

Ms. Lemka Izmailova  
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National Accreditation Agency (NAA)  
33 Shabolovka Str.  
115162 Moscow, Russia

Dublin, 23 September 2015

**Subject: Outcome of the appeal from NAA against the ENQA Board's decision on membership**

Dear Ms. Izmailova,

I am writing to inform you of the outcome of the ENQA Board's discussion of 15 September 2015 regarding the appeal NAA lodged on 30 April 2015 against the ENQA Board's decision of 6 March 2015 to designate NAA as a Full Member under review for a period of two years with the need to undergo a new (partial) review process at the end of this period, or sooner, if NAA wishes.

On 30 April 2015 NAA submitted an appeal to the ENQA Board against the Board's decision. In a letter of 19 May 2015 the President of ENQA informed the ENQA Appeals and Complaints Committee (hereafter: EACC) of the appeal, requesting the EACC to review the Board's decision. Enclosed in the President's letter to the EACC were:

- The ENQA Board's decision letter to NAA dated 18 March 2015
- NAA's letter of appeal with annex 'Art. 92'
- The scrutiny report of ENQA's Review Committee
- The expert panel's review report

On 19 May 2015, the EACC was furthermore sent two additional documents received from NAA. They consisted of English translations of documents concerning negative review conclusions. These above-mentioned documents have made up the evidence on which the EACC's conclusion is based.

The EACC gave their statement to the ENQA Board on 25 June 2015 in which the Committee rejected the appeal and confirmed the Board's decision of 6 March 2015.

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Following this, the Board took a decision at its meeting on 15 September 2015, in which it follows the statement of the Appeals and Complaints Committee and stands with its initial decision to designate NAA as a Full Member under review. According to the Statutes of ENQA, the decision of the Board of ENQA is final.

Please find the summary of the EACC's findings as an appendix to this letter. This letter will be published on the ENQA website together with the final review report as well as the Board's initial decision.

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

Yours sincerely,



Padraig Walsh  
President of ENQA

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## Appendix 1.

### Summary of findings

The EACC concluded that the decision of the ENQA Board should stand in the context of evidence provided and evaluated against the appropriate criteria, standards and guidelines (ESG).

#### Criterion 1 (ESG 3.1; 3.3)

##### Use of internal quality assurance procedures (ESG 2.1)

The review panel and the ENQA Board found weaknesses in the consistent production/publication of self-evaluation reports (SERs) and in the fact that these reports follow a fixed template that focusses on quantitative data, with no SWOT analysis and no proposals for improvement.

To this NAA responded in their appeal by saying that SERs are on the institutions' websites, but sometimes difficult to find, and that the structure of the SERs is prescribed by national legislation.

EACC considers that neither the NAA nor the ENQA review panel makes it evident that (most) institutions actually do produce SERs annually, which they then publish. The SERs, following a standard template, seem very restricted in scope and do not seem to address quality and quality work in more than a minimum requirement sense.

The statement in the ENQA panel's report that 'the yearly self-evaluation reports seem to have less importance during state accreditation programs, as the reports mainly focus on the institutional level' casts doubt on the coherence of the processes. The panel's report does not explain the relationship between the institutional and programme levels in the process very well and it remains unclear whether this actually functions as a programme or an institutional accreditation! However, section 3.4.1 of the panel's report refers to the process as 'state accreditation of programs'.

The EACC's interpretation is that the self-evaluation report seems to be trying to evaluate activities at the level of the institution while the accreditation focuses on a programme level individual accreditation. The role of the SER thus seems most unclear in the context of the evaluation. If the outcome of the accreditation process leads to recommendations on programmes and conclusions relate to positive or negative programme accreditation decisions, what role does the institutional level SER play and how does it feature in the accreditation process? The fact that some SERs were not available and that NAA procedures for monitoring of the SERs is under development implies that the institutions may not

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understand or even disregard the purpose and impact of the SER. This is a serious factor in the context of the relevance of the SER in the entire process.

The lack of clarity around the SER's connection to the evaluation process and the value of the information to the on-site experts are all questions the ENQA review panel did not manage to make clear. It appears, however, that the NAA accreditation experts work independently on site during the accreditation process most of the time, focusing on individual programme level issues, while the conclusion of the panel is drafted by the head of the expert group. So the SER does not seem to feature at all. The SER is described in the NAA documentation as more of a monitoring tool in between the evaluations. The ENQA panel questions the relevance of the content of the SERs as it has no quality assurance effectiveness or improvement and it is stated that not all HEIs present them or publish them. The objective for the SER is unclear in terms of what and when it is incorporated into the evaluation.

The EACC consider that NAA's reference to the recent letter of Rosobrnadzor no 07-675 of 25.03.2015 provides no clarification or additional information on these matters. The reference in the NAA appeal letter to the Ministry's regulations for SERs shows these as relating (exclusively?) to the institutional level. Their statement that the external review was carried out in the "settings of the ongoing amendments in the legislation" cannot carry any weight at all. The objections of the ENQA Board therefore remain unchallenged.

