KOSOVO ACCREDITATION AGENCY (KAA)

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European Association for
Quality Assurance in Higher Education

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EXECUTIVE SUMMARY

This report analyses the compliance of the Kosovo Accreditation Agency (KAA) with the European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), as required by the Terms of Reference (TOR) stipulated between the agency and ENQA/EQAR. It is based on an external review conducted from March 2024 to September 2024, including a site visit from 2nd to 4th July 2024 in Pristina.

This is KAA's third review, but since the agency was removed from EQAR in 2018 and lost its ENQA membership in 2019, KAA is effectively being reviewed as a new agency. Results and recommendations from the 2019 ERR are nevertheless considered throughout the report. As ENQA amended its statutes in 2020 so that only members from a member state of the EHEA are now eligible for ENQA membership, ENQA's General Assembly in Stockholm in October 2022 confirmed KAA as an ENQA affiliate. In 2023, KAA requested an ENQA co-ordinated review so that it could be considered for re-listing on EQAR.

KAA was established by the competent Ministry in 2004 and became fully operational in 2009, starting with accreditation activities at institutional and programme level, with the support of international projects, donors and experts. In 2014, KAA became an ENQA member and was accepted into EQAR in 2015. In 2017, the Ministry suddenly dismissed the Director and the whole Board of KAA (SCQ), citing irregularities. This act of political interference on the independence of the agency led to its exclusion from EQAR in 2018 and from ENQA in 2019, following the ENQA external review in the same year. In 2023 finally a new Law on KAA was adopted, establishing the independent legal status of the agency and its Board.

Based on this law, external QA activities of KAA include accreditation and re-accreditation, monitoring and validation for HEIs and their study programmes in Kosovo. The mission of KAA is to support the development of quality in HEIs and ensure the overall quality of the sector in Kosovo. Specific goals are the promotion of HE quality, an increase in transparency and accountability in the HE sector, the improvement of quality of HE offers, encouraging innovative content, ensuring comparability between Kosovo HE and international qualifications, and also to contribute to the integration of Kosovo into the EHEA. Activities of KAA are based on the values of independence of KAA, of transparency, credibility and professionalism.

In light of the available documentary and oral evidence considered by it, the review panel made the following judgements and recommendations on the compliance of KAA with the ESGs:

- Compliance with ESG 3.2, 3.3, 3.4, 3.7, 2,1, 2.2, 2.4, 2.5, 2.6, 2.7
- Partial compliance with ESG 3.1, 3.5, 3.6, 2.3

Based on the analysis provided, the review panel considers that, in the performance of its functions, KAA does not substantially comply with the ESG. The agency is recommended to take appropriate action to achieve compliance in all standards at the earliest opportunity.

INTRODUCTION

This report analyses the compliance of the Kosovo Accreditation Agency (Agjencia e Kosovës pr Akreditim / Agencija Kosova za Akreditaciju, KAA) 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 2024 to September 2024.

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 compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015. However, as Kosovo is not a member state of the EHEA and therefore KAA cannot become an ENQA member, the review was requested on a voluntary basis pursuing EQAR registration.

This is KAA's third review, but since the agency was removed from EQAR in 2018 and lost its ENQA membership in 2019, the panel is expected to review KAA as a new agency but also to consider the results and recommendations from the 2019 ERR.

As explained in more detail in the Chapter about KAA, the agency became a member of ENQA in 2014 following a review and became listed in EQAR that same year. Then it was excluded from EQAR in 2018. It undertook a five-year review for ENQA membership in 2019 and its membership was not renewed. In 2020, ENQA amended its statutes so that only members from a member state of the EHEA are now eligible for ENQA membership. The minutes of ENQA's General Assembly in Stockholm in October 2022 confirmed KAA as an ENQA affiliate.

In 2023, KAA requested an ENQA co-ordinated review so that it could be considered for listing on EQAR.

SCOPE OF THE REVIEW

The tripartite Terms of Reference (TOR) between KAA, ENQA and EQAR were finalised in March 2024. As KAA applied for inclusion in EQAR, a full review was required, considering the compliance of KAA with each of the standards of Part 2 and 3 of the ESG.

Considering the chronology explained in the Introduction of this ERR, the panel was required in the TOR "to give specific attention to the issues where the Register Committee concluded in its last decision, that the agency was not compliant with the ESG, namely ESG 3.3."

The following activities carried out by KAA are considered in this review according to the TOR:

- Institutional accreditation: QA procedure at institutional level for public and private HEIs to obtain a first accreditation or re-accreditation, necessary to gain and maintain the ministerial licence to operate in Kosovo (every 3 to 5 years)
- Programme accreditation: QA procedure at programme level (Bachelor and Master) for already accredited HEIs, necessary to operate a specific study programme (every 3 to 5 years)
- Monitoring procedures: QA procedure to be performed every 6 months at programme or institutional level in order to confirm that the conditions of the last accreditation are being maintained
- Evaluation of doctoral programmes: QA procedure at programme level (Doctorate) for already accredited HEIs, necessary to operate a specific Doctoral programme (every 3 to 5 years)

According to the Law on KAA, the agency also performs validation of international accreditations at institutional and programme level, as a pre-condition for institutions to operate and offer specific study programmes in Kosovo after they have been accredited by international QA agencies. To the knowledge of the panel, there are no other external QA activities performed by KAA falling within the scope of the ESG and not listed in the TOR.

MAIN FINDINGS OF THE 2019 REVIEW

Prior to the current review, KAA underwent an external review in 2019, with the site visit in March 2019. Using the 2015 ESG and the ENQA Guidelines for Agency Reviews in place at the time (with four possible levels of compliance: fully, substantially, partially, not), the review panel reached the following judgements:

ESG	Compliance level
3.1 Activities, policy, and process for quality assurance	Partially compliant
3.2 Official status	Fully compliant
3.3 Independence	Substantially compliant
3.4 Thematic Analysis	Partially compliant
3.5 Resources	Partially compliant
3.6 Internal quality assurance and professional conduct	Partially compliant
3.7 Cyclical external review of agencies	Fully compliant
2.1 Consideration of internal quality assurance	Substantially compliant
2.2 Designing methodologies fit for purpose	Substantially compliant
2.3 Implementing processes	Partially compliant
2.4 Peer-review experts	Partially compliant
2.5 Criteria for outcomes	Substantially compliant
2.6 Reporting	Partially compliant
2.7 Complaints and appeals	Fully compliant

Based on the ERR, the ENQA Board decided on 19th September 2019 not to renew the KAA membership, sharing the panel's concern about the areas of partial compliance with the ESG, and the ENQA President communicated the decision to KAA on 1st October 2019. KAA was advised by ENQA to follow-up and implement the provided recommendations before reapplying (after at least two years from the ENQA decision).

In May 2022 KAA delivered a follow-up report to ENQA, providing an overview of the main recent developments at KAA and a self-assessment of the level of fulfilment of the recommendations from the 2019 ERR. In 2022 KAA also became an affiliate of ENQA.

In the present ERR the follow-up of the recommendations from the 2019 ERR will be discussed under the corresponding ESG.

Summary

In the executive summary of the 2019 ERR (p. 4) the panel expressed the following overall judgement: "The review panel considers that, in the performance of its functions, KAA does not substantially comply with the ESG. The agency is recommended to take appropriate action to achieve at least substantial compliance in all standards at the earliest opportunity."

REVIEW PROCESS

The 2024 external review of KAA 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 KAA was appointed by ENQA in May 2024 and composed of the following members:

- Padraig Walsh, Chief Executive, Quality and Qualifications Ireland (QQI), Ireland – Chair, quality assurance professional (ENQA nominee)
- Giuliana Sabbatini, Head of Service and Competence Center for Higher Education Development and Quality Management, Austria – Secretary, quality assurance professional (ENQA nominee)
- Tomaž Deželan, Full Professor, Jean Monnet Professor, CoE&EU European Youth Researcher (PEYR), Faculty of Social Sciences, University of Ljubljana, Slovenia – Panel member, academic (EUA nominee)
- Natalia Greniewska, PhD student in Literature, Faculty of Oriental Studies, University of Warsaw and Master's student in Economics, Warsaw School of Economics, Member of the European Students' Union Quality Assurance Student Experts' Pool, Poland – Panel member, student (ESU nominee)

Alexis Fábregas Almirall, Project and Reviews Officer at ENQA acted as the coordinator for the review. The coordinator is not a member of the panel.

The review panel received the SAR together with its Annexes on 23rd May 2024. In the weeks between the provision of the SAR and the site visit, the following online meetings took place:

- 4th June 2024: briefing of the panel members attended by ENQA and EQAR representatives
- 17th June 2024: kick-off meeting (1st part) with panel members and ENQA coordinator
- 26th June 2024: kick-off meeting (2nd part) with panel members and ENQA coordinator
- 26th June 2024: meeting with the agency (two KAA representatives, panel members and ENQA coordinator)

On 1st July 2024, the day before the site visit, the panel members met once again in person in Pristina to finalise the preparation activities.

Concerning the schedule of the site visit, a proposed structure for the sessions and their composition was provided by the review panel on 12th June 2024, draft versions were circulated and adapted on 20th and 25th, then finalised on 26th June 2024.

Based on the internal discussions among the panel members concerning the mapping between ESG and evidence (SAR and its annexes, KAA website etc.), extensive additional documentation was first required by the panel on 11th June 2024 and then again during the site visit itself. Before as well as during the site visit, KAA provided the required documents promptly (where available, otherwise a short information or explanation was returned).

Self-assessment report (SAR)

According to the SAR itself (p. 7), this document was first drafted by a small team made up of the President of KAA's Board (State Council of Quality, SCQ), KAA's Director and the Head of the Department for Monitoring and Post-Accreditation Procedures (previously called the Department for Follow-up Procedures); then thoroughly discussed in two workshops in December 2023 and January 2024 with Board members, KAA staff members, and (in the second workshop) also with representatives of the (international) donors and of two higher education institutions (HEIs). A consultation phase followed, in which the document was circulated through KAA's website as well as

via email with representatives of all stakeholders of the agency. Feedback was integrated by the original team and the document finalised and submitted.

The SAR consists of eighty-eight pages and three annexes, whereas several other documents available on KAA's website and more generally on the web are given as links in the text. The document contains information about the agency's development, the national context regarding QA and HE, and the history, profile and activities of KAA. It provides evidence about compliance with ESG Part 2 and 3 and includes opinions of KAA's stakeholders, a reflection on the recommendations from the previous review and their implementation, and a SWOT analysis including KAA's findings on the main challenges and future developments.

A collection of additional documents was provided in the week prior to the site visit, as well as during the site visit itself based on the requests of the review panel, as the panel members were not always in the position, based on the SAR itself, to recognise if specific activities or steps described in the SAR were already implemented or still in the planning / introduction phase. The panel believes that it would have been more helpful if more evidence had been provided directly in the SAR or in the Annexes.

The SAR also includes an overview (pages 78-83) of the recommendations from the 2019 ERR and the corresponding progress of the agency.

Site visit

The site visit took place from 2nd July to 4th July 2024 in Pristina at the premises of the agency, according to the time schedule in Annex 1. In sixteen sessions, representatives from the following groups and stakeholders were interviewed by the panel:

- KAA's Board (SCQ) members
- KAA's Director and staff from the Departments of Evaluation and Accreditation as well as Monitoring and Post-Accreditation procedures
- International donors and consultants involved in (capacity-building) projects and activities with KAA
- Representatives of employers / industry / labour market and of the civil society
- Representatives of the responsible Ministry of Education, Science, Technology and Innovation (MESTI) and of the national ENIC/NARIC
- Representatives from the HEIs in Kosovo – public as well as private ones: senior management (e.g. Rector or Dean) and quality management units
- Experts involved in reviews conducted by KAA: student reviewers and non-student reviewers (both these meetings took place online)
- Student representatives from Kosovo HEIs

All meetings were held in English and only a few participants needed support with translation, which was kindly provided by other participants in the same sessions.

Before the beginning and at the end of each site-visit day, as well as between the sessions and in a longer slot during the last day of the site visit, the panel members prepared and discussed the mapping between the various ESG standards and the evidence provided, as well as reflected on the results of each session. Additional documents provided during the site visit were also analysed during these time slots.

The panel members thank the agency for the organisation of the site visit and the fruitful discussions during the meetings.

External review report

Already during the site visit, in the last private sessions, the panel members had the chance to thoroughly review their main findings and possible recommendations. The results of this session were summarised by the panel chair and served as a starting point for the ERR. The report itself was first drafted by the secretary of the panel and then circulated with and edited by all panel members, so that a final version of the draft could be provided to the ENQA coordinator on 30th July 2024. Based on the coordinator's feedback the panel reviewed the ERR and sent it to the agency on 12th August 2024, in order for the agency to check for factual inaccuracies. The agency provided feedback on 31st August 2024 and the final report was sent by the panel to the ENQA coordinator on 6th September 2024.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM

The following characterisation is based on information contained in the SAR, on KAA's report "The state of higher education in Kosovo" (2020[1]), and on the explanations and further information provided during the site visit, especially by KAA's Board President, KAA's Director and the representatives of the ministry (MESTI). The HE sector is regulated by the Higher Education Law (2011, link in the SAR on p. 11) and includes:

- Bachelor's degrees: 3 or 4 years with 180-240 ECTS
- Master's degrees: 1 or 2 years with 60-120 ECTS
- Doctoral degrees: at least three years
- As well as post-secondary education

The sector is made up of different types of HEIs, which – depending on their type/status and their nature (public or private) – are entitled to provide programmes at one or more of the levels listed above. These types include Universities, University Colleges, Colleges, Institutes, Schools of Higher Education and Academies. According to the law, public HEIs are established by decision of MESTI, ratified by the parliament, while private HEIs are privately founded. Both have to undergo institutional accreditation.

Following the end of the war in 1999 and then in 2008 the declaration of independence, in Kosovo an intensive expansion of higher education began, leading to the proliferation of HEIs of both a public and private nature. This posed and still poses specific challenges to KAA, because this new rapidly growing sector had to be developed, regulated and consolidated during the past years, and a quality culture established and nurtured step by step together with all stakeholders. At the time that SAR was released, the Kosovo HE sector consisted of 26 institutions (9 public and 17 private ones, p. 9), offering a total of 382 study programmes (58% at public HEIs and 42% at private ones) to 71,835 students (57% in the public sector and 43% in the private sector). More recently, the total number of HEIs, especially of private HEIs, has dropped significantly. However, this is still a highly diversified and large sector for a total population of about 1,59 Mio in the country in 2024 (according to information from the Kosovo Agency of Statistics[2]).

QUALITY ASSURANCE

The general framework of QA in the Kosovar HE sector evolved rapidly (starting with 2002 with the first Law on Higher Education where the role of KAA was first defined) and is set out in the current version of the Law on Higher Education (updated in 2011), in the responsibility of the Ministry of

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[1] https://akreditimi.rks-gov.net/wp-content/uploads/2021/11/Report-on-the-state-of-higher-education-in-Kosovo_ENG.pdf (access 12th July 2024)
[2] https://ask.rks-gov.net/ (access 3rd August 2024)

Education, Science, Technology and Innovation (MESTI). Article 7 of this law introduces KAA and its duties and responsibilities, and also sets the boundaries between the activities of the agency and of the ministry: KAA is responsible for QA and accreditation decisions; based on these decisions and with the advice by KAA, MESTI grants, modifies and revokes the licences of HEIs to offer study programmes in Kosovo (see Article 7, §2.2). Accreditation and a licence are both necessary to offer HE study programmes. Of course, decisions about licences also affect financial conditions for the HEIs (same Article, §2.5 and Article 41, §3). Article 15 defines the national framework for accreditation, at institutional and at programme level. The legal framework is then further developed and specified in the Law on KAA (2023), which defines in more detail the State Council of Quality (SCQ, the Board of KAA) and corresponding regulations. A whole chapter of this Law (Chapter III) is dedicated to Accreditation, establishing in detail the national framework for accreditation activities at institutional and programme level.

Both, MESTI and KAA, have recently played an important role in the consolidation of the HE sector in Kosovo, strongly contributing, together with all the stakeholders, to the development and establishment of a quality culture. Beside MESTI and KAA and the directly involved stakeholders (HEIs, students, employers/industry), a specific role is played by the civil society and especially by NGOs engaged for transparency, accountability and integrity in HE in Kosovo. The Coalition for Integrity and Transparency in the University (KITU) was already involved in 2018 in the communication with EQAR to raise attention to the problem of political interference in the QA in HE in Kosovo The Kosovo Education Center and especially the Organization for Increasing Quality of Education (ORCA) are strongly involved in the activities of KAA (for example, ORCA monitors regularly the activities of the SCQ and prepares yearly monitoring reports on it).

As the country with its 1,7 Mio inhabitants only has limited resources for QA activities and the whole HE sector is young, international experts have played and continue to play a huge role:

- The first round of institutional accreditations was commissioned to and carried out by the British Accreditation Council (BAC) in 2008, before KAA became fully operative.
- A number of international projects largely funded by donors like the US Embassy and the Austrian Development Agency played a huge role in capacity building and standards development with KAA.
- Institutional and programme accreditations still involve exclusively international reviewers in the panels, both student and academic experts; as national capacity has not yet been built up, for various reasons.

KAA

According to the SAR (§3.1), KAA was established by MESTI[3] in 2004 by means of the Administrative Instruction for the Establishment of the Kosovo Accreditation Agency, based on the Law on Higher Education of 2002. Quality assessment and accreditation of public and private institutions were defined as KAA's responsibilities. The same law also already required the establishment of the SCQ. It was not until 2009 that KAA became fully operational and started with accreditation activities at institutional and programme level, with the support of international projects, donors and experts. These helped with the design of the procedures and with staff development.

Starting with 2011, when the new Law on Higher Education was established, the decisions by the SCQ concerning the accreditation of institutions and programmes became effective on their own, without

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[3] The former name of this ministry was MEST – Ministry of Education, Science and Technology, only in recent years it was changed to include Innovation. In this report, the current name and abbreviation are used.

need for approval by the Government of the Republic of Kosovo (this was the case based on the Law of 2002).

In 2014, KAA became an ENQA member and was accepted into EQAR in 2015. In 2017, MESTI on behalf of the Prime Minister of Kosovo suddenly dismissed the Director and the whole Board of KAA (SCQ), citing irregularities. Despite attempts from several sides, no further clarification or evidence was provided. This act of political interference on the independence of the agency led to its exclusion from EQAR in 2018 (effective as of 2017) and from ENQA in 2019, following the ENQA external review in the same year.

In 2018, a new Administrative Instruction on the Criteria and Procedures on the Appointment of the Members of the State Council of Quality of KAA was adopted. According to the SAR (§6.3.1), all current members of the SCQ have been elected based on this regulation.

Following these drastic changes, the role and work of KAA and of its Board were progressively developed and their activities standardised, thanks to a network of international donors (e.g. the US Embassy in Kosovo and the Austrian Development Agency), numerous international projects and experts, significantly supporting capacity building, staff development and alignment with international practices.

In 2023 finally a new Law on KAA was adopted, establishing the independent legal status of the agency and its Board as well as the framework for its activities based on the already existing Law on Higher Education. The provisions of this new Law are not yet fully implemented and to the knowledge of the panel there is no official time plan for their full implementation.

KAA'S ORGANISATION/STRUCTURE

According to KAA's website and to the SAR (§3.2 and §6.3.1), the State Council of Quality (SCQ) is the Board of the agency and acts as its policy- and decision-making body, as defined in the Law on KAA (which sets out the composition and selection of the Board members, based on open calls for nomination), and in the SCQ's own Regulation on the Work of the State Council of Quality (SCQ). The SCQ includes nine members (with a President and a Vice-President), three of whom are international, and including KAA's Director. The current composition is published on KAA's website. According to the Law on KAA, a student member with the right to vote is to be included in these nine members, this is not yet the case – the open call for nominations was only published by MESTI during the site visit. Moreover, two industry representatives as non-voting members are to be included as well, the procedure for their nomination has not been started by MESTI yet.

The SCQ is responsible for the approval of KAA's statutes and regulations, its strategic documents, workplans, guidelines and procedures for the different activities; it takes decisions concerning all steps of the procedures for institutional accreditation, programme accreditation, monitoring and evaluation of doctoral programmes, from the approval of the timelines and the lists of international experts to the approval of the corresponding reports.

KAA's staff is led by the Director and consists currently of eighteen employees according to the SAR[4]. This number has been and is continuously growing, from ten employees in 2018 to the planned thirty-two positions according to the SAR and confirmed by the representatives of MESTI during the site visit. The organogram from the website shows the organisational structure of KAA, where the external

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[4] KAA's website shows 15 employees (access 14.7.2024) including 2 colleagues who started shortly before the site visit and who were met by the panel. During the site visit, the Director and the Heads of the two Departments explained that 2 further employees have been already selected to start at the beginning of August 2024.

QA activities are carried out by the staff of two Departments (Department of Evaluation and Accreditation and Department of Monitoring and Post-Accreditation Procedures). Each Department consists of two Divisions, and four further Divisions for several support functions directly report to the Director (in brackets the number of employees per unit):
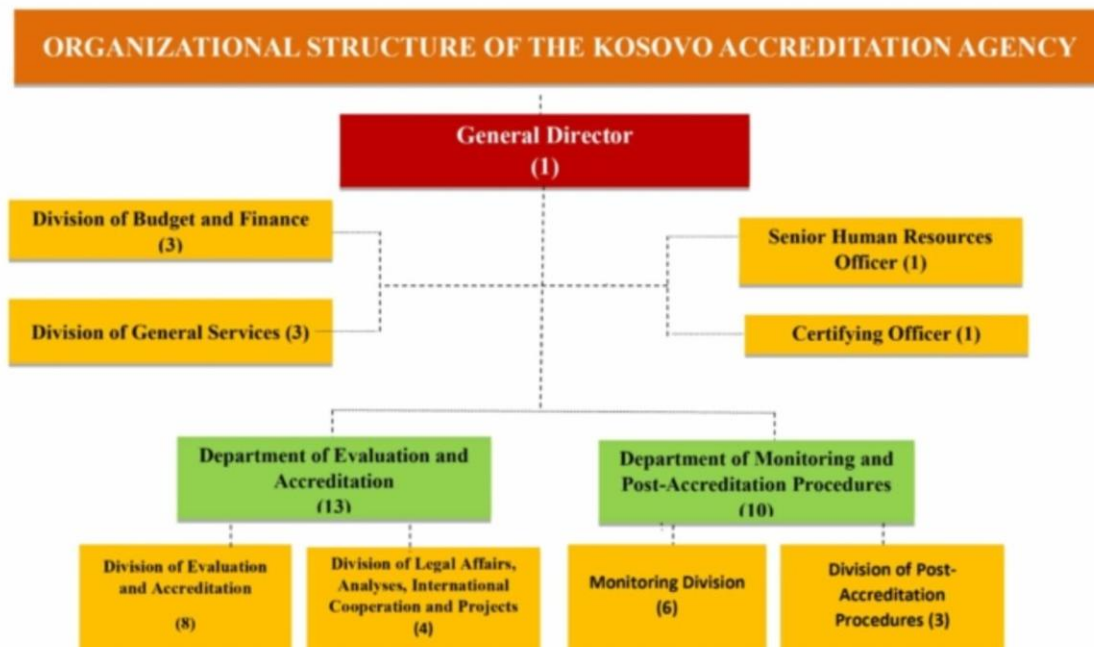

ORGANIZATIONAL STRUCTURE OF THE KOSOVO ACCREDITATION AGENCY

General Director (1)

Division of Budget and Finance (3)

Division of General Services (3)

Senior Human Resources Officer (1)

Certifying Officer (1)

Department of Evaluation and Accreditation (13)

Department of Monitoring and Post-Accreditation Procedures (10)

Division of Evaluation and Accreditation (8)

Division of Legal Affairs, Analyses, International Cooperation and Projects (4)

Monitoring Division (6)

Division of Post-Accreditation Procedures (3)

Figure 1 - Organogram of KAA (from KAA's website)

KAA's FUNCTIONS, ACTIVITIES, PROCEDURES

According to the website and to the SAR (§3.2), KAA is "responsible for internal and external quality assurance, including accreditation, re-accreditation, monitoring, validation and all other quality assurance processes in higher education institutions and their study programs in the Republic of Kosovo".

According to the Law on KAA and as reported in the SAR (§4), the activities carried out by KAA consist of:

- Accreditation and re-accreditation of HEIs: QA procedure at institutional level for public and private HEIs to obtain a first accreditation or re-accreditation, necessary to gain and maintain the ministerial licence to operate in Kosovo (every 3 to 5 years), based on the Accreditation Manual
- Accreditation and re-accreditation of programmes offered by already accredited HEIs, at the level of Bachelor, Master and Doctoral Programmes, necessary to operate a specific study programme (every 3 to 5 years), based on the Accreditation Manual (for Bachelor and Master) and on the Standards for Evaluation of Doctoral Programmes
- Validation of internationally accredited institutions and programmes, as a pre-condition for institutions to operate and offer specific study programmes in Kosovo after undergoing accreditation by an international QA agency.
- Follow-up and monitoring procedures concerning HEIs and their programmes, as defined in KAA Methodology on Monitoring and Post-accreditation Procedures: monitoring consists of

QA activities to be performed every 6 months at programme or institutional level to confirm that the conditions of the last accreditation are maintained; while follow-up procedures serve to ensure the delivery and implementation of measures based on an accreditation procedure (at institutional or programme level)

While the post-accreditation activities correspond to conventional forms of follow-up, the monitoring activities are peculiar to the Kosovo context and consist of detailed control activities on the side of KAA with the aim of verifying if the HEIs comply with what has been accredited at institutional and programme level. The panel would like to draw attention to the fact that monitoring as defined by the Law on KAA (Chapter IV) presents issues about the question of matching this activity with the standards of Part 2 of the ESG due to its nature / traits and to the national legislation. Among other things, monitoring is directly performed by KAA's staff (Article 42), not by external experts.

An overview of KAA's activities at the level of institutional and programme accreditation as well as evaluation of doctoral programmes is provided in the SAR (§4)[5]:

	2021	2022	2023
Institutional accreditation	6	14	10
Programme accreditation	234	97	64
Evaluation of Doctoral Programmes	5	5	2

Table 2 - Overview of accreditation activities 2021-2023

For the monitoring activities (only introduced in this form in 2023), the list provided by the agency during the site visit as requested by the panel shows nineteen activities for 2023 and 5 activities for the first half of 2024.

The international activities of KAA are summarised in the SAR (§3.1) and reported in detail on KAA's website for the interested public. They consist mainly of:

- Participation in activities organised by international bodies such as ENQA and the International Network for Quality Assurance Agencies in Higher Education (INQAAHE)
- Visits to other European QA agencies with the aim of exchanging good practices and of staff development (e.g. AQ Austria and ACQAHE in 2022, AQAS and ASIIN in 2023)
- International projects funded by the Austrian Development Agency:
  - Heras Plus[6] (twinning project with AQ Austria, 2021)
  - QAINT - Quality, Accountability, Integrity, and Transparency in Higher Education (2019-2022), with the participation of the Kosovo Education Center (KEC, Kosovo), the Organization for Increasing Quality of Education (ORCA, Kosovo) and the Centre for Social Innovation (ZSI, Austria)
  - HEI25 (2022-2025), involving KAA, KEC and MESTI, and staff and students' representatives from seven public universities in Kosovo

Several documents directly resulted from the cooperation with international experts in the context of these international projects and from further activities funded by the US Embassy in Kosovo. Examples of such documents (also available on KAA's website) include:

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[5] The current IT-system was introduced in 2020 and does not contain reliably comparable data for the years 2019 and 2020.
[6] Also called HERAS+ depending on the source.

- Guidelines for Student Engagement in Internal and External Quality Assurance of Kosovo Higher Education (see SAR §6.1.4)
- Thematic Analysis of Processes Involved in Accreditation/Reaccreditation of Study Programmes
- Report on the State of Higher Education in Kosovo
- Guidelines on conducting thematic analyses by Kosovo Accreditation Agency
- Thematic Analysis Preparation of the Kosovar Graduates for the Labour market – Employer and Alumni Perspective
- Recommendations on revision of standards for Institutional and Programme Accreditation by Kosovo Accreditation Agency
- Review of good practices on the carrying out of thematic analysis by the accreditation agencies in selected European countries

KAA'S FUNDING

The two main sources of funding of the agency are the budget from the Government of Kosovo and the fees paid by the HEIs for the procedures conducted by KAA. The budget from the Government is planned according to the SAR (§6.5.1) over a three-year period and mainly covers the salaries of the employees of KAA (who are civil servants), but also additional costs for infrastructure. The fees paid by the HEIs roughly correspond to the external costs of the procedures with the international experts (apart from the monitoring procedures, which are undertaken only by KAA staff, and from the follow-up procedures, covered by KAA according to the SAR). Additionally, as a third source, donors and international grants support some infrastructure and above all the external personnel costs for international experts and consultants involved in capacity building.

The financial information was provided in the form of Annexes to the SAR and is also available on KAA's website – and was further explained by KAA's Director during the site visit.

Budget	2021	2022	2023	2024
Government	216.813 EUR	255.092 EUR	356.310 EUR	280.604 EUR
Revenues	530.100 EUR	530.100 EUR	530.100 EUR	530.100 EUR
Total	746.913 EUR	785.192 EUR	886.410 EUR	810.704 EUR

Table 3 - KAA's budget 2021-2024

The budget already includes salaries for thirty-two employees for the entire period 2021-2024, while the actual number of employees only increased from 9 in 2021 to11 in 2023. Therefore, the actual expenditures for the period 2021-2023 show that only 32-36% of the Government grant was drawn down:

Expenditures	2021	2022	2023
From Government	78.832,01 EUR	88.251,00 EUR	112.046,04 EUR
From revenues	521.932,41 EUR	457.077,94 EUR	362.094,33 EUR
Total	600.764,42 EUR	545.328,94 EUR	474.140,37 EUR

Table 4 - KAA's expenditures 2021-2023

FINDINGS: COMPLIANCE OF KAA 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.

2019 review recommendations

- Find as soon as possible HE-wide consensus and consequently decide on a KAA Strategic Plan, including solid activity plans with performance indicators and well defined responsibilities, so as to prepare a sound basis for regular future activities.
- Involve students in the daily activities and the decision making structure of KAA.

Evidence

The mission, strategic goals and values of KAA have been defined based on the Law on Higher Education and communicated through the website and in the Strategic Plan 2021-2025. The mission is defined in terms of supporting "the development of quality in HEIs" and ensuring for "the society of Kosovo that the quality of teaching and learning is at the level of international standards." Based on this mission, the following strategic goals are identified and published on KAA's website:

- promote, improve and enhance the quality of HE
- increase transparency and accountability in the HE system
- improve the quality of studies in HEIs
- encourage innovative content in HE
- ensure the comparability of qualifications from Kosovo HEIs with those provided by international programmes
- implement the objectives for the integration of Kosovo in the EHEA and contribute to its development

The activities of KAA are defined in the Law on KAA and include, according to Chap. II, §6.1:

- Accreditation and re-accreditation of HEIs
- Accreditation and re-accreditation of programmes of HEIs, including programmes offered in foreign languages, joint and double degree programmes
- Validation of internationally accredited institutions and programmes
- Continuous quality control and enhancement in accredited institutions and their programmes
- Monitoring of HEIs and their programmes concerning the implementation of the accreditation criteria

- Withdrawal or revocation of accreditation of a HEI or programme
- Cooperation with MESTI regarding granting, changing, limiting or cancelling of licences (for HEIs)
- Drafting and approval of rules and procedures, criteria, accreditation forms, reaccreditation, validation, external evaluation, quality control, monitoring and selection of international experts
- Involvement and close cooperation with the academic community as well as dialogue with all stakeholders in the process of drafting rules, procedures and standards for accreditation, re-accreditation, validation, external assessment, quality control and monitoring
- Cooperation with MESTI regarding the implementation of policies for QA in HE and the harmonisation of the legal terms of accreditation and licensing
- Undertaking activities in accordance with European and international standards for accreditation, re-accreditation, monitoring, validation in function of QA in HE in Kosovo.

KAA has defined procedures for:

- Accreditation and re-accreditation of HEIs (in the Accreditation Manual)
- Accreditation and re-accreditation of programmes at Bachelor and Master level (in the Accreditation Manual) and at doctoral level (in the Standards for Evaluation of Doctoral Programmes)
- Follow-up of accreditation and re-accreditation of HEIs and their programmes (in the document KAA Methodology on Monitoring and Post-accreditation Procedures)
- Monitoring activities (in the document KAA Methodology on Monitoring and Post-accreditation Procedures)

Reports of accreditations (institutional, programme, doctoral evaluations) as well as reports of monitoring activities are published on the website, providing evidence that KAA carries out the procedures on a regular basis.

The published Strategic Plan 2021-2025, as explained in the SAR (§6.1.1) was first drafted by the agency and then further developed with external experts and HEI representatives; the document was then disseminated for consultation to HEIs, donors, international experts and representatives of the civil society. It introduces six strategic objectives for the work of KAA during this period:

1. To regain the KAA membership in European Network for Quality Assurance - ENQA and registration in EQAR
2. To consolidate the legal framework that guarantees KAA institutional and financial independence in performing external quality assurance processes
3. To advance the KAA management and administration by increasing physical and professional capacities
4. To improve quality in higher education sector with efficient and effective accreditation and follow-up procedures
5. To advance KAA procedure digitalization for an effective external evaluation procedure information and data management
6. To strengthen KAA cooperation with external quality assurance international agencies

For each strategic objective sub-goals are listed in the same document. According to the document itself, KAA prepares on this basis its working plan, including activities, indicators and deadlines, subject to regular evaluation and reporting.

During the site visit, the panel was informed that KAA was in the phase of preparing the annual work plan for 2025 which includes a list of activities (accreditations, re-accreditations, monitoring and follow-up procedures) to be performed. This annual work plan does not link to the Strategic Plan, and

an overall work plan with deadlines and performance indicators for the implementation of the Strategic Plan is not available and not planned yet, based on the meetings during the site visit. The SAR (§6.1.2) mentions that the annual work plan is evaluated at the end of each calendar year, but no evidence of this was presented to the panel. The evaluation reports mentioned and linked there are those concerning the external QA activities of KAA, not the evaluation of KAA's own annual work.

According to the SAR (§3.2) and as required by the Law on KAA, civil society and stakeholders are directly involved in the governance of KAA through the composition of its Board (the State Council of Quality) and through the composition of the commission for the selection of the Board members.

- Composition of the commission for the selection of the members of the State Council of Quality (SCQ): The commission includes one representative from MESTI, one academic representative from the Academy of Science and Arts of Kosovo, one representative from the Rectors' conference, one representative of an international development partner and one from civil society, both active in the education field in Kosovo. The commission has the aim of preparing a short list of candidates based on the applications, whereas the short list should contain at least twice the number of members to be nominated, respecting all criteria.
- Composition of the SCQ: The SCQ consists by law of 9 voting members, including 5 academic members from Kosovo HEIs (whereas a single HEI cannot have more than 3 members and academic members cannot move to another HEI during their mandate), 1 student member (attending Master or Doctoral studies in Kosovo) and 3 international members (experts in the field of QA with academic experience). Non-voting members are KAA's Director and two industry representatives. Overall gender representation has to be ensured. Academic members include at least one person for each of the following groups of study fields: human sciences; social sciences, justice and economy: natural sciences, agriculture and environment; medical sciences; architecture, engineering and technology.

Although the Law has been in force since June 2023, at the time of the site visit the procedure for the nomination and selection of the employer/industry representatives had not yet been started by MESTI. The open call for the nomination and selection of the student member was only started during the site visit itself.

Beside the representation in the SCQ required by the law, stakeholders of KAA are involved in ad-hoc consultations and workshops, for example in the revision of procedures and guidelines of KAA, with a strong emphasis on HEIs and international experts. There is no evidence of a regular, structured involvement of other stakeholder groups (for example in consultative bodies) outside these ad-hoc activities.

Analysis

The standard requires the agency to conduct external QA processes at programme and/or institutional level on a regular basis. Agencies must also ensure the involvement of stakeholders in their governance and work.

Moreover, the recommendations from the 2019 review required the agency (a) to find HE-wide consensus and provide a Strategic Plan including an activity plan with indicators and responsibilities, and (b) to involve students in the daily activities and decision-making structures of KAA.

The panel considers that the first part of the standard is well implemented: KAA conducts on a regular basis external QA activities at institutional and programme level as defined by the ESG Part 2. For these activities, goals and objectives are defined and published and are consistent with KAA's mission.

The standard also requires that the agency's goals be translated into actions. While the agency has produced a five-yearly strategic plan, it is not clear that this is translated into a series of actions to be

performed annually, as the working plans only focus on the list of procedures to be conducted in the upcoming year. The production of an implementation plan, including indicators and responsibilities as recommended in the 2019 review, would assist in the planning of the agency's work and in particular, would drive a workforce plan to ensure that appropriate human and financial resources are found to deliver on the priorities of the Strategic Plan. The panel believes that the publication and dissemination of the implementation plan would be a particularly useful way of indicating the agency's progress in delivering on its goals to its wide stakeholder base.

The last part of the standard requires agencies to ensure the involvement of stakeholders in their governance and work. The panel understands that the legal provisions of the SCQ as defined in the Law on KAA in 2023 ensure students' and employer/industry representation in the governance of the agency, but it was disappointing to note that the process for the nomination of a student representative only commenced during the panel's visit and that the process for the nomination of employer/industry representatives in the SCQ had yet to commence at the time of the panel visit.

The panel believes it would be beneficial for the agency to widen the base of stakeholders that are regularly and structurally engaged in the totality of their work, not only on an ad-hoc basis for specific consultations and workshops. Regular engagement with a wide student base and the expansion of engagement with the wider world of work would greatly enhance the work of the agency. The agency could for example establish consultative structures that it could meet on a frequent and structured basis to inform its work and disseminate its outcomes. Overall, the panel believes that the agency needs to develop more expertise in how it engages and communicates with the wider Kosovar community.

Panel recommendations

The agency is strongly recommended to implement as soon as possible the representation of a student (voting) member and of two industry (non-voting) members in the SCQ, as defined by the Law on KAA (2023). These three members should be nominated and directly involved in the meetings and the activities of the SCQ at soon as possible.

The panel strongly recommends translating KAA's Strategic Plan in a (multi-year) implementation plan, setting out measures / activities and the corresponding time plan, which are necessary to ensure that the goals are reached in all areas.

Panel suggestions for further improvement

The stakeholder basis for the further development of QA in Kosovo should be enlarged. A stronger and wider, regular and structured, involvement of students and student representatives, of employer / industry representatives, of civil society in the work of KAA would be beneficial – beside ad hoc working groups or consultations. This could be realised through consultative bodies, either through an adaptation of the Law, or on a voluntary basis on the part of KAA and SCQ. Industry / professional representatives could also be included in accreditation panels.

Panel conclusion: Partially 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.

Evidence

According to the SAR (§3.1), KAA was established by MESTI[7] in 2004 by means of the Administrative Instruction for the Establishment of the Kosovo Accreditation Agency, based on the Law on Higher Education of 2002. The same law was updated in 2011 (this version is the current one at the time of the present review) and defines KAA in its §7: "Kosovo Accreditation Agency KAA is an independent agency responsible for assessing and promoting quality of higher education in Kosovo." The same article establishes the responsibilities of KAA:

- advising with the Ministry on applications from institutions for licences to offer courses or programs forming part of or otherwise leading to higher education qualifications
- inspecting providers of higher education and advising with the Ministry related to granting, modification or revocation of licences
- performing periodic audits over the quality of licensed providers of higher education and taking decision on accreditation or their re-accreditation including the right to award titles and diplomas
- undertaking periodic quality assessment of programs offered by accredited providers of higher education
- advising the Ministry, on the results of quality assessment and its implications for financing public providers of higher education, regarding the allocation of funds for private providers of higher education and with the support of free discretion to students who attend study programs to private providers of higher education
- carrying out, on behalf of the Ministry, such functions as may be delegated to it relating to the recognition of academic and professional qualifications and, in particular, acting as the competent authority for the regulation of higher education qualifications in accordance with of the Law on state qualifications
- undertaking other activities that conform to European standards and coherent for higher education that are aimed at ensuring and improving the quality and standards in higher education in Kosovo

During the interviews, the panel heard that a thorough political discussion followed the exclusion of KAA from EQAR in 2018 and the termination of the ENQA membership in 2019 due to the political interference in 2017. The discussion helped create a broad consensus about the role and the importance of KAA and of its independence for the HE sector and for the economy and society of Kosovo. This resulted in June 2023 in the new Law on KAA, which further specifies the role and work of KAA in the broader framework of the Law on Higher Education. A first definition is provided in Article 3 of KAA as "a regulatory agency for quality assurance in higher education in the Republic of Kosovo, which is responsible for the evaluation, accreditation, re-accreditation, validation, quality control and monitoring of higher education institutions and their study programmes". Article 5 defines

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[7] It seems to be the case that the former name of this ministry was MEST – Ministry of Education, Science and Technology, and only in recent years it was changed to include Innovation. Throughout this report, the current name and abbreviation are used.

the status of the agency: "Kosovo Accreditation Agency (KAA) is a regulatory agency for ensuring the quality of higher education which operates in the entire territory of the Republic of Kosovo."

This same law further declares the principles on which the work of KAA is based (Article 4), its duties and responsibilities (Article 6), the SCQ and its conditions as a decision-making body of KAA (Article 9) with corresponding duties and responsibilities (Article 11) as well as the rules for the SCQ members (Articles 12 to 16). Moreover, Article 17 defines the procedure for dismissal of SCQ members.

Analysis

The standard requires that the agency has an established legal basis and is recognised by the competent public authorities.

Based on the evidence presented, it is clear to the panel that the agency has been established in law and that the agency is recognised for its work by the government, the competent ministry and institutions. Indeed, the panel found that all stakeholders were extremely supportive of the work and outputs of the agency and believe strongly that it contributes significantly to the improvement of the quality and standing of higher education in Kosovo. Many stakeholders commented during the site visit on the marked improvement over the past number of years.

Panel conclusion: 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.

2019 review recommendation

In conducting evaluations according to the new procedures as described in the Accreditation Manual 2018 make sure that operational independence and independence of formal outcomes is guaranteed.

Evidence

Organisational independence

The SAR and the meetings during the site visit confirm that after the sudden dismissal of KAA's Director and members of the SCQ by MESTI in 2017, a lot of effort has been put in creating a national consensus around the role, the duties and the work of the agency, as well as in ensuring full independence of its work and of the decisions of its Board. This was explicitly mentioned by several stakeholder groups (ministry, public and private HEIs, employer / industry representatives, NGOs and civil society, international experts, donors). The Law on KAA itself is a very tangible result: Articles 12 to 16 define criteria and modalities for the selection of SCQ members; Article 17 defines under which conditions dismissal of members of SCQ can take place. The composition of the SCQ and the composition of the commission for the selection of the nomination of the SCQ members have already been explained in the evidence about ESG 3.1.

The nomination procedure itself is defined in the Law on KAA in the Articles 14 and 16:

- A public call for the local members is published by the Ministry.
- For the international members, the Ministry asks international development partners and QA agencies that are full members of ENQA/EQAR and the US Department of Education to nominate experts from their respective countries.
- For all voting members, the criteria for selection are provided by Article 12 of the Law, while Article 13 lists incompatibility criteria. The commission prepares a short list based on the applications (Article 15). From this short list, the Minister selects the required members.
- The non-voting industry representatives are directly nominated by the Minister.
- The Minister forwards the list to the Government for approval and the Assembly of the Republic of Kosovo appoints the members of the SCQ.

All members are nominated for 4 years with the exception of the student member, nominated for 2 years, and members can be re-elected for a second mandate. The SCQ members directly choose the President and Vice-President by a majority vote among the representatives from the national academic community.

Article 17 of the Law on KAA defines under which conditions dismissal of one or more SCQ members is possible. Seven criteria are listed as possible reasons for dismissal, whereas the dismissal procedure can be started either by MESTI or by the General Assembly. In this case, the Minister appoints a temporary commission based on the same composition rules as for the commission selecting the nominations of the Board members. The commission prepares and submits to the Minister a report containing recommendations of appropriate measures related to the dismissal initiative, and the Minister makes a decision based on the proposal of the Commission. A dismissal decision is subject to the approval first of the Government and second of the Assembly.

Operational independence

The operational independence of KAA is established by the Law on KAA mainly through Article 20, which lists the activities under the responsibility of the Director of KAA as its chief administrative officer. These cover:

- The whole organisation of the work of KAA and its work coordination with MESTI, as well as the cooperation with MESTI about the licensing and inspection processes of HEIs
- The coordination of the activities with the SCQ and the Appeals Commission and the implementation of their decisions
- The drafting of the Strategic Plan and the work plan, to be approved by the SCQ, and the management of the budget of KAA and its expenditures as well as the recruitment and evaluation of the work of KAA's staff
- The organisation of all activities of external QA for HEIs and their programmes, and the compilation of the list of external evaluators, submitted to the SCQ for annual approval
- The submission of external evaluation reports to the SCQ for approval and the compilation of reports of monitoring procedures, