
Vladimir Karelin
Director
National Accreditation Agency of the Russian Federation (NAA)
33 Shabolovka Str.
115162 Moscow
Russia

Dublin, 18 March 2015

Subject: External review of NAA and decision on membership

Dear Mr. Karelin,

The purpose of this letter is to inform you of the outcome of the ENQA Board discussion of 6 March 2015 regarding the external review of NAA and its membership in ENQA.

After careful consideration of the review report of NAA, the Board voted in favour of designating NAA as a Full Member under Review as a number of areas are of concern, as detailed in the Annex to this letter. In some cases where compliance is reported by the review panel as substantial or full, the Board's judgement differs. The Board found the level of compliance of criterion 1 (activities), 5 (independence) and 6 (external QA criteria and processes) to be significantly lower than the other criteria, which can be deemed as satisfactorily met.

This has made the Board of ENQA to conclude that in an overall perspective, NAA cannot be considered as substantially compliant with the ESG and full membership cannot consequently be renewed at this moment. NAA will be a Member under Review for a period of two years from the 6th March 2015 and will need to undergo a new (partial) review process at the end of this period, or sooner, if NAA wishes.

In making this decision, the Board would like to urge your Agency to consider requesting the amendment of legislation concerning state accreditation in order to enhance transparency and the autonomous responsibility of NAA in the accreditation procedures.

Should NAA be dissatisfied with the decision of the ENQA Board, it may file an appeal according to the procedures outlined in article 38 of the Statutes of ENQA.

Since NAA has been a member of ENQA for almost 10 years, we hope that the shortcomings identified in the review will be addressed and substantially resolved in the next two years.

Yours sincerely,



Padraig Walsh
President of ENQA

ANNEX: AREAS FOR DEVELOPMENT

The accreditation system is described in the review report as quite formal and not providing support towards quality enhancement.

In addition to the panel's recommendations listed in the review report, the Board would like to draw the Agency's attention to the following areas for development, on which the partial review, to be conducted within two years, will focus.

ENQA Criterion 1– Activities (ESG 3.1, 3.3)

ESG 2.1 Use of internal quality assurance procedures

The review report reads that *"not all HEIs have self-evaluation reports [publicly] available".* Self-evaluation reports *"focus mainly on figures and quantitative data, e.g. about the number of students, number of lessons etc. The reports do not contain a SWOT-analysis or other kinds of quality self-assessment with reflections on needs for improvements".*

→ Since external quality assurance procedures do not take into account the effectiveness of the internal QA processes described in Part 1 of the ESG, this standard is not fully but substantially met.

ESG 2.3 Criteria for decisions

The consistency in assessments could be strengthened through the attendance of agency officers on site visits and increasing the resources available for quality assurance of expert panels' reports in proportion with the high number of accreditation processes. As recommended by the panel, the *"state accreditation requirements to the institutions should be more ambitious and qualitative in order to stimulate quality development and ensure the relevance of state accreditation as a valuable external quality assurance process".*

→ Therefore, this standard is not fully but substantially met.

ESG 2.4 Processes fit for purpose

- NAA should include trained international experts in the panels, especially as there are no legal obstacles to do so. The Board notes NAA's intention to involve international experts in the future.
- NAA should include students in the panels. Involvement of student will be a requirement in the revised ESG.
- The Board notes that *"experts mostly work alone during a site visit"*, and strongly supports the panel in recommending that experts work as a team *"in order to facilitate the inclusion of students and international experts in the groups and in order to avoid the risk of subjective assessments by separately working experts"*.

→ Some aspects or parts of the criterion/ESG standard are not met. The three reasons listed above lead to a finding of partial compliance.

ESG 2.5 Reporting

In 2008, the panel recommended NAA to make the expert panels' reports publicly available. Not much progress has been made in this area. As stated in the review report: *"The state accreditation*

process is not documented in a single report, but in a number of documents with different purposes and different readerships". "Expert reports on the individual programs are only communicated to the HEI under review and not made public. This means, that future students, employers, the academic community, or other stakeholders do not have the possibility to study the analyses and recommendations of the experts. This is important information, and it should be made available for the general public".

The outcomes of state accreditation are not easily accessible: only the expert panel's conclusions and positive decisions of the AB are published. Negative decisions can only be found in the annual analytical report made by NAA.

In addition to the lack of publication of full reports, HEIs do not have an opportunity *"to comment on the experts' reports, the joint conclusion of the expert panel, or the analytical report prepared by NAA for the Accreditation Board before the decision making process in the Board"*. The Board concurs with the panel in finding it *"inappropriate that HEIs do not have an opportunity to correct factual misunderstandings with potential importance for the overall conclusions"*.

→ The lack of publication of full reports, the lack of easy accessibility of accreditation outcomes and the lack of opportunity for HEIs to comment experts' reports on factual accuracy lead to a finding of partial compliance. The Agency is advised to promptly address these weaknesses as the revised ESG will be more challenging in terms of reporting.

ENQA Criterion 5 – Independence (ESG 3.6)

- Rosobrnadzor, the official government authority, participates directly in the recruitment and certification of new experts for which NAA does not have full and formal responsibility.
- NAA selects experts from the database and does not have the authority to complete the composition of expert panels as the final composition of the panel, including the head of the panel, is approved by Rosobrnadzor.
- The Accreditation Board makes formal decisions *"to be considered as recommendations to Rosobrnadzor, who takes the final decision on accreditation. [...] Representatives from Rosobrnadzor are members of the Accreditation Board. The head of Rosobrnadzor is even chairing the board"*.

→ Independence is therefore not guaranteed from the evidence gathered in the review report. The three reasons listed above lead to a finding of non-compliance.

ENQA Criterion 6 – External quality assurance criteria and processes used by the members (ESG 3.7)

The following deficiencies should be addressed:

- No student involvement as experts in panels. In addition, experts have to be approved by Rosobrnadzor.
- No publication of full reports and no permanent appeals procedure established as part of the state accreditation system. In addition, HEIs do not have an opportunity to correct factual errors in expert's reports.
- No follow-up procedure beside the reaccreditation processes after 1 or 6 years.