 3.2** ('Official status'). The review panel concluded '**fully compliant**'.

Evidence

The status of KAA is established in Article 7, al 2.1-2.4 of the Law on Higher Education, where it is explained that *"KAA is an independent agency responsible for assessing and promoting quality of higher education in Kosovo. KAA shall be responsible for inspecting providers of higher education and advising with the Ministry related to granting, modification or revocation of licences; performing periodic audits over the quality of licensed providers of higher education and taking decisions on accreditation or their re-accreditation including the right to award titles and diplomas; undertaking periodic quality assessment of programs offered by accredited providers of higher education"*.

According to the Law, Article 15 *"All providers of higher education shall be subject to procedures for audit procedures and quality valuation by the KAA in accordance with this Law and sub-legal acts. Re-accreditation of providers shall be carried out by the KAA at intervals of not more than five years. Accreditation certificates shall be issued by the KAA. Failure by a licensed provider of higher education to obtain institutional accreditation or reaccreditation, will result in a different organization for accreditation no later than one year. A second failure to obtain accreditation will result with the revocation of the licence"*.

During the meetings representatives of HEIs underlined the importance of KAA accreditations. In its meeting with the Minister and in various other meetings the review panel learned that a new Law, specific to KAA, is in preparation. It was clearly expressed that this would reinforce the position and independence of the agency. However, during the site visit the panel could not be informed about the definitive outcomes of this preparation.

Analysis

The review panel examined thoroughly the legal basis for the operations of KAA (Law on HE and AI). Further questions were discussed with regard to the new and specific law for KAA. Based on the content of the documents as well as the consistent statements during the interviews, the review panel concludes that the official status and legal basis of KAA is properly defined in the relevant laws

and legal documents. KAA is the only institution in Kosovo responsible for external accreditation and quality assurance of higher education. This role is recognized by the HEIs.

Panel conclusion

Fully 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.

ENQA-review 2014

ESG 2015 Standard 3.3 was in **ESG 2005 Standard 3.6 ('Independence')**. The review panel concluded **'fully compliant'**.

Relevant to this standard is the EQAR-flag: *It should receive attention how KAA has progressed in consolidating its independence. In particular the arrangements for the appointment of the Executive Director and KAA's further staff should be addressed.*

Evidence

Legal provisions

The independence of the agency is established by the Law on HE, which states in Article 7 that *"Kosovo Accreditation Agency KAA is an independent agency responsible for assessing and promoting quality of HE in Kosovo. KAA ensures that the standards and quality of HE in Kosovo meet the demands and expectations of the European Network of the Association for quality assurance in higher education (ENQA)".* This is reinforced in the AI which underlines that *"KAA is an independent agency"* (Article 3, al 1) *"responsible for the accreditation process"* (Article 3, al 2) and *"defines standards and designs its quality assurance procedures in accordance with local legislation and international quality standards in higher education"* (Article 3, al 3). One principle underlying KAA activities reads that *"decisions shall be made independently"* (website and Draft Strategic Plan). Currently the legal basis is included in the Law on Higher Education. According to the Minister and KAA management team, a new law specific for the agency is in preparation and should reinforce the independence of the agency. As stated before, no definitive texts of this new Law could be presented to the review panel.

Organisational independence

The organisational independence shows itself in the composition of the Board, the appointment of the Director and the KAA-staff.

The Board

After the dismissal of the entire Board in 2017 a new procedure has been set up to name the new members of the Board. The initial step is an open call. A specific committee, including international members, checks the eligibility of candidates. The Minister chooses among the list of eligible candidates in order to ensure balance in representation (field, gender, type of institutions). The Board is finally ratified by the Assembly. The review panel could check that no current member of the Board is in the leadership of an HEI. KAA reports annually to the parliament. It is an informative report based on an action plan. However, the last report which KAA could present to the review panel was on 2015-2016.

Director

The recruitment of the Director of KAA is based on an open call. A specific committee of representatives from the Minister and Public Administration selects three candidates among those fitting the rules of administration and profile requirement. The list of three is proposed to the Prime Minister for decision. No Director has been nominated yet. The last attempt of the Ministry of Education together with the Ministry of Public Administration to complete the procedures for the appointment of the new Director at KAA has taken place in February 2019. However, because of procedures which are related to the Governmental committees on appointing senior positions in the civil service in Kosovo, the process has been interrupted and no further progress has been made so far. The interruption of the process is not related to the position at KAA but is a general matter which affects all positions in the civil service system in Kosovo.

According to interviewees this situation is mainly due to the fact that the requirements for the position are difficult to meet (qualification, number of years of experience, etc.) and not necessarily in relation to salaries offered.

Staff

The agency is independent in recruiting its own staff, but has to comply with the same rules as any ministerial agency in Kosovo (in particular it needs preliminary approval of the Minister of Finances). KAA is free to hire their preferred candidates providing that they take into account profile requirements defined by MEST.

Operational independence

Based on the Law on HE, KAA defines its procedures and methods. Finances of KAA come mainly from the accreditations processes paid by the HEIs, then from MEST and support from external partners for specific projects. KAA is independent in using its funding. HEIs have to pay for the accreditation processes in relation to the number of experts.

Composition of expert teams

The composition of evaluators' teams is defined in the AI on Accreditation. The size of the teams depends on the number of study programs. For the evaluation of institutions at least one member is a student, who is appointed to evaluate student matters. All members of expert teams, including students, come from outside Kosovo. They are approved by KAA and the Board. The experts sign a declaration of no-conflict of interest. According to the Minister and the agency, the decision to have only external experts is to increase the independence of their evaluations.

Independence of formal outcomes

Decisions on accreditation or non-accreditation are taken by the Board on the basis of a summary report prepared by the staff of the agency. Since its establishment in April 2018 the new Board did not have the opportunity to take such decisions. Decisions are the result of a majority vote of the Board members attending the meeting and in which at least one international member must be present. If accreditation is not granted the HEI cannot enrol new students. To increase independence of decisions, a representative of ORCA, a non-profit civil society organisation working in Serbia and the Balkan region, attends all meetings of the Board and monitors all decisions. Also attendance at Board meetings by representatives of media is meant to increase transparency. An Appeals Committee, composed of three members, independent from the Board, has been established in November 2018 and started work in January 2019.

Independence and expertise

To enter the accreditation process (= formal application) HEIs must demonstrate that at least one PhD holder (Doctor of Philosophy, or more general doctorate) in the field taught is hired for 60 ECTS (that means a minimum of three for a BSc). This is a major source of disagreement between HEIs and KAA since there are divergent interpretations of the definitions of fields, whereas not all fields are represented in the Board which is responsible to take decisions on acceptance of the formal application and proceed with full application.

Analysis

The review panel recognizes that, regarding the appointment of its Board members, a procedure has been set up to limit the influence of the Minister on the one hand and of HEIs on the other hand in order to increase independence. The current composition of the Board (as based on a transparent selection process, Board members not involved in accreditation processes, presence of international members) limits potential interferences in the decision-making process. However, the review panel believes that including students and members outside HEIs in the Board would further ensure the independence of decisions. Apart from that the review panel considers that the fact that for some years now only acting directors have been appointed weakens the agency to some extent. The draft law for KAA suggests that the independence of the agency is a matter of importance for the MEST.

KAA autonomously defines its evaluation procedures and criteria and appoints its external experts serving as a clear indicator for operational independence. The clearly defined decision process based on more objective criteria limits the possibility to promote possible particular interests and enables an independent decision making process.

In the case of the pre-accreditation process, the fact that decisions regarding the number of PhD holders in the field is taken by Board members who do not always know the field could be a threat to the requirement that decisions are based on expertise only.

Panel suggestion for further improvement

As regards the formal step of an application for re-accreditation, refinement of the definition of academic fields related to study programmes, c.q. seeking advice from experts, would possibly reduce interpretation gaps.

Panel recommendation

In conducting evaluations according to the new procedures as described in the Accreditation Manual 2018 make sure that operational independence and independence of formal outcomes is guaranteed.

Panel conclusion

Substantially 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.

ENQA review 2014

ESG 2015 Standard 3.4 is a slightly modified formulation of **ESG 2005 Standard 2.8** ('System-wide analysis'). In the 2014 review the panel concluded on this standard '**partially compliant**'. The following recommendation of the 2014 review applies:

Recommendation 7: *KAA is recommended to carry out regular in-depth system-wide analyses, eventually also with help of independent outsiders.*

Also the EQAR-flag applies: *It should be analysed how KAA has carried out additional system-wide analyses.*

Evidence

Follow-up of recommendation

In PR2015 KAA states that it would make arrangements to produce once every two years analytic reports on all evaluations as from April 2016. This would be supported by the new Law on Higher Education. However, as stated in SAR, due to shortage of staff, KAA has been unable to follow the recommendation to carry out regular in-depth system-wide analysis, even though some efforts to produce thematic analyses in specific areas have been made. These efforts refer in particular to data about staff in HEIs and a survey of stakeholder opinions.

Data about staff in HEIs

In the last two years, KAA has analysed data and published reports concerning the sufficiency of academic staff in HEIs. This procedure is carried out in accordance with the AI on Accreditation. The procedure starts when HEIs submit documentation to KAA on their academic staff engagement. This must be done every year before 31 October. After KAA-staff has checked whether HEIs meet the minimum criteria the Board decides which HEIs are allowed to continue to deliver their study programmes and/or shall be accepted for re/accreditation. Reports concerning the number of academic staff for every study programme, generally including excel sheets, are published at KAA's website.

The legal requirement for HEIs as regards the number of employed full time academic staff already existed, but until recently KAA was not able to verify the formal criteria with full accuracy. A step forward has been made with the establishment of a Management Information System (E-Akreditimi, e-accreditation), which enables KAA to collect data in a more efficient way and to produce analytic reports about the situation of academic staff in HEIs. In principle this could be seen as a first step in preparing comprehensive reports on the quality of academic staff.

Stakeholder survey

In SR2017 a wide stakeholder survey was presented. The consulted stakeholders included HEIs, officials from MEST, HE experts and representatives from civil society organisations. The aims of the project were to evaluate the present system of QA in HE and to which extent the national QA system is fit-for-purpose, to explore the needs and aspirations of HEIs and society and to identify best practice to improve standards and guidelines. The survey provided KAA with information on the quality of current QA system and future needs. It enabled KAA to carry out improvements in the

standards and criteria. This is expected to have a positive impact on the development of QA in the HE system.

