

ENQA AGENCY REVIEW

NATIONAL ACCREDITATION AGENCY OF THE RUSSIAN FEDERATION (NAA)

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4 MARCH 2021

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EXECUTIVE SUMMARY

This external review report analyses how the National Accreditation Agency (NAA) of Russian Federation meets the expectations of the Standards and Guidelines for Quality Assurance in the European Higher Education Area 2015 (ESG). It is based on an ENQA-coordinated external review conducted between March 2020 to March 2021 with an online site visit between 27 and 29 of October 2020. The purpose of this review is to provide information to the ENQA Board as the basis for making decision on NAA's continued membership in the association.

This is the third review of NAA against the ESG, the first two took place in 2008 and 2014. The review in 2014 was followed by a partial review in 2017 where four of ESG standards were re-assessed. In 2019 legal changes related to state accreditation were introduced at NAA, which has impacted the agency's statute and structure and the process of the external review. Following this reason, NAA asked ENQA to postpone its external review against the ESG for one and a half year.

NAA is a non-commercial organisation established as a federal state budgetary institution. Its main task is to assist Federal Service of Supervision in Education and Science (Rosobrnadzor) in executing state accreditation of educational activities through carrying out external evaluation of study programmes in higher education institutions. NAA started its activities in 1995, but the current name was granted in 2004. NAA is the only public body that is responsible for external evaluation of study programmes for the purposes of granting a state accreditation in Russian Federation. In addition to state accreditation, quality assurance system in Russia involves an independent quality assessment of educational activities, public accreditation of higher education institutions, and professional and public accreditation of study programmes that are conducted by other quality assurance agencies. All of the listed processes are voluntary, but the results are taken into account by the experts of NAA during the state accreditation of study programmes.

NAA's activities are recognised by stakeholders as state accreditation guarantees that study programmes comply with the requirements of Federal state educational standards. State accreditation is based on the applications submitted by the HEIs, but it is to the HEIs' interest to undergo the state accreditation as a positive result grants a right to the HEI to receive state financial support, award state recognised diplomas, use mobility tools etc.

Considering the self-evaluation report, the numerous evidence submitted by NAA and as found on the NAA's website, as well as based on the stakeholder interviews and impressions collected while talking to the NAA staff during the site visit, the panel emphasises that NAA has an established legal basis for its external quality assurance activities, conducts its activities on a regular basis and has sufficient resources for the daily operations.

The panel found NAA to be compliant with the ESG as follows:

- Fully compliant for the following ESG: 2.5; 3.2; 3.5; 3.6; 3.7
- Substantially compliant with the following ESG: 2.1; 2.2; 2.3; 2.6; 2.7; 3.1; 3.3
- Partially compliant with the following ESG: 2.4; 3.4

Thus, the panel concludes that NAA's activities are, overall, in substantial compliance with the ESG.

INTRODUCTION

This report analyses the compliance of National Accreditation Agency of Russian Federation (NAA) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. It is based on an external review conducted from March 2020 to March 2021.

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 NAA's third review (previous reviews in 2008, 2014 and one partial review in 2017), 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 AND THE 2017 PARTIAL REVIEW

The previous ENQA coordinated review took place in 2014. With respect to the ESG (2005) it found NAA:

- fully compliant with ESG 2.1 (use of internal quality assurance procedures); 2.2 (development of external quality assurance processes); 2.3 (criteria for decisions); 2.7 (periodic reviews); 2.8 (system-wide analysis); 3.3 (activities); ESG 3.2 (official status); 3.5 (mission statement);
- substantially compliant with ESG 2.4 (processes fit for purpose); 2.5 (reporting); 2.6 (follow-up procedures); 3.1 (use of external quality assurance procedures for higher education) 3.4 (resources); 3.7 (external quality assurance criteria and processes); 3.8 (accountability procedures); ENQA Criterion 8 (consistency of judgements, appeals system and contribution to ENQA aims);
- partially compliant with ESG 3.6 (independence) and ESG 3.7 (external quality assurance criteria and processes used by the agencies).

The 2014 review also made three general recommendations to NAA and the educational authorities in the Russian Federation. They addressed mainly the need of NAA to have a stronger mandate and a better platform for promoting high academic stands and quality enhancement in Russian higher education, together with the need for a greater transparency and more orientation towards development of the state accreditation system. Next, some additional points of attention were listed as the specific recommendations:

- The annual self-evaluation process at the institutions should have a stronger developmental element where the institutions assess their own strengths and weaknesses and identify needs for improvement.
- 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.
- NAA should ensure that international academics are recruited, trained, and certified as experts in state accreditation in the future.
- NAA should act proactively to ensure a formal platform for the involvement of students as experts in state accreditation in the future.

- NAA should ensure that experts work more as a common 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.
- NAA should publish experts' reports on the programs under review as the reports contain important information to the academic community and the general public.
- NAA and the responsible authorities should make it possible for an institution under review to comment on the experts' program reports and the joint conclusion of the expert panel before the decision-making process of the Accreditation Board. NAA should also consider making it possible for the institutions to comment on the analytical report from NAA.
- NAA should produce a user-friendly tool for future students and their parents, so that they can easily access the outcomes of state accreditation from all the years (including information about HEIs withdrawing their application for state accreditation during the process).
- NAA should request that HEIs produce a follow-up plan when the state accreditation process is finalised. The HEIs should send their follow-up plans to NAA.
- NAA could consider paying more attention to communicating the annual analytical reports and the results of its research activities.
- NAA should make strict guidelines for its consultancy service activities.
- NAA should have full and formal responsibility for the recruitment and certification of new experts.
- NAA should have delegated authority to complete the composition of expert panels.
- Representatives from Rosobrnadzor should under no circumstances be members of the Accreditation Board.
- NAA and the responsible authorities should see to that a formal appeals procedure be established as part of the state accreditation system.
- NAA should invite the institutions under review to comment on the composition of the expert panel.

After the external review in 2014, NAA was awarded the status “full member under review”, with the decision dated in March 2015. Between November 2016 and March 2017, a partial review was then conducted against the ESG 2005 to assess the eligibility of NAA for the renewal of membership in ENQA. Following the evaluated ESGs, the agency substantially complied with the ESG 2.4 (processes fit for purpose); 2.5 (reporting); 3.6 (independence), and partially complied with the ESG 3.7 (external quality assurance criteria and processes used by the agencies). The agency was recommended to take appropriate action, so far as it was empowered to do so, to achieve full compliance with these standards at the earliest opportunity.

REVIEW PROCESS

The 2020 external review of NAA 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 panel for the external review of NAA was appointed by ENQA and composed of the following members:

- Nora Skaburskiene (Chair), Director for Studies, Vilnius Gediminas Technical University, Lithuania - ENQA nominee;
- Simona Lache (Secretary), Professor and Vice-rector for Internationalization and Quality Evaluation, Transilvania University of Brasov, Romania - EUA nominee;
- Klemen Subic, Undersecretary, Slovenian Quality Assurance Agency for Higher Education - ENQA nominee;

- Dale Whelehan, PhD Surgical Performance, Trinity College Dublin, Ireland, *Member of the European Students' Union Quality Assurance Student Experts Pool* - ESU nominee.

Goran Dakovic, Reviews Manager at ENQA, acted as the review coordinator.

NAA produced a self-assessment report (SAR) that provided the basis for the panel's work. Panel members received the SAR from NAA in August 2020 and immediately began to evaluate its contents against the ESG. In September 2020, the ENQA coordinator facilitated an online meeting where the panel discussed the SAR and other practical aspects of the review, including the schedule of meetings for the site visit and the need for potential additional documentation. The panel conducted an online site visit to NAA from 27 to 29 October 2020 (with 16 October 2020 as Day 0 of the visit), where it further examined both the claims made in the self-assessment report, and cross-checked other evidence as provided by the agency. The panel was also able to clarify any points at issue. During the site visit, the consecutive translation was provided by a professional that was approved in advance by ENQA. Finally, the review panel produced the external review report based on the following sources: the SAR, information collected during the online site visit, and other evidence. In doing so, the panel provided an opportunity for NAA to comment on the factual accuracy of the draft report. The review panel confirms that it was given access to all documents and people it wished to consult throughout the review process.

SELF-ASSESSMENT REPORT

The self-assessment report provided a description of higher education system in Russian Federation, the NAA's history and its activities, position and status in the national context, as well as the agency's compliance with the national requirements. The report also contained a self-assessment on compliance of NAA's quality assurance activities against the ESG.

The SAR was developed by a group of people consisting of NAA's employees (representatives of senior management, mid-level managers, and other staff members with relevant qualifications) and the external stakeholders acting as consultants. A deputy director was appointed to the self-assessment working group as a focal point for coordination of work.

The panel learned that stakeholders (e.g. expert organisations, experts and representatives of higher education institutions) were involved in the self-assessment process by offering feedback and thereby helped define the agency's main objectives and developmental directions.

The review panel found the SAR to be primarily descriptive rather than analytical, although the document did include a reflective SWOT analysis.

SITE VISIT

Due to the pandemic caused by COVID-19, the site visit took place online, from 27 October 2020 to 29 October 2020, with an additional Day 0 being organised on 16 October 2020. The visit schedule was previously agreed with the agency (see Annex 1). The panel found the visit to be well planned and organised, thus the review panel was able to meet and interview all key internal and external stakeholders of the agency, e.g. the NAA's director, deputy directors and a chief accountant, heads and staff of NAA departments, representatives of the ministry and the Accreditation body of the Federal Service for Supervision in Education and Science, heads and QA officers from HEIs, members of the evaluators' pool - including students, student organisations and employer representatives. The discussions in the meetings were triangulated with the self-assessment report and the documentary evidence as provided by the agency in advance, which altogether allowed the panel to come to conclusions and judgements on the compliance as presented in this report.

The panel wishes to express its thanks to all involved parties that dedicated their time to meet up and help the panel to better understand the activities of NAA and the context within which it operates.

At the end of the site visit, the panel held an internal meeting where it was agreed on the preliminary conclusions on the level of compliance of NAA on each of the standards of Part 2 and 3 of the ESG. All of the review panel members contributed to the report. The panel secretary then finalised the report and circulated it again for final revision. The draft report was submitted to NAA for factual check in January 2021 and then finalised by February 2021.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM

The higher education system in Russian Federation (RF) is regulated by the Federal Law on Education, which divides the educational system into general education, professional education, further education and professional training providing the opportunity to realise the right to education throughout life (lifelong education). General education and professional education are implemented by educational levels. There are altogether four levels of professional education: 1) secondary vocational education; 2) higher education – Bachelor's level; 3) higher education – Specialist's and Master's levels; 4) higher education - Training of highly qualified staff.

A typical learning path in higher education is realised by the scheme "Bachelor - Master - Training of highly qualified staff". In some areas (e.g. in the field of healthcare) there is no level of basic higher education (Bachelor) and training is conducted by the scheme "Specialist - Training of highly qualified staff."

Since 2018, higher education is managed by The Ministry of Science and Higher Education of the Russian Federation and its control lies within The Federal Service for Supervision in Education and Science (Rosobrnadzor), operating directly under the Government of the Russian Federation.

The following types of institutions form the HE system of Russian Federation:

- By founders:
 - **State (of federal regulation) universities**, administered by the Government of the Russian Federation or by federal executive bodies of the constituent entities of the Russian Federation; they are funded by the federal budget.
 - **State (of regional regulation) universities**, administered by the constituent entities (regions) of the Russian Federation; they are funded by the budgets of the RF regions.
 - **Municipal universities**, administered by relevant local authorities; they are funded mainly by local budgets.
 - **Non-State universities**, established by private individuals or non-governmental organisations. They can be financed at the expense of the state, but mainly at the expense of extra budgetary funds.

- By status:
 - **Universities of special status**, considered as unique scientific and educational institutions of great importance for the development of Russia (i.e. Lomonosov Moscow State University and St. Petersburg State University).
 - **Federal Universities** - leading higher educational institutions in the federal district and considered as the centre of science and education.
 - **National Research Universities** - this status is awarded based on competition, for 10 years' period, to universities which organise an effective educational process and integrate it with research conducted at the same university.

- Other higher education institutions.

According to the SAR, the higher education programmes (bachelor, master and specialist) are implemented by 741 organisations of higher education (496 state and municipal universities and 245 private universities) and 596 branches (455 of state and municipal universities and 141 of private universities). 90,9% of the student population study in state and municipal universities and only 9,1% are enrolled in private universities, although the latter represent about 33% of the higher education institutions of Russian Federation.

In Russian Federation, the higher education programmes of all levels are regulated by the Federal State Educational Standards (FSES) that set the requirements for the programmes' implementations by HEIs.

QUALITY ASSURANCE

According to the Federal Law on Education, the mechanisms that assure the quality of the Russian education system are associated to the following activities:

- licensing of educational activities;
- state accreditation of educational activities;
- state control (supervision) in the sphere of education;
- independent evaluation of the education quality;
- professional public accreditation;
- public accreditation;
- monitoring.

The panel learned that state accreditation of educational activities is conducted at the study programme level by NAA only and aims to assess the compliance of programmes with the Federal State Educational Standards (FSES). This accreditation process takes into consideration the results of the independent evaluation of the education quality that is performed by other quality assurance agencies. Furthermore, professional public accreditation is based on assessing compliance of study programmes in the RF with the professional standards in the respective fields, while public accreditation is conducted at the institutional level.

NAA is the quality assurance agency responsible for practical operation of the state accreditation procedures for study programmes, while state control in the sphere of education is exerted by Rosobrnadzor.

NATIONAL ACCREDITATION AGENCY – NAA

NAA was established in 1995 under the name of “The Research and Information Centre of State Accreditation of Goskomvuz (State Committee on HEIs) of Russia”, aiming to support the implementation of the state accreditation procedure. In 2002 the body became “The Information and Methodological Centre of the Ministry of Education of the Russian Federation” and since 2004 it is named “The National Accreditation Agency in the Sphere of Education” (in English – “The National Accreditation Agency”). Until 2011, the agency was located in Yoshkar-Ola, when it moved to Moscow. The branch in Yoshkar-Ola is still in place, covering mainly NAA's needs for information technology support.

NAA'S ORGANISATION/STRUCTURE

According to its statute, NAA is a federal state budgetary institution operating under the Federal Service on Supervision in Education and Science (Rosobrnadzor). The agency is administered by a director appointed by Rosobrnadzor. The management includes three deputy directors and a chief accountant. NAA is organized in 11 departments (in Moscow) and one branch (in Yoshkar-Ola); a total of 102 people are employed as permanent staff.

The management of the agency is carried out by the director, who is appointed/ dismissed by the order of Rosobrnadzor, for a period of maximum five years. Its responsibilities are listed in the agency's statute.

The Chief Accountant is appointed/ dismissed by the order of the NAA's director in agreement with Rosobrnadzor, for a period of maximum five years. Its responsibilities are listed in the agency's statute.

According to the organizational flowchart, the deputy directors are assigned to manage the NAA's departments as follows:

1. Automated Data Processing Department; Support for Accreditation Procedures Department; Analytical Department.
2. Organizational Support and Logistics Department; Document Preparation Group; Database Support Department; Technical Support Group.
3. Information and Events Organization Department, Methodological Support and Legal Expertise Department, Analytical Department (Yoshkar-Ola branch), Information and Methodological Department (Yoshkar-Ola branch).

NAA structure also includes the Accounting Department and Contractual Relations and Administration Department, under the responsibility of the chief accountant.

NAA'S FUNCTIONS, ACTIVITIES, PROCEDURES

The NAA's goals, objectives and types of activities are stipulated in its statute. The main goal of the agency is to assist Rosobrnadzor in exerting its powers for:

- state accreditation of educational activities,
- formation and maintenance of information resources,
- interaction with government bodies of foreign states and international organisations in the established field of activity.

The external quality assurance activity of the agency consists of conducting external evaluations in the view of state accreditation of study programmes of HEIs. This activity has been evaluated against the ESG in the present ENQA review.

