



National action plan for quality assurance development in Montenegro



With the support of the Erasmus+ programme of the European Union

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ISBN [if relevant]

ISSN [if relevant]

National action plan for quality assurance development in [country] is one of the deliverables of the project 'Supporting European QA Agencies in meeting the ESG', reference number 898925-SEQA-ESG-EPLUS2020-EHEA09-2019.

The present document can be downloaded from the ACQAHE's website at: not applicable

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Montenegro, Podgorica, 2022

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Note from the project coordinator

The Agency submitted the draft version of the National Action Plan in May 2021. The final version of the document was expected to be approved once the new Law on Higher Education had been adopted, as the new law was expected to represent a sound base for the action plan and the implementation of the ESGs in Montenegro. Nevertheless, the law was not adopted in July 2021 as originally planned. The Ministry decided instead to set up a Working Group. The Agency joined this group and exchanged with the Ministry on the process of harmonisation of the legal framework with the ESGs. The Working Group produced a new draft of the law at the end of November 2021. A public consultation on this draft was then organised. The Agency took part in this consultation as some provisions of the draft were not aligned with the ESG.

At the time of writing this note (November 2022), the new Law on Higher Education has not been approved. Therefore, the National Action Plan has never been officially concluded either. The version presented here is the last one that was agreed upon with the Ministry and reflects the status of play in May 2021. The decision to submit this draft version has been taken in consultation with the Agency. Unfortunately, all the efforts from the project coordinator to officially conclude this document have been unsuccessful.

1. Introduction

The work on the SEQA-ESG project overlapped with governmental and institutional changes in Montenegro. Namely, since the summer of 2020, Montenegro has twice changed the Government and the ministries in charge of higher education. As the Ministry of Education, Science, Culture and Sports was going through a series of staff changes, the Agency took over the obligation to draft and submit the National Action Plan.

The drafting and coordination of the National Action Plan in the Agency were carried out by the deputy director for quality assurance and research, Tijana Stanković. Tamara Đuričković and Ana Rutović, advisers for quality control, and Milica Kavedžić and Dunja Bulajić, advisers for international cooperation, were involved in the process of giving comments and suggestions. The Action plan was sent to the former Director of the Agency and members of the Steering Committee of the Agency for comments and suggestions too.

After the first version was drawn up and agreed in the Agency, the National Action Plan was sent to the relevant stakeholders for their opinion:

- Ministry of Education, Science, Culture and Sports (members of the Working Group for the preparation of the Law on Higher Education, the Director General for Tertiary Education and a member of the SEQA-ESG team in front of the Ministry).
- All institutions of higher education;
- Experts who participated the evaluation procedures;
- Representatives of students;
- Representatives of business associations.

The feedback was mostly complimentary, all comments have been included. Expected feedback from everyone to whom the draft was sent was missing.

The draft National Action Plan was sent to the coordinator of the SEQA-ESG project timely, and the comments received from ENQA were included in June 2021. The final version of the plan is expected to be approved once the new Law on Higher Education is adopted in July 2021.

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Regardless of the status of this document, the National Action Plan represents the effort for harmonization of the Montenegrin system with ESG. This effort should reduce bottlenecks related to ESG implementation and contribute to better efficiency, and functionality and keep the authenticity of the system. The process of drafting the National Action Plan forced us to identify the obstacles, define the challenges and discuss and provide solutions. At some moment, it is going to be updated, approved by the Ministry and adopted by Government as an official document that represents path to qualitative higher education according to European standards.

2. Country's higher education system

Montenegro has been a full member of Bologna Process since 2007 and the European Higher Education Area since 2010. However, the Bologna Declaration is being implemented since 2004, even before Montenegro renewed its independence.

Strategic objectives of the development of higher education were conceived by the Strategy of the Development of Higher Education in Montenegro 2016-2020¹:

- Improvement of the higher education system and creation of competitive staff,
- Harmonizing education with the labour market needs,
- Improvement of scientific-research work and increased level of participation in EU projects,
- Internationalization of higher education,
- Lifelong learning education,
- Setting up a sustainable model of financing.