### **Criteria for decisions (ESG 2.3)**

The ENQA review panel as well as the ENQA Board express particular concern as to the lack of evidence for ensuring consistency within the NAA accreditation system, in particular the fact that agency officers do not take part in site visits and that the requirements to the institutions should be more ambitious and qualitative.

NAA in their appeal letter take support from the review panel, who 'recognize the operating system of criteria defined by the FSES in Russia as transparent and understandable'. They also point to the fact that the agency 'provides remote support of the accreditation procedure' and insist that 'the requirements of FSES are first and foremost qualitative'.

EACC find that the criteria are clear and published. The fact that they were produced without much sector involvement may be regrettable, but not contrary to the ESG. The question is whether they are consistently applied. The training of experts seems to be well done and it is a process that is heavily invested in by NAA. This is a positive consistency factor. However, it would appear that the agency simply has no additional/other way of demonstrating the consistent application of criteria across the sheer volume of programmes evaluated. So there is every reason to doubt it, simply because there is no 'stabilizing' influence through the participation of agency officers, no real peer review (by two or more experts) and because the Board cannot discuss 11 000 reports in any meaningful way when it meets six times a year.

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For an agency that provides 11 000 programme evaluations per year (2013) it is of course impossible to involve staff on site visits. But this cannot count ‘in defense’ of the agency; rather, it indicates that the agency’s task in terms of the volume of work is too large for its size and resources. A panel of experts seems to have responsibility for a large number of programmes and its composition will change according to the nature of the programs that are evaluated. According to the ENQA panel’s report, ‘an expert is given sole responsibility for one or a group of programs’; with expert panels of so little coherence, how can consistency be safeguarded?

In addition, the link between the evidence produced in the accreditation experts’ reports and the final accreditation decisions seems vulnerable. NAA is not a decision-making body and does not even make proposals for the Accreditation Board; it only offers information. It is indeed a strange arrangement that the Accreditation Board is not part of NAA (or vice-versa), but a commission of Rosobrnadzor.

Consistency within a field of learning is difficult enough to ensure; across the entire HE sector it is even more complex. Devolving this consistency to panels and individuals is therefore problematic. More information would have been useful for making precise assessments of NAA’s use of criteria. From what information we do have, we find that NAA has failed to demonstrate consistency of implementation of the accreditation process and its outcomes, although some good effort goes into consistency of input in terms of panel member training. However, the ENQA review panel has also failed to explore this fully. We find that this is certainly not fully compliant but closer to substantially compliant as consistency is part of the standard and not the guideline. The response of NAA did not provide further clarification or evidence on this point.

#### **Processes fit for purpose (ESG 2.4)**

The ENQA review panel’s conclusion on this standard is ‘substantially compliant’, as they find weaknesses in the composition of accreditation expert panels: there is no international participation and no students directly involved. In addition, they find that experts largely work alone to assess individual programmes and recommend an improved arrangement where experts can work more as a team.

In their appeal letter NAA state that it is difficult to involve foreign experts because they have to ‘understand the content of the standard.’ Concerning the involvement of students, NAA point to the fact that students are represented as members of the Accreditation Board.

In EACC’s assessment, the absence of international and student participation in the processes represents an obvious failure to comply with this standard, if also understandable in the light of legislation, tradition and – not least – a situation where a large number of accreditations have to be undertaken each year with very restricted resources. Since individual programs are

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in effect assessed by one person only (hardly peer review in the traditional sense), international and student experts would be unlikely as single evaluators. However, the EACC considers that their participation would be possible in other ways, on levels above or around the immediate scrutiny of individual programmes. The role of the national agency is very important here; the agency must be an active promoter of international collaboration and students' involvement at all levels (IQA, EQA, decisions).

Another weakness is the absence of follow-up processes. We do not consider 'next cycle evaluation' as follow-up in the sense required by the ESG.

The question of fitness for purpose depends on the purpose. If the purpose is to carry out control with the institutions' compliance with minimum standard requirements, the processes may perhaps be deemed fit. But clearly the ESG expects more. The EACC considers that in this regard NAA cannot be more than substantially compliant, and arguably only partially compliant.

### **Reporting (ESG 2.5)**

The ENQA review panel point out that only the expert panels' conclusions and the positive decisions of the Accreditation Board are published. Negative decisions can only be found in the annual analytical report produced by NAA. An institution under review does not have the opportunity to comment on the experts' accreditation report, the joint conclusion of the expert panel or the analytical report prepared by NAA for AB. The ENQA review panel finds NAA to be substantially compliant on this standard.

Contradicting the review panel's (and the Board's) conclusions, NAA point to what they see as incorrect information about the failure to publish negative conclusions. The NAA further argue that the conclusions clearly indicate which criteria of the standard are implemented and which are not.

EACC finds that NAA's response does not really add anything in terms of clarification. EACC have not been able to check if negative conclusions are published on the (Russian language) website but it appears that the NAA does not elaborate a final report (assumed by the AB) of the individual accreditation assessments. Anyway, the question whether both positive and negative conclusions are published is in itself hardly the major point.

As far as the EACC have been able to ascertain, current reporting practice includes:

- experts' accreditation reports – not public documents
- conclusions - prepared by NAA staff (informing which criteria of the standard are implemented and which are not) – published on the NAA website
- decisions – published on the Rosobrnadzor and NAA websites

On the other hand, no summative external evaluation reports are published.

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Although ENQA review panel of 2008 recommended that the expert panels' reports should be made public, NAA have failed to improve their reporting practice to fall more in line with the ESG guidelines.

Reports are not published by the NAA. Reporting has the general weaknesses that (a) it is split between two different websites and that (b) important elements are missing. Held up against the ESG standard and guidelines, the reports on external QA procedures leave much to be asked for. Some of the missing elements – for example the external expert reports and the 'analytical materials' – are in fact what would normally be thought of as the core elements in a report. Reporting is lacking in transparency and evidence.

The response from NAA that the comment from the panels' conclusion is more balanced than the assessment of the Board is hardly appropriate. An agency may publish as many different types of reports as it deems appropriate (summary; statistical analysis and so on); however, one full report of the outcomes as relayed by the panel needs to be published, which is not the case here. In addition, there is no follow-up report. Nor does there seem to be an opportunity for HEIs to openly check and challenge the factual accuracy of reports. EACC considers that NAA are closer to partially than to substantially compliant on this standard.

## **Criterion 5**

### **Independence (ESG 2.6)**

The ENQA review panel highlight the following points that weaken NAA's position as an independent agency, seen in relation to the ESG standard:

- The recruitment of experts is carried out by the Commission on Accreditation of Experts, which is a part of Rosobrnadzor, and is therefore not the full and formal responsibility of NAA
- The panel members have to be approved by Rosobrnadzor
- The Accreditation Board makes the formal decisions on accreditation, approved by Rosobrnadzor
- Representatives of Rosobrnadzor are members of the Accreditation Board and the Head of Rosobrnadzor also chairs the Board.

According to NAA's appeal letter, NAA has an influence on accreditation decisions through its five members (of 13) on the Accreditation Board. They also point out that 'all legal relationships with experts, including payment for the work, resulting in the accreditation process are established only with NAA.' They argue that certain changes in the legal framework have meant that 'considerable positive changes have been made regarding criteria ESG 3.6 since the external review.'

EACC finds that the weaknesses in NAA's powers and position are indeed serious with regard to its position as an independent agency. NAA's response does little to provide additional

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clarification or evidence to change this finding. The fact that NAA has five members on the Accreditation Board, if anything, underlines the ‘corporative’ nature of these arrangements. Changes in the arrangement of NAA procedures that are reported to have taken effect after the ENQA review cannot be taken into consideration in this assessment.

NAA does not make proposals for the Accreditation Board, providing only information around the accreditation. (See ESG 2.3), This makes it unclear if they really have an active role in the decision-making process at all. The Accreditation Board is not part of NAA (or the other way round); it is a commission of Rosobrnadzor.

EACC considers that in order to comply with the ESG, NAA should be able to make its own decisions as an expert body in quality assurance, to write full accreditation reports and to submit these reports to the Accreditation Board, which would be responsible for the final decisions at the legislative level. As it is (according to available information), it is difficult to speak of NAA as an independent external quality assurance agency at all. The role of the agency is more like that of an organising and facilitating agency. Accreditation decisions appear to be twice removed from NAA, and as an organisation, they have no say. In the EACC’s assessment, their compliance with this ESG standard is certainly no more than ‘partially compliant’, bordering on ‘non-compliant’. The NAA appeal letter does not offer any information that changes this.

## **Criterion 6**

### **External quality assurance criteria and processes used by the members (ESG 3.7)**

The review panel (and the Board of ENQA) reiterate the most important weaknesses that are observed under previous headings, for example the fact that there is no student involvement in panels, that experts are approved by Rosobrnadzor, that there is no publication of the full report, that there is no permanent appeals procedure established and no follow-up procedure beyond the reaccreditation processes after 1 or 6 years.

NAA’s appeal letter does not refer specifically to this standard.

EACC refers to what is set out above under standards 2.1 and 2.3 – 5. We cannot find that NAA is fully compliant on any of these standards, and on 2.1, 2.4 and 2.5 it could be argued that they are only partially compliant. (EACC does not see it as their remit to make exact decisions on degrees of compliance, ‘in competition’ as it were with the ENQA review panel.)