Future developments

In 2017 KAA agreed with the international organization HERAS to start a project with regard to thematic analysis, but this activity has been postponed mainly because of KAA's staff shortage. During the site visit the review panel was informed that activities planned within this project shall continue. In the KAA's SWOT analysis, as presented in the SAR, thematic analysis is not mentioned as a weakness. Also no particular strategic goal or activity in relation to thematic analysis has as yet been envisaged in the (draft) Strategic Development Plan 2019-2023. However, in the interview session at MEST it was confirmed that thematic analysis in specific areas would be useful to MEST.

Analysis

The publication of overall lists of HEIs and study programmes, which do or don't fulfill formal criteria is beneficial to transparency, but in terms of thematic analysis it is only a first step. The survey on stakeholders' opinions (SR2017) presents useful information, but a close connection with the general findings of the external assurance activities as carried out by KAA is missing. Developments, trends and areas of good practice or persistent difficulty should be made clear, to bring these reports more in line with the guideline to the present ESG standard.

The panel considers that although some small steps have been made in order to produce thematic analysis, it is clear that much more effort should be done in that direction. Thematic analysis could be very helpful to those who make decisions in the system of HE to better plan necessary changes, based on reliable data and evidences. In achieving this goal, the useful tool E-Akreditimi could play a major role.

Panel recommendation

Use data collected during accreditation processes and other activities to carry out thematic and system-wide analysis in order to support further development of the HE system in Kosovo.

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.

ENQA review 2014

ESG 2015 Standard 3.4 was before partially **ESG 2005 Standard 3.4** ('Resources'). In the 2014 ENQA-review the panel concluded '**substantially compliant**'. The following recommendation of the 2014 review applies:

Recommendation 8: *KAA is recommended to act according its strategic plans and at the same time regularly monitor the workload of its staff in view of the many activities that it intends to carry out.*

Evidence

Human Resources

Past and present situation

In response to the recommendation in the 2014 review in PR2015 it was stated that during the site visit of the review, early 2014, the KAA's office was still significantly understaffed, with a secretariat consisting of the Director and five administrative staff, while three vacant positions were to be filled. By August 2015 two of the three vacant positions had not been filled in, one was still open.

At the time when the SAR was completed (Nov. 2018), the secretariat was down again to an (Acting) Director and five permanent employees. The reason why KAA is led by the Acting Director is that procedures for the election of a permanent Director of KAA have yet to be completed. Permanent employees are civil servants and they are recruited according to Law with a procedure defined by the Government.

During the site visit, the review panel was informed that one staff member had left KAA since the SAR was submitted. Therefore currently the secretariat consists of the Acting Director and four permanent employees: one officer for evaluation and monitoring, who is directly linked with the organisation and management of the re/accreditation process, one legal officer, who is responsible for the overall applicability of legislation at KAA, one officer for Budget and Finances, who is responsible for the management of all financial affairs within KAA and one officer for administration and recruitment, who is responsible for the management of the administrative work with respect to the staff of KAA. In the SWOT analysis presented in the SAR it is emphasized that two weaknesses of KAA are related to human resources: KAA has insufficient human resources and KAA continues to operate without a permanent Executive Director, which has impacted upon the dynamism of the institution.

As to human resources development, according to the SAR staff-members have participated in workshops, seminars, study visits to European universities and quality assurance agencies as part of KAA's staff development plan. The review panel has confirmed this in interviews with KAA staff. The continuous investment in its staff by offering them training relevant to their work has been emphasized in KAA's SWOT analysis as one of its strengths.

New appointments

The review panel was provided with evidence that a public call for application for three job positions (one for monitoring and evaluation, one for evaluation and accreditation and one for information technology) has just been finished and that the recruitment process of new employees is underway and planned to be completed very soon. Also during the site visit the review panel was informed that the approved number of employees for the year 2019 is 13 (including already employed staff). The agency expects that this number of employees will be reached during this year. In addition to these 13 employees, the agency has a comprehensive plan to employ another 19 employees during the following years in order to reach the number of 32 employees. The review panel was presented with a concept document based on which the new Law on Accreditation Agency is planned to be drafted. In this document the proposed increase of human resources is mentioned.

Recruitment procedure

According to the SAR, the recruitment procedure is entirely organised and managed by KAA. The Commission for the final selection of the successful candidates consists of five members: two representatives of KAA, two representatives of MEST and one representative of civil society organisations in Kosovo. Due to shortage of finances, KAA is not able to increase the number of its employees without preliminary approval from the Ministry of Finances and the Ministry of Public Administration. When funding is ensured, KAA can organize the recruitment process of the administrative staff independently.

Stakeholder's views

In the stakeholder's survey, which KAA conducted in 2016, stakeholders expressed that, although the number of employed staff is quite limited, staff members are devoted and experienced. The panel confirmed this during the interviews. One of the recommendations was to increase the human resources of KAA.

Finances

Current funding

KAA is financed from two main sources: a Government grant and KAA's own source revenue. The Government grant secures the compensation of KAA's staff. KAA staff members are civil servants and cannot be financed from own sources. KAA's own source revenue is generated from the re/accreditation fees paid by HEIs. This revenue is spent for conducting re/accreditation activities. In 2018 KAA's own source revenue had gone down considerably due to absence of activities. In the years when re/accreditation is carried out to full extent this source of financing is stable and sufficient to cover the costs of re/accreditations. As is written in the SAR, KAA's budget is separate from that of MEST and entirely managed by the Director of KAA.

Future funding

During the site visit the review panel was provided with additional data and explanation about the availability of funds, its expenditure and future plans. As shown in this report under KAA's Funding (p. 14) the total approved budget for the year 2019 for the category Wages and Salaries is EUR 84,907.56 (of which 75,595.56 Government grant). The approved budget for the year 2019 for the category Goods and Services is EUR 427,510.00 (of which 10,000.00 Government grant) with an additional EUR 1,500.00 Government grant for Utilities.

During the meeting with KAA, Acting Director and staff were positive about future plans and they perceive the whole situation (slightly increased budget, new approved staff positions, a concept document based on which the new Law on Accreditation Agency will be drafted, broader social awareness of the importance of KAA etc.) as a positive signal. During the site visit the Minister confirmed his full support to secure adequate resources for KAA.

Donors

The review panel was provided with data on budget from donors, available to KAA during the last years. This budget was spent on Goods and Services. During the meeting with external donors, the review panel was informed that they would be willing to sponsor specific activities by KAA, but that they first want to be sure about KAA's priorities.

Space

The review panel had a short tour of the premises. KAA offices are located in the same building as some other institutions like the Qualification Framework Authority. KAA has limited offices and space. The available space is appropriate for the current number of employees, which is very low, but KAA is aware that limited space is one of its weaknesses. According to the agency in future new space should be provided when the number of staff will be increased.

Analysis

Since the 2014 review the number of staff of KAA has dropped, but during the site visit the panel was informed that the recruitment process for three new employees is planned to be finished very soon. Public funds have been allocated for this purpose and recruitment procedures are in full swing.

In the opinion of the panel a weak point is the fact that currently there is only one officer for evaluation and monitoring. Even though no reviews were carried out in 2018, in daily practice this meant that the workload was already extreme. During the site visit it became not clear to the panel

how in 2019 KAA, with its limited human resources, will deal with the huge number of requests for re/accreditation which have already been received. Naturally, the three expected new employees, among whom two will be involved in re/accreditations, could be of considerable use, but they would first need to be prepared and properly trained for their participation in re/accreditations.

Not only could the lack of human resources have an impact on KAA's accreditation activities, it also affects other activities, like field monitoring of HEIs on a regular basis and thematic analysis in specific areas. All groups of interviewed stakeholders during the site visit emphasized the lack of human resources of KAA as one of the main challenges. The interviewees were aware that the lack of staff prevents KAA to conduct broader activities (trainings, workshops etc.) in addition to re/accreditation, which would support the development of HEIs. The slight increase of the total approved budget for the category Wages and Salaries in 2019 will be sufficient to cover the cost of a few more employees, but in order to achieve a greater increase of employees, additional public funds have to be secured.

Panel recommendation

Take all necessary actions in order to assure adequate human and financial resources needed for conducting the activities expected from KAA.

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.

ENQA review 2014

ESG 2015 Standard 3.6 was before part of **ESG 2005 Standard 3.8** 'Accountability procedures'. On this standard the ESG 2014 review panel concluded '**fully compliant**'.

Evidence

Documents supporting internal quality assurance

Legal provisions, such as the Law of Higher Education and various AIs, and a number of documents are in place that should define and assure the quality of work. Among these documents are:

- AM2018
- Templates of SERs both for Institutions and Study Programs
- Templates for review reports
- Code of Ethics
- Procedure for complaints and appeals,
- Procedure for foreign recognized accreditation agencies.

As to the foreign agencies those that are member of ENQA, or formally approved in the United States could be accepted.

Apart from this KAA uses an e-accreditation system, which allows HEIs to register the basic data of available study programs, their accreditation validity periods and academic staff. This tool is useful for transparency and quality assurance. However, there is no more than a two-page draft-paper of a

Quality Assurance Plan. This paper is still work-in-progress and not yet published at the KAA website. As mentioned elsewhere, also the KAA Strategic Plan exists in a draft-version only.

Internal quality assurance policy, practice and culture

As to the daily practice of quality assurance KAA staff told the review panel that there are so few staff members that everybody is aware of each other's work. But as there are no staff members with similar job descriptions and tasks, the application of an internal four-eyes quality assurance practice is absent.

Although staff members are free to share their views in formal meetings, with an easy access to Board members in a given context, there is no mechanism for collecting written feedback from KAA staff to the Board.

Inputs from outside for internal quality assurance

As part of evaluation of its processes and procedures the agency collected feedback from HEIs in the survey, reported in SR2017. There is no template for HEI's feedback on reviews as the agency prefers to collect feedback on informal basis. The agency informed the panel that formal and informal meetings between the agency and HEIs, colleagues from civil society and student unions do take place, but the panel didn't get a clear view of how frequent they are. The large workload and lack of KAA-staff are major constraints to hold these practices on a regular basis. Private university representatives feel largely left out of informal feedback collection processes. Some representatives from different interview groups suggested that KAA could organise once or twice a year a meeting with HEIs to discuss QA issues and the agency's methodologies, since AM2018 was accepted in a short time and there was little opportunity to familiarise themselves with the new requirements and enforced criteria.

KAA collects oral feedback from experts at the end of a site visit, but not all experts interviewed were fully satisfied with opportunities for this exercise. Formal mechanisms such as feedback questionnaires for expert team members, that could be completed at the end of each evaluation, are missing. Students are largely absent in giving feedback to the agency.

The agency and all stakeholders involved are well aware of the major risk of understaffing to assure and enhance the quality and integrity of their activities.

Analysis

Various components of internal QA are addressed in a number of documents, which the panel considers as a good continuation of the 2014 review. However an Internal Quality Assurance Policy document, with concrete aims, performance indicators, adequate work plans and a strategic vision to assure the agency's internal quality of work is only in its first stages. In the opinion of the panel the absence of four-eyes quality assurance and of structural feedback mechanisms so as to create closed-loop practices carries some risks.

The panel learned from the self-assessment report and during the site visit that feedback from HEIs is not well regulated and occurs at incidental basis only. More specifically gathering feedback from students and involving them in agency's activities is presently lacking at the agenda of the agency. Although reliance on informal feedback is part of the culture in a small country, formal feedback collection mechanisms are vital in the light of upcoming evaluations, and the newly implemented procedures as prescribed by AM2018. This should be a beneficial practice for all stakeholders involved .

The panel learned that KAA is aware about the major challenge of understaffing, and the agency stated that internal quality assurance processes will hardly become stable if there is not enough human recourse to carry out all the activities the agency aims to, even when procedures laid out in documents are clear.

Panel recommendation

In order to collect feedback KAA should increase and describe in documents the implementation of formal rather than informal mechanisms to create solid routines of internal quality assurance based on principles like closed-loop practices and the four-eyes system.

Panel conclusion

Partially 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.

ENQA review 2014

ESG 2015 Standard 3.7 was formerly part of **ESG 2005 Standard 3.8** ('Accountability procedures'). The 2014 review panel's conclusion on standard ESG 2005 3.8 was '**fully compliant**'.

Evidence

The AI on Kosovo Accreditation Agency stipulates that the agency is *subject to regular evaluation*. The Law on Higher Education mentions the required compliance with *demands and expectations of ENQA*. The review conducted in 2019 is the second review of this type. KAA produced a progress report on the recommendations of the 2014 ENQA review. In a separate chapter of the SAR, KAA describes how the recommendations have been addressed since 2014 and the present stage of implementation.

Analysis

The review panel confirms that KAA undergoes periodic external review as requested by the ESG since the agency applied for a renewal 5 years after the previous evaluation.

Panel conclusion

Fully 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 1 of the ESG.

ENQA review 2014

ESG 2015 Standard 2.1 was before **ESG 2005 Standard 2.1** ('Use of internal quality assurance procedures'). The review panel concluded '**substantially compliant**'.

Evidence

In the SAR it is mentioned that KAA’s external QA model and methodology is based upon the aim to promote a quality culture that consistently and continuously contributes to the achievement of a high-quality HE provision in Kosovo. KAA therefore addresses ESG-2015 Standards Part I through AM2018, Chapter 2. To illustrate the relation between KAA-standards and ESG-standards Part 1 in the SAR a 5-page table is presented. Table 5 (p.29) is a condensed representation hereof.

In the KAA frameworks for accreditation, which form the basis of Table 4, it appears that at institutional level in re/accreditation there are eleven areas, containing between five and fourteen standards each, with a total of 104 standards. For re/accreditation of programmes seven areas apply, containing between six and twelve standards each, with a total of 64 standards. Many standards are accompanied by performance indicators. The respective areas have a label (e.g. ‘public mission and institutional objectives’ or ‘learning and teaching’), but do not stand for an over-arching standard as such.

Evidence on coverage in general

According to Table 5 all ESG 2015 Standards Part I are covered in *initial accreditation of a HEI and its programmes*. The same applies to *re/accreditation of programmes and HEI’s*. In *initial programme accreditation at an accredited HEI* ESG Part 1 Standards 3, 4, 5 and 6 are left open. To the review panel it was explained that these standards would have been covered already during the initial accreditation of an institution and its existing programme(s). It was to be assumed that in an additional new programme these standards would be maintained in much the same way. To the review panel it remained unclear why in *re/accreditation of programmes and HEIs* reference was made to areas and standards of the framework for re/accreditation of programmes only and not to those of institutions.

Further evidence on coverage

In order to find evidence on how the mapping would work out in practice the review panel carried out various searches. An example is ESG Standard 1.3 *Student-centred learning, teaching and assessment*. The first part of this standard reads: ‘*Institutions should ensure that the programmes are delivered in a way that encourages students to take an active role in creating the learning process*’. According to Table 5 during initial accreditation of an HEI and its programmes ESG-Standard 1.3 is covered by Institutional Area 6. Looking a bit closer, this area covers various aspects of educational design. ESG Standard 1.3 is to some extent represented by standard 6.8 , which emphasizes ‘*student-centred learning methods and environments*’ and ‘*engagement in the learning process*’. However, the picture becomes less clear in re/accreditation of programmes and HEIs. According to Table 5 Programme Area 4 provides standards on the educational process, but only standard 4.6, which stresses ‘*partnership between teacher and student*’, comes close to ESG Standard 1.3, albeit in a general sense. Various other searches (e.g. on ESG Standard 1.5: Teaching Staff) provided similar evidence: it looks like ESG Standards part 1 are covered in a general sense at institutional level. However, it remains unclear how they are represented at programme level.

Table 5: Mapping of ESG Part 1 standards on KAA frameworks

	Initial accreditation of an HEI and its programmes	Initial programme accreditation at an accredited HEI	Re/accreditation of programmes and HEIs
ESG Standards	KAA Standards	KAA Standards	KAA Standards
(1) Policy and procedures for quality assurance	Inst. Area 5 (Qual. Ass.): 5.1, 5.2, 5.4	Prog. Area 2 (Qual. Man.): 2.2, 2.9	Prog. Area 2 (Qual. Man.): 2.2, 2.9
(2) Design and approval of programmes	Inst. Area 5 (Qual. Ass.)	Prog. Area 2 (Qual. Man.): 2.3, 2.4; Prog. Area 4 (Educ.)	Prog. Area 2 (Qual. Man.): 2.3, 2.4

		Process Content).	
(3) Student-centred learning, teaching and assessment.	Inst. Area 6 (Learning and Teaching)		Prog. Area 4 (Educ. Process Content)
(4) Student admission, progression, recognition and certification	Inst. Area 9 Student Administration and Support Services)		Prog. Area 4 (Educ. Process Content); Prog. Area 5 (Students)
(5) Teaching staff	Inst. Area 8 (Staff, Employment Process and Prof. Dev.)		Prog. Area 3 (Academic Staff)
(6) Learning resources and student support	Inst. Area 10 (Learning Resources and Facilities)		Prog. Area 5 (Students) Prog. Area 7 (Infra-struct. and Resources)
(7) Information management	Inst. Area 5 (Qual. Ass.): 5.11, 5.12	Prog. Area 2 (Qual. Man.): 2.6	Prog. Area 2 (Qual. Man.): 2.6
(8) Public information	Inst. Area 4 (Acad. Int., Responsibility, Public Accountability)	Prog. Area 2 (Qual. Man.): 2.8	Prog. Area 2 (Qual. Man.): 2.8
(9) Ongoing monitoring and periodic review of programmes	Inst. Area 5 (Qual. Ass.)	Prog. Area 2 (Qual. Man.): 2.7, 2.9	Prog. Area 2 (Qual. Man.): 2.7, 2.9
(10) Cyclical external quality assurance	Law: all HEIs Inst. Accr. 3-5 years	Law: all HEIs Progr. Accr. 3-5 years	Law: all HEIs Progr. Accr. 3-5 years

Interpretation of standards

According to AM2018 the SER must provide the expert team enough data to support them in understanding the main characteristics of how the institution approaches the quality assurance process as compared to the national standards. Peer review experts will address the compliance of the education provider against the standards and performance indicators through the External Review Report. Naturally much depends on the way the KAA-standards are perceived by HEIs and by expert teams. During the site visit there was no evidence yet on the application of new frameworks and its interpretation of ESG 2015 in either SERs or external review reports.

Analysis

As shown in various searches carried out by the review panel, KAA-standards are substantially in line with the intentions of ESG 2015 Standards Part I, at least at institutional level. As yet, there are no experts reports on institutions and programmes according to the new KAA-frameworks. Only these reports will show how in practice the KAA-frameworks address the internal QA-practices of HEIs along the lines of ESG standards Part 1.

Panel recommendation

Take care that in institutional and programme self-evaluations, in site visits and in review reports the ESG 2015 Standards Part I are addressed clearly.

Panel conclusion

Substantially 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.

ENQA review 2014

ESG 2015 Standard 2.2 forms part of **ESG 2005 Standard 2.2** ('Development of external quality assurance processes') and **ESG 2005 Standard 2.4** ('Processes fit for purpose'). On both standards 2.2 and 2.4 the review panel concluded '**substantially compliant**'. The following recommendation from the 2014 review applies:

Recommendation 2: In view of the rapidly changing needs of Kosovan society and HE, KAA is recommended to involve all relevant stakeholders, including students, teachers and employers, in the process of further developing the QA procedures.

Evidence

Follow-up of recommendation

In PR2015 it was mentioned that KAA had secured financial support from donors for a broadened stakeholder engagement. Per January 2016 a working group consisting of a variety of stakeholders, including students, would be set up, to enhance the involvement of stakeholders in design, evaluation and accreditation processes themselves.

According to the SAR in December 2016 the broad process of revising the then current standards and guidelines was conducted. On 30 November and 1 December 2016 KAA organized a workshop for quality officers and a national conference for the development of quality assurance in Kosovo higher education. The purpose of these two events was:

- to place on the public agenda the debate about the national quality assurance system in Kosovo by engaging the academic community, higher education experts and civil society
- to invest in capacity building at institutional level by providing suggestions for the development of internal systems of quality assurance in higher education institutions, authorities and organisations as well as national and international experts.