The higher education system in Montenegro is regulated by the Law on Higher Education (hereinafter referred to as: Law), and mid-term goals are defined through the Higher Education Strategy. The governmental body responsible for the higher education policy was the Ministry of Education until November 2020, and since then it is the Ministry of Education, Science, Culture and Sports (hereinafter referred to as: Ministry). The Law has been amended in the recent years and the most significant changes happened in 2017:

- The establishment of the Agency for Control and Quality Assurance of Higher Education (ACQAHE);
- New model of studies 3+2+3, as the dominant model in the European Higher Education Area, instead of the former model of 3+1+1+3;
- Bachelor and Master studies free of charge in the public higher education institutions starting from 2017/2018 for Bachelor studies; second cycle studies, i.e., Master studies in the reformed model of studies, as of 2020/2021;
- New model of higher education financing, the so-called contract model; it includes contracts on financing for the implementation of study programmes, which will potentially ensure higher allocations from the budget, but more responsibilities too;
- Compulsory practical teaching at the level of at least 25% of the total load of students by subjects, i.e. by year, depending on the learning outcomes for each study programme.

Higher education is provided by autonomous higher education institutions, licensed according to the Law: university, faculty, academy and non-university. Studies in Montenegro differ according to:

- Degree of the programmes: bachelor, master and doctoral (PhD);
- bachelor and master studies can be academic or applied;
- Ownership: public (faculties do not have the capacity of legal entity) and private (faculties can have the capacity of legal entity);
- Organization of implementing the study programmes: independent and joint programmes with local or foreign institutions;
- Method of teaching: on-site, distance and in English.

¹ The new Strategy of Higher Education 2021-2026 was prepared by the Ministry. The Agency has been actively participating which has resulted in defining ESG implementation as one of strategic goals. Unfortunately, neither the Strategy was adopted by the Government and nor members of Working group received its final draft.

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There are four universities in Montenegro and three non-university institutions (independent faculties). University of Montenegro is the only public and largest university, while three private universities have been established since 2006. In 2020/21, cca. 22,700 students enrolled higher education institutions, out of which cca. 71% enrolled at public and cca. 29% at private universities. Out of all of the enrolled students, 81% started bachelor, and 19% postgraduate and doctoral studies. Women represent around 56% of all of the enrolled students in bachelors' and masters' respectively, while 51% of total enrolled in doctoral studies.

Regarding graduate students, Montenegro registered high drop-offs. Only cca. 5235 students graduated at all degrees of studies in 2020/21- 58% at bachelor, 42% at specialistic and master and 0,4% on doctoral studies. Analysing ownership structure of institutions, 70% of the total number graduated on public and 30% on private universities.

Diplomas acquired at higher education institutions are:

- Diploma of bachelor studies: academic (180 ECTS) and applied (180 ECTS)
- Diploma of master studies: academic (120 ECTS) and applied (120 ECTS)
- Diploma of completion of integrated bachelor and master studies in the scope of 300, that is 360 ECTS
- University diploma in the area of regulated professions (medicine, dentistry, architecture, pharmacy, higher school of medicine) in accordance with the Directive 2005/36EC and Directive 55/13EC
- University diploma of academic doctoral studies in the scope of 180 ECTS

279 study programmes are being realized at higher education institutions in Montenegro. From the total number, 40% are taught at bachelor, 45% at master and 15% at doctoral studies. At the University of Montenegro, 169 study programmes are being realized in 18 faculties, one art academy and three research institutes. Three private universities are realizing teaching at 102 study programs totally within 25 faculties. At three independent faculties, out of which one is public, teaching is realized through seven study programmes.

All organizational units (faculties, academies, institutes) of the higher education system are located in central and costal region of Montenegro, mainly in the capital of Montenegro - Podgorica.

3. Quality assurance of higher education in the country

3.1 Legal framework

The legislative framework for quality assurance of higher education in Montenegro is the [Law on Higher Education](#) and set of by-laws. Before establishing the Agency for Control and Quality Assurance (ACQAHE or Agency), external quality assurance was provided by the Higher Education Council. According to amendments to the Law in 2017, the Agency was established by Government of Montenegro and began to operate functionally in adequate human and technical capacities since September 2018. The fees paid by HE institutions to go under external evaluation are regulated by the Law on Administrative Taxes.

