

ENQA-board
Dr. C. Grolimund, President

Avenue de Tervuren, 36-38 – bte 4
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Date	Your reference	Our reference
June 11th 2019	-	NVAO/20191969/RH

Subject
NVAO follow-up on ENQA recommendations

Information		
R. Hageman	+31 6 11714988	r.hageman@nvao.net

Dear Mr. Grolimund,

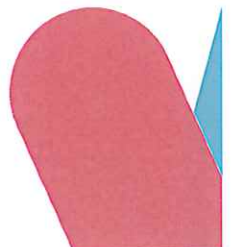
In your letter of reconfirmation of our membership in ENQA dated 26 September 2017 you asked us to send the Board a follow-up report on the recommendations in the panel report of 2017.

In this letter the NVAO will explain the actions and improvements taken on the recommendations given by the panel.

- a. *The panel recommended that NVAO remains sensitive regarding issues of implementation as experienced by stakeholders and adopts a clearer terminology to differentiate between substantively different approaches to follow up of decisions (ESG 2.3).*

The NVAO underlines to necessity to be clear about decisions and the follow up of these decisions.

In the Dutch and Flemish approach there is a difference between conditions and recommendations, that according to our own evaluation of the ENQA visit, has led to misunderstanding by the panel. The Dutch words 'voorwaarden' and 'aanbevelingen' have been translated both in conditions whereas 'aanbevelingen' should have been interpreted as recommendations; as suggestions for further improvements. The NVAO intentionally only follows up on recommendations in the next assessment and when called for. It is also politically not acceptable considering the debate about reducing administrative burden to organize a separate follow up for recommendations. Recommendations are intended for the enhancement and not for the accountability of the quality of education. The



Conditions on the other hand are always followed-up within a fixed and short timeframe. This approach is reflected in NVAO's new QA systems for the Netherlands and Flanders.

The new Dutch legislation accentuates this distinction and made recommendations part of a development letter by the panel to the programme and specifically not part of the (accountability)report send to the NVAO.

In the new 2018 Dutch accreditation framework the NVAO (as an outcome of the new legislation) emphasized the uniformity of its decisions through consistent use of terminology for all procedures and decisions. Panels use the terms 'Meets the standard', 'Partially meets the standard, and 'Does not meet the standard' for all judgments per standard. Upon final decision the terms 'Positive', 'Conditionally positive' and 'Negative' are used. In the new framework the meaning of these decisions is explained.

The new Flemish QA system (2019) makes a clear distinction between conditions and recommendations. When a panel formulates conditions, they will also need to formulate a timeframe within which these conditions are to be met and assessed: "Any quality deficiency must be explicitly substantiated by reference to (a) condition(s) that must be met to remedy the deficiency. In addition to conditions, recommendations may also be formulated.

The limited validity is set down in consultation with the programme, taking account of the timeframe within which the programme can satisfy the condition(s). The maximum timeframe is three years, takes effect immediately after the previous accreditation period, and prompts a new accreditation decision no later than three months before the end of the timeframe."

- b. *NVAO is recommended to reflect on the grading system as presently applied and to consider making it as straightforward as necessary for the purpose of yes/no/conditional accreditation (ESG 2.5).*

The ENQA site-visit helped the NVAO to stress the importance of using clear and explicit criteria that can be used consistently. While Flanders extended the positive/conditionally positive/negative grading to all its procedures in 2015, it was still under discussion in the Netherlands during the ENQA review of 2017. This aspect was indeed also emphasized in the evaluation of the QA system by the Dutch inspectorate of education. The grading of outcomes was a strong political desire to stimulate institutions to enhance the quality of education. The NVAO wrote a letter to the minister of Education, stating that grading of outcomes (from unsatisfactory to excellent) could not be done in a consistent and reliable manner and therefore pleaded that grading of outcomes should not be part of the legislation that drives the practice of the NVAO. This letter, together with the review done by the inspectorate and backed by the notions made by the ENQA panel, led to a political debate. The outcome of this debate was that grading of outcomes was abolished in the Dutch system and that the NVAO only uses the terms 'Positive', 'Conditionally positive' and 'Negative'.

- c. *It is recommended that NVAO analyses the actual and potential readership of its reports and their needs, and develops new means to reach a readership among students and employers (ESG 2.6).*

In the new Dutch framework, the NVAO emphasized that the panel reports should start with a short and to the point summary directed to a large audience.

In accreditation processes where NVAO coordinators operate, the coordinators are stressed to use a standardized format that includes a handout for that summary.

In the accreditation of existing programs, institutions are leading the process i.e. by hiring an evaluation bureau. In the analysis of these reports, next to the judgment of compliance to the standards, also the quality of the report is subject to evaluation. Three questions are asked:

1. Is the report fully and formally correct (including the presence of a sound summary)?
2. Is the assessment process described transparent and clear?
3. Are the judgement and substantiation described clear and straightforward?

The NVAO analyses the reports and gives where appropriate direct feedback to secretaries.

To share and make reports available to students and other stakeholders NVAO agreed with Studiekeuze123 that they install a direct link on their website to the accreditation reports of each individual program or institutional assessment.

Studiekeuze123 is the national platform for (new) students where they can find actual information about all Dutch study programs, institutions and cities where these institutions are based (<https://www.studiekeuze123.nl/>).

In Flanders, institutions have been able to work with other EQAR registered agencies for the last ten years. This has led to very heterogeneous assessment reports but has never led to complaints from neither institutions nor students.

Where NVAO coordinates the assessment procedure, the potential readership has always played an important role. Institutional review reports are clearly targeted at expert readership while programme assessment reports are written with a broader readership in mind. But even here, short ten-line summaries are not feasible. Quality above brevity.

All NVAO's decisions, underlying assessment reports and periods of validity are automatically uploaded from NVAO's internal database to the Flemish higher education database, and from there shared with the pertinent institutions and published on the official website.

- d. *The panel recommended that NVAO develops a complaint procedure and opens a section 'Complaints and appeals' on its website with appropriate formats for complaints and appeals (ESG 2.7).*

We agreed with the panel that our procedure for complaints regarding QA procedural aspect and the conduct of NVAO's employees and board members could be given more attention and be more formal.

The NVAO has adapted its complaints and appeals section on its website. The complaints procedure has been given a position alongside the appeals procedures for the Netherlands and Flanders both in Dutch (<https://www.nvaio.net/nl/klachten>) and in English (<https://www.nvaio.net/en/complaints>, just published).

- e. *The panel recommended that NVAO prepares coherent development plans on the future short-term and long-term development of accreditation processes in Flanders and the Netherlands, on the basis of comprehensive evaluations of the NL- and FL-pilots and taking into account expectations about quality assurance in higher education by all relevant stakeholders (ESG 3.1).*

In the Netherlands, NVAO is actively involved in the pilot of programme accreditation to reduce the administrative burdens whilst maintaining the necessary level of quality.

In addition, the NVAO takes actively part in the exploration and preparations of the new strategic agenda for higher education by the ministry of Education.

NVAO also initiated discussion with partners about the future directions of quality and quality control in the Netherlands. Partners are the associations of students, universities and universities of applied sciences, the ministry of Education, the inspectorate of education and employers. The NVAO (Flanders and the Netherlands) both started visits to institutions to engage talks about trust, ownership, reduction of burden, accountability and enhancement with board members, students, employees and external stakeholders.

In Flanders, NVAO widely engaged with all stakeholders both to evaluate the pilot phase of the institutional reviews and to prepare the new QA system. The pilot phase was positively evaluated by an evaluation group and an international resonance group both installed by the minister of education. NVAO organised a year long onboarding process in which it got all institutions, all stakeholders organisations, all representative employers organisations, all political parties, and the national union of students to agree on the new QA system. The legal change to the higher education law was developed in close collaboration with the NVAO and was approved by all members of parliament. Such a parliament wide agreement is a rare occasion and we are quite proud of it.

- f. *The panel recommended that NVAO reviews the approach to thematic analysis and in consultation with stakeholders, identifies a common purpose and a means to regularize processes and priorities in this area (ESG 3.4).*

Thematic analyses for the NVAO aim to inform institutions (and other stakeholders) to enhance the educational quality of their programmes and their internal quality assurance processes. The NVAO wants to enhance the learning capacity of institutions. This will be done by sharing good practices and by providing insight into larger processes, by analysing accreditation reports and sharing analysis of the processing times, the opportunities for success and the do's and don't's.

In the Netherlands, in cooperation with the inspectorate of education and the Higher Education Efficiency Committee (CDHO) NVAO explores new ways to conduct thematic analyses making use of 'Big data' and the vast databases the inspectorate maintains. The ministry of Education in cooperation with the Inspectorate, CDHO, NVAO and the associations for universities and universities of applied sciences apply an information agreement in which all research and inquiries done within institutions of higher education in a specific year are agreed upon. All research and inquiries done outside of this agreement have to be specifically approved by all parties. In Flanders, we have reviewed our general approach. Since 2017, we distinguish between two types of thematic analyses. The first kind is what we refer to as the overview report. An overview report is published after a set of similar assessment procedures has been finalized and then summarises the general findings that resulted from these assessments. Overview reports consist of four chapters: an introduction, a justification explaining the rationale and organisation of the procedures, a reporting of findings and considerations, and, finally, a chapter presenting NVAO's insights.

The second type of thematic analyses are our system-wide analyses. These have been legally embedded in the new QA system and will now be organised yearly. The main aim of these analyses is to identify good practices in a theme or topic related to educational quality and share these among the higher education institutions. An important element of these analyses is the international perspective brought in by selected peers from abroad.

- g. *The NVAO is recommended to remain alert on loose loops in the plan-do-check-act-cycle of the quality assurance system (ESG 3.6).*

The NVAO has reviewed its procedures and the way the plan-do-check-act cycle is conducted at these procedures. The omissions the panel observed taught us to be more aware and more stable in our processes.

For NVAO this resulted in updating the internal quality process reviewing all processes with special attention for closing the cycle. On each accreditation process a coordinator is appointed who, under guidance of the internal quality assurance coordinator, evaluates the processes and formulates recommendations. The evaluations will be discussed between the coordinators and will lead to comprehensive recommendations to the management of the NVAO.

Regarding the publication of reports after a formal decision has been made the NVAO developed a tool that after a decision is made automatically uploads the decision and report to the website.

The new legislation in the Netherlands makes registration of panel secretaries mandatory. The NVAO is appointed to develop and maintain this registration. One of the aspects of the registration is the training of new secretaries and the development of refresh courses for experienced secretaries. The NVAO evaluated the existing training for secretaries together with them. This led to a review of the training.

The new legislation in Flanders has led to a renewal of our approach to internal QA. The shift is mainly from a quantitative backbone for accountability and improvement towards a (qualitative) backbone for a quality culture. This transition is not finalised yet.

I hope that the above gives you a good and clear insight in our actions and that it meets your expectations regarding the follow-up of the recommendations. If any of the above leads to questions we are always at your disposal for further information or clarification.

Yours sincerely,


Dr. A. Flierman
Chair