For achieving its goals, NAA ensures organizational and technical, technological, information and methodological, as well as analytical support to Rosobrnadzor and specifically to its Accreditation Body - established to consider issues related to awarding/ suspension/ renewal/ withdrawal of state accreditation of educational activities with respect to the study programmes of HEIs.

According to its statute, the NAA's activities are the following:

- conducting peer review during state accreditation procedure of educational activities;
- certification of experts and (or) expert organisations for conducting peer review during state accreditation procedure of educational activities;
- assessment of quality of students' training, conducted during evaluation of learning outcomes in study programmes that are submitted for state accreditation;
- preparation and updating of methodological and other documents for the analysis of the content and quality of students' training in organisations involved in educational activities, as well as of assessment tools and mechanisms that assess the learning outcomes;
- organisational and technical support for the collection, processing and storage of information related to educational organisations involved in licensing and state accreditation procedures of educational activities;

- monitoring research in the education system of the Russian Federation to ensure the powers executed by Rosobrnadzor;
- ensuring technical support and maintenance of data systems as well as the components of information and telecommunications infrastructure related to the execution of Rosobrnadzor powers in licensing and state accreditation procedures of educational activities;
- ensuring organisational, technical, information and analytical support for activities related to interaction with foreign and international organisations in the sphere of quality assurance of education, assessing the quality of students' training and accreditation of educational organisations.

The NAA statute also provides that the agency is entitled, in agreement with Rosobrnadzor, to perform the following other types of activities (it is specifically mentioned that these activities are to be carried out *“to the extent that it serves to achieve the goals of the agency and is in line with those goals”*):

- state accreditation procedures of educational activities in accordance with the international law;
- implementation of educational activities of further professional programmes;
- development and dissemination of software, as well as to create, design and maintain databases and other information resources in the sphere of education of the Russian Federation. The agency also grants rights for the internally developed software and databases' usage on the terms of a simple (non-exclusive) license;
- implementation of project and research work;
- organisation of conferences, seminars and other meetings in the sphere of education in the Russian Federation, participation in international conferences and seminars outside the territory of the Russian Federation.

Since 2016, NAA has been supporting the peer review procedure through the use of digital tools. As mentioned in the SAR, this technology is still under development; however, during the site visit the panel was able to see the current developments and appreciates their potential.

NAA'S FUNDING

NAA's income is principally made up of state funding (84%), provided annually in the form of 'State assignment'. This is supplemented by the agency's own funds, coming from projects, commercial seminars and webinars, as well as from other activities.

NAA's budget in the past five years are presented below.

Table I. Overview of the NAA's budget

Year	2016	2017	2018	2019	2020
NAA's budget [million RUB]	246,7	235,4	281,5	278,0	218,3

FINDINGS: COMPLIANCE OF NAA 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.

2014 review recommendation: “NAA should make strict guidelines for its consultancy service activities.”

Evidence

The agency was established by the Russian Federation State Committee for Higher Education in 1995, when it was established as a state institution under the name “The Research and Information Centre for State Accreditation of Goskomvuz of Russia”. After the transfer to the jurisdiction of the Federal Service of Supervision in Education and Science (–i.e. Rosobrnadzor) in 2004, the current name “The National Accreditation Agency” (NAA) was given to the organisation. NAA was previously located in Yoshkar-Ola, but in 2011 the main office moved to Moscow. NAA still has an operating branch in Yoshkar-Ola with 10 employees.

NAA’s core activity is evaluation of study programmes of higher education institutions, which forms a basis for accreditation decisions by Rosobrnadzor. External quality assurance in Russia made a transition from institutional to programme accreditation in 2014, and the agency has been since then performing the accreditation activities at programme level on a regular basis. Every year NAA organises a high number of evaluation procedures in higher education institutions: in 2017 there were 584 external reviews conducted that included 7069 study programmes, in 2018 there were 636 reviews for 8465 programmes, and in 2019 there were 705 reviews for 10224 programmes. The panel learned that the general information on the NAA’s main activities, and the related documents, are available on the agency’s website.

NAA’s overall aims and functions are defined by the agency’s statute. The Agency has formulated the following mission: “to ensure quality through provision of state accreditation of educational activities at a high professional level in accordance with the principles of objectivity, responsibility, openness, independence and transparency, as well as to provide external quality assurance of the Russian education”. The mission and quality assurance policy are published on the NAA’s website in both Russian and English, along with the strategy for 2020-2022 (i.e. the Development Programme of the National Accreditation Agency), annual action plans and yearly plans for international activities.

The agency’s goals are to assist Rosobrnadzor in executing its powers for:

- state accreditation of educational activities;
- formation and maintenance of information resources;

- interaction with government bodies of foreign states and international organisations in the established field of activity.

Importantly, the agency is set up to assist Rosobrnadzor in executing its powers by providing the organisational and technical, technological, information and methodological as well as analytical support.

NAA's mission reflects the agency's goals and is targeted towards the execution of the state function of carrying out the procedure of state accreditation of educational activities at a high professional level. The agency claims to implement programme accreditations in accordance with the principles of objectivity, responsibility, openness, independence, and transparency, as well as to provide external quality assurance of higher education in Russia.

In accordance with the statute, NAA also carries out additional activities related to implementation of further professional programmes, development of software, design and maintenance of databases, implementation of projects, organization of various events in the field of education, monitoring of students' training quality.

International activities are considered as one of the agency's priority areas. The agency has signed agreements on cooperation with several quality assurance agencies across the EHEA and beyond. NAA also develops annual plans for international activities.

The key stakeholders of NAA are experts and expert organisations involved in the accreditation processes. NAA is a federal state budgetary institution and the stakeholders (HEIs representatives, employers, students) cannot participate in the agency's governance. However, the agency actively involves these stakeholders in the process of the expert appointment. This is done through the composition of the Accreditation Commission that is represented by:

- Higher Education Institutions - 10 persons;
- Expert organisations - 2 persons;
- Scientific organisations - 1 person;
- Russian Union of Youth - 1 person;
- Employers - 2 persons;
- Rosobrnadzor and NAA staff - 9 persons.

The most experienced experts of NAA are also involved in the development and review of the methodological support to the accreditation as well as in revising the materials for assessing the quality of students' training.

The stakeholders' feedback is received through annual surveys of experts and HEIs that have undergone state accreditation of study programmes. The outcomes are published on the NAA webpage.

Analysis

QA activities

Referring to 2014 recommendation that NAA should make strict guidelines for its consultancy activities, the agency provided to the panel the explanation in the SAR as well as during the discussions at the site visit. The panel was clarified that the additional activities as carried out by NAA should be and are in line with the remits of the statute. In 2018 NAA developed and approved the regulations on the procedure for income-generating activities of the National Accreditation Agency that clearly determined the types and cost of additional activities of the Agency. The document also lists the areas where the generated funds could be spent.

Based on the information provided in SAR and gathered during the visit, the panel confirms that NAA is engaged in regular EQA activities in accordance with its legal acts published on the website. External quality assurance in the form of programme accreditations is the main activity of NAA. The panel notes that this is also reflected in the mission and goals of the agency also published on the NAA's website.

Findings from the analysis of the development of higher education system, existing problems and possible challenges were reflected in the agency's Strategy (Development Programme) for 2020-2022. The panel commends NAA for the involvement of stakeholders, especially the agency experts into the discussion on the agency's SWOT analysis and for collection of the experts' opinions. The panel learned about an example of such a seminar that was held in Makhachkala in June 2019.

Moreover, the panel learned during the site visit that NAA staff (heads of departments and top management) engages in drafting the annual work plans and the Development Programme.

Both the Strategic Plan and the yearly plans and reports are publicly available on the NAA's website. Nevertheless, the panel advises the agency to link closely the key strategic objectives for the agency's development with its yearly plans. The panel believes this would allow for better monitoring of the implementation of plans. The Strategic Plan for 2020-2022 does not identify any risks nor activities that should be undertaken should any unforeseen situation occurs; thus the agency's Management should take this remark into consideration when developing the next organisational strategy.

The panel also recognises the NAA's active work in the international context. Participation in international networks and projects allows NAA to benchmark its activities with the other European agencies, accumulate best practices and promote them to the Ministry, Rosobrnadzor as well as to HEIs. The emphasis on internationalisation is also reflected in the separate planning documents for international activities, annually published on the agency's website.

Stakeholders' involvement

The panel learned that no stakeholders are involved in the governance of the agency. The panel understands that the legal status of NAA does not allow for formal involvement of different stakeholder groups into the agency's governance bodies, but NAA should think of ways of indirect involvement of stakeholders, such as organising an Advisory Board of a public nature or similar. The panel is of the opinion that this would be beneficial to the agency in both for planning the external quality assurance activities as well as for proposing suggestions for legal changes.

Currently, mostly experts are involved in the activities of NAA (i.e. in the development of methodologies and other tools of the agency). The involvement of students in the agency's strategic matters is minimal and limited to those students that engage in the expert panels. In the view of the panel, NAA should do more to actively involve stakeholders, such as students, professional organisations, and employers into the further development of the agency's activities. During the interviews, the panel got an impression that students and employers are ready to actively participate in the NAA's governance and work. The panel additionally notes that this challenge was also identified by the working group of the SAR. This group came to the conclusion that despite the stakeholders' involvement in the agency's activities, the NAA's interaction with professional communities, HEIs' and students' associations is still insufficient.

Panel recommendations

In the development of future strategic documents, the agency should make the participation of HEIs and students more visible.

Even within the present legal situation, NAA should look for more systematic ways of holding a dialogue between NAA and the specific stakeholders (HEIs, students, professional organisations), which would be beneficial for the agency's governance and work. The agency is additionally encouraged to involve the international experts more actively in its activities, using the international connections.

Panel suggestions for further improvement

The panel suggests the agency to involve a mechanism of risk identification into the strategic planning.

The panel suggests the agency to use the strategic plan as a basis for developing the annual activity plan.

The panel encourages NAA to continue its international activities and analyse best practices of other QA agencies, for example in students' and other stakeholders' involvement, evaluation of student centred learning, and for performing thematic analyses.

Panel conclusion: substantially 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.

2014 review recommendation: none

Evidence

The SAR states that the agency is a federal state budgetary institution, established in 1995 by the Russian Federation State Committee for Higher Education. NAA is a legal entity with an independent balance sheet. NAA's activities are regulated by laws, decrees, instructions of the President of the Russian Federation, resolutions, and instructions of the Government of the Russian Federation and are under control and coordination of the Federal Service on Supervision in Education and Science (Rosobrnadzor). NAA is officially recognised by the Russian Federation authorities, state accreditation of HEIs being granted based on its work and results.

Analysis

The panel was provided with the relevant legal documentation (laws, decrees, instructions) in translation, which clearly corroborate the statements in the SAR.

All those to whom the panel spoke, including ministry, HEIs, students' and employers' representatives acknowledged the NAA's legal position as the sole quality assurance agency providing state accreditation of study programmes in Russian Federation.

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.

2017 review recommendation: *“The panel recommends that NAA staff should not be members of the Accreditation Board of NAA responsible for selecting and certifying experts and expert organisations. Although outside the scope of this review, the panel also recommends Rosobrnadzor not to include its own staff as members of its Collegial body.”*

Evidence

Organisational independence

One of the key elements of NAA's mission is to perform state function in accordance with the principles of objectivity, responsibility, openness, independence and transparency. The organisational independence is also featured in the NAA's statute, stating that the NAA is a non-profit and non-federal state executive body unlike Rosobrnadzor, which is the federal executive authority and the founder of the NAA. Rosobrnadzor adopted a new NAA statute in March 2020 (document No. 312), which sets out the agency's tasks, including assisting Rosobrnadzor and executing its powers for state accreditation of educational activities, formation and maintenance of information resources and interaction with governmental bodies of foreign states and international organisations.

The subject of the activity of the agency is to assist Rosobrnadzor in executing its powers by organisational and technical, technological, information and methodological as well as analytical support.

Although appointed and dismissed by Rosobrnadzor, the director of the agency is responsible for carrying out the day-to-day activities of the agency and for its management. The duties of the director are defined in the agency's statute. The agency is responsible for the implementation of state tasks, within which it independently organises its activities in the field of selection of experts, offering organisational, financial, and methodical support for state accreditation procedures and performing different types of statistical analysis and assessment of collected information.

Operational independence

The agency uses a comprehensive recruitment and training system for its certified experts. The qualification requirements for experts and expert organizations, the procedure for the selection of experts and expert organizations to conduct the external review are established by the Order of the Ministry of Education and Science of Russia No. 556 of 20.05.2014. The Ministry issued the rules of work of experts and expert organizations (Procedure for the work of experts and/ or representatives of expert organizations included in the expert panel carrying out the accreditation external review, approved on 17.01.2017, No. 24). In addition, within its competences, the agency prepared and adopted, in 2020, the methodological recommendations for conducting external reviews, to ensure the consistency of EQA procedures.

The agency has established and implemented an information system for selecting experts for individual review procedures according to several criteria (e.g. expertise, competences, as well as absence of the conflict of interests). The HEIs have the possibility to object to selected experts. The NAA is independent in selecting and training the expert pool members, while the Accreditation body is responsible for appointing experts from the pool of expert panels. The independence of expert panel members and representatives of expert organizations is therefore guaranteed through several mechanisms, one of the being that the experts/representatives of expert organisations are automatically and randomly selected via the information system (but still according to their expertise,

specialties, profession, and place of residence). Moreover, the experts have to sign written consent confirming non-conflict of interests. The panel additionally notes that NAA is forming the expert panel and selects the expert panel Chair.

Independence of formal outcomes

The Federal Law on Education (Article 92, paragraph 11) stipulates that accreditation review should be objective and experts are responsible for the quality of assessment. When forming the expert panel, each individual member is assigned to one or more study programmes for assessment. Each member of the expert panel writes one or more reports and the final decision on the assessment is agreed with the expert panel Chair. The expert panel members are responsible for the decision made.

Despite the status of a state institution, the agency ensures the independence of decision-making process by creating special mechanisms to verify the reliability of documents and materials, by involving the highly qualified experts in the state accreditation procedure, ensuring the participation of the Accreditation Commission for the certification of experts and expert organizations, as well as for decision making on state accreditation of educational activities.

Analysis

External stakeholders see the NAA primarily as a relevant partner in offering professional advice, organizing trainings for experts, and supporting higher education institutions in preparation for state accreditation procedures. The review panel notes that the role of the agency, as a relevant partner in the Russian HE policy making process, is less evident, although it could significantly contribute to the development and co-creation of it, with its long-term experience (both national and international). Nevertheless, within its remit, NAA is involved in preparing proposals for changes in legislation in the area it covers. The panel would like to encourage the Ministry and the Rosobrnadzor to give the NAA greater value in shaping the Russian EQA system, in order to become more relevant and independent stakeholder, also involved in the development of FSES and other standards. At the same time, it is important to note that the NAA should co-formulate criteria for training of experts, as this would make it easier to include professionals who are currently underrepresented (i.e. students and professionals of some professions, specialties and fields of training). The proposed approach could also respond more quickly to the changes and needs of the environment and make an important contribution to setting up an appropriate register of experts, containing of all the necessary and highly professional experts.

The panel commends NAA for being very active in developing partnerships with other agencies, organisations and bodies, as stipulated by this analysis and the presented evidence. NAA strives to assist Rosobrnadzor, the Accreditation Commission and expert panels on one side and HEIs on the other, to guarantee as transparent and user-friendly methodologies as possible for EQA procedures and processes. Although the final decision lies with the Accreditation body - Rosobrnadzor, the role of NAA within the Russian EQA system is indispensable.

Following the recommendation of the previous ENQA review and the ENQA Board, the composition of the Accreditation Commission for the certification of the experts and expert organizations has undergone some changes. Even though the number of NAA staff decreased, there are still seven members of Rosobrnadzor and five NAA staff members in the board composition. Nevertheless, the review panel notes that the total number of members is 25 and that members of Rosobrnadzor and NAA combined do not represent a majority in this body. In addition, the agency has set up a well-functioning system of automatic and random selection of experts and representatives of expert organizations, thus ensuring procedural independence.

During the site visit, the review panel learned also about the introduction of a new mechanism in accreditation procedure as implemented by the Rosobrnadzor in 2019, namely that the member of

the Accreditation body indicated in the executive directive shall monitor the expert panel's activity and is responsible for reviewing experts' conclusion based on the external review results. The panel learned that this mechanism would be used during a site visit to a HEI, where the HEI can call the appointed member of the Accreditation body and complain about the conduct of the group of experts. This is an example of Rosobrnadzor's control over the work of a group of experts and the agency, which, in the opinion of the panel, could seriously jeopardize the independence of the agency conducting the accreditation procedure. In the event of non-conformities being detected, a possible telephone complaint to a member of the Accreditation body could affect the final assessment of the group of experts and the independence of the agency. Although the appeal procedure is described in more detail later in this report under ESG 2.7 (complaints and appeals), the independence of the agency in this part of the report is questionable. Namely, the agency uses the established mechanisms and has an adequate system in place to independently select and train experts, has mechanisms in place to prevent conflicts of interest and monitors the implementation of evaluations during site visits. HEI, therefore, can address their complaints directly to the agency (the agency's staff), A complaint to a member of the Accreditation body could clearly interfere with the agency's independent operation. If there are reasonable grounds for additional oversight of the work of the expert group and the work of the agency, this should be clearly addressed and developed in a properly designed appeals and complaint procedure and in no way in the form of an (in)formal telephone conversation with a member of the Accreditation body.

Panel commendations

The panel commends NAA for being very active in developing partnerships, communicating with stakeholders and participating in the development of normative legal acts. Although the final decision of the accreditation procedure lies with the Accreditation body - Rosobrnadzor, the role of NAA within the Russian EQA system is indispensable.

Panel recommendations

The agency is recommended to reconsider the adequacy and purpose of establishing an institute of additional control through a member of the Accreditation body being responsible for monitoring the expert panel's activity and for reviewing the experts' conclusions, as this interferes with and threatens the independence of the agency.

Panel suggestions for further improvement

In the light of upcoming legal changes, the panel believes the agency could be more actively involved in policy-making as an equal partner in the Russian HE, and could substantially contribute to the HE development. By doing so, NAA will also become an equal and more relevant interlocutor and one of key carriers of international best practice examples.

The panel suggests the legislator and Rosobrnadzor to pay special attention to maintaining the independent status of the agency and promoting its autonomy.

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.

2014 review recommendation: none (this is the first time this standard has been reviewed)

Evidence

NAA produces and publishes reports with description, analysis and conclusion of its quality assurance activities on an annual basis. The reports relate to the state accreditation activities in Russian Federation and are named “*Report on the results of NAA’s activities for the Year*”. In such reports, NAA describes the organisational, technical, information and analytical support provided for the state accreditation procedure; the activities conducted within the NAA branch in Yoshkar-Ola; organisational and technical support provided to the formation and maintenance of information resources related to implementation of Rosobrnadzor’s powers; NAA’s additional activities; information support provided to experts and expert organisations; agency’s participation in seminars/ meetings /conferences etc.; project and international activities; and the summary of the key tasks for the subsequent year. This programme of work helps to inform the development of NAA’s strategic directions.

Additionally, NAA facilitates the analytical work of other stakeholders such as Rosobrnadzor and HEIs on various projects. Such work has resulted in scientific publications.

Analysis

The ESG standard on thematic analysis was adapted in 2015 to encourage agencies to use and disseminate findings on (meta-analytical) trends that are found across the higher education landscape. The Guidelines of the standard clarifies that agencies should, in the course of their work “*gain information on programmes and institutions that can be useful beyond the scope of a single process, providing material for structured analyses across the higher education system. These findings can contribute to the reflection on and the improvement of quality assurance policies and processes in institutional, national and international contexts. A thorough and careful analysis of this information will show developments, trends and areas of good practice or persistent difficulty.*” (ESG 2015).

While the agency uses its data in a meaningful way to guide its strategic directions and disseminates the findings to the relevant stakeholders, the philosophy of thematic analysis as envisaged by the ESG is misunderstood. The panel gathered an inconsistent response from interviewees as to what constituted the work of thematic analysis that is currently conducted by the agency. Following the ESG standard, the panel believes there are two possible areas improvement. The first area is to explore the findings of the external reviews as conducted by expert panels, and thus to analyse trends across the sector, searching for common areas where educational enhancement may occur, or where good practice is consistently applied. The panel believes this is covered by the requirement of the ESG standard stating “*analyse the general findings of their external quality assurance activities*”. The second area to explore is the requirement to “*regularly publish reports that describe*” these findings. The dissemination activities of NAA that are already produced should better incorporate the thematic analyses as proposed by the panel.

Panel recommendations

The panel recommends the agency to re-evaluate its current understanding of the philosophy of thematic analysis as required by the ESG 3.4. The agency may consider exploring best practices of thematic analysis in the international context and establish a review group to strategize thematic analysis activities. For this the agency could involve stakeholders from the Ministry, HEIs (staff and students) as well as the labour market representatives.

The agency is recommended to explore the conclusions of expert panels in order to understand trends within the national context of higher education in Russian Federation.

The panel recommends the agency to regularly publish the reports on thematic analysis in order to ensure their proper dissemination.

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.

2014 review recommendation: *none*

Evidence

Human resources

The SAR describes that NAA has 102 employees, out of which 10 operate in the NAA’s branch in Yoshkar-Ola. 94% of the staff are employed full-time, the rest being employed on a contract basis. 10 members of the staff hold a PhD degree, and two of them hold the academic title of an associate professor.

NAA staff is organised in several departments, either serving directly the state accreditation activities (35%) or supporting them (management 7%, administration and accountancy 26%, IT 11%). There is also the agency’s human resource dedicated to „research, information and methodological work” (21%).

According to the SAR, the agency staff is periodically updated on changes in legislation and in the external quality assurance methodologies. At the same time, the staff can attend trainings either organised by NAA for higher education institutions, expert evaluators and expert organisations, or the other types of trainings for improving their professional skills.

NAA implements its activities and processes by collaborating with 1754 accredited experts. 1168 experts and 628 candidates were trained within an extensive project carried out in 2018-2019.

Financial resources

The panel notes that the SAR described only very briefly the NAA’s budget and its categories of expenses, therefore the panel needed to ask for additional information.

Operations of NAA are largely funded by the state (84%), while the rest of the budget comes from other activities that are conducted by the agency (projects, commercial seminars and webinars). The funds coming from the state are spent exclusively on accreditations and salaries of the agency’s staff. NAA uses the extra-budgetary funds for the agency’s developmental purposes. During the last four years, the budget has been fairly steady (Table 1, page 11), with a certain drop in 2020. The NAA’s director explained to the panel that the drop was connected to the 10% budget cut as decided by the government regulations in April 2020. For comparison, Table 2 shows the expenditures of the last two years.

Table 2. Overview of the NAA’s expenses during the last two years

Year	2019	2020
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Agency staff costs [million RUB]	126,15	123,85
Expenses for accreditation reviews performed by experts [million RUB]	101,31	52,47
Other expenses	30,35	42,55
Total expenses [million RUB]	257,81	218,88

Other resources

During the site visit, the review panel was provided with a virtual guided tour of NAA's premises. The agency ensures its staff an appropriate working environment, access to the internet and to several information systems (State Accreditation Information System, Information System of Education Activities Licensing, Interdepartmental Electronic Interaction System). The demonstration on digital tools confirmed to the review panel that the agency indeed holds the efficient means for the IT-supported management of its EQA and other processes.

During the interview with the NAA's director, the review panel additionally found out about the further financial support provided by Rosobrnadzor and the Ministry of Communications in order to maintain the technical requirements for the information systems as used by the agency.

Analysis

Human resources

The panel is in no doubt that, until now, all the agency's activities have been carried out in an efficient manner and through a valuable contribution of the permanent staff. The organisational chart of NAA clearly defines the responsibilities within departments. The interviews confirmed that the agency's human resources are adequate, both in number and qualification. The panel also learned that the staff benefits from constant opportunities for professional development, either by case-by-case proposals for courses or by choosing the trainings from the NAA's official career development plan. The staff also appreciates the stimulation measures provided by the agency, e.g. the acknowledgement letters that are sent annually to the best employees by the management.

Although the workload with state accreditation procedures is high - around 8000 study programmes are yearly accredited by NAA, the panel believes the workload is well balanced among the involved staff (approximately 60% of the NAA's staff is involved with the accreditations). In addition, the information system for submission and processing of applications as in place is valued among the agency staff. Since the system is still under development, the staff is able to make amendments to it and the interviewees confirmed that the proposals for improvement are taken into consideration.

Taking into account all the information gathered during the review process on the experts' remuneration, it was clear to the panel that the fees for experts are rather low and some of the involved students in the accreditation procedures (i.e. from the Russian Union of Youth) are even not paid at all. The panel therefore urges the agency to consider increasing the expert fees and equally pay all of its experts, including the students for their work within the expert panels.

Financial resources

The panel considers that, to this point, the agency's budget has been adequate for the implementation of the agency's activities. At the same time, the panel encourages NAA to pursue other types of activities and thus gain further resources for its own development (i.e. to gain sufficient financial independence from the governmental budget).

Other resources

The panel encourages the agency to continue being mindful of ensuring the adequate working facilities and technical infrastructure for its external quality assurance activities, considering that the digital approach on state accreditations is still well under development.

Panel suggestions for further improvement

The panel suggests the agency to increase the fees for experts (including students) to attract the best professionals in state accreditations.

The panel suggests the agency to continue conducting the activities that supplement the government budget, primarily for the agency's further development purposes.

Panel conclusion: fully 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.

2014 review recommendation: none

Evidence

NAA has updated its mission and Quality Assurance policy in 2018 and is committed to continuously develop and improve its operations and activities, with particular emphasis on improving tools and mechanisms for implementing procedures of state accreditation of educational activities using information and communication technologies. Thereby, NAA ensures objectivity, openness, transparency, and independence, while responding effectively to the changes and improvement.

NAA has adopted Quality Policy, Guidelines on the Internal Quality Assurance (from 2020) and Development Programme of the NAA for 2020-2022, while in the system of internal quality assurance also considers other regulations and normative acts, ESGs, Methodological materials for assessment of the FSES and other documents relevant for NAA's operation. NAA's QA system is mainly focused on continuous improvement of the agency's activities and statutory tasks and functions, and on building the agency's reputation and stakeholder's satisfaction. NAA's Quality Policy complies with the agency's objectives and is aimed at defining, ensuring and improving quality and integrity of its operations. NAA publishes the agency's internal quality assurance policy documents on the official website, where is also published the NAA's SAR elaborated for this ENQA review.

NAA has a highly educated and experienced staff that perform their work in accordance with the professional standards and tasks set out in the employment contract. They take care of their regular training and upgrading of the knowledge and skills necessary for their growth and development.

Requirements for experts' competence and professionalism are set in the qualification requirements to experts and expert organisations involved in accreditation reviews. NAA has a rather rigorous procedure of testing and certifying experts and expert organisations (qualification exams, oral and written). All experts and expert organisations should follow the Code of Expert Profession Ethics. Each expert signs consent to conduct accreditation review and non-conflict of interest statement.

The agency has developed various external and internal feedback mechanisms to monitor satisfaction and gather feedback on the procedures it conducts. For internal stakeholders and employees, it has an established internal feedback mechanism.

A questionnaire is available for stakeholders on the NAA's website, through which they can communicate their opinions or comment on the work of the agency and expert panels.

Regarding the protection of various forms of intolerance and measures to prevent discrimination, the agency shall take into account the Constitution of the Russian Federation and other normative and legal acts.

Analysis

The review panel notes that the NAA has adopted Guidelines on the IQA in 2020, which in most cases cover the internal assessment of the agency's activities and tasks. Despite the fact that the procedures, measures and responsibilities of the key actors of the IQA system are not precisely formulated and defined, the review panel acknowledges that the agency is very committed to promoting communication and cooperation with stakeholders and is successful in gathering feedback and inputs, especially from experts and HEIs.

NAA organises various meetings and seminars at which it presents and coordinates proposals for external QA acts (Methodology), presents an analysis of findings and responses of HEIs to the organisation and implementation of state accreditation procedures and organises meetings at which it presents important legislative changes in the Russian HE. The panel commends the Agency to facilitate and encourage stakeholders to be actively involved in the agency's operation and activities. These meetings and sessions are used also for gathering feedbacks from stakeholders. During interviews, the panel was told that also NAA employees could give suggestions and feedback to their superiors from the field of their work.

As already mentioned, the panel commends the agency for its efforts and engagement in the field of information exchange and professional conduct. NAA outlines appropriate communication and the involvement of external stakeholders in updating the procedures and methodologies related to state accreditation activities.

On the other hand, the SWOT analysis shows findings (e.g. insufficient awareness level of the agency's employees in interpreting international standards in higher education, a large amount of paper workflow, insufficient automation of documentation processing) that should be addressed in the self-evaluation of the agency. The panel recommends NAA to consider revising and optimising the IQA system in a way to provide all (internal and external) stakeholders a permanent two-way communication (flow of information), enabling initiatives and suggestions, improving cooperation between different departments, organisations and bodies, and providing NAA's management with valuable insight into all relevant issues and challenges the agency is facing, not exclusively to challenges related to accreditation procedures. It is important that the IQA system enables the determination of the actual situation, including the level of satisfaction of internal and external stakeholders, the transfer of ideas and information, and is adaptable to the needs and expectations of all relevant stakeholders, internal and external.

Regarding the provision of anti-discrimination measures and various forms of intolerance, the review panel did not find any irregularities or indications that the measures put in place would not be effective.

Panel commendations

The panel commends the agency for its efforts and commitment to providing quality services in state accreditation procedures, which was also confirmed by all interviewees.

The panel also commends the agency's active participation in the development of draft normative and legal acts in the field of its operation and in the preparation of regulatory initiatives, and its success in communication with outside organizations and entities within NAA's established authority.

Panel suggestions for further improvement

In order to further develop the agency's IQA system, NAA might consider increasing the involvement of all major stakeholders and partners in its internal QA activities. In that way, the agency could develop constant feedback mechanisms from relevant stakeholders to respond efficiently to the needs and expectations of the students, experts, HEIs and society.

Panel conclusion: fully 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.

2014 review recommendation: none

Evidence

This is the third external review of NAA against the ESG. Moreover, the partial review in 2017 reconfirmed the agency's full membership in ENQA. The present review has been initiated by the agency to again reconfirm its ENQA membership. Following the last two reviews (the full one in 2014 and the partial one in 2017) NAA has been working hard to address number of recommendations arising from these reviews. The SAR provided to the panel includes a section that summarises the progress, current status and the achieved results for each recommendation.

Though there are no formal requirements for the external evaluation of the agency, the NAA statute stipulates that "the agency participates in the activities for the implementation of the Bologna Declaration in terms of quality assurance". NAA undertakes external evaluation coordinated by ENQA on its own initiative in order to improve its quality and based on that provide suggestions for further enhancement of the Russian system for QA in HE. Being listed as an ESG compliant agency falls in line with the voluntary commitment of the Russian Federation to co-create the EHEA.

Analysis

The panel confirms that NAA undergoes the periodic external reviews as stipulated by the ESG 3.7. Moreover, the panel learned that the agency remains committed to complying with the ESG generally.

However, the review panel notes that not all recommendations from the previous reviews have been implemented to the full extent. Progress has been made in areas such as consideration of internal quality assurance and independence, but recommendations in the areas of reporting, follow-up procedures, and the involvement of students were not fully addressed thus far.

All in all, with the participation of NAA in three subsequent external reviews against the ESG, the agency complies with the ESG standard 3.7.

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 I of the ESG.

2014 review recommendation: “The annual self-evaluation process at the institutions should have a stronger developmental element where the institutions assess their own strengths and weaknesses and identify needs for improvements”.

Evidence

NAA involvement in the review of HEIs’ internal quality assurance is directly related to the evaluative framework of their state accreditation process, in particular the Federal Law on Education (Art. 28, paragraph 3) which states that “the competence of an educational organisation in the established sphere of activity includes: ... self-evaluation, ensuring the functioning of the internal QA system”. Since 2017, Federal State Educational Standards (FSES) have provision for standards devoted to the internal quality assurance of higher education institutions, namely the “requirements for the applied mechanisms of quality evaluation of student education activities and training under the degree programme”. Such standards obligate HEIs to maintain a system of internal quality assurance which involves opportunities to assess content and quality of the educational process. The SAR reports that in order to improve its study programmes, the HEIs conduct regular internal surveying involving all relevant stakeholders, and that students have the opportunity in this process to assess conditions, organisation, content and quality of the educational process at a programmatic and modular level. The assessment of NAA in reviewing the standards associated with 2.1 of the ESG has begun, since the introduction of these standards at the agency in 2017, to mention briefly in the expert conclusions the IQA review process. In 2018, the Ministry of Education and Science of the Russian Federation established ‘The Methodological Recommendations for the Organisation and Conduct of an Internal Independent Assessment’ which forms the basis for institutions to found their internal QA systems. Consideration for all aspects of the IQA is however not explicitly mentioned within reports published by the agency, particularly in regard to the consistent involvement of students in evaluating the quality of the study process.

Table 3 shows NAA’s alignment of the FSES with the ESG, Part I. In instances where parallel matching of the FSES does not exist, a commentary from the panel interviews is included.

Table 3. ESG Standards associated with relevant FSES

ESG Standard	FSES associated
I.1 Policy for Quality Assurance	FSES 4.1.6.
I.2 Design and approval of programmes	FSES 1.3, FSES 1.4, FSES 1.8, FSES 1.9, FSES 1.1, FSES 1.13, FSES 2.1, FSES 2.2, FSES 2.4, FSES 2.8, FSES 2.9, FSES 3.1, FSES 3.2, FSES. 3.3, FSES 3.4, FSES 3.4, FSES 3.5, FSES 3.7, FSES 3.8.
I.3 Student-centred learning, teaching and assessment	FSES 1.5, FSES 1.8, FSES 2.3, FSES 2.8, FSES 2.9, FSES 2.10., FSES 3.8, FSES 4.3.5, FSES 4.3.5, FSES 4.6.2, FSES 2.1.

I.4 Student admission, progression, recognition and certification	FSES 4.2.1, FSES 4.2.2, FSES 4.2.3, FSES 4.3.1.
I.5 Teaching Staff	FSES 4.4.2, FSES 4.4.3, FSES 4.4.4, FSES 4.4.5, FSES 4.3.2, FSES 4.3.3, FSES 4.3.4, FSES 4.3.5.
I.6 Learning resources and student support	FSES 1.5, FSES 1.8, FSES 2.10, FSES 4.2, FSES 4.3.1, FSES. 4.3.2, FSES 4.3.3, FSES 4.3.4, FSES 4.3.5.
I.7 Information management	FSES 4.2.2, FSES 4.6.2.
I.8 Public Information	N/A
I.9 On-going monitoring and periodic review of programmes	FSES 4.6.1, FSES 4.6.2.
I.10 Cyclical external quality assurance	FSES 4.6.1.

Analysis

Hereafter, description of the extent to which the external quality assurance procedures associated with the FSES assess the effectiveness of internal quality assurance processes in higher education institutions is elaborated.

It is the analytical view of this panel that alignment of the ESG 2.1 with FSES is done so in a matter of compliance, and from the expert report findings it is difficult to draw conclusions as to what extent the IQA within institutions is rigorously implemented independent of a desktop-review. This may be due to the recent introduction of FSES associated with IQA. Nonetheless, the panel feels that a significant effort should be made by NAA in conjunction with their stakeholders to evaluate internal quality assurance in a more meaningful manner.

I.1 Policy for quality assurance

In accordance with the Russian Federal Law on Education and the FSES, HEIs implementing their QA policies should demonstrate the involvement of employers, teaching staff and students. These documents are analysed during state accreditation reviews. In complying with ESG Standard I.1, the agency states that the purpose of IQA is to determine whether the quality of the student training can successfully support the mastery of the desired programme outcomes. This is assisted through improving HEIs study programmes structure content; improving resource support as required; improving teaching staff competency; improving student motivation to successful study programme completion; enhancing HEIs cooperation with external organisations which can improve the educational process; and reacting against corruption cases in the implementation of the educational process.

I.2 Design and approval of programmes

During state accreditation procedures, a review of the study programme inclusive of its design, structure, scope and intended learning outcomes is done in accordance with the FSES requirement statement: *“the content of higher education in the field of training is determined by the Bachelor’s degree programme established and approved by the organisation independently. When establishing a Bachelor’s degree programme, the organisation sets up requirements for the programme learning outcomes as universal, general professional and professional competencies of graduates”*.

This means that study programmes designed by HEIs are done in accordance with the FSES but are not subjected to FSES approval prior to commencement. Additionally, while the ‘universal’ and

'general' competencies are defined by the FSES, the professional competencies for study programmes are established based on standards from the corresponding professional field, i.e. through consultation with the labour market.

1.3 Student-centred learning, teaching and assessment

One of the most significant changes in the 2015 revision of the ESG is the increased focus on provision of student-centred learning. Such a standard is focused on how students can take an active role in ensuring that their own learning processes are individually tailored. The panel heard of individualised learning pathways being an increased focus in the higher education sphere in Russian Federation. While such efforts are welcomed, it is evident that involving students in the design process, and building capacity of student representation in quality assurance through removal of barriers is urgently required to ensure a student-informed student-centred teaching and learning process. This involves collaboration with student groups within the Russian Federation for ensuring that a diverse student voice is incorporated into educational design. Such efforts have already commenced including engagement on the experiment with the Russian Union of Youth, and the Erasmus+ Jean Monnet project. Recognising the value that the Ministry of Education places now on student involvement in their letter "*Letter on student involvement*", NAA should continue to look at international best practice on meaningful ways to engage students further in quality assurance. In particular, the panel believes that two areas that should be further explored are those not currently covered by FSES requirements – namely, diversity of student assessment methods; and procedures for dealing with student complaints.

There are currently a multitude of standards which are related to the student, including the opportunity for students to assess conditions, content, organisation and quality of the educational process, cognisant of student workload. During the panel review, it was difficult to ascertain what role the NAA expert panel plays in ensuring that the student voice is heard in a meaningful way in the internal quality assurance process. At a minimum, the expert panel assesses compliance with the relevant FSES but does not explore the role the student plays in shaping the educational process beyond checking for the provision of student surveys. There is also an included provision within the state accreditation procedure for individual curriculums for students with disabilities including appropriate support through E-learning. This is also in accordance with *The Federal Law of 29.12.2012 No 273-FL "On Education in the Russian Federation"*, which ensures no discrimination in education is acceptable.

1.4 Student admission, progression, recognition and certification

According to the review expert panels, student data relating to admission, progression, recognition and certification is assessed. All of these documents regulating the students' cycle are published on HEIs' official websites in accordance with the state normative documentation "*On approval of requirements for the structure of the official website of an educational organisation in the. Information and telecommunication network and the form of information presentation there*". To ensure that sufficient resources for these transitions in the student cycle are assured, FSES standards regarding the electronic information education environment are assessed. These reflections are not consistently assessed as part of the NAA expert reports.

1.5 Teaching staff

In the context of evaluation of teaching staff, the state accreditation of study programmes ensures that the expert panel checks compliance with the associated FSES requirements which mandate for minimum requirements of teaching staff credentials, including: stipulations for relevant educational background in delivering module content, a minimum statistical requirement for engagement in research, educational, methodological and (or) practical training corresponding the discipline profile.

In relation to aspects relating to human resource allocation to higher education, a minimum requirement is stipulated within the FSES. As part of the accreditation process, experts analyse a multitude of documents relating to teaching staff, including employment contracts, staff individual working plans, staff publications and staffing charts. Little focus is given to the assessment of professional development programme mandates within higher education institutions.

1.6 Learning resources and student support

NAA reviews learning resources and student support in the context of the relevant FSES requirements, particularly in compliance with those on '*Electronic information and educational environment*' which have been previously discussed as well. This includes assessment of HEIs' compliance with provision of access to curricula, digital educational publications and electronic educational resources specified in working programmes of disciplines. The requirements also make stipulations regarding a functional E-learning environment through assessment of appropriate software and educational qualifications of those HEIs that organise online learning provision. Minimum requirements for resourcing are assured in the '*requirements for material-technical and educational-methodological support*' and experts, as part of the review process, assess questionnaire findings from students and academic staff.

1.7 Information management

The FSES does not include criteria which would allow the panel to assess how institutions collect, analyse, and use relevant information for the effective management of their programmes (KPIs, student progression, success and drop-out rates, career paths of graduates). Nonetheless, the panel was assured that experts review evidence from HEIs stakeholders' questionnaires in assessing the criteria of "*internal system of quality assurance for educational process and students training*" and "*provision of regulation internal evaluation of the quality of educational process and students training*", which allows experts to assure the function of the system of internal quality assurance. Additionally, within '*Electronic information and educational environment*', HEIs are to form students' electronic portfolios and use this information during the internal QA of study programmes. All HEIs are to conduct self-evaluations annually, as determined by the Ministry of Education, and publish these on their websites. This information includes indicators of student numbers, research, financial activities, and infrastructure.

1.8 Public information

There exists a separate order of the Ministry regarding the publication of information online. All Russian HEIs are required to publish information on official websites in accordance with the order "*On approval of requirements to the structure of the official website of an educational organisation in the information and telecommunications network and the form of information presentation there*". As part of this, they are required to publish student admission rules, documents regulating students' training process, frequency and procedure of ongoing monitoring and midterm assessments of students, procedures and grounds for students' transferring, expelling and resuming studies; as well as documents on cost and payment for the procedure of training. The panel thus learned that public information is not a criterion for assessment and is not evaluated by NAA expert panels during the external quality assurance processes.

1.9 On-going monitoring and periodic review of programmes

Fulfilment of this standards correlates to that of the requirements of FSES in assurance that the quality of student education activities and training are determined within internal systems of quality assessment. In processes of improving programmes, the standards assure for the involvement of employers and (or) their associations as well as academic staff in enhancing educational quality and making it beneficial to the labour market needs. The panel acknowledges that this compliance procedure exists, but notes on inspection of expert panel conclusions it is often not enacted. There is

little emphasis placed on student feedback in driving review outcomes, and students as consistent stakeholders in the external reviews of HEIs is not present.

1.10 Cyclical external quality assurance

Russian law requires that programmes leading to an official university degree will be subjected to an external evaluation process on a cyclical basis which involves a validity period of state accreditation lasting 6 years.

Summary

The panel has the opinion that NAA is conducting the compliance of the FSES within IQA as the primary focus of their external quality assurance reviews. Within that, they are assuring through the letter of the law that HEIs have developed IQA systems which reflect a majority of the ESG Part I standards. Based on the meetings with stakeholders, it is evident to the panel that the role of the student in the stakeholder process requires significant development should there be compliance with student-centred approaches to learning, teaching and assessment.

Panel recommendations

The panel recommends the agency to integrate the concept of student-centred learning in a more systematic approach, including consideration of this part in future endeavours to revise the FSES, or in addition to compliancy structures (ESG 1.3).

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.

2014 review recommendation: none

Evidence

External quality assurance in Russian HE is defined in the *Regulations on state accreditation, Federal Law on Education* and in the *Procedures of conducting accreditation external reviews*. The aim of state accreditation is to examine the compliance of the content and quality of educational activities of educational organisations with the requirements of Federal State Educational Standards (FSES). The content of FSES is determined by the Federal Law on Education. Currently there are 500 FSES adopted in different fields and specialties. Each of FSES contains general and specific requirements for an individual study programme or several study programmes of the same specialties and represent criteria for the state accreditation external review. The external expert panel assesses, in the process of state accreditation, compliance with the criteria as defined in the FSES and prepares a conclusion for all study programmes within one group of specialties, whether these programmes meet the requirements. The final expert panel conclusion is a result of several individual reports prepared by each member of the expert panel on one study programme. When conducting state accreditation, the expert panel

considers also information about the independent evaluation of the quality of students' training, if received timely by the Accreditation body.

According to the Decree of the Government of the Russian Federation of 18.11.2013 N 1039 on State Accreditation of Educational Activities (amended on 12.12.2019, N1648) the state accreditation shall be carried out for study programmes delivered by an educational organisation in accordance with FSES, as well as to check whether the study programmes are delivered in compliance with the educational standards adopted by federal state non-profit educational institutions of higher professional education, i.e. "Moscow M.V. Lomonosov State University" and "Saint-Petersburg State University". The same approach is used for higher education organisations of the specially established category of "federal university" or "national research university", as well as the federal state higher educational institutions from the list of educational organisations approved by the decree of the President of the Russian Federation. There are also a few exceptions when private organisations are carrying out their educational activities in the territory of Skolkovo Innovation Centre. In such cases the HEIs carry out their educational activities without state accreditation.

With the latest legislative changes and a new version of FSES HE (entitled '3++') there is a new requirement for HEIs to have developed and implemented an IQA system in which also students must be involved. Not all FSES are currently amended or supplemented in this way.

NAA is responsible for developing and adapting the methodology for conducting the accreditation external reviews. To this end, NAA cooperates with experts, expert organisations and educational methodological associations. The latest changes to the methodology have been implemented in 2019 because of the updated FSES HE (3++), changes to the Federal Law on Education, as well as due to the increase in the number of accreditation procedures and the development of the independent assessment of education quality (quality of students' training and study programme implementation).

The panel additionally notes the progress made on the development of the information system and submission of applications through the electronic forms, as well as the progress that has been made to require from HEIs to publish key documents and information needed for the assessment on their websites.

Analysis

The review panel received a very positive response from the stakeholders about the new FSES HE (3++) and thus the changes made in NAA's methodology, as these changes allow for more openness and freedom for an independent assessment of the quality of education in HEIs. The revised FSES also offers HEIs to reply on the identified non-conformance of the content or quality of the students' training within five days from receiving such information from the Chair of the expert panel. External stakeholders confirmed in the interviews with the panel that the state accreditation process is now more open and offers in some cases also recommendations at the end of the site visit. This is not the case for all state accreditation procedures but only those that include also professional public accreditation's results from another evaluation. The review panel notes that although these are individual cases, they do represent a step in the right direction to formalize and implement an adequate procedure related to continuous improvement.

The review panel recognises some elements of the follow-up to the programme accreditation related mainly to the functionality and operation of the agency's information system (real-time monitoring of the adequacy of available information on the institutions' websites). At the same time, Rosobrnadzor, as a control body, can respond to potential complaints regarding non-compliance with the regulations in force during the external evaluation process. However, this is not a systemic follow-up according to the ESG, but only acting in case of detected non-conformities.

To help monitor the progress at the HEIs and to establish a proper follow-up procedure, the panel believes the agency may seize the already existing and well-established information system, as this would need only a minor development upgrade for this purpose. The review panel would like to emphasise that it is of outmost importance that the information system should be user friendly, reliable, and accessible to different types of HEIs and at the same time it should not cause any additional bureaucratic burden to stakeholders. In establishing and formalising such a follow-up system, NAA should pay attention to the feedback mechanisms in order to assure two-way communication with applicants, experts, expert organisations, students and others. The information system could thus serve as a facilitator for the information exchange between the agency and their internal and external stakeholders.

The panel learned that the agency's information system is well established and allows all applicants to submit their applications online. At the same time, the review panel notes that the agency still accepts applications in a physical manner, i.e. in hard copy, which represents double work for HEIs and prevents the agency from switching exclusively to the electronic application system. The large number of applications and the number of the required attachments also hinder the agency in streamlining its operations, as it must provide the appropriate digital as well as physical archiving of all applications. Since the electronic application system has proven to be effective and reliable, the review panel recommends the agency to switch exclusively to digital submission and processing of applications in the future.

Panel commendations

The agency strives to provide all necessary assistance and support to experts, expert organisations, HEIs as well as to the Accreditation Commission of the Federal Service for Supervision in Education and Science (Rosobrnadzor). The review panel commends NAA for its efforts and visible progress made in the last two years, which has contributed to the simplified procedures and better information management that is of benefit to all stakeholders.

The level of satisfaction with the agency's services and support is at a very high level among all stakeholders, which has been repeatedly confirmed in the interviews during the online site visit.

Panel recommendations

The panel recommends that NAA's digital support to all users should become one of the key aspects of their methodology design, in order to improve efficiency and decrease the workload for the applicants; the submitting and processing of applications in a solely digital manner should be also considered.

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

2017 partial review recommendation (ENQA criterion 6 / ESG-2005 3.7: External quality assurance criteria and processes used by the agencies): *“The panel recommends NAA to create a basis for a follow-up in the form of genuine feedback to HEIs in the reports and subsequent contact with the institutions about their progress.”*

Evidence

As already elaborated under ESG 2.2, the steps in the state accreditation procedure follow national (Federal Law on Education, Regulations on state accreditation, FSES, and other normative and legal requirements) and international (ESG) regulations. First of all, the data for implementation of the study programmes (for example, analysis of activity indicators in the reporting year, including indicators of the number of students, research activities, international activities, financial and economic activities, and infrastructure) that are declared for the state accreditation are considered by NAA as a self-assessment report. In addition to that, the HEIs are obliged to publish on their websites all other relevant data on their study programmes. Importantly, all HEIs must carry out the self-evaluation according to the indicators established by the Ministry of Education and Science. The self-evaluation report must be published on the HEI’s website by 20 April every year, so the agency and experts could have access to the respective document.

An accreditation is then conducted with or without the site visit. In an initial accreditation procedure at programme level (for accreditation of new programmes) in the state accredited HEIs¹ and study programmes at HEIs located outside the Russian Federation, the site visit is usually not compulsory.

The outcome of the accreditation process is a conclusion of the expert panel that follows the individual expert reports’ findings and includes a final decision of the Chair of the expert panel. The experts use also retesting methods for students and teaching staff (in a form of questionnaires) to assess their knowledge and skills.

In case of conducting the accreditation of study programmes without the site visit, each expert assesses and analyses the documents that were submitted by the HEI, as well as checks the HEI’s official website, results of student assessment and other documents.

NAA does not publish expert reports. The content of an individual report (i.e. every involved expert in the panel produces his or her report) is finalised into the final report by the expert panel Chair and serves as the ground for decision making in the state accreditation procedure, as performed by the Accreditation body. The decision of the state accreditation can be either granting or refusing the accreditation. In case of a positive decision, the HEI gets a certificate of state accreditation. Conclusions on state accreditations are published on the official website of Rosobrnadzor.

Furthermore, the register of accredited HEIs is published on the website of the Accreditation body.

There is no formal mechanism of the follow-up of NAA’s external reviews.

Analysis

The review panel analysed the evidence and would like to point out that the NAA’s approach to preparing the accreditation reports increases the risk of errors and subjective decisions. The panel thus believes that the assessment should be carried out by a group of experts and not just one expert per evaluated programme. Although the panel is aware that the agency’s workload is high and

¹ NAA does not perform accreditation of HEIs, its procedures refer solely to study programmes.

numerous procedures need to be conducted annually, it considers important that the agency examines the possibility of changing its accreditation methodology to assure as objective and efficient assessment as much as possible to all HEIs. For example, the assessment of several study programmes could be divided among several experts and not just one. The proposed changes would ensure greater objectivity of the assessment as well as reduce the potential for errors or poor-quality decisions.

The panel additionally learned the conclusion of the NAA expert panel is not followed by a set of recommendations, but only a final decision on compliance against the minimum standards of the FSES is delivered to the HEI. Nevertheless, the review panel found that in some procedures the NAA expert panel gave oral recommendations at the end of the visit, but in an informal manner, as these recommendations were not stated in the final decision. All in all, for NAA's programme accreditations the recommendations are not an integral part of the procedure or the decision-making.

On the other hand, the agency, within its competences, monitors the fulfilment of individual standards through automated checks of the websites and with the help of NAA's information system. According to the Federal Law on Education, HEIs have to publish all required documents for their activities (including those for state accreditation procedures) on their websites and update them accordingly. The panel learned from the SAR that the agency carefully monitors these websites, but the review panel could not determine whether the agency checks only the publications (e.g. the self-evaluation reports) or also the quality of the content and the progress made.

The review panel notes that it is essential to systematically collect the examples of good practice that are currently recorded through the public professional accreditations, where the experts give HEIs (rather informal) recommendations at the end of the site visit. The panel believes it is of utmost importance that the recommendations become a mandatory part of the expert assessments and conclusions (and not provided in an informal manner). The recommendations should be clearly stated as a part of the decisions/orders on state accreditation in order to be successfully followed upon by HEIs. By doing so, NAA and Rosobrnadzor will be able to monitor and assess the progress and not only assess the compliance with minimum requirements as regulated with FSES. The proposed approach will thus allow HEIs to grow and plan accordingly their development and progress.

Last but not least, the panel believes that the greater involvement of foreign experts and students would further add to the value of assessments, enable comparability and benchmarking with other educational environments, and enable the transfer of good and transferable practices from abroad.

Panel recommendations

The panel recommends the agency to urgently amend the FSES in a way that recommendations are provided in the conclusions of the accreditation expert panels. Although this does not fall directly under the agency's remit, the very absence of an appropriate follow-up mechanism (in the form of written recommendations) to help HEIs improve and not just monitor their compliance with the FSES is a necessary condition for compliance of NAA with the ESG 2.3.

The agency is responsible for training and selection of experts and for preparation of the accreditation methodology, therefore the panel recommends the agency to redesign this methodology (in cooperation with the external stakeholders) in such a way that it would eliminate the possibility of subjective decision-making by only one expert.

Panel suggestions for further improvement

In contrast to Rosobrnadzor carrying out "only" inspection tasks, the agency might consider developing mechanisms and tools for monitoring the progress and improvements of HEIs through the provision

of recommendations. The review panel is aware that the purview and the powers of the agency in this regard are very limited and that the state accreditation procedures need to be reformed first. However, if the EQA of the Russian HE desires to fully comply with the ESGs and follow the developments in the European and international HE Area, and thus increase its competitiveness, visibility and quality, it will might consider to embrace and implement these changes.

Panel conclusion: substantially compliant

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).

2017 partial review recommendations (ENQA criterion I /sub-criterion ESG-2005 2.4: Processes fit for purpose):

“The panel recommends NAA to continue its effort to recruit and train international experts in order to allow for an international perspective on the quality of Russian higher education.

The panel recommends NAA to define a specific role for students as full members of expert panels, for instance with tasks regarding the general quality of the learning environment, students’ involvement in internal quality assurance procedures at the institution, and students’ satisfaction across the individual programmes. This is especially important with a view to the explicit requirement of the ESG-2015 that external quality assurance should be carried out by groups of external experts that include (a) student member(s).”

Evidence

The accreditation external reviews are carried out by a group of external experts known as ‘expert panels’. The requirements of the Ministry of Education and Science ‘*qualification requirements for experts, requirements for expert organisations involved in accreditation external review*’ determine the necessary composition of the panels in terms of educational requirement, work experience and profile. Currently, 1754 experts exist on the published register. Such experts involve representation from seven accredited expert organisations including the *Medical League of Russia*, and the *Expert Centre of the Russian Law Association for quality and qualifications assessment in the field of law* as examples. Each expert undergoes a rigorous protocol of assessment to ensure a baseline level of competency. The final legal approval of an expert review panel is completed by Rosobrnadzor on the basis of a draft executive order on the composition of the expert panel for external review. The draft composition of the panel is prepared by NAA. Should experts give consent to participate, a non-conflict of interest document is sent to both the expert in question and the higher education institution to assure proper, objective, and independent conduct of the accreditation review.

Panels consist of a minimum of two members, as determined by the “*The Procedure for Selecting Experts and Expert Organisations for Carrying Out External Review*”. Each evaluation consists of a number of study programmes under review and the number of these programmes determines the final panel size (i.e. more members are part of a panel if more study programmes of a HEI are under review). In practice, a single panel member is then assigned to an educational programme. They, alone, may determine compliance with FSES without input from other panel members. To be the Chair of the panel, a minimum of two years’ participation in accreditation reviews is required, or the experience in leading expert panels during previous accreditation reviews.

A series of training seminars are provided for experts, of which 1168 experts completed their training in 2019. Moreover, a series of skype meetings are held with the accredited experts before each expert review, where necessary information is provided about the current accreditation process. Experts also have the opportunity to ask any questions about the practical arrangements for the review.

Limitations of student involvement in external quality assurance are associated with the qualification requirement of “work experience in the field of education of at least 5 years” as stipulated in the document “*Qualification Requirements for Experts, Requirements for Expert Organisations Involved in Accreditation External Review*”. These requirements preclude the involvement of bachelor students in engaging in the accreditation process. Nevertheless, the panel commends the efforts to increase student participation as their involvement has increased over the years, also due to the Erasmus+ Jean Monnet project and engagement of the expert organisation Russian Union of Youth (RUY). However, in some instances, the panel learned that some of the experts that are already part of the expert pool are assigned the student status, since these people are actually studying (next to their other professional obligations). These students receive equal payment to other experts. In contrary, when student representatives come from the RUY, they do not have the equal status to other ‘students’ and are not paid for their engagement in the review panels. The cooperation with RUY is set by the experiment “*forms of public assistance of students in the procedures of state accreditation of educational activities*”, where students are not treated as equal experts in the review panels. As already stated, these students do not receive payment for their engagement despite support from the Russian Federation as stipulated in the document No. 09-1256 “*On Involvement of Students*” dated 20 June 2017.

NAA currently involves nine international experts in the expert pool, and aims to increase this cohort in the coming years, especially with the experts from ex-Soviet Union countries. The limitation in increasing international representation relates to legislation No. 556 of 20.05.2014 “*On Approval of Qualification Requirements for Experts and Expert Organisations Involved in Accreditation External Review*”, which states that experts need to have competency in the Russian language, as well as have extensive understanding of Russian legislation, and a minimum of five years of working experience in the field of education.

Analysis

A consistent involvement of students in the NAA’s review panels is limited. One of the main barriers to engaging students in the external quality assurance activities of NAA is the legal requirement for five years of educational experience. The changes of the governmental decree “*On state accreditation of educational activities*” in 2019 awarded a right to establish qualification requirements for experts by Rosobrnadzor. During the site visit NAA confirmed that the work in this regard is currently in progress, and given its timely opportunity, changing requirements in favour of students is believed to be important. In the ongoing programme accreditations as conducted by NAA and Rosobrnadzor, efforts should be made to ensure a consistent engagement of students within the expert panels, and equal stakeholdership. Similarly, the training opportunities offered by the RUY for student panellists should be consolidated with that of NAA’s efforts to both increase the emphasis on student-centred approaches to teaching and learning, as well as to solidify the role of students as equal stakeholders in a systematic and consistent manner. This is consistent with previous recommendations made by ENQA and must be rectified in order to ensure greater compliance with ESG 2.4. The increased focus on revision of FSES to be less prescriptive in the future may facilitate this, in conjunction with further collaboration with student stakeholder groups to grasp a comprehensive understanding of how students can act as full panel members in a consistent manner.

Recognising the NAA’s wish to increase its number of international experts (and as recommended by the ENQA partial review in 2017), the panel believes this should be the focus of the agency’s future

strategic directive as it may encourage broader views of quality assurance approaches from an international perspective.

Panel commendations

The panel commends the agency for its efforts to create a student expert pool and for an emphasis placed on wanting to manage legislative barriers and thus improve student representation on expert panels.

Panel recommendations

The panel recommends the agency to review and increase accessibility of student cohorts into expert panels through collaboration with RUY and the Ministry of Higher Education.

The panel recommends the agency to consider paying for all student experts and to make them equal stakeholders in a consistent manner.

The panel recommends the agency to share and collaborate on training student experts between the agency and RUY, with special consideration given to student-centred learning.

The panel recommends that the agency focus their efforts to increase internal experts to ensure greater diversity in expertise in the external quality assurance process of HEIs.

The panel recommends working with international agencies to explore means in improving best practices in peer-review group composition and procedures.

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.

2014 Panel recommendations: *“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”.*

Evidence

Government decree (approved in 2013 and amended in 2019) explicitly foresees that state accreditation shall be carried out in accordance with the federal state educational standards (FSES) and its criteria. Every FSES is approved by the order of the Ministry of Education and Science of the Russian Federation. All FSESs are published on the Ministry’s official website, in the legal information reference systems and websites of higher education institutions. Alternatively, the state accreditations can also be carried out in accordance with the educational standards adopted by higher education institutions (see the specific case of Moscow M.V. Lomonosov State University and Saint-Petersburg State University, or of HEIs of the specially established category of a "federal university" or a "national research university").

Every FSES represents a set of obligatory requirements for the implementation of the main professional educational programmes of higher education. The requirements are set for the structure

and volume of the programme, learning outcomes, conditions for implementation (requirements for learning resources and infrastructure, staff, financing conditions, internal quality assurance processes).

During the external evaluation, every requirement of FSES is assessed by deciding whether HEI's documents and students' training comply with the requirements or not. Every expert panel is given detailed workbooks where each particular FSES is presented in a form of a table, so the experts could clearly identify each requirement. According to the Governmental decree "On state accreditation of educational activities", in case of the non-compliance of the study programme with FSES requirements, experts must specify the part of the relevant FSES where the non-compliance has been identified. Additionally, experts need to provide a detailed description of the identified non-compliance. The experts attach copies of the physical documents that prove the non-compliance or provide documents and materials that are posted on the official website of the HEI in question. For the latter, the documents need to be certified by the e-signature of the HEI's head.

According to the "Methodological Recommendations for Conducting Accreditation External Review" the experts should base their judgements on different kinds of evidence:

- the application for accreditation, including the attached annexes;
- additional documents and materials received upon the written request of the expert panel;
- information on the results of an independent evaluation of the quality of the students' training;
- information on the results of professional and public accreditation;
- analysis of the information gathered from the official website of the HEI;
- information and analytical materials of the Ministry of Education and Science of the Russian Federation (e.g. results of the monitoring of the HEIs' efficiency, monitoring of the graduates' employment);
- interviews (surveys) of students and teaching staff during the site visit.

The final decision on accreditation cannot be positive if at least one of FSES requirements is not met.

Based on the conclusions of the expert panel, Rosobrnadzor (the Accreditation body) makes a decision on granting the state accreditation (for 6 years) or denying it.

The consistency of the accreditation review reports is ensured by:

- the preliminary analysis of compliance of the study programme with the FSES requirements using the information on the HEI's website;
- the specially developed evaluation forms (Expert's workbook);
- regularly organising the expert trainings, information seminars;
- providing expert consultations (Skype meetings, e-mail, telephone) before and during the external review process;
- and by screening the draft expert reports by the agency's staff.

Analysis

NAA uses criteria that are determined by regulatory documents - FSESs, which are approved by the Ministry of Education and Science of the Russian Federation. All FSESs are published on the Ministry's website. However, the panel notes that there is no reference of FSES on the NAA's website. The outcomes of the external evaluation activities conducted by NAA are based on a careful check of compliance on all FSESs requirements, which is in most cases a quantitative exercise. The panel learned that each expert panel is provided with the expert's workbook, where they can register the values for each requirement while preparing the report. During the discussions at the site visit, the NAA's experts stated this methodological support to be very helpful.

