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Agency for Development of Higher Education and Quality Assurance of Bosnia and Herzegovina (HEA)
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BA – 78000 Banja Luka, Bosnia and Herzegovina

Dublin, 29 September 2017

Subject: Membership of HEA in ENQA

Dear Mr. Halilovic,

I am writing to inform you of the decision taken by the ENQA Board on 13 September 2017 regarding the membership of HEA in ENQA.

After thorough consideration and discussion on the final review report, the ENQA Board came to the conclusion that the overall level of compliance with the ESG is not sufficient to grant HEA membership at this stage, as there are a number of areas of concern as detailed in the Annex to this letter. The Board was especially concerned about the cases where only partial compliance with the ESG is reached:

ESG 3.3 Independence

The Board notes that HEA is working in a special national setup and legal regulatory environment and some issues related to its independence are not in HEA's direct power to determine or change. Nevertheless, the Board is of the opinion that HEA should work further on strengthening its organisational as well as operational independence as recommended by the Panel.

ESG 2.2 Designing methodologies fit for purpose

The Board shares the Panel's concern that the designed processes seem to be quite burdensome in terms of administration, which raises the question of their fitness for purpose.

ESG 2.3 Implementing processes

The Board is concerned that a consistent follow-up is not ensured.

ESG 2.5 Criteria for outcomes

The review report reads that HEA's external evaluation reports "vary in terms of depth of analysis". The panel mentions, "albeit reports identify anomalies in HEIs' operations, they still

have positive judgements". The problem of consistency of judgements is further elaborated in the review report as follows: "The panel found that each particular expert committee seems to agree on how to interpret criteria on their own at the preparatory meeting on the first day of the site visit without having guidance from HEA. The further inconsistency is also about which criteria are used in their work, namely do they use the 'accreditation criteria' or also 'norms on minimum standards'. They should be using both, but in practice this is not always happening."

Thus concerning this standard, the Board concluded that the findings lead to partial and not substantial compliance, as recommended by the Panel.

ESG 2.7 Complaints and appeals

The Board considers that the complaints and appeals procedure needs further refining as recommended by the Panel.

Should HEA wish to re-apply for ENQA membership in the future, you can do that in two years' time from this decision. The ENQA Board advises your Agency to carefully follow up and implement the Panel's recommendations before re-applying.

In addition, HEA can still avail of the voluntary progress visit – a new enhancement-led feature in the review process. The visit will not have the objective of checking the agency's ESG compliance but might be helpful to determine if the agency has addressed the areas of concern. The visit would take place in about two years' time from this decision. The ENQA Secretariat will be in touch with you in about a year's time to discuss this possibility. The costs of this visit have already been included as part of the review fee and are non-refundable except for the travel costs of the experts. More information about the progress visit can be found in the [Guidelines for ENQA Agency Reviews](#).

If HEA is dissatisfied with the decision of the ENQA Board, it may file an appeal according to the procedures outlined in article 24 of ENQA's Rules of Procedure.

For any questions, do not hesitate to be in touch with the ENQA Secretariat.

Yours sincerely,



Padraig Walsh
President

Annex: Areas for development

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

ESG 2.1 – HEA is recommended to make the interpretation of particular criteria more explicit and to include all aspects of the ESG Part 1.

ESG 2.2 – It is recommended that the agency does a thorough review of the different documents related to the methodology of external QA in BiH, with special regard to multiplication and overlapping; number, content and interpretation of criteria; level of generalisation; and sensitivity to substandard operations.

ESG 2.3 – It is recommended that the consistency of accreditation procedures would be further improved with the stronger consultative and supporting role of the coordinating staff member.

ESG 2.3 – Although this is not a direct responsibility of HEA, it is necessary that the BiH authorities consider updating the FLHE and corresponding rules to at least give the responsibility to HEA for monitoring the follow-up procedures and reacting if necessary with consequences for HEIs.

ESG 2.4 – HEA is recommended to make the call for application to the experts list on an annual basis.

ESG 2.4 – It is recommended that the agency organises training sessions regularly and practises refreshment training for experts that are in the pool for a number of years but have not attended a training session recently.

ESG 2.5 – It is recommended that HEA further considers and implements mechanisms for (i) consistency of accreditation criteria interpretation by expert committees and (ii) consistency of judgements of expert committees.

ESG 2.5 – Moreover, HEA is recommended to make its accreditation criteria more explicit.

ESG 2.6 – It is recommended for HEA to ensure all reports have the same format and reach the same level of consistency in information and critical examination. Moreover, HEA is recommended to publish all reports in English on the internet and to make sure that all pages of reports are scanned and published.

ESG 2.7 – It is recommended for HEA to establish a complaints and an appeals process for the QA procedures that it is responsible for. The appeals and complaints would include more than the possibility to comment on a draft external review report and the general possibility for appeals in the administrative court.

ESG 3.1 – It is recommended that the agency includes stakeholders in all levels of its work – spanning from formal decision-making bodies, to expert groups and to wider consultation processes. Specifically, it is suggested to nominate stakeholders to the Steering Board (SB) in the next call for members.

ESG 3.1 – It is recommended that the agency makes further efforts in completing the first institutional accreditation for all existing HEIs and commences programme accreditation procedures.

ESG 3.1 – It is recommended that the clear definition of the roles and responsibilities of the different actors in the QA process be agreed and published.

ESG 3.3 – It is recommended to make the composition of the SB more balanced, not having only members coming from HEIs (public universities), and especially them not having any leadership positions at their HEI.

ESG 3.3 – It is recommended that HEA takes over the whole responsibility for creating the national list of experts and then appointing expert committees for the accreditation procedures.

ESG 3.3 – It is recommended the accreditation decisions be made by the SB of HEA.

ESG 3.4 – HEA is recommended to use the review reports and other available information to analyse the actual findings of evaluations and the state of the BiH HE system more systematically and generally. Moreover, analysing the accreditation documents for their fitness of purpose would be useful. The thematic analyses should be more than satisfaction surveys and could improve in the critical approach.

ESG 3.5 – There is a concern about the level of human and other resources if HEA wishes to commence with study programme accreditations and also with the new practice in which HEA staff member accompanies expert committees during the site visits. These two major changes will demand substantial additional resources for HEA. HEA is recommended to strengthen its human and financial resources to be able to fulfil the predicted tasks.

ESG 3.6 – It is recommended that HEA and its Quality Committee implement a coherent annual self-evaluation process as planned according to the SAR (p.6).