Once the consultative process ended a revised version of KAA's Standards and Guidelines for external quality assurance was produced. This accreditation manual (AM2018) contains chapters on standards and performance indicators for external quality assurance (25 pages) and guidelines for external quality assurance (12 pages), apart from an introduction with a glossary of terms, an overview of developments in the quality assurance of higher education and basic principles of the manual (7 pages). The manual was circulated for public consultation among all higher education institutions and relevant stakeholders and finally adopted by the Board in June 2018.

Methodologies used

As described under Standard 2.3 (Implementing processes) the methodologies as outlined in the manual consist of self-assessment by institutions and programmes, site visits, reports and follow-up.

Stakeholders' confirmation

During the site visit various stakeholders confirmed that they had been actively involved in the process of revising KAA's standards, and they could give examples in which their feed-back had been used. Also students had been involved, but the ones with whom the review panel spoke during the

site visit were others than those who had participated earlier on in the consultation process, and therefore could not give further information on involvement in the process at large.

During the site visit stakeholders generally expressed support for the new standards and guidelines. More in general there is support for the two step process for re/accreditation in which the first step involves formal application and the second step full application. Stakeholders believe also that the formal outcomes will become more clear with the new documents in place.

As expressed during the site visit, stakeholders are generally satisfied with the support given by KAA as regards workshops and trainings, but, for shortage of staff, individual members at KAA-office are not always easy to reach. At the time of the site visit no experience had been gained as regards the demands set by the instructions of AM2018, e.g. in terms of the workload for HEIs.

Analysis

The review panel considers that the methodologies used in external quality assurance are well designed for the purposes of accreditation activities as conducted by KAA. Stakeholders have been actively engaged in designing AM2018. The system of formal and full applications and the frameworks for re/accreditations at large find ample support. However, as yet no conclusion can be drawn as to the workability of the frameworks and the workload for HEIs.

Panel recommendation

Make sure that during accreditation activities the workability of the methodologies is guaranteed.

Panel conclusion

Substantially 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

ENQA review 2014

ESG 2015 Standard 2.3 was formerly **ESG 2005 Standard 3.7** ('External QA criteria and processes used'). On this standard the review panel concluded '**substantially compliant**'. The following recommendations of the KAA review 2014 apply:

Recommendation 4: *KAA is recommended to be more strict on the coverage and acceptance of the self-evaluation reports as provided by HEIs, in order to facilitate the work of the external evaluators.*

Recommendation 6: *KAA is recommended to further develop the follow-up procedures, in particular the follow-up on improvement plans and the length of re-accreditation cycles, and to become more specific on conditional (re-)accreditations.*

Evidence

Steps in the accreditation process

In the SAR it is explained that in all types of (re)accreditation there is a distinction between formal application and full application.

In formal application three steps are taken:

1. Submission of the request plus list of academic staff
2. Approval of academic staff (or rejection, if requirements are not met)
3. Formal approval of application (or rejection, if all requirements are not met)

In full application, after acceptance of the formal application, the following four steps are to be made:

4. Submission of Self Evaluation Report (SER) by the applicant HEI.
5. If the SER meets the criteria as stipulated in the Accreditation Manual, an external evaluation takes place by a panel of international experts, consisting of:
 - a) review of the SER
 - b) an onsite visit (together with KAA officials)
 - c) preparation of an evaluation report
6. Final decision by the Board about granting (re)accreditation and if so, the duration of accreditation.
7. HEIs write a plan for improvement addressing the recommendations of the evaluation panel

There is a deadline to conclude the accreditation within one year. If applications are submitted before 31 October, KAA issues an accreditation decision not later than July of the following year.

The process leads to accreditation for three or five years, depending on the recommendations of the expert team.

Due to dismissal of the Board in September 2017 no implementation could be given to this step-by-step process in the months thereafter. In May 2018, after a standstill of eight months, the new Board decided to extend all valid accreditations with one year. Formal applications by 31 October 2018 have been taken into consideration again. Presently the procedures for review of full applications are starting up.

Self-evaluation reports (SERs)

In the SAR it is mentioned that KAA has defined rules related to SERs provided by HEIs. These rules are part of AM2018. Some of the rules are related to the style and general structure of the SER along with recommendations for the elaboration of the SER. Also, according to AM2018, KAA staff should check that the submitted SER meets the basic requirements before the next stage of the re/accreditation process is initiated. KAA has developed two templates for the preparation of a SER: one for institutional and programme evaluation and one for programme evaluation. The template includes an introductory part (a brief overview of the institution and programme under review), the main body which follows the areas and standards as specified in AM2018, recent evaluation and developments, recorded since the previous evaluation and appendices. The templates are published at the KAA website. KAA organized a workshop with representatives of all public and private HEIs in which the guidelines were explained.

As there had been no reviews in 2018 and 2019 up to the site visit in March 2019, the review panel was not in a position to get insight in the quality of recent SERs or how KAA-officers and review experts would have dealt with them. However, QA-officers from HEIs told the review panel that they had attended trainings on AM2018 and that some of them had already tried out SER templates without great difficulty.

Follow-up and monitoring

On the recommendation on follow-up procedures in PR2015 it is mentioned, that to carry out monitoring two officers had been appointed in 2014 with the explicit task to work on follow-up procedures, improvement plans and to analyse the extent to which institutions have met the conditions of approval. Thanks to donors also training of KAA staff has taken place, for instance a visit to the Austrian Quality Assurance Agency and participation in relevant seminars, workshops and working groups.

The SAR mentions that since the last revision of the AI (2017) it had become more clear how KAA should conduct monitoring as prescribed by the Law on Higher Education. Article 29 of the AI (2017) defines the process of *Monitoring and Control* as follows:

- *“KAA performs monitoring and quality control with prior notification at accredited HEIs*
- *Monitoring and quality control is carried out by international external evaluators*
- *The cost of the monitoring is covered by KAA*
- *The monitoring of accredited HEIs is organised twice within one academic year”.*

According to the SAR over the past three years KAA has consistently collected evidence from HEIs in order to assess their level of compliance with formal requirements concerning sufficiency of academic staff per programme. For this matter the computerized system e-accreditation has been established, which allows HEIs to submit details in a less complicated way than before. During the site visit this was confirmed by HEIs and there is wide support for this system. According to the SAR HEIs are also obliged to submit to the KAA at the end of each academic year an implementation plan to address the recommendations of the review-team. However, limited financial resources prevented KAA from conducting field monitoring, as HEIs don't pay for monitoring and Government grants are limited. Also the fact that earlier appointed staff had left KAA prevented KAA from conducting field monitoring on a regular basis. KAA is working on drafting Monitoring Standards.

Analysis

The processes of accreditation contain the elements asked for in the present Standard. A self-assessment is foreseen, as well as a site visit, reports and a follow-up. The clear prescriptions of AM2018 should contribute positively to processes, which are predefined and published well.

However, over the last 1½ year no reviews of full applications have taken place. In 2018 a full year extension of current accreditations has been allowed. There has been no monitoring of follow-up of recommendations in earlier reviews. Monitoring has been limited to formal requirements only, that is: limited to control rather than to quality enhancement. For this matter the 2014 recommendation has not been followed up. While the introduction of AM2018 and the intentions to apply more intensive and quality-oriented monitoring look positive no evidence could be provided yet on the consistent implementation, reliability and usefulness of the processes. As to the quality of SERs no evidence could be supplied either for lack of recent SERs, prepared according to the new accreditation manual.

Panel recommendation

1. Monitor and evaluate the implementation of accreditation activities from 2019 onwards thoroughly.
2. Concentrate on quality improvement, when monitoring the follow-up of recommendations to HEIs provided by expert panels.

Panel conclusion

Partial compliance.

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).

ENQA review 2014

ESG 2015 Standard 2.4 was part of **ESG2005 Standard 3.7** ('External quality assurance criteria and processes used by the members'). In ESG 2015 it has become a separate standard.

The 2014 review panel concluded on ESG 2005 standard 3.7 '**substantially compliant**'. The following recommendations of the 2014 review apply:

Recommendation 1: *KAA is recommended to ensure that the international, non-Albanese speaking evaluation experts are able to gain sufficient insight in the effectiveness of the internal quality assurance of student assessment.*

Recommendation 3: *Students should take part in panels on the (re-)accreditation of study-programmes.*

Also an EQAR-flag is related to this standard: *It should be addressed whether KAA has systematically included student experts on all panels for programme accreditation.*

Evidence

Experts and site visits

During site visits the composition of the team of external experts depends on the type and complexity of re/accreditation. If there is no institutional evaluation, the composition of the expert team shall consist of only one expert of the respective area (field of study) of the study programs under evaluation. If there is also institutional evaluation, then the expert team shall consist of at least one expert (depending on the size of the HEI), with specific expertise on quality assurance/institutional issues. The composition of the external expert team does not differ when it comes to initial accreditation or re/accreditation procedures. The same external experts can be engaged in different institutions of higher education within one year.

International experts only

The (re)accreditation process involves international experts only, as is stipulated by the Law on Higher Education. A list of independent experts is published on the agency's web-page. This list includes 150 experts with only six student members. External experts are selected to the agency's pool by addressing them directly, following recommendations from European accreditation agencies, and include international external evaluation experts as well as international quality assurance experts. The KAA director drafts the list of external experts and the Board approves the list. The value of international experts only is considered positively among the stakeholders because of avoiding any conflict of interests, even though they are critical of the fact that international experts often have little understanding of the Kosovar context.

For a specific re/accreditation review experts in the expert team are appointed by the KAA Board, who chooses experts from a short-list, made up by the Director.

Criteria for experts

The criteria to inclusion in the list of external experts are: status of professional in the current field with expertise in accreditation processes, PhD holder, with special consideration given to university management experience for institutional evaluations. The latter does not apply to student members of the pool. The expert team members are obliged to sign a no-conflict-of-interest declaration, along with a Code of Ethics provided for consideration. During the site visit some stakeholders pointed out

that the procedure and criteria for the appointment of expert team members were not entirely clear.

Expert teams and student participation

In PR2015 it is mentioned that in 2015 up till August 2015 in 30 site visits a total of 11 visits included students. The SAR mentions that in 2016 33 expert panels invited 10 students recommended by ESU, in 2017 30 panels invited 9 students. In the AI on Accreditation from 2017, art 14, it is stated that “*in the team of evaluators at least one student will be appointed to evaluate student matters during the evaluations of higher education institutions*”. However, due to the absence of reviews since this time, this has yet to be implemented.