The review panel concludes that there was some progress in the direction as highlighted by the ENQA panel in the 2014 review: “The state accreditation requirements to the institutions should be more ambitious and qualitative”. Since 2017 new FSESs include a separate requirement for HEIs to have the formalised internal quality assurance processes in place that involve employers or their associations, other legal entities and individuals, including academic staff. The panel additionally learned that the internal quality assurance should be focused on improving the study programmes while conducting regular internal surveys of students by HEIs. Currently, the external evaluation procedure of NAA does not require more than checking the availability of documents for the internal quality assurance on the HEI’s website. The experts are not asked to comment on the content of these documents or the related procedures. Another change that was implemented since 2019 relates to the evaluation of the quality of students’ training, where the expert panel of NAA analyses the results of professional and public accreditations and also takes into account the results of an independent evaluation of the quality of students’ training.

The review panel learned that the consistency of the reports is secured through the usage of several tools, such as the approved template for reporting and other methodological tools for experts. The panel also learned about the various activities that are organised by NAA for the experts. During the interviews, the NAA’s experts confirmed this and highlighted the importance of updating their knowledge and skills.

NAA also organises events to introduce HEIs to the evaluation process, such as holding the individual meetings with the HEI representatives or having general seminars for all HEIs. It was clear to the panel that HEIs are aware of the criteria used for the programme evaluation as this was confirmed during the site visit.

Panel suggestions for further improvement

The panel suggests the agency to provide links to the FSESs on its website.

Panel conclusion: fully 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.

2017 partial review recommendation: “The panel recommends NAA to develop the report template so that the experts’ analyses and arguments behind the assessments as well as recommendations for enhancements are presented in the reports and published. This would greatly ameliorate the transparency, the possibility to check consistency as well as the value of the state accreditation process for the HEIs in terms of enhancement orientation.”

Evidence

Experts produce a report of their findings following each external evaluation of a study programme. The forms for the expert reports and the final conclusion on the results of the accreditation reviews are approved by the order of the Ministry of Education and Science. Every report uses a standard template comprising of: date and number of the order of Rosobrnadzor on carrying out the accreditation procedure; name of the HEI; availability of documents and materials submitted by HEI

to NAA or available online for state accreditation; findings and judgements on whether each of the FSES requirements are met, comments in case of non-compliance; conclusion on compliance or non-compliance. The experts fill in the reports for the specific programmes they are assigned to by the Chair of the expert panel. After finalising and signing the report, the report is submitted to the Chair, who accordingly prepares a conclusion based on the individual reports. The Chair submits his or her conclusions and the expert's individual reports to the agency. Only the conclusion is used as the basis for accreditation decision by the Accreditation body.

In cases when a HEI does not provide all the necessary documents and materials as listed in the Governmental decree on state accreditation, the experts fill in and attach to the report a statement on non-submission of documents that would be needed for the external review.

If an expert has identified any non-compliance of the study programme with the FSES requirements, a reference to a respective section of the FSES has to be provided. Moreover, all the reports contain copies of documents as certified by the HEI in a form of the report annexes.

If the programme is found to be incompliant with any requirement of FSES, the HEI can make, within five days' period, changes in the documents or activities in order to eliminate the non-compliance. The HEI then submits documents to the panel proving the elimination of issues that led to non-compliance.

All expert's conclusions as well as orders on accreditation as made by Accreditation body are published on the website of Rosobrnadzor. The panel further learned through the additional documents that negative conclusions and decisions are published as well on the website of Rosobrnadzor.

Analysis

Based on the above presented evidence, the panel concludes that the recommendations to NAA from the previous review in 2017 were not considered. Experts do understand that substantive changes of the reporting would require a review of the entire system of external quality assurance in the country and consequently the respective actions by official bodies - the Ministry and Rosobrnadzor. However, by taking into account that with the adoption of the new Federal Law on Education in 2012 higher education in Russia has taken steps towards more elaborate implementation of Bologna tools, the movement towards a more enhancement-focused external quality assurance process is acknowledged by the panel.

Currently, all information that consists in the expert's reports is included into the conclusion by the Chair of the expert panel. Usually, one expert is assigned to evaluate one or several programmes of a particular study field. During the site visit, the ENQA panel was assured that the final decision is being discussed by the whole panel of experts and that all information from the experts' reports is moved to the conclusion.

The report contains only of statements of compliance or non-compliance of the programme with the requirements of FSES. No recommendations for development of the reviewed programme are provided by the panel. During the meetings with the representatives of HEIs and experts, the panel has learned that in fact during the visit the experts do discuss the quality of the programme with the representatives of HEIs and give oral recommendations. These discussions and insights from the panel are highly valued by HEI's staff and are used for the further development of study programme and its study process, which shows that there is a need for NAA to be proactive in suggesting a revision of the state accreditation procedure and introducing the enhancement elements in the reports and conclusions of the experts. Introduction of recommendations in the evaluation reports would be in line with the main goal of state accreditations as listed in the self-evaluation report: *"The main goal of state accreditation is to ensure the quality of educational activities and improve the activities of market participants that helps to increase trust between all stakeholders."*

After changing the form of state accreditation from institutional review to programme accreditation, the initial task of NAA was to secure that state recognised diplomas would be issued only after graduation of students enrolled into the programmes that fully meet the state requirements. But since the system of higher education has been evolving, the overall approach to reporting must evolve as well. Current template for reporting does not make it possible for the experts to present their evidence, arguments and findings as well as the recommendations for improvements in the most efficient and effective manner. The statements in the reports are not supported with analyses. Only in case of non-compliance the experts give explanations on which aspects of a study programme do not comply with the FSES requirements. The panel also believes that the reports are not that easy to understand and the potential students may not be able to form an overall impression about the quality of the programme based solely on its compliance with the standard's requirements. There is also no preliminary explanation about the purpose of the external review, its format and the criteria used in decision making. All this prevents an outside reader from understanding the process of state accreditation in a complete manner, neither of its outcomes.

The draft report is sent to the HEIs only if the non-compliance is identified. In this case the HEI has a right to make changes in the documentation or the institutional processes within a set period. This part of the process is not considered by HEIs or experts as a correction of factual errors, but a possibility to adjust the documentation or processes. Taking into account the formative nature of the reports, the interviewed experts believe that there is little room for factual errors. But even in such cases, the panel believes all HEIs should have a right to receive draft reports for correction of factual error.

After the end of the accreditation process, the conclusions and decisions are published on the website of the Accreditation body - Rosobrnadzor. ENQA panel is of the opinion that the most significant outcome of the evaluation process of NAA are the experts' reports with the conclusions. Thus, each report should be published on (or linked to) the webpage of NAA. Before the visit the ENQA experts found it difficult to locate the conclusions on the webpage of Rosobrnadzor as these are published together with the other administrative acts. It is not possible to find the conclusion of a separate study programme as one accreditation conclusion may contain reports of a large number of study programmes of one institution. Another important point - conclusions are only signed by the Chair of the panel and no names of the experts are provided. In order to bring more transparency to the programme accreditation, the panel recommends the agency to consider including expert names into the conclusions published online.

Panel recommendations

The review panel recommends NAA to be proactive in initiating changes to the template of the expert's reports in order to include an adequate evidence basis, analysis and findings as well as recommendations for improvement. This would facilitate development of the follow-up process and provide an additional value for HEIs.

The review panel recommends the agency to send all draft reports to HEIs for correction of factual errors.

The review panel recommends NAA to assure that outcomes of state accreditation can be accessed from their webpage in a user friendly manner. The decisions and the reports could be supported with a simple search engine.

Panel suggestions for further improvement

The panel suggests the agency to make the outcomes of an accreditation review more transparent by including expert names into the conclusions.

Panel conclusion: substantially 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.

2017 partial review recommendation: *“The panel recommends NAA and Rosobrnadzor to make the complaints procedure more transparent, for instance with explicit and predefined criteria for assessing a complaint. The panel also recommends that the possibility to complain against the conclusion of the panel be described on NAA’s website.”*

Evidence

NAA states in their SAR (p. 61) that HEIs can express their opinion on the process or persons involved in the accreditation procedure. Opinion could be expressed through mail, e-mail, or by consulting the section "Anti-Corruption" on the NAA’s webpage. Information about this opinion is analysed by the Accreditation Commission of Rosobrnadzor.

The final decision on accreditation is taken by the Accreditation body - Rosobrnadzor and the possibility of appeal lies within this same Accreditation body. The order of the Ministry of Education and Science *"On the approval of the Administrative regulations for the provision of the Federal service for supervision in the field of education and science public services for state accreditation of educational activities"* sets a procedure of a prejudicial appeal by the applicant on the decisions and actions (or inactions) of Rosobrnadzor, official persons of Rosobrnadzor or federal state civil servants of Rosobrnadzor.

In the last three years NAA received no complaints or appeals.

Analysis

ESG clearly distinguishes two processes: the complaints about the conduct of the external quality assurance process or those carrying it out; and the appeals procedure, when the institution questions the formal outcomes of this process.

Already in 2017, the external review against the ESG urged NAA to make the complaints procedure more transparent and clearer. So far, the procedure of complaints is not well developed in the opinion of the panel. Possibilities of filing complaints are not known to HEIs and are not described in the *Methodological recommendations for conducting accreditation external review* nor published on the NAA’s webpage. There are no predefined criteria and procedures for examination of the received complaint. During the meetings with representatives of HEIs, the panel learned that the only way HEIs believe they can complain is through calling a responsible staff of the agency by phone.

During the visit, the review panel also learned about the introduction of a change in the accreditation procedure, as introduced in 2019. Following this change, there was a nomination (by the order of Rosobrnadzor) of a staff member of the Accreditation body that has a right to monitor the expert panel’s activity and their overall conclusion based on the external review results. During the interviews the panel learned that this is a process of supervision as carried out by the Accreditation body. Its intention is to prevent conflicts between HEI and expert panel. Therefore, following this change in the accreditation methodology, HEIs can complain directly to the staff member of Rosobrnadzor about the activities of the expert panel. New amendment raises a question about the independence of NAA

in carrying out the evaluation procedures, as interpreted by the review panel, and this is further discussed under ESG 3.3. According to the panel, the change indicates as well the absence of a proper complaints mechanism at NAA.

As regard to the appeals, there is a formal mechanism in place of filing an appeal to Rosobrnadzor. The procedure is run according to the predefined steps. The order of the Ministry on administrative regulations, including on appeals, is published on the Rosobrnadzor's website and the one of NAA. Nevertheless, the panel learned that it is difficult to find information about the appeals procedure on either of the websites. Thus, the panel recommends NAA to provide a clear information on their website on how an appeal against the decision on accreditation could be lodged, and how it is being considered by the agency.

Panel recommendations

The panel recommends NAA to establish a clear and transparent complaints procedure and publish it on the website of the agency.

The panel recommends NAA to provide information about possibilities to lodge an appeal and the order of its review to all involved parties of state accreditation.

Panel suggestions for further improvement

NAA might discuss together with Rosobrnadzor a need for establishing a separate committee for considering appeals against the accreditation decisions. This would ensure full transparency in processing the appeals. Such a committee should involve representatives of all stakeholders.

Panel conclusion: substantially compliant

ADDITIONAL OBSERVATIONS

In addition to the conclusions reached about NAA's compliance with the ESG, as outlined above, the review panel wishes to share some additional observations about NAA.

TRUST IN THE INTERNAL QUALITY ASSURANCE SYSTEMS OF HEIS

State accreditation system in Russian Federation is designed to guarantee that study programmes meet the minimum requirements as set in Federal state educational standards. The core of the process is checking if HEIs have all required documents to prove to be in compliance with the set standards and check the quality of the students' training with the FSES requirements. The quality of the training is checked during the site visit by the experts or by taking into account the results of an independent assessment of the quality of student's training. For this, experts take the existing assignments or tests as developed by and used at a HEI and give these to students during the visit. The results of testing are then compared with the results of the students' assessment that was previously done by their lecturers.

Even if the tests are developed by the HEI itself, the process of re-testing carries the notion of a mistrust in the HEI's study process and signals the inspective nature of the external evaluation process of NAA.

Considering that more and more emphasis at NAA is placed onto the development of the internal quality assurance systems within HEIs, the panel would expect to learn that the final responsibility for the quality of student assessment is left to HEIs themselves. The panel notes that some other agencies in the EHEA use for instance a different set of methods to learn about the quality of assessments, for example, they perform a review of samples of exam tasks and students' tests, or analyse samples of final theses and compare them with the final assessment mark. This stated, the panel does not wish to compare the approaches, but to emphasise that it should be the task of the internal quality assurance system to ensure the transparency and consistency of assessments at the HEI. This is also linked with the basic principle of quality assurance in the EHEA: "Higher education institutions have primary responsibility for the quality of their provisions and its assurance".

CONCLUSION

SUMMARY OF COMMENDATIONS

3.3 Independence

- The panel commends NAA for being very active in developing partnerships, communicating with stakeholders and participating in the development of normative legal acts. Although the final decision of the accreditation procedure lies with the Accreditation body - Rosobrnadzor, the role of NAA within the Russian EQA system is indispensable.

3.6 Internal quality assurance and professional conduct

- The panel commends the agency for its efforts and commitment to providing quality services in state accreditation procedures, which was also confirmed by all interviewees.
- The panel also commends the agency's active participation in the development of draft normative and legal acts in the field of its operation and in the preparation of regulatory initiatives, and its success in communication with outside organizations and entities within NAA's established authority.

2.2 Designing methodologies fit for purpose

- The agency strives to provide all necessary assistance and support to experts, expert organisations, HEIs as well as to the Accreditation Commission of the Federal Service for Supervision in Education and Science (Rosobrnadzor). The review panel commends NAA for its efforts and visible progress made in the last two years, which has contributed to simplified procedures and better information management for all stakeholders.
- The level of satisfaction with the agency's services and support is at a very high level among all stakeholders, which has been repeatedly confirmed in the interviews held by the review panel during the online site visit.

2.4 Peer-review experts

- The panel commends the agency for its efforts to create a student expert pool and for an emphasis placed on wanting to manage legislative barriers and thus improve student representation on expert panels.

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

3.1 Activities, policy and processes for quality assurance

- In the development of future strategic documents, the agency should make the participation of HEIs and students more visible.

- Even within the present legal situation, NAA should look for more systematic ways of holding a dialogue between NAA and the specific stakeholders (HEIs, students, professional organisations), which would be beneficial for the agency's governance and work. The agency is additionally encouraged to involve the international experts more actively in its activities, using the international connections.

3.3 Independence

- The agency is recommended to reconsider the adequacy and purpose of establishing an institute of additional control through a member of the Accreditation body being responsible for monitoring the expert panel's activity and for reviewing the experts' conclusions, as this interferes with and threatens the independence of the agency.

3.4 Thematic analysis

- The panel recommends the agency to re-evaluate its current understanding of the philosophy of thematic analysis as required by the ESG 3.4. The agency may consider exploring best practices of thematic analysis in the international context and establish a review group to strategize thematic analysis activities. For this the agency could involve stakeholders from the Ministry, HEIs (staff and students) as well as the labour market representatives.
- To agency is recommended to explore the conclusions of expert panels in order to understand trends within the national context of higher education in Russian Federation.
- The panel recommends the agency to regularly publish the reports on thematic analysis in order to ensure their proper dissemination.

2.1 Consideration of internal quality assurance

- The panel recommends the agency to integrate the concept of student-centred learning in a more systematic approach, including consideration of this part in future endeavours to revise the FSES, or in addition to compliancy structures (ESG I.3).

2.2 Designing methodologies fit for purpose

- The panel recommends that NAA's digital support to all users should become one of the key aspects of their methodology design, in order to improve efficiency and decrease the workload for the applicants; the submitting and processing of applications in a solely digital manner should be also considered.