ACQAHE is in charge of quality assurance as a legal entity that performs its activities in the public interest (Article 13a). The rights and obligations of employees are regulated by Law on Civil Servants and State Employees. The Agency is financed by the central budget. The Agency represents an independent budget unit and has the legal possibility to collect its own revenues. The Ministry in charge of education supervises the operations of the Agency. The management bodies are the Director and the Steering Committee. The Director of the Agency is selected by the Ministry and nominated by the Government, while members of the Steering Committee are selected and nominated by the Government.

The Law addresses quality assurance to ESGs², although many of the individual stipulations are opposite to the ESGs. Therefore, by-laws on procedures could not fully comply with ESGs.

3.2 QA activities and their methodologies

Quality assurance in Montenegro is provided through internal quality assurance (self-evaluation reports) and external quality assurance. According to Law on higher education, the Agency performs four external evaluation procedures as follows:

1. Accreditation of study programs
2. Reaccreditation of HE institutions
3. Accreditation of long-life learning programs
4. Periodical evaluations on request of the Ministry or HE Institution

There is no initial accreditation of institutions. The accreditation of all study programs is an initial precondition for a newly founded institution to get a license for work.

The validation period for accreditation of study programs is five years, although the concept of reaccreditation of study programs is not defined by the Law. The reaccreditation of institutions is valid for a period of five years too.

The procedure methodology is defined through the following by-laws:

1. Rulebook on accreditation of study programs
2. Instructions for expert commissions for accreditation of study programs
3. Rules for reaccreditation procedure of higher education institutions
4. Rules for accreditation of LLL programs

² "Activities related to quality assurance in higher education shall be carried out by Agency for Quality Control and Quality Assurance in Higher Education in compliance with the European Standards and Guidelines" (Article 13a, Paragraph 1)

The procedures for reaccreditation of institutions (Rules for reaccreditation) and procedures for LLL programs accreditation were adopted by the Agency according to the Law and in coordination with other stakeholders. The procedures for accreditation of study programs (Rulebook for accreditation) were adopted by the Ministry, also according to the Law.

The external evaluation procedures include:

1. Self-evaluation in the prescribed form for the programme, as well as for institution evaluation. Self-evaluation form is based on a set of standards with criteria that institutions approve with requested documentation. These standards are harmonized with the ESGs in a great extent.
2. The external assessment is coordinated by an employee from the Agency (coordinator) who represents the link between the evaluated institution and the expert commission, training/informing its members on all. The expert commission is established by the director of the Agency on the coordinator's suggestion of experts selected from the List of experts. The list of experts (experts, students, business representatives) is created based on prescribed criteria.
3. The expert commission makes a preliminary evaluation report before a site visit. The site visit lasts from one to two days. After the site visit, the expert commission makes the evaluation report with a recommendation for (re)accreditation of the institution/programme. The institution has an opportunity to complain about the report. The decision on (re)accreditation is made by the director based on experts' recommendations. The report and decision are available on Agency's website.
4. The follow-up is a mandatory part of the institutional external evaluation-reaccreditation (Rules). The Ministry has not approved follow-up procedures for accreditation of study programs (Rulebook).

3.3 National/agency criteria in external quality assurance

External evaluation is implemented according to standards from which are developed criteria:

1. Standards for study programs accreditation (bachelor and master, doctoral, DL, English, study programs for teachers)
2. Standards for reaccreditation of institutions.

The Agency is in charge of the adoption of standards and criteria implemented in external evaluation procedures. Every standard is referred to certain ESG.

1. Standards for study programs accreditation (bachelor and master, doctoral, DL, English, study programs for teachers) are related to the ESGs. The criteria are derived from specific standards:
 - i. Alignment of the HE institution to the Law
 - ii. The structure of the study programme and concept for its implementation
 - iii. Resources
 - iv. Quality assurance and management
 - v. Internal regulation procedures and its transparency
 - vi. Comparative examples of good practice

Additional standards for accreditation of study programmes are related to:

- vii. Long Distance learning programmes

- viii. Study programmes in English
 - ix. Doctoral study programmes
 - x. Initial education of teachers
2. Standards for reaccreditation of HE institutions, from which specific criteria were derived, are related to:
- i. Policy of quality assurance
 - ii. Creation and improvement of the study programmes
 - iii. Learning, teaching and assessment of knowledge focused on student
 - iv. Enrolment, advancement, recognition and certification
 - v. Teaching staff
 - vi. Resources for learning and support for students
 - vii. Information management
 - viii. Continuous evaluation and periodic revision of study programmes
 - ix. Cyclical external quality assurance
 - x. Mechanisms of academic integrity and strengthening the culture of integrity

3.4 Peer review experts

According to the Law on Higher Education, the Agency establishes an expert commission for the external evaluation of study programs/institutions. According to the Statute, the Director of Agency is the person that selects experts from the List of experts on the coordinator's proposal.

In order to establish the List of experts for study programmes accreditations and higher education institutions reaccreditation, with appropriate skills and competences, and no conflict of interest, the Agency announces a Public invitation for the application of experts from Montenegro and other countries. All interested applicants need to meet the criteria provided by public invitation, such as:

- possession of scientific or academic title;
- proven expertise and specialization in relevant and referent fields;
- working experience in relevant and referent fields;
- proven experience in quality assurance of higher education,
- relevant experience in management positions in higher education institutions;
- experience in projects in the field of his/her own expertise;
- the most important awards/acknowledgement/accomplishment in the field of his/her own expertise;
- the most important memberships in relevant experts bodies or associations of his/her own expertise;
- knowledge of English and other languages.

The Internal commission appointed by the Agency, which consists of three members from the ranks of employees, reviews submitted applications and checks whether the criteria are met. Taking into account specific requirements, the Commission proposes experts to the director of the Agency, who decides on the final composition of the list of experts. Before forming an Expert Commission for study programme accreditation or higher education institution reaccreditation, the Agency ensures the independence and impartiality of selected experts from the List by checking for potential conflicts of interest in regard to the institution which is being evaluated or whose study programme is being accredited. Following their official appointment, the Agency sends decision on the nomination of the Commission members to the institution to present its opinion and examine possible conflicts of interest. Additionally, members of the Commission before the commencement of the review process

sign the Confidentiality and non-conflict of interest statement on a specific form, which is an integral part of the regulations on the quality assurance procedures.

When it comes to the student election for institutional evaluation, the Agency announces a separate Call for applications of students from all areas of higher education in the final years of undergraduate, master's and doctoral studies to participate in external quality assurance procedures. All interested students can submit their CV and a Motivation Letter (500 words), in which they will state the key reasons for application, recommendations for improving the quality of higher education in Montenegro, as well as expectations from their participation in the Expert panel.

Members of the expert commission are in a conflict of interest if:

- a. A Member of the Commission is/was under an employment contract or any cooperation agreement or has for the last two years been under an employment contract or any other cooperation agreement with the institution or participates in a project the respective institution takes part in;
- b. A Member of the Commission takes part or has in the last two years taken part in the management, expert, professional or advisory bodies of the institution;
- c. A Member of the Commission is associated with the members of management bodies of the institution, i.e. is a relative of members of management in a straight line and laterally to the second degree of kinship, is in-law up to the first degree of kinship, marital and extra marital spouse, adopter and adoptee;
- d. A Member of the Commission studies in the institution;
- e. A Member of the Commission establishes an employment relationship with the institution within one year after the completion of a review procedure.

The Agency briefs the experts and provides support during the procedure itself. At the beginning of the process, experts are electronically provided with the application for accreditation/reaccreditation submitted by the respective institution with all accompanying documentation. The Agency also ensures guiding material and all relevant regulation on quality assurance. The training of experts is stipulated in the Rules for procedures of re-accreditation of HE institutions, but it is not included in the Rulebook on the procedure for Accreditation of Study Programs due to rejecting this Paragraph by the Ministry.

One day before the site visit at the latest, all members of the Commission undergo an additional briefing conducted by the Agency in its premises regarding the procedures, duties, tasks and methods of preparing an external assessment report, the content of the adopted standards and ESG, as well as all other issues relevant for the procedure being undertaken by the Agency.