Preparation of experts

The international experts who were active till part of 2017 used to receive the necessary documentation: SER, annexes, additional documents, and the support of the agency. During the site visit experts told the review panel that they were generally satisfied with the preparation and the 3-hour briefing by KAA on their site visits. This was confirmed in a statement provided by a student-expert, who was unable to attend the ENQA-review site visit, but communicated with the review panel by e-mail. The briefings to experts were given the day before the site visit, during an informal meeting. The briefing generally covered the HE national framework, KAA’s methodologies and any additional issues raised by experts. However, it was mentioned to the panel that the briefing may have been too condensed for experts visiting Kosovo for the first time. Over the past 1½ year no expert reviews have taken place. AM2018’s instructions and templates for institutional and program evaluations are still to be tested. The opinions on AM2018 expressed by the experts, whom the review panel met during the site visit, were controversial. On the one hand the new methodology was considered to be precise and fit to cover the local context, on the other hand some experts raised their concern on its workability and not having being involved in the design of AM2018.

Site visit and feed back

Some interviewees mentioned the defensive posture of the universities during the site visits, which may be due to a general perception of KAA as controllers. The interviewed experts mentioned lack of feedback possibilities to and from the universities, which, in their view would be a point for improvement.

Support for non-Albanian speaking experts

In the PR2015 as well as in the SAR it is mentioned that experts are always supported by KAA if there are any language problems and that translation of documents is always available. This however was not the concern of the review panel in 2014. The real concern was that non-Albanian speaking expert panels would possibly be unable to judge the standard of exams and other degree-work such as theses, if these were presented in Albanian language. This concern was addressed in PR2015 by stating that from end 2016 onwards KAA would ask institutions to provide more detailed information and documents (translated into English) on how learning outcomes are related to examinations, how the learning outcomes are achieved with detailed examples, and assessment methodology in relation to learning outcomes. In the SAR it is not mentioned whether these requests were made by KAA. During the site visit it was remarked that experts during their evaluations normally do not get into this measure of detail and that not only Albanian but also English is used in thesis-work. In view of data presented in SR2017, according to which not more than 29% of the responding stakeholders would say that academic degrees in Kosovo are very credible in the international world, while 28% were stating that they completely lack credibility in the international world, with 43% ‘don’t know’ or ‘left open’, the earlier concern of the 2014 review panel about scrutiny by experts of degree-work still stands.

Analysis

KAA has a large pool of experts for its upcoming evaluations, which is an example of good practice and worth a commendation. The exclusive involvement of international experts is generally valued among the local stakeholders, even though sometimes with slight reservations as regards the occasional lack of insight in the Kosovo-context. It is believed that international experts bring diverse contributions and that HEIs may benefit from and enhance transparency of the processes. Yet, the review panel maintains and repeats the concerns of the 2014 review panel on in-depth program evaluation with little or no possession of local language.

As regards student participation the number of international student experts in the pool of experts is very small - 4% from the total number of the pool and actual participation of students in the evaluations in the years 2015-2017 has remained low. The review panel considers this as an insufficient follow-up of the 2014 recommendation. The agency may explore the benefits of involving the local students in programme evaluations and/or monitoring follow up, as there is an obvious motivation from the students' side to a larger participation in QA in different levels.

There are little or no formal feedback collection mechanisms from and to international experts, thus preventing consistent development of agency's basic working tools. Although there have been workshops and meetings with stakeholders, the panel believes that the agency needs to ensure consistent mechanisms for feedback collection from its (1) expert pool and (2) from HEIs on expert teams. The selection criteria for expert teams are not always clear to HEIs, although there is a general consensus regarding the professional credibility of the pool.

As for the introduction and use of the AM2018, the panel proposes KAA to consider using on-line platforms to organise webinars for its international experts regarding the peculiarities of Kosovar HE and its development. More in general, the panel believes that it would be very useful to work hard on better preparation of experts as regards the demands of AM2018 and have consensus meetings among experts so as to make consistent judgement on the many standards in AM2018 possible.

It remains a challenge for KAA how local Kosovar experts may play a role in quality assurance. This applies to both staff and students, not only within institutions and programmes, but also in the HE-QA-system at large. In particular, the panel believes that student participation in the QA-system is vital for further development of Kosovo HE. Perhaps yearly training days on AM2018 for Kosovo staff members and students and involvement in the monitoring of recommendations would be useful steps, which could have the additional advantage of internalizing and strengthening a quality culture within HEIs.

Panel commendation

KAA is commended on the large pool of experts involved in reviews.

Panel recommendations

1. Make sure that the level of degree-work can and will be judged properly by the expert panels.
2. Make sure that full students' participation in institutional reviews and program evaluations is guaranteed.
3. Build a network of national experts, including students, in order to participate in activities such as monitoring of the follow-up of recommendations provided in review reports.

Panel conclusion

Partially 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.

ENQA review 2014

ESG 2015 Standard 2.5 was in **ESG 2005 Standard 2.3** ('Criteria for decisions'). The review panel concluded '**fully compliant**'.

Evidence

The outcomes in general

As explained before, outcomes are to be expected in two stages of the accreditation process: after formal application and after full application.

Formal application

The outcomes of the formal application are based on the requirements described in the SAR:

- submission of the relevant data (e.g. in the case of study programmes: name of programme, length/years, semesters, ECTS, responsible person, academic staff)
- approval of academic staff. The requirement is that at least 50% of academic staff proposed per programme should have a regular contract with the institution and that a minimum of one qualified staff with PhD should be employed per 60 ECTS.

During the site visit the review panel was informed that these requirements had existed for a long time already, but that they were applied more rigorously since 2017. This has met with some resistance, mentioned earlier on in this report, because of occasional lack of clarity as to which PhD would be acceptable for a specific study programme.

Full application

In the SAR it is described that the decision on full application can be *accreditation* or *non-accreditation*. Initial (preliminary) institutional accreditation can be granted for three years, re/accreditation for not longer than five years unless the team of expert recommends an alternative time limit which is approved by the Board. The duration of programme re/accreditation can be between three and five years, unless the review team recommends another time limit which is approved by the Board. In accordance with AM2018 there may be conditional accreditation for one year too, with further specifications on how to go about meeting the conditions.

Decision arithmetic

The accreditation decisions will be based on a scale of overall compliance with KAA-standards consisting of fully, substantially, partially or non compliant. A provider has to meet a level of substantial compliance as a minimum for a positive re/accreditation decision.

The overall compliance level is determined by compliance across all areas of the frameworks for institutional accreditation (11 areas) and programme accreditation (7 areas). For this matter the areas are judged on a f/s/p/n-scale too. The most frequent (modal) compliance level across the areas determines the overall-compliance.

The level of compliance within an area is determined by the following arithmetic:

Fully compliant: all standards in an area are met

Substantially compliant: 70-90% of the standards in an area are met

Partially compliant 30-60% of the standards in an area are met

Non-compliant: less than 30% of the standards in an area are met.

Due to the absence of reviews there was not yet evidence of decisions made according to this arithmetic. As a response to the review panel's questions as to the workability of the arithmetic, also considering the number of standards involved in it, it was expressed that AM2018 allows for a more objective decision making process. The Board also told the panel that it would thoroughly evaluate the experiences with handling of criteria in the coming review reports.

Analysis

As regards the formal applications for re/accreditation the criteria are clear on paper, but in practice confusion has arisen as to what the applicability of a PhD in a neighboring scientific field amounts to. This goes along with some doubts from the side of HEIs as to the capacity of the Board to judge this appropriately. The panel believes that for this matter the input of experts may be helpful.

As regards the full applications the criteria for outcomes as described in AM2018 are clear. However, actual reviews will still have to show, how they work out in practice.

Panel suggestion for further improvement

The review panel suggests that in assessing standards and in decision-making a cautious approach to applying arithmetic is asked for. One area may carry more weight than another, and the standards may not always be of equal importance.

Panel recommendation

Monitor how the existing rules for assessing standards and for decision-making work out in reality. If needed, improvements both in decision rules and by way of trainings, may have to be considered.

Panel conclusion

Substantially 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.

ENQA-review 2014

ESG 2015 Standard 2.6 was in ESG 2005 Standard 2.5 ('Reporting'). On this standard the review panel concluded '**substantially compliant**'. The following recommendation of the 2014 review applies:

Recommendation 5: *KAA is recommended to be more critical at the reports produced by the evaluation experts, and compare the standards of report writing with those of established external evaluation agencies.*

Evidence

Accessibility

According to the Law on HE, KAA is obliged to publish its re/accreditation reports. The publication of reports is done per each HEI according to the year in which the site visit took place and the Board issued a final decision. The decisions on re/accreditation are published on KAA's web site. The last reports have been made as part of re/accreditation activities which were carried out before August 2017. They are easily accessible via KAA's website.

Albanian and English language

As a rule KAA publishes full evaluation reports together with decisions. The reports are available in English and Albanian. Re/accreditation decisions are available in Albanian. The review panel compared the website on reports in Albanian and in English language and noticed a few cases in which some reports are missing in the Albanian or English version of the website, while decisions were there.

The quality of reports

On the reports before 2018 reviewers and HEIs informed the review panel that improvements in the quality of reports had been necessary: the structure of reports was not uniform, clear rules didn't exist and KAA officers were not allowed to send reports back to reviewers, if they were not satisfied with the quality. Some of the reported weaknesses in a earlier survey among stakeholders were: lack of adequate information and transparency (lack of data/statistics) and the clarity of information provided.

The review panel checked some examples of reports and noticed that the quality of reports indeed differed from case to case. The structure of reports was not uniform. There were reports with low quality and shallow assessments, without deep analysis and connection with evidences. Some examples of statements in the reports:

- *'the ratio of academic staff to students is very good'* (without further data)
- *'methods of assessment are appropriate'* (without further evidence provided)
- *'quantity of staff seems to be adequate'*

In some cases there is no explanation nor description to which extent the standard has been met, but only a short answer *yes* or *no*.

Instructions according to AM2018

In the SAR it is described that following the recommendation on the quality of reports, KAA has defined the rules related to drafting and approving of re/accreditation reports. These rules are part of AM2018. Some changes according to these rules are as follows: the re/accreditation report should respect the general structure provided by the AM2018 and its templates, the chair of the expert panel ensures that the report is collectively agreed by all members, KAA validates the report as regards the general structure and concerning the coherent flow between the body of the report (arguments and evidences) and the recommendation. The validation process may include further communication between KAA and the expert panel.