2.3 Implementing processes

- The panel recommends the agency to urgently amend the FSES in a way that recommendations are provided in the conclusions of the accreditation expert panels. Although this does not fall directly under the agency's remit, the very

absence of an appropriate follow-up mechanism (in the form of written recommendations) to help HEIs improve and not just monitor their compliance with the FSES is a necessary condition for compliance of NAA with the ESG 2.3.

- The agency is responsible for training and selection of experts and for preparation of the accreditation methodology, therefore the panel recommends the agency to redesign this methodology (in cooperation with the external stakeholders) in such a way that it would eliminate the possibility of subjective decision-making by only one expert.

2.4 Peer-review experts

- The panel recommends the agency to review and increase accessibility of student cohorts into expert panels through collaboration with RUY and the Ministry of Higher Education.
- The panel recommends the agency to consider paying for all student experts and to make them equal stakeholders in a consistent manner.
- The panel recommends the agency to share and collaborate on training student experts between the agency and RUY, with special consideration given to student-centred learning.
- The panel recommends that the agency focus their efforts to increase internal experts to ensure greater diversity in expertise in the external quality assurance process of HEIs.

2.6 Reporting

- The review panel recommends NAA to be proactive in initiating changes to the template of the expert's reports in order to include an adequate evidence basis, analysis and findings as well as recommendations for improvement. This would facilitate development of the follow-up process and provide an additional value for HEIs.
- The review panel recommends the agency to send all draft reports to HEIs for correction of factual errors.
- The review panel recommends NAA to assure that outcomes of state accreditation can be accessed from their webpage in a user friendly manner. The decisions and the reports could be supported with a simple search engine.

2.7 Complaints and appeals

- The panel recommends NAA to establish a clear and transparent complaints procedure and publish it on the website of the agency.
 - The panel recommends NAA to provide information about possibilities to lodge an appeal and the order of its review to all involved parties of state accreditation.
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In light of the documentary and oral evidence considered by it, the review panel is satisfied that, in the performance of its functions, NAA is in compliance with the ESG.

SUGGESTIONS FOR FURTHER DEVELOPMENT

3.1 Activities, policy and processes for quality assurance

- The panel suggests the agency to involve a mechanism of risk identification into the strategic planning.
- The panel suggests the agency to use the strategic plan as a basis for developing the annual activity plan.
- The panel encourages NAA to continue its international activities and analyse best practices of other QA agencies, for example in students' and other stakeholders' involvement, evaluation of student centred learning, and for performing thematic analyses.

3.3 Independence

- In the light of upcoming legal changes, the panel believes the agency could be more actively involved in policy-making as an equal partner in the Russian HE, and could substantially contribute to the HE development. By doing so, NAA will also become an equal and more relevant interlocutor and one of key carriers of international best practice examples.
- The panel suggests the legislator and Rosobrnadzor to pay special attention to maintaining the independent status of the agency and promoting its autonomy.

3.5 Resources

- The panel suggests the agency to increase the fees for experts (including students) to attract the best professionals in state accreditations.
- The panel suggests the agency to continue conducting the activities that supplement the government budget, primarily for the agency's further development purposes.

3.6 Internal quality assurance and professional conduct

- In order to further develop the agency's IQA system, NAA might consider increasing the involvement of all major stakeholders and partners in its internal QA activities. In that way, the agency could develop constant feedback mechanisms from relevant stakeholders in order to respond efficiently to the needs and expectations of the students, experts, HEIs and society.

2.3 Implementing processes

- In contrast to Rosobrnadzor carrying out "only" inspection tasks, the agency might consider developing mechanisms and tools for monitoring the progress and improvements of HEIs through the provision of recommendations. The review panel
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	<p>is aware that the purview and the powers of the agency in this regard are very limited and that the state accreditation procedures need to be reformed first. However, if the EQA of the Russian HE desires to fully comply with the ESGs and follow the developments in the European and international HE Area, and thus increase its competitiveness, visibility and quality, it will might consider to embrace and implement these changes.</p>
<p>2.5 Criteria for outcomes</p>	<ul style="list-style-type: none"> • The panel suggests the agency to provide links to the FSESs on its website.
<p>2.6 Reporting</p>	<ul style="list-style-type: none"> • The panel suggests the agency to make the outcomes of an accreditation review more transparent by including expert names into the conclusions.
<p>2.7 Complaints and appeals</p>	<ul style="list-style-type: none"> • NAA might discuss together with Rosobrnadzor a need for establishing a separate committee for considering appeals against the accreditation decisions. This would ensure full transparency in processing the appeals. Such a committee should involve representatives of all stakeholders.

ANNEXES

ANNEX I: PROGRAMME OF THE SITE VISIT

OCTOBER 16, 2020		
TIMING	TOPIC	PERSONS FOR INTERVIEW
15 minutes	Checking the stability of internet connection (review coordinator and the agency's contact person)	
15:00 - 17:00 BRUSSELS (CET): 14.00-16.00 DUBLIN: 13.00-15.00 VILNIUS, BUCHAREST: 15:00 - 17:00	Review panel's kick-off meeting and preparations for day 1	
15 minutes	Break (and connection set-up for the coordinator)	
OCTOBER 27, 2020		
TIMING	TOPIC	PERSONS FOR INTERVIEW
15 minutes	Connection set-up	
9:00 - 9:30 BRUSSELS (CET): 7.00-7.30 DUBLIN: 6.00-6.30 VILNIUS, BUCHAREST: 8.00 - 8.30	Review panel's private meeting	
15 minutes	Connection set-up	
9:45 - 10:30 BRUSSELS (CET): 7.45-8.30 DUBLIN: 6.45-7.30 VILNIUS, BUCHAREST: 8.45 - 9.30	Meeting with the Director of NAA	NAA Moscow office: Lemka Izmaylova
15 minutes	Connection set-up	
10:45 - 11:30 BRUSSELS (CET): 8.45-9.30 DUBLIN: 7.45-8.30 VILNIUS, BUCHAREST: 9.45 - 10.30	Meeting with the team responsible for preparation of the self-assessment report	NAA Moscow office: Murad Shishkhanov Tatiana Bibik Denis Shabanov Yoshkar-Ola office: Olga Nefedova Flyura Garifullina
11:30 - 12:00 BRUSSELS (CET): 9.30-10.00 DUBLIN: 8.30-9.00 VILNIUS, BUCHAREST: 10.30 -11.00	Review panel's private discussion (and connection set-up for the coordinator)	
12:00 - 12:45 BRUSSELS (CET): 10.00-10.45 DUBLIN: 9.00-9.45 VILNIUS: 11.00 -11.45	Meeting with Directorate members of NAA: deputy directors and chief accountant	NAA Moscow office: Elena Efimova, Raev Konstantin, Davydova Larisa, Yoshkar-Ola office: Petropavlovsky Mikhail
12:45 - 13:15 BRUSSELS (CET): 10.45-11.15 DUBLIN: 9.45-10.15	Review panel's private discussion (and connection set-up for the coordinator)	

VILNIUS, BUCHAREST: 11.45 -12.15		
13:15-14:15 BRUSSELS (CET): 11.15- 12.15 DUBLIN: 10.15-11.15 VILNIUS, BUCHAREST: 12.15 -13.15	Lunch	
14:15 - 15:15 BRUSSELS (CET): 12.15- 13.15 DUBLIN: 11.15-12.15 VILNIUS, BUCHAREST: 13.15 -14.15	Review panel's private discussion (<i>and connection set-up for the coordinator</i>)	
15:15 - 16:00 BRUSSELS (CET): 13.15- 14.00 DUBLIN: 12.15-13.00 VILNIUS, BUCHAREST: 14.15 -15.00	Meeting with heads of NAA departments	NAA Moscow office: Shishkhanov Murad, Bibik Tatiana, Denis Shabanov, Kalmykova Olga, Cherepov Igor, Olga Mergeneva, Ozeranskiy Sergey, Avteneva Elena, Yoshkar-Ola office: Olga Nefedova, Vedernikova Galina
16:00 -1 6:30 BRUSSELS (CET): 14.00- 14.30 DUBLIN: 13.00-13.30 VILNIUS, BUCHAREST: 15.00 -15.30	Review panel's private discussion (<i>and connection set-up for the coordinator</i>)	
16:30 - 17:15 BRUSSELS (CET): 14.30- 15.15 DUBLIN: 13.30-14.15 VILNIUS, BUCHAREST: 15.30 -16.15	Meeting with key staff of the agency/staff in charge of evaluations	NAA Moscow office: Zakhvatova Elena, Matyukhina Nadezhda, Yoshkar-Ola office: Shuvalov Evgeniy
17:15 - 17:45 BRUSSELS (CET): 15.15- 15.45 DUBLIN: 14.15-14.45 VILNIUS, BUCHAREST: 16.15 -16.45	Review panel's private discussion (<i>and connection set-up for the coordinator</i>)	
17:45 - 18:30 BRUSSELS (CET): 15.45- 16.30 DUBLIN: 14.45-15.30 VILNIUS, BUCHAREST: 16.45 -17.30	Meeting with representatives of the Accreditation Body of Federal Service of Supervision in Education and Science	Krasnorutsky Pavel - Chairman of the Accreditation Board, Kochetova Svetlana - Deputy Head of Rosobrnadzor
18:30 - 19:30 BRUSSELS (CET): 16.30- 17.30 DUBLIN: 15.30-16.30 VILNIUS, BUCHAREST: 17.30 -18.30	Break	

19.30 - as necessary BRUSSELS (CET): 17.30-16.30- VILNIUS, BUCHAREST: 18.30 -	Wrap-up meeting among panel members and preparations for day II	
OCTOBER 28, 2020		
TIMING	TOPIC	PERSONS FOR INTERVIEW
15 minutes	Connection set-up	
9:00 - 9:30 BRUSSELS (CET): 7.00-7.30 DUBLIN: 6.00-6.30 VILNIUS, BUCHAREST: 8.00 -8.30	Review panel private meeting	
15 minutes	Connection set-up	
09:45 - 10:30 BRUSSELS (CET): 7.45-8.30 DUBLIN: 6.45-7.30 VILNIUS, BUCHAREST: 8.45-9.30	Meeting with NAA's director	Lemka Izmaylova
10:30 - 11:00 BRUSSELS (CET): 8.30-9.00 DUBLIN: 7.30-8.00 VILNIUS, BUCHAREST: 9.30-10.00	Review panel's private discussion (<i>and connection set-up for the coordinator</i>)	
11:00 - 11:45 BRUSSELS (CET): 9.00-9.45 DUBLIN: 8.00-8.45 VILNIUS, BUCHAREST: 10.00-10.45	Meeting with heads of some reviewed HEIs/ HEI representatives	Elena Verkhovskaya, Vice-Rector for Educational Activities, Non-State Educational Private Institution of Higher Education "Moscow Financial and Industrial University "Synergy", Sergey Kosenok, Rector, Professor of the Department of State and Municipal Administration and Personnel Management, Budgetary institution of higher education of the Khanty-Mansiysk Autonomous Okrug - Ugra "Surgut State University", Elena Alekseeva, Vice-Rector for Academic Affairs, Federal State Budgetary Educational Institution of Higher Education "Oryol State University named after I.S. Turgenev"
11:45 - 12:15 BRUSSELS (CET): 9.45-10.15 DUBLIN: 8.45-9.15 VILNIUS, BUCHAREST: 10.45-11.15	Review panel's private discussion (<i>and connection set-up for the coordinator</i>)	
12:15 - 13:00 BRUSSELS (CET): 10.15-11.00 DUBLIN: 9.15-10.00 VILNIUS, BUCHAREST:	Meeting quality assurance officers of HEIs	Olga Ageeva, Head of the Department for training highly qualified personnel, associate professor of the Department of Criminal Law, Criminalistics and Criminology, Federal State Budgetary Educational Institution of Higher Education "National Research Mordovian State University named after N.P. Ogarev",

11.15-12.00		<p>Anna Volynskaya, Head of the Department for the Support of the Educational Process, Federal State Budgetary Educational Institution of Higher Education "Ural State University of Railways",</p> <p>Irina Shapovalova, Associate Professor of the Department of Logistics and Supply Chain Management, Head of the Department for Licensing, Accreditation and Quality Control of Educational Activities, Federal State Budgetary Educational Institution of Higher Education "St. Petersburg State Economic University",</p> <p>Olga Savka, Head of the Department of Documentation, History and Law, Head of Educational and Methodological Administration, Federal State Budgetary Educational Institution of Higher Education "MIREA-Russian Technological University"</p>
13:00 - 14:00 BRUSSELS (CET): 11.00-12.00 DUBLIN: 10.00-11.00 VILNIUS, BUCHAREST: 12.00-13.00	Lunch	
14.00-14.15	Review of NAA premises	
14:15 - 15:00 BRUSSELS (CET): 12.15-13.00 DUBLIN: 11.15-12.00 VILNIUS, BUCHAREST: 13.15-14.00	Review panel's private discussion (<i>and connection set-up for the coordinator</i>)	
15:00 - 15:45 BRUSSELS (CET): 13.00-13.45 DUBLIN: 12.00-12.45 VILNIUS, BUCHAREST: 14.00-14.45	Meeting with representatives from the reviewers' pool (including representatives of expert organizations involved in external review)	<p>Timur Tabishev, Head of the Department of State Accreditation of the Department of Educational Policy of the Federal State Budgetary Educational Institution of Higher Education "Kabardino-Balkarian State University named after H.M. Berbekov ",</p> <p>Galaktion Shvedov, Associate Professor of the Department of Electric Power Systems, Federal State Budgetary Educational Institution of Higher Education "National Research University" MPEI ",</p> <p>Lidia Zarapina, Associate Professor of the Department of Civil Law, Federal State Budgetary Educational Institution of Higher Education "Russian State University of Justice",</p> <p>Natalya Evtikhieva, General Director of the Association of Groups and Organizations aimed at the development and implementation of methods and standards for management and quality assessment of business and management study programs "National Accreditation Council for Business and Management Education",</p> <p>Tatiana Litvinova, All-Russian Public Organization "Medical League of Russia" - Chairman of the Expert Council,</p> <p>Igor Darda, Vice-Rector for Academic Affairs, The Autonomous Non-profit Organization of Higher Education "Russian New University"</p>
15:45 - 16:05 BRUSSELS (CET): 13.45-14.05 DUBLIN: 12.45-12.05 VILNIUS, BUCHAREST: 14.45-15.05	Review panel's private discussion (<i>and connection set-up for the coordinator</i>)	
16:05 - 16:50 BRUSSELS (CET): 14.05-14.50 DUBLIN: 13.05-13.50	Meeting with representatives of student organizations	Daria Matvienko, Project Manager, Department for Implementation of Educational Programs and Career Development, Russian Students' Union (RSU)

VILNIUS, BUCHAREST: 15.05-15.50		
16:50 - 17:10 BRUSSELS (CET): 14.50-15.10 DUBLIN: 13.50-14.10 VILNIUS, BUCHAREST: 15.50-16.10	Meeting with Ministry representative	Tatyana Ryabko, Head of Department of State policy in HE area
17:10 - 17:55 BRUSSELS (CET): 15.10-15.55 DUBLIN: 14.10-14.55 VILNIUS, BUCHAREST: 16.10-16.55	Meeting with students involved in evaluations	Anna Rozentsvaig, PhD student, Institute of Legislation and Comparative Law under the Government of the Russian Federation, Sergei Leonov, postgraduate student, St. Petersburg State University of Industrial Technologies and Design, Denis Lazarenko, Master's Degree student, Federal State Autonomous Educational Institution of Higher Education "National Research University" Higher School of Economics "
17:55 - 18:15 BRUSSELS (CET): 15.55-16.15 DUBLIN: 14.55-15.15 VILNIUS, BUCHAREST: 16.55-17.15	Review panel's private discussion (<i>and connection set-up for the coordinator</i>)	
18:15 - 19:00 BRUSSELS (CET): 16.15-17.00 DUBLIN: 15.15-16.00 VILNIUS, BUCHAREST: 17.15-18.00	Meeting with employer representatives	Anton Molev, Deputy Head of the Department of Education and Science of the City of Moscow, Vyacheslav Lapin, Deputy Technical Director of «Urals Mining and Steel Production Plant» Ltd, Alexey Barmashov, Head of Staff Development Department, Goznak JSC, Sergey Chernykh, Production Director of Sernur Cheese Factory, Agroholding LUKOZ
19:00 - 20:00 BRUSSELS (CET): 17.00-18.00 DUBLIN: 16.00-17.00 VILNIUS, BUCHAREST: 18.00-19.00	Break	
20:00 - as necessary BRUSSELS (CET): 18.00-17.00- DUBLIN: 17.00- VILNIUS, BUCHAREST: 19.00-	Wrap-up meeting among panel members and preparations for day II	
OCTOBER 29, 2020		
TIMING	TOPIC	PERSONS FOR INTERVIEW
15 minutes	Connection set-up	
9:00 - 10:00 BRUSSELS (CET): 7.00-8.00 DUBLIN: 6.00-7.00 VILNIUS, BUCHAREST: 8.00-9.00	Meeting among panel members to agree on final issues to clarify	
15 minutes	Connection set-up+ presentation of IT functions	

<p>10:15 - 11:15 BRUSSELS (CET): 8.15-9.15 DUBLIN: 7.15-8.15 VILNIUS, BUCHAREST: 9.15-10.15</p>	<p>Meeting with the NAA's director of to clarify any pending issues</p>	<p>Lemka Izmaylova</p>
<p>11:15 - 12:45 BRUSSELS (CET): 9.15-10.45 DUBLIN: 8.15-9.45 VILNIUS, BUCHAREST: 10.15-11.45</p>	<p>Private meeting among panel members to agree on the main findings</p>	
<p>12:45 - 13:30 BRUSSELS (CET): 10.45-11.30 DUBLIN: 9.45-10.30 VILNIUS, BUCHAREST: 11.45-12.30</p>	<p>Lunch (and connection set-up for the coordinator)</p>	
<p>13:30 - 14:00 BRUSSELS (CET): 11.45-12.45 DUBLIN: 10.45-11.45 VILNIUS, BUCHAREST: 12.45-13.45</p>	<p>Final de-briefing meeting with staff and Council/Board members of the agency to inform about preliminary findings</p>	<p>NAA Moscow office: All above Moscow office staff members Yoshkar-Ola office: Petrovavlovsky Mikhail Olga Nefedova Flyura Garifullina Vedernikova Galina Shuvalov Evgeniy</p>

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

I. Background and context

The Ministry of Education of Russian Federation established the National Accreditation Agency of the Russian Federation (NAA) in 1995. NAA is a non-profit organization whose **mandate** is to assure the state accreditation procedure and quality of educational activities (including organizational, technical, informational, methodological and analytical part of it), and participation in the implementation of the Bologna Declaration.

NAA's main activity is to ensure the implementation of external review, the subject of which is:

- to determine the compliance of the content and quality of students' training with the federal state educational standards for each level of education (higher, secondary vocational, secondary general education, etc.); to carry out certification of experts and expert organizations;
- to develop draft documents and methodological materials on the analysis of the content and quality of students' training;
- to carry out monitoring studies of the education system in the Russian Federation.

In its activities, the agency is governed by the legislation of the Russian Federation in the field of education.

NAA's **mission** is to ensure quality through provision of state accreditation of educational activities at a high professional level in accordance with the principles of objectivity, responsibility, openness, independence and transparency, as well as to provide external quality assurance of the Russian education. NAA follows the Quality Assurance Policy based on the established priorities and core objectives, as well as the ESG criteria.

The agency actively interacts with the executive authorities at the level of Ministries and Departments in the field of education, the Committee on Education and Science of the State Duma (Russian Parliament), educational and scientific organizations, the Russian Youth Union, employers' associations, including the Councils on professional qualifications and various public organizations.

The **sphere of interaction** is quite extensive: holding joint events (conferences, forums, discussion platforms, seminars, etc.); participation in joint projects on quality assurance of higher education, improving the culture of quality of education, independent assessment of qualifications, implementation of quality assessment mechanisms, etc.; leadership of the Commission in the field of quality assurance of the CIS member states: Armenia, Azerbaijan, Belarus, Kazakhstan, Kyrgyzstan, Moldova, Russia, Tajikistan, and Uzbekistan.

NAA has been a member of ENQA since 2009 and is applying for renewal of ENQA membership.

NAA is not applying for registration on EQAR.

2. Purpose and scope of the evaluation

This review will evaluate the way in which and to what extent NAA fulfils the requirements of *the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*.

2.1 Activities of NAA within the scope of the ESG

In order for NAA to apply for ENQA membership, this review will analyse all activities of NAA 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 independent of whether the activities are carried out within or outside the EHEA and whether they are obligatory or voluntary.

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

- I. Programme accreditations at higher education institutions.

3. The Review process

The review will be conducted following the methodology of ENQA Agency Reviews. The process is designed in line with *the Guidelines for ENQA Agency Reviews* and the requirements of *the EQAR Procedures for Applications*.

The evaluation procedure consists of the following steps:

- Formulation of the draft Terms of Reference for the review;
- Finalising the Terms of Reference for the review following EQAR's Eligibility Confirmation (if relevant);
- Nomination and appointment of the review panel;
- Self-assessment by NAA including the preparation and publication of a self-assessment report;
- A site visit by the review panel to NAA;
- 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 Board of ENQA and their decision regarding ENQA membership;
- Follow-up of the panel's and/or the Board's recommendations by the agency, including a voluntary progress visit.

3.1 Nomination and appointment of the review team members

The review panel consists of four members: one or two quality assurance experts (at least one of which is currently employed by an ENQA member agency), an academic employed by a higher education institution, a student member, and eventually a labour market representative (if requested). 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. If requested, the labour market representative may come from the Business Europe nominees or from ENQA. An additional panel member may be included in the panel at the request of the agency under review. In this case, an additional fee to cover the reviewer's fee and travel expenses is applied.

The panel will be supported by the ENQA Secretariat review coordinator who will monitor the integrity of the process and ensure that ENQA's requirements 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 Board of ENQA are not eligible to serve as reviewers.

ENQA will provide NAA with the list of suggested experts and their respective curricula vivarium to establish that there are no known conflicts of interest. The experts will have to sign a non-conflict of interest statement as regards the NAA review.

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

NAA 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 NAA 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 which has four 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 two weeks. In such cases, an additional fee of 1000 EUR 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

The review panel will draft a proposal of the site visit schedule which shall be submitted to the agency at least two months before the planned dates of the visit. The schedule is to include 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 usually 2,5 days. The approved schedule shall be given to NAA at least one month before the site visit, in order to properly organise the requested interviews.

The review panel will be assisted by NAA in arriving in Moscow, Russia.

The site visit will close with a final de-briefing meeting outlining the panel's overall impressions but not its judgement on the ESG compliance of the agency or the granting or reconfirmation 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 concerning each ESG. A draft will first be submitted to the ENQA review coordinator who will check the report for consistency, clarity and language, and it will be then submitted to NAA usually within 10 weeks of the site visit for comment on factual accuracy. If NAA 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 NAA and finalise and submit the document 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* to ensure that the report will contain sufficient information for the Register Committee for application to EQAR.

For the purpose of applying for ENQA membership, NAA is also requested to provide a letter addressed to the Board of ENQA outlining its motivation for applying for membership and the ways in which NAA expects to contribute to the work and objectives of ENQA during its membership. This letter will be taken into consideration by the Board of ENQA together with the final evaluation report when deciding on the agency's membership.

4. Follow-up process and publication of the report

NAA will consider the expert panel's report and will publish it on its website once the Board of ENQA has made its decision. The report will also be published on the ENQA website, regardless of the review outcome and decision by the Board. NAA 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 Board of ENQA within the timeframe indicated in the Board's decision on membership. 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 progress 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 to be of particular importance or a challenge to NAA. Its purpose is entirely developmental and has no impact on the judgement of membership and/or judgment of 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 NAA is in compliance with the ESG and can thus be admitted/reconfirmed as a member of ENQA. The report can also be used for registration on EQAR, and is designed to serve these two purposes. However, the review report is to be considered final only after being approved by the Board. Once submitted to ENQA and until it is approved by the Board, the report may not be used or relied upon

by NAA, the panel, or any third party and may not be disclosed without the prior written consent of ENQA. The approval of the report is independent of the decision of the ENQA Board on membership.

6. Budget

NAA shall pay the review related fees as specified in the contract between ENQA and NAA.

It is understood that the fee of the progress visit is included in the overall cost of the review and will not be reimbursed in case the agency does not wish to benefit from it.

In the event of a second site visit required by the board of ENQA and aiming at completing the assessment of compliance, and should the agency accept a second visit, an additional fee of 500 EUR per expert, as well as the travel and subsistence costs related to the second site visit will be charged to the agency.

7. Indicative Schedule of the Review

Agreement on terms of reference	March 2020
Appointment of review panel members	June 2020
Self-assessment completed	30 June 2020
Pre-screening of SAR by ENQA coordinator	July 2020
Preparation of site visit schedule and indicative timetable	August 2020
Briefing of review panel members	September 2020
Review panel site visit	October 2020
Draft of evaluation report and submitting it to ENQA coordinator for pre-screening	December 2020
Draft of evaluation report to NAA	January 2021
Statement of NAA to review panel if necessary	February 2021
Submission of final report to ENQA	February 2021
Consideration of the report by Board of ENQA	April 2021
Publication of report	April/May 2021

ANNEX 3: GLOSSARY

ENQA	European Association for Quality Assurance in Higher Education
ESG	Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015
EQA	external quality assurance
FSES	Federal State Educational Standards
HE	higher education
HEI	higher education institution
IQA	internal quality assurance
NAA	National Accreditation Agency
QA	quality assurance
RUY	Russian Union of Youth
SAR	self-assessment report

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY NAA

Self-assessment report (August 2020)

Annex 1: Results of the survey of experts and educational organizations

Annex 2: State accreditation and ESG Part 1: comparison of the standards and NAA's activities

Annex 3: Hyperlinks to the documents and materials on NAA's website

Documents

- The Federal Law of December 29, 2012 No. 273-FL "On Education in the Russian Federation" Decree of the Government of the Russian Federation of November 18, 2013 No. 1039 "On State Accreditation of Educational Activities"
- The federal state educational standards of higher education – Bachelor in the field of training 09.03.01 Informatics and Computer Engineering (FSES)
- Decree of the Government of the Russian Federation dated 10.07.2013 No. 582 "On approval of the Rules for publishing and updating information on the educational organization's official website in the information-telecommunication network "Internet"" (in Russian)
- The order of Rosobrnadzor dated May 29, 2014 No. 785 "On approval of requirements for the structure of the official website of the educational organization in the information and telecommunication network "Internet" (in Russian)
- Procedure for the work of the experts and/or representatives of the expert organizations included in the expert panel during external review (Order of the Ministry of Education and Science of Russia dated November 11, 2016 No. 1386)
- Lists of documents and materials necessary for conducting external review with or without a site-visit to an organization engaged in educational activities or its branch were approved (Order of the Ministry of Education and Science of the Russian Federation No. 1385 dated November 9, 2016)
- Forms of the external review report and conclusions of experts and (or) representatives of expert organizations, based on the external review results (Order of the Ministry of Education and Science of the Russian Federation dated January 17, 2017 No. 24)
- On approval of application forms for conducting state accreditation of educational activities, on renewal of a certificate of state accreditation of educational activities and / or annexes (annexes) to it, on the issuance of a temporary certificate of state accreditation of educational activities, on the issuance of a duplicate of a certificate of state accreditation of educational activities and / or annexes (annexes) to it, a form of information on the implementation of basic study programs, declared for state accreditation, and requirements for their completion and registration" (the Rosobrnadzor's order dated November 29, 2019 No. 1628 (in Russian)
- The procedure for selecting experts and expert organizations for carrying out external review (approved by the order of the Ministry of Education and Science dated of May 20, 2014 No. 556)
- Qualification requirements to experts and expert organizations involved in accreditation reviews (approved by the order of the Ministry of Education and Science dated of May 20, 2014 No. 556)
- Methodological Recommendations for the organization and conduct of an internal independent assessment of the quality of education in educational organizations of higher education on the educational programs of higher education - bachelor's degree programs, specialist's programs and master's programs (Letter of the Ministry of education and science of February 15, 2018, N 05-436)
- NAA statute

- Development Program (Strategy) for the medium term
- Guidelines on the internal quality assurance
- Methodological materials for assessing the compliance of the content and quality of students' training with the requirements of the Federal State Educational Standard

Publications

- Report on the results of NAA's Activity for 2019
- The culture of quality in higher education in Russia: traditions and innovations: collection of scholarly works of the National Accreditation Agency employees and experts in carrying out state accreditation of educational and scientific organizations (in Russian)

Stakeholders' Feedbacks

- Feedback from Susanna Karakhanyan, INQAAHE President
- Feedback from David Atchoarena, the Director of the UNESCO Institute of Lifelong Learning
- Letter from the Association of Lawyers of Russia (in Russian)
- Letter from the Association of societies and organizations "National Accreditation Council of Business and Management Education" (in Russian)
- Results of the survey of experts and educational organizations (in Russian)

ADDITIONAL DOCUMENTS PROVIDED BY NAA BEFORE THE SITE VISIT, ON REQUEST OF THE REVIEW PANEL

- Available documentation on how is assessed 'student-centred learning, teaching and assessment'
- Policies around inclusivity and diversity of the student population and enabling opportunities for students for underrepresented groups to be heard in the educational review process
- The minimum educational criteria for resourcing and examples of this standard as evidence
- Policy or criteria on the following items: recruitment strategy of staff; progression opportunities for staff; the training programmes curricula offered to staff in accordance with FSES 4.4.3
- Minimum criteria for resourcing - example of stakeholder involvement in resource allocation and sufficiency
- Examples to provide evidence for information management, student feedback/ other stakeholder feedback to meet the federal standards
- Mapping ESG (Part I) into FSES
- Evidence and outcomes of stakeholder involvement in changes of accreditation standards.
- Policy for recognition of foreign accreditation decisions
- Communication plan with stakeholders
- International expert recruitment and strategy
- Selection process and training curriculum of: 1. internal 2. external 3. student 4. industry experts
- Evidence on the limitations of current legislation for student participation in reviews ("Students limited by current legislation")
- Policy on role of student in the process
- Conflict of interest policy for peer reviews
- Stats on student and international recruitment following recommendations made by the previous ENQA review
- Outcome or supporting evidence documentation of the 2017 project "form of public assistance of students in the procedures of state accreditation of educational activities"
- Outcome or supporting evidence of the Erasmus+ Jean Monnet Project
- List of criteria and indicators for accreditation
- Policy for refusal to start accreditation procedure

- Expert's workbook example
- Examples of site visit schedule from accreditation procedure with site visit
- Minutes of Accreditation Board
- Examples of the experts' reports from different expert panels
- Description of Complaints procedure
- The rules and procedures on consulting services
- Example of a project that went from (i) data collection (ii) data analysis (iii) thematic finding and analysis approaches (iv) dissemination of findings (v) actioning on findings (vi) review of outcomes
- Examples of seminars run informed by thematic analysis (i.e. Scientific articles published on website - how have these changed practice?)
- NAA's annual budget with breakdown on categories of expenses, for 2019 and 2020
- Supporting evidence on training NAA's staff for "improving qualifications"
- Minutes or other evidence of meetings and/or decisions of the self-evaluation group
- Examples of analysis performed for the purpose of the SAR
- Evidence or analysis of briefings - "internal feedback"
- Analysis of the feedback from questionnaires on the work of experts.

ENQA AGENCY REVIEW 2021

THIS REPORT presents findings of the ENQA Agency Review of the National Accreditation Agency of the Russian Federation (NAA), undertaken in 2020.

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European Association for
Quality Assurance in Higher Education