For each external quality assurance procedure, the Agency is designating a coordinator among the employees of the Agency who carries out the activities of written and oral communication with the Commission members. Apart from organizational aspects of the process, the coordinator plays a crucial role in briefing the experts, in particular as regards assuring correct and consistent understanding of the adopted regulations. Additionally, the coordinator supports the president of the Commission in ensuring that the site visit is organized with the predefined protocol and that all relevant topics are discussed. After the final report is submitted to the Agency, the coordinator verifies its factual and structural correctness and takes care that all relevant aspects of the process have been addressed in a proper manner.

3.5 Stakeholder engagement

According to the procedures for accreditation of study programs, it is not stipulated to have any other stakeholders, but experts in a certain field (professors from universities and faculties). Although the Agency has proposed to include students and business association representatives, they were excluded by the Ministry in the final Rules for Accreditation of Study Programs and adopted as such.

According to the procedures for reaccreditation of institutions it is specified to have more than half foreign experts and students as compulsory members and a representative of the real economy as a voluntary one. This is due to the fact that Law on Higher Education does not stipulate what institution is obliged to adopt procedures for reaccreditation of study programs, thus Agency took over that responsibility, having freedom to adjust it to ESGs.

3.6 Other additional chapters

The current legislative framework in Montenegro does not provide for full implementation of ESGs. Some standards that even complied with ESGs could be improved too. Some of the main legal incompliances to ESGs are the **absence of follow-up** in the implementation process, the **inclusion of students and business sector** representatives is not recognized in the evaluation of study programmes and **complaints and appeals are not regulated** by the Law.

The standard on independency is not fully implemented. **Organizational independence** is not achieved either *de facto*, or *de jure*. The Director of the Agency makes all decisions regarding external evaluations- from the selection of members of the expert panel to the final decision on (re)accreditation. **Operative independence** is not fully achieved. The Ministry is in charge of the adoption of procedures (Rulebook) for the accreditation of study programmes. The wider selection of experts from the lists of experts (experts, students and business representatives) in expert panels is made by the evaluation coordinator. The nomination of the expert panel is a decision of the director of the Agency. The standards with criteria, as well as the procedures for the evaluation of institutions, are in charge of the Agency. **The independence of formal outcomes** is partly achieved if we bear in mind that students and business representatives are not members of expert panels for evaluation of study programmes according to the legislative. They are mandatory members in expert panels for the evaluation of institutions. According to the Administrative Law, the Agency is responsible for decisions made on (re)accreditations.

Besides the briefing, there is **no structured and planned training for experts (peer reviewers)** from the Experts' list. The reason for that differs by procedure. In the accreditation of study programmes, the Ministry did not approve the coordinator to train the expert. In the re-accreditation of HE institutions, coordinators need training too in order to provide well-structured, focused and time-lined training for all experts on the Experts' list and lately for all new experts.

The inclusion of stakeholders was realized through round tables, workshops and participation in the development of procedures. The Agency is aware of the importance to include all relevant stakeholders that can contribute to objective and qualitative assessment of study programs at all levels of external evaluation. The reason for not having students and business representatives in the evaluation of study programmes is Ministry's opinion that the Law stipulates the inclusion of experts and "students are not experts". Furthermore, the accreditation of all study programs represents the initial accreditation of the institution in the process of its establishment, increasing the importance of students and business associations 'inclusion in QA from the beginning of the institutions' functioning.

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In order to develop strong analytical capacities, the Agency needs additional human and financial resources. The **thematic analyses**, besides they are part of ESG, contribute to reliable decision-making and identifying the obstacles and comparative advantages of the system

4. Priority actions

Although the first priority action is the basic one and most of the rest of activities depends and derives from the first one, we wanted to put the same priority to all of them:

1. New legislation framework on quality assurance of HE system (new Law on Higher Education)
2. Implementation of the new legislative framework on QA in higher education
3. Improved procedures for external evaluation
4. Improvement of national criteria for external QA
5. Improved quality of expert groups (peer review experts)
6. Stakeholder involvement

5. Summary table

No.	Priority action	Was the priority action already identified in BFUG TPG C-QA? (YES/NO)	Activity steps (including status of implementation in case the activity was already identified in BFUG TPG C-QA)	Actors	Timeline	Desired outcome
1	New legislation framework on quality assurance of HE system (new Law on Higher Education)		1.1. Drafting the suggestions for the new Law on Higher Education that include: <ol style="list-style-type: none"> a) Recognition of the Agency in the system of public administration b) Establishment of Agency Council which members should be nominated by HE institutions, student associations, business associations, Government and Agency. The Council should adopt procedures and criteria, select the Director of the Agency, select the peer expert commission members, make decisions on evaluations, and other relevant decisions regarding QA and Agency's work and organization. c) Establishment of complaint commission selected and nominated by Agency Council. d) Procedures and criteria prepared and adopted by Agency in consultancy with stakeholders e) Recognition of the follow-up as mandatory part of external QA. 	ACQAHE	April 2021 (finished)	<ul style="list-style-type: none"> • Independent QA of higher education in Montenegro • Consistent and comprehensive implementation of ESGs • Inclusion of all relevant stakeholders of QA in the process of the new legislative solutions

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			<p>f) Stakeholders' inclusion in all relevant bodies and processes regarding external QA.</p> <p>g) Internal quality assurance of the Agency</p> <p>h) Other relevant questions.</p>			
			1.2. Engaging the expert for drafting the Law	European Council project "Quality Education for All in Montenegro"	In the process	
			1.3. Drafting the provisions for the new Law on HE	Ministry of Education, Science, Culture and Sport	In the process	
			1.4. Comments and suggestions on Draft of Law on Higher education	ACQAHE HE Institutions	May- June 2021	
			1.5. Public consultation on Draft of Law on Higher education	Ministry of Education, Science, Culture and Sport ACQAHE HE Institutions Students Business associations Alumni associations	June- July 2021	
			1.6. Adoption of the Draft Law on Higher Education	Parliament of Montenegro	July 2021	
2	Implementation of the new legislative framework on QA in higher education		2.1. Establishment of the Agency Council	ACQAHE Ministry of Education, Science, Culture and Sport	September- December 2021	Consistently and timely implemented the new legal solutions. The system operates functionally on principles of independence, transparency,

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						cooperation, and integrity
			2.2. Establishment of the Complaint commission	ACQAHE Ministry of Education, Science, Culture and Sport	September-December 2021	
			2.3. Proposing the new structure and amount of Agency's budget for State Budget Law for 2022 according to new needs	ACQAHE Ministry of Education, Science, Culture and Sport Ministry of Finance	September-December 2021	
3	Improved procedures for external evaluation		Rulebooks on external evaluation of institutions	ACQAHE	October 2021 - March 2022	<ul style="list-style-type: none"> Implemented all ESGs' 4 key steps into external evaluation procedures which means inclusion of the follow up as a compulsory part of the process Improved efficiency and accuracy of the external evaluation process Database for thematic and other research and analyses for HE system policies Trained Agency staff for implementation of new procedures
			Rulebook on external evaluation of study programs	ACQAHE	October 2021 - March 2022	
			Rulebook on external evaluation of LLL programs in HE	ACQAHE	October 2021 - March 2022	
			Development of the unique database on the HE system	ACQAHE through ERASMUS +	December 2021-December 2023	
			Development of the electronic platform for external evaluations	ACQAHE through ERASMUS +	December 2021-December 2023	
			Capacity building of Agency staff for implementation of procedures and criteria compliant with the ESG	ACQAHE Projects (EU Funds)	September 2021-December 2024	
			Trainings for HE institutions and peer review experts for implementation of the new procedures	ACQAHE Projects (EU Funds)	April 2022-December 2022	

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						<p>through electronic tools</p> <ul style="list-style-type: none"> • Trained stakeholders for implementation of the procedures
4	Improvement of national criteria for external QA		Improved criteria for institutional evaluation	ACQAHE HE Institutions Students Business representatives	September 2021-March 2022	<ul style="list-style-type: none"> • Better distinction of criteria between institutional and programs evaluation, and academic and applied studies • Full Part 1 of ESGs is set as minimum criteria for external evaluation procedures • Additional criteria regarding the specificities of the Montenegrin HE system are developed. • Criteria are better structured with less overlapping • Transparency, integrity, independence and cooperation are formal principles of ACQAHE work and organization
			Improved criteria for study program evaluation	ACQAHE HE Institutions Students Business representatives	September 2021-March 2022	
			Improved criteria for evaluation of LLL programs	ACQAHE HE Institutions Students Business representatives	September 2021-March 2022	
			Developed criteria for applied study programs	ACQAHE HE Institutions Students Business representatives	September 2021-March 2022	
			Developed criteria for internal evaluation of the Agency	ACQAHE HE Institutions Students Business representatives	April-June 2022	

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5	Improved quality of expert groups (peer review experts)		The new Law recognizes three groups of experts: university professors, students and business representatives	Ministry of Education, Science, Culture and Sport ACQAHE HE Institutions Students Business associations	April - July 2021	<ul style="list-style-type: none"> • Improved selection, nomination and diversification of experts • Students and business representatives are mandatory members of all expert commissions. • Members of expert commissions are trained on procedures and criteria before the evaluation process • Quality foreign experts are more interested to participate in external evaluation in Montenegro • The functioning and quality of expert commissions are constantly improving
			The new Law recognizes international experts in reviews as well as in decision-making bodies	Ministry of Education, Science, Culture and Sport ACQAHE HE Institutions Students Business associations	April - July 2021	
			The new Law provides a new process of expert selection and nomination into the expert commissions by the independent body-Agency Council	Ministry of Education, Science, Culture and Sport ACQAHE HE Institutions Students Business associations	April - July 2021	
			Developed criteria for the selection of experts representing employers	ACQAHE	January-June 2022	
			The public call for all groups of experts open during the whole year	ACQAHE	January-June 2022	
			Developed methodology of training for experts	ACQAHE	January-June 2022	
			Increase in expert fee	ACQAHE Ministry of Education, Science, Culture and Sport Ministry of Finance	January 2023	

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			Surveys on quality of external evaluation process	ACQAHE	From January 2022	
6	Stakeholder involvement		The new Law recognizes all stakeholders as an inevitable part of the QA system: members of the Agency Council, members of expert commissions, participants in procedures and criteria development, participants of training.		April-July 2021	<ul style="list-style-type: none"> • Decisions made in QA in HE are products of the system that include all relevant stakeholders. • Efficiency necessary for managing the changeability of the structures in the QA system. • The process of stakeholders' involvement is constantly improving
			Database of stakeholders	ACQAHE	From January 2022	
			Surveys on the quality of the processes where stakeholders participate	ACQAHE	From January 2022	

6. Conclusions

The current legislative framework in Montenegro does not provide for the full implementation of ESGs. Some standards and procedures that are compliant with ESGs should be improved in direction of clarity and simplification. Compliance with ESGs in Montenegro requires changes in the law that regulates quality assurance (Law on Higher Education or the new law related to QA only) precisising, on the principal level, all the issues that will provide comprehensive and consistent implementation of ESGs. The provision from the Law should ensure a sound base for the development of standards and procedures through by-laws and other relevant laws (Law on administrative taxes, Law on Budget) in direction of:

- Recognizing ACQAHE as an independent state agency in the national system of public administration.
- Creation of a new institutional framework in charge of decision-making on external evaluations, appeals and objections and other relevant decisions in the field of QA.
- Adoption of all procedures on external evaluation by ACQAHE.
- Adoption of all national standards and criteria by ACQAHE.
- Inclusion of stakeholders (students and employers, primarily) in the external evaluations and other decision-making processes.
- Training of experts consistently and periodically implemented.
- Digitalization of external evaluation procedures.
- Strengthen the research component of the ACQAHE.

Besides the Law, other strategic documents- Strategy for Higher Education and Mid-term Program Budget - must be adopted and be consistent with the new Law so that the system can work harmoniously, providing all necessary resources.

The process of ESG implementation by itself is equally important for the Agency and all other stakeholders of the Montenegrin higher education system as the act of membership in ENQA and registration in EQAR has. Learning how to independently and harmoniously improve the quality of higher education, keeping its authentic characteristics as comparative advantages as well as exchanging opinions, knowledge and experience is actually strengthening the capacities of the Agency and all other stakeholders. This process turns the ESG into the essence of the everyday functioning of higher education institutions, instead of an obligation.