New templates

Along with AM2018 KAA has developed two templates for re/accreditation reports: one for institutional and programme evaluation and a second one for programme evaluation. The template includes an introductory part (context, description of the procedure and description of the institution under review), the main body which follows general areas and standards as specified in AM2018, an overall evaluation and judgement and appendices. Apart from the templates there are guidelines for experts, a briefing of the expert panel before the site visit and frequent engagement of experts who are already well experienced. The templates are published on the KAA website.

Analysis

Whereas HEIs, reviewers and other stakeholders have no complaints on the publication of reports as such, they have all been aware of the unsatisfactory situation as regards the quality of reports. They would have liked to see more qualitative reports with more evidences and data and more transparency in general. KAA is also aware of the importance to improve the quality of its reports and has made significant changes in order to achieve this goal in AM2018. These changes include the AM2018 and new templates and rules for the preparation of the reports. All these changes are still

to be implemented. The panel considers that KAA has taken positive steps but has been very slow in addressing the issue of improving the quality of reports as indicated in the 2014 review.

In addition to that it is not fully clear how experts will be briefed and/or trained in order to cope with the new guidelines, which role KAA's coordinator will take in the preparation of the re/accreditation report and how much time is available to carry out this task.

Panel recommendation

Improve the quality of reports and make sure that they contain deeper analysis and a better connection with evidences and that the full reports are regularly published.

Panel conclusion

Partially 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.

ENQA review 2014

ESG 2015 Standard 2.7 was part of **ESG 2005 Standard 3.7** 'External quality assurance criteria and processes used by members'. The review panel concluded '**substantially compliant**'. The following recommendation of the 2014 review applies:

Recommendation 9: KAA is recommended to revise the composition of the Appeals Committee in the direction of committee members being without links to the KAA Board.

There is an EQAR-flag related to this standard:

Standard 2.7: It should receive attention whether KAA's appeals procedure has been changed in a way to ensure that appeals are considered independently of those who made the decision.

Evidence

SAR and terminology

In the SAR no distinction is made between complaints and appeals. The panel understood that complaints and appeals were handled in the same manner. For this matter in this report 'Appeals' should be read as 'Complaints and Appeals'.

Early follow-up of ENQA-recommendation and EQAR-flag

In PR2015 and in the SAR it was mentioned that in November 2014 the Board had decided to set up an internal rule for an appeal procedure and an Appeals Committee. As from July 2015 this Committee was operational. It was chaired by an international member of the Board and included an external member coming from an academic background and with experience in quality assurance. However, soon after its start the Appeals Committee upheld two cases. Therefore, in September 2015 the Board decided to suspend the Appeals Committee and ask for a legal opinion from the Legal Office of the Prime Minister's Office. From then on, appeals were handled again in the 'old' way, which had met with criticism by the 2014 review panel.

New arrangements

In 2017 a new AI on the Appeals Committee stipulated how KAA should manage an appeals procedure. The AI was revised in September 2018. The legal provisions laid down in this AI also determine the way the Appeals Committee will be established. Main elements are:

- The Appeals Committee shall consist of three permanent members, and two reserve (alternative) members who will be engaged only in cases when one of the members will not be able to exercise his/her function, either due to a conflict of interest or any other reason which prevents him/her from participating in the work of the Committee.
- Two out of three permanent members of the commission and two reserve members shall have the PhD degree and have at least the academic title of Associate Professor.
- The third permanent member shall have a legal background, be qualified in the national jurisprudence, and shall have at least ten years' professional experience in legal issues.

Appointment of members

To realize the membership of the Appeals Committee the following procedure will be carried out:

- Members of the Appeals Committee shall be selected by an interim commission appointed by the Minister of Education with the following composition:
 - a) KAA Director, Chairperson
 - b) One MEST representative, member
 - c) One representative from the Ombudsperson, member
 - d) One representative from the EU Office in Kosovo, member
 - e) One representative of the civil society, member
- The KAA Director shall propose to the interim commission a list of 10-15 persons who meet the criteria specified in the AI, and the commission shall select from this list KAA's permanent Appeals Committee.
- After having evaluated and selected the members of the Appeals Committee, the KAA Director shall issue a formal decision on the appointment of the Appeals Committee members.

Recent developments

In Autumn 2018 an interim commission appointed by the Minister, reviewed and assessed the list of people proposed by the Director of KAA in line with the above mentioned legal provisions, and reached the decision to appoint three permanent members of the KAA's Appeals Committee and two reserve members. The establishment of the Appeals Committee took place on 20 November 2018. Members have a mandate of two years from then on. The formal decision of the KAA's Acting Director on the appointment of the Appeals Committee members is published in the KAA's web page. The Appeals Committee will deal with complaints and appeals according to the same procedures. In the AI procedures, time-frames, kind of appeals and all sorts of definitions are provided. On 8 January 2019 the Board approved a regulation concerning the functioning of the Appeals Committee with practical arrangements on meetings, minutes etc.

Recent activities

Before the site visit the review panel was able to study the CVs of the members of the Appeals Committee. During the visit the review panel met with the full Appeals Committee. The Appeals Committee is happy not to be politically nominated, but by virtue of expertise. A leading principle is *no conflict of interest*. So far the Appeals Committee has studied twelve old appeals and concluded that these were outdated according to Kosovo Law. The respective HEIs had been informed. New appeals had not been handled yet. The Appeals Committee has the right to call for assistance from the list of experts. This right can be materialized thanks to a grant of the EU-office. The Appeals Committee feels confident about its future work: *"We won't bend easily, we don't bend at all"*.

Analysis

It has taken a long time, more or less the 5-year span between the last ENQA-review and the present review, but by now the panel believes that an independent Appeals Committee has been established, based on expertise, without interference by politicians and with no connections with

Board. The relevant documents, discussions and the checks the review panel made regarding independence and *no conflict of interest* are convincing.

Panel conclusion

Fully compliant.

ADDITIONAL OBSERVATIONS

CONFIDENCE

Although the picture emerging from this review is less positive than in the 2014 review, it struck the review panel, that at many instances a sense of optimism about the future development of KAA and accreditation processes at large was communicated to the panel, not only by KAA-Board and staff, but also by stakeholders. As the Board stated: *"Within two years we will be an example for the region"*.

SUPPORT FROM STAKEHOLDERS

As was expressed various times during the site visit, and despite occasional criticism volunteered by some HEIs, generally speaking the work of the current Board and KAA-office, however understaffed, is valued highly among stakeholders. The functioning of KAA within the field of HE is seen as an example of good practice within Kosovo.

CONCLUSION

SUMMARY OF COMMENDATIONS

2.4 Peer-review experts	KAA is commended on the large pool of experts involved in reviews.
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OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

3.1 Activities, policy, and process for quality assurance	P	<p>1. Find as soon as possible HE-wide consensus and consequently decide on a KAA Strategic Plan, including solid activity plans with performance indicators and well defined responsibilities, so as to prepare a sound basis for regular future activities.</p> <p>2. Involve students in the daily activities and the decision making structure of KAA.</p>
3.2 Official status	F	
3.3 Independence	S	In conducting evaluations according to the new procedures as described in the Accreditation Manual 2018 make sure that operational independence and independence of formal outcomes is guaranteed.
3.4 Thematic Analysis	P	Use data collected during accreditation processes and other activities to carry our thematic and system-wide analysis in order to support further development of the HE system in Kosovo.
3.5 Resources	P	Take all necessary actions in order to assure adequate human and financial resources needed for conducting the activities expected from KAA.
3.6 Internal quality assurance and professional conduct	P	In order to collect feedback KAA should increase and describe in documents the implementation of formal rather than informal mechanisms to create solid routines of internal quality assurance based on principles like closed-loop practices and the four-eyes system.
3.7 Cyclical external review of agencies	F	
2.1 Consideration of internal quality assurance	S	Take care that in institutional and programme self-evaluations, in site visits and in review reports the ESG 2015 Standards Part I are addressed clearly.

2.2 Designing methodologies fit for purpose	S	Make sure that during accreditation activities the workability of the methodologies is guaranteed.
2.3 Implementing processes	P	1. Monitor and evaluate the implementation of accreditation activities from 2019 onwards thoroughly. 2. Concentrate on quality improvement, when monitoring the follow-up of recommendations to HEIs provided by expert panels.
2.4 Peer-review experts	P	1. Make sure that the level of degree-work can and will be judged properly by the expert panels. 2. Make sure that full students' participation in institutional reviews and program evaluations is guaranteed. 3. Build a network of national experts, including students, in order to participate in activities such as monitoring of the follow-up of recommendations provided in review reports.
2.5 Criteria for outcomes	S	Monitor how the existing rules for assessing standards and for decisionmaking work out in reality. If needed, improvements both in decision rules and by way of trainings, may have to be considered.
2.6 Reporting	P	Improve the quality of reports and make sure that they contain deeper analysis and a better connection with evidences and that the full reports are regularly published.
2.7 Complaints and appeals	F	

In light of the documentary and oral evidence considered by it, the review panel considers that, in the performance of its functions, KAA does not substantially comply with the ESG. The agency is recommended to take appropriate action to achieve at least substantial compliance in all standards at the earliest opportunity.

SUGGESTIONS FOR FURTHER DEVELOPMENT

As to further development of KAA, and apart from the recommendations in this report, suggestions have been made within the text under the various standards. One has been mentioned specifically under Standard 3.3 (Independence):

1. As regards the formal step of an application for re-accreditation, refinement of the definition of academic fields related to study programmes, c.q. seeking advice from experts, would possibly reduce interpretation gaps.

Another suggestion was made under Standard 2.6 (Criteria for outcomes):

2. The review panel suggests that in assessing standards and in decision-making a cautious approach to applying arithmetic is asked for. One area may carry more weight than another, and the standards may not always be of equal importance.

For further development of KAA's work at large and for implementation of the good intentions shown during the present review a more general suggestion is: make it happen. Not only in the next two years, or in the years thereafter, but already in 2019. On many aspects concentrated action before the end of this year is crucial to the functioning of KAA in Kosovo's higher education and in the service of many ambitious students, and also to its international standing and recognition.

ANNEXES

ANNEX 1: PROGRAMME OF THE SITE VISIT

Schedule ENQA Review KAA 17-20 March 2019			
NB: all sessions were chaired by the review panel chair, except session 14 (Students) which was chaired by the student member of the review panel			
Sunday 17 March 2019			
Timing	Meeting with	Persons for interview	Issues and standards to be discussed:
15.00 - 17.00	Review panel's kick off meeting and preparations for Day 1		
Session 1 17.00- 18.30	Meeting with contact person KAA	Shkelzen Gerxhaliu, Coordinator from KAA	Clarify elements related to the overall system and context
19.00 -	Working dinner panel		
Day 1: Monday 18 March 2019			
Timing	Meeting with		
8.30 - 9.00	Private meeting panel		
9.00 - 9.15	Short tour of premises	Shkelzen Gerxhaliu – Coordinator from KAA	
Session 2 9.15 - 10.00	Meeting with KAA President Board and acting director KAA	Prof. Dr. Gazmend Luboteni, President of the Board Avni Gashi (Acting Director of KAA) Shkelzen Gerxhaliu (Senior Officer at KAA)	Standards 3.1, 3.3, 3.5, 3.6, 3.7, 2.3, 2.7
15 minutes	Break		
Session 3 10.15- 11.00	Meeting with team responsible for preparation SAR	Prof. Dr. Dukagjin Zeka (Board) Prof. Dr. Arta Jakupi (Board) Prof. Jeffery Butel (Board) Avni Gashi (Acting Director of KAA) Shkelzen Gerxhaliu (Senior Officer KAA)	Preparation SAR
15 minutes	Break		
Session 4 11.15 - 12.00	Meeting with (other) members Board	Prof. Dr. Vjollca Krasniqi Prof. Dr. Arta Jakupi Prof. Dr. Dukagjin Zeka Dr. Rozafa Koliqi Dr. Xhavit Rexhaj Prof. Dr. Magdalena Ziolo Prof. Dr. Herbert Amato Prof. Jeffery Butel	Standards 3.1, 3.3, 3.4, 2.4, 2.5, 2.7
12.00 - 13.00	Lunch for panel		
Session 5 13.00 - 13.45	Meeting with Minister of MEST and relevant	Mr. Shyqiri Bytyqi, Minister of MEST Mr. Baton Dushi, Adviser to Minister	Standards 3.1, 3.2, 3.3, 3.4,

	advisers	Mr. Fehmi Hysenaj, Adviser to Minister Ms. Fadile Dyla, Representative from HE dept. Ms. Qamile Sinani, Head of division within MEST	3.5, 2.7
15 minutes	Break		
Session 6 14.00 - 14.45	Meeting with Director and KAA staff working on external evaluations	Avni Gashi, Acting Director of KAA Shkelzen Gerxhaliu, Senior Officer for Evaluation and Monitoring Elmi Kelmendi, Senior Legal Officer Albana Begu, Finance and Budget Officer Leona Kovaci, Personnel, Administration, and Human Resources Officer	Standards 3.1, 3.3, 3.4, 3.5, 3.6, 2.1, 2.3, 2.4, 2.5, 2.6
15 minutes	Break		
Session 7 15.00 - 15.45	Meeting with Appeals and complaints committee	Prof. Dr. Shukrane Germizaj Prof. Dr. Arben Hajrullahu Mr. Burim Abazi Prof. Dr. Bujar Pira, Prof. Dr. Visar Morina	Standards 3.1, 3.3, 2.5, 2.7
15 minutes	Break		
16.00 -17.45	Wrap-up meeting on first day		
19.00 -	Panel dinner		
Day 2: Tuesday 19 March 2019			
Session 9 8.30 - 9.15	Meeting with expert review panel members	Prof. Dr. Melita Kovacevic Prof. Dr. Milan Pol Prof. Dr. Peter Normaak PhD. Anca Prisacariu Ms. Simona Dimovska, European Student Union (e-mail inquiry)	Standards 3.1, 3.3, 2.4, 2.5, 2.7
15 minutes	Break		
Session 10 9.30 - 10.15	Meeting with donor agencies	Ms. Albulena Zajmi, Austrian Development Agency Mr. Aqim Emurli, HERAS Project Ms. Syzana Jagxhiu, EU Office	Standard 3.1
15 minutes	Break		
Session 11 10.30 - 11.15	Meeting with heads of HE-institutions	Prof. Dr. Hysen Bytyci, Vice-Rector of University of Prishtina Prof. Dr. Bujar Pira, Vice-Rector of University of Ferizaj Prof. Dr. Mimoza Dushi, Vice-Rector of University of Gjakova Prof. Dr. Edmond Hajrizi, Rector of UBT College Prof. Dr. Shemsedin Vehapi, Vice-Rector of AAB College	Standards 3.1, 2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7
15 minutes	Break		
Session 12 11.30 - 12.15	Meeting with QA-staff at institutions	Mr. Besnik Loxha, QA Office of University of Prishtina	Standards 3.1, 2.1, 2.2, 2.3,

		Ms. Furtuna Mehmeti, QA Office of the AAB College Ms. Faton Merovci, QA Office of University of Mitrovica Mr. Jasmin Jusufi, QA Office of University of Prizren Mr. Armend Muja, QA Office of the UBT College	2.4, 2.5, 2.6
12.15- 13.15	Lunch for panel		
Session 13 13.30 - 14.15	Meeting with HE-teachers	Mr. Blerim Saqipi, Teacher representative of University of Pristina Mr. Muzafer Shala, Teacher representative of University of Mitrovica Mr. Ibish Mazreku, Teacher representative of University of Peja Ms. Aida Alla, Teacher representative of AAB College	Standards 3.1, 2.1, 2.2
15 minutes	Break		
Session 14 14.30 - 15.15	Meeting with students	Ms. Krenare Cerkini, Kosovo Students Union Mr. Eris Cunaku, AUK College Mr. Ardian Sallauka, AAB College	Standards 3.1, 2.1, 2.2, 2.3, 2.4
15 minutes	Break		
Session 15 15.30 - 16.15	Meeting with representatives stakeholders	Mr. Milot Hasanxhekaj, National Qualification Authority Mr. Bujar Galloperi Mr. Ron Gjinovci, NGO ORCA	Standards 3.1
15 minutes	Break		
Session 16 16.30 - 17.30	Open hour	Mr. Petrit Hasanaj, Iliria College Mr. Arber Reçi, Iliria College Mr. Leonis Gashi, ISPE College One more representative of ISPE College Ms. Baroha Qirezi, Riinvest College	n.a.
17.30 - 18.30	Wrap up meeting panel 1st and 2nd day		
19.00 -	Panel dinner		
Day 3: Wednesday 20 March			
8.30 - 9.30	Panel meeting to agree on final issues		
Session 17 9.30 - 10.30	Meeting with President Board and interim director KAA	Prof. Dr. Gazmend Luboteni Mr. Avni Gashi Mr. Shkelzen Gerxhaliu	n.a.
10.30 - 12.00	Panel meeting on main findings		
12.00 - 13.30	Lunch for panel		
Session 18 13.30 - 14.00	Final debriefing of the Board c.s. on preliminary findings		n.a.
14.00 -	Departure panel		

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

Terms of reference

External review of the Kosovo Accreditation Agency (KAA) by the European Association for Quality Assurance in Higher Education (ENQA)
October 2018

1. Background and Context

Kosovo Accreditation Agency (KAA) is an independent public agency responsible to evaluate and accredit public and private institutions of higher education and their study programmes in the Republic of Kosovo. KAA was established by the Ministry of Education, Science and Technology (MEST) based on the Law on Higher Education 2003 and the Administrative Instruction on the Establishment of the Kosovo Accreditation Agency 16/02/2004.

KAA's mission is to ensure the Kosovo society that the quality of teaching and learning is of comparable standards to the international ones. Through the accreditation process, KAA aims at increasing the transparency of the complex system of higher education in Kosovo, both in the public and private sector.

KAA undertakes the accreditation of institutions and their study programmes through formal and transparent procedures that ensure internationally comparable standards. The accreditation process is mandatory process in Kosovo therefore, HEIs and their study programmes undergo accreditation process in order to ensure that they meet the minimum quality criteria and requirements.

KAA's primary responsibilities are:

- The accreditation and re-accreditation of public and private institutions and programmes of higher education;
- The continuing assurance of quality at accredited institutions and their programmes.

Responsibilities and competences of KAA are laid down in the national legislation, respectively on the Law on Higher Education No. 2011 and the Administrative Instruction on the Accreditation of HEIs and their study programmes No. 2017. Apart from these legal acts, KAA has developed a number of internal documents which serve for the regulation of its own work as well as for the description of the accreditation procedures.

Over the course of ten years of establishment, KAA has undergone a number of developments which have advanced the system of quality assurance in Kosovo. It has continuously undertaken activities aiming at implementing the Standards and Guidelines for Quality Assurance in EHEA, and has made adoptions in the national legislation and procedures in line with the ESG.

KAA has been an ENQA member since September 2014 and ENQA member under review since 19 April 2018 and is applying for renewal of its membership.

KAA has been registered on EQAR from June 2015 to September 2017. With this review KAA is also re-applying for EQAR registration.

2. Purpose and Scope of the Evaluation

This review, will evaluate the way in which and to what extent KAA fulfils the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. Consequently, the review will provide information to the ENQA Board to aid its consideration of whether membership of KAA should be reconfirmed and to EQAR to support KAA application to the register.

The review panel is not expected, however, to make any judgements as regards granting membership.

2.1 Activities of KAA within the scope of the ESG

In order for KAA to apply for ENQA membership and for registration in EQAR, this review will analyse all KAA activities that are within the scope of the ESG, i.e. reviews, audits, evaluations or

accreditation of higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation). This is regardless of whether these activities are carried out within or outside the EHEA, and whether they are obligatory or voluntary.

The following activities of KAA have to be addressed in the external review:

- initial accreditation of higher education institutions and their programmes (preliminary accreditation)
- initial accreditation of programmes at an accredited higher education institution
- re-accreditation of programmes and higher education institutions.

3. The Review Process

The process is designed in the light of the *Guidelines for ENQA Agency Reviews* and in line with the requirements of the *EQAR Procedures for Applications*.

The evaluation procedure consists of the following steps:

- Formulation of the Terms of Reference and protocol for the review;
- Nomination and appointment of the review panel;
- Self-assessment by KAA including the preparation of a self-assessment report;
- A site visit by the review panel to KAA;
- Preparation and completion of the final evaluation report by the review panel;
- Scrutiny of the final evaluation report by the ENQA Review Committee;
- Analysis of the scrutiny by the ENQA Board and their decision regarding ENQA membership;
- Follow-up of the panel's and/or ENQA Board's recommendations by the agency, including a voluntary follow-up visit.

3.1 Nomination and appointment of the review team members

The review panel consists of four members: one or two quality assurance experts, an academic employed by a higher education institution and student member. One of the members will serve 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.

In addition to the four members, the panel will be supported by the ENQA Secretariat review coordinator who will monitor the integrity of the process and ensure that ENQA expectations are met throughout the process. The ENQA staff member 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 KAA with the list of suggested experts with their respective curriculum vitae to establish that there are no known conflicts of interest. The experts will have to sign a non-conflict of interest statement as regards KAA review.

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

KAA is responsible for the execution and organisation of its own self-assessment process and shall take into account 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 broken down by the topics of the evaluation and is expected to contain, among others: a brief description of the national HE and QA system; background description of the current situation of the Agency; an analysis and appraisal of the current situation; proposals for improvement and measures already planned; a SWOT analysis; each criterion (ESG part II and III) addressed individually. All agency's QA activities (whether within their national jurisdiction or

outside of it, and whether obligatory or voluntary) will be described and their compliance with the ESG analysed.

- The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which KAA fulfils its tasks of external quality assurance and meets the ESG and thus the requirements of ENQA membership.

- The self-assessment report is submitted to the ENQA Secretariat who has 4 weeks to pre-scrutinise it before forwarding the report to the panel of experts. The purpose of the pre-scrutiny 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 whether the necessary information, as stated in the Guidelines for ENQA Agency Reviews, is present. For the second and subsequent reviews, the agency is expected to enlist the recommendations provided in the previous review and to outline actions taken to meet these recommendations. In case 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 reject the report and ask for a revised version within 4 weeks. In such cases, an additional fee of 1000 € will be charged to the agency.

- The report is submitted to the review panel a minimum of six weeks prior to the site visit.

3.3 A Site Visit by the Review Panel

KAA will draw up a draft proposal of the schedule for the site visit to be submitted to the review panel at least two months before the planned dates of the visit. The schedule includes 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 2,5 days. The approved schedule shall be given to KAA at least one month before the site visit, in order to properly organise the requested interviews.

The review panel will be assisted by KAA in arriving in Pristina, Kosovo.

The site visit will close with a final de-briefing meeting outlining the panel's overall impressions but not its judgement on compliance or granting of ENQA membership.

3.4 Preparation and completion of the final evaluation report

On the basis of the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will take into account the purpose and scope of the evaluation as defined under articles 2 and 2.1. It will also provide a clear rationale for its findings with regards to each ESG. A draft will be first submitted to the ENQA review coordinator who will check the report for consistency, clarity and language and it will be then submitted to KAA within 11 weeks of the site visit for comment on factual accuracy. If KAA chooses to provide a statement in reference to the draft report it will be submitted to the chair of the review panel within two weeks after the receipt of the draft report. Thereafter the review panel will take into account the statement by KAA, finalise the document and submit it to ENQA.

The report is to be finalised within three months of the site visit and will not exceed 40 pages in length.

When preparing the report, the review panel should also bear in mind the *EQAR Policy on the Use and Interpretation of the ESG*, so as to ensure that the report will contain sufficient information for the Register Committee for application to EQAR.

KAA is also requested to provide a letter addressed to the ENQA Board outlining its motivation applying for membership and the ways in which KAA expects to contribute to the work and objectives of ENQA during its membership. This letter will be discussed along with the final evaluation report.

4. Follow-up Process and Publication of the Report

KAA will consider the expert panel's report and will publish it on its website once the ENQA Board has made its decision. The report will also be published on the ENQA website, regardless of the review outcome and decision by the ENQA Board. KAA commits to preparing a follow-up plan in which it addresses the recommendations of the review panel and to submitting a follow-up report to the ENQA Board. The follow-up report will be published on the ENQA website, in addition to the full review report and the Board's decision.

The follow-up report will be complemented by a small-scale visit to the agency performed by two members of the original panel (whenever possible). This visit will be used to discuss issues, based on the ESG, considered as of particular importance or challenge by KAA. Its purpose is entirely developmental and has no impact on the judgement of membership and/or compliance of the agency with the ESG. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator about this.

5. Use of the report

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

The review report is used by the Board of ENQA for the purpose of reaching a conclusion on whether KAA has met the ESG and can be thus admitted/reconfirmed as a member of ENQA. The report will also be used for registration on EQAR, and is designed so as to serve these two purposes. However, the review report is to be considered final only after being approved by the ENQA Board. Once submitted to KAA and ENQA and until it is approved by the Board the report may not be used or relied upon by KAA, the panel and any third party and may not be disclosed without the prior written consent of ENQA. KAA may use the report at its discretion only after the Board has approved of the report. The approval of the report is independent of the decision on membership.

The Chair of the panel shall remain available to respond to questions of clarification or further information from the EQAR Register Committee provided that the ENQA Secretariat is copied in all such requests.

6. Budget

KAA shall pay the following review related fees:

Fee of the Chair	4,500 EUR
Fee of the Secretary	4,500 EUR
Fee of the 2 other panel members	4,000 EUR (2,000 EUR each)
Fee of 2 panel members for follow-up visit	1,000 EUR (500 EUR each)
Administrative overhead for ENQA Secretariat	7,000 EUR
Experts Training fund	1,400 EUR
Approximate travel and subsistence expenses	6,000 EUR
Travel and subsistence expenses follow-up visit	1,600 EUR

7. Indicative Schedule of the Review

Agreement on terms of reference	June/July 2018
Appointment of review panel members	October 2018
Self-assessment completed	October 2018
Pre-screening of SAR by ENQA coordinator	November 2018
Preparation of site visit schedule and indicative timetable	December 2018/January 2019
Briefing of review panel members	February 2019

Review panel site visit	March 2019
Draft of evaluation report and submitting it to ENQA coordinator for pre-screening	By May 2019
Draft of evaluation report to KAA	May 2019
Statement of KAA to review panel if necessary	June 2019
Submission of final report to ENQA	June/July 2019
Consideration of the report by ENQA Board and response of KAA	September 2019
Publication of the report	September 2019

ANNEX 3: GLOSSARY

AI	Kosovo-Administrative Instruction
AM2018	KAA-Accreditation Manual (2018)
CHEA	Council for Higher Education Accreditation (United States of America)
CVET	Council of Vocational Education and Training
ECTS	European Credit Accumulation and Transfer System
EHEA	European Higher Education Area
ENQA	European Association of Quality Assurance in Higher Education
EQAR	European Registry of (credible) Quality Assurance agencies
EQF	European Qualification Framework
ER2014	ENQA review 2014
ERASMUS +	European Region Action Scheme for the Mobility of University Students
ESG	Standards and Guidelines for Quality Assurance in the European Higher Education Area (if not otherwise indicated referring to version 2015)
EU	European Union
ESU	European Student Union
EYE	Enhancing Youth Employment
HE	Higher Education
HEI	Higher Education Institution
HERAS	Higher Education, Research and Applied Sciences
KAA	Kosovo Accreditation Agency
KESP	Kosovo Education Strategic Plan and Action Plan
LHE	Law on Higher Education
MEST	Ministry of Education, Science and Technology (Kosovo)
MLSW	Ministry of Labour and Social Welfare
NGO	Non-Governmental Organization
NQF	National Qualifications Framework
PhD	Doctor of Philosophy (more generally: doctorate)
PR2015	Progress report (2015) on ENQA Review 2014
QA	Quality Assurance
SAR	Self-assessment report, as prepared by KAA
SER	Self-evaluation Report, as prepared by HEIs
SCQ	State Council of Quality = the KAA Board
SR2017	Stakeholder Report 2017
SWOT Analysis	Strengths, Weaknesses, Opportunities and Threats Analysis
USDE	United States Department of Education
VET	Vocational Educational Training

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY KAA

1. SAR
2. Administrative Instruction on Establishment KAA (11-2004)
3. Law on Higher Education (2011)
4. Draft Law on Higher Education
5. Preparatory document for the Law on KAA (2019)
6. Administrative Instruction on Accreditation (15-2018)
7. Administrative Instruction on Licensing of HEIs in Kosovo (25-2012)
8. Administrative Instruction on HE Management Information System (13-2018)
9. KAA Annual report 2015-2016
10. KAA Overviews of budget
11. KAA Draft Strategic Plan
12. KAA Plan of Activities 2018-2019
13. KAA draft QA plan
14. KAA Accreditation Manual (11.07.2018)
15. KAA Code of ethics (07.07.2018)
16. KAA Procedure for foreign agencies (07.07.2018)
17. KAA Criteria and Procedures for the election of the Board (6-2018)
18. KAA Procedure for Complaints and Appeals (07.07.2018)
19. KAA Rules for Complaints and Appeals committee (8/1/2019)
20. CVs of current Board members
21. CVs of current members Appeals Committee
22. Example of a decision of formal approval or rejections by the Board
23. Example of final Report and decision of the last review
24. Updated list of International Experts
25. Public Call for Experts
26. Templates for experts for institutional and programme review reports
27. Documents on NQF
28. Stakeholder Report 2017 = Dr. A. Prisacariu (2017): *Development of QA in Kosovo HE - systemic and institutional approaches. Research Report*. Pristina, KAA
29. Diagrams on HE-system Kosovo, decision-making structure HE and KAA-organization.
30. Website KAA, including minutes of Board meetings, reports and decisions.

OTHER SOURCES USED BY THE REVIEW PANEL

31. ENQA-review report KAA 2014
32. Progress report on 2014 ENQA review (2015)
33. 2017-2021 Kosovo Education Strategic Plan and Action Plan
34. Commission Staff Working Document Kosovo 2018 (Strasbourg 17 April)
35. Correspondence between ENQA and KAA, 2017-2018
36. Correspondence between EQAR and KAA, 2017-2018
37. Various letters of complaints by, or concerning private HEIs
38. Public complaint by 6 public HEIs and response by KAA-Board (Jan. 2019)
39. Statement by EU-ambassador Apostoleva, Jan. 2019
40. Various press-articles 2017-2019.



THIS REPORT presents findings of the ENQA Agency Review of the Kosovo Accreditation Agency, undertaken in 2019.



2019 ENQA AGENCY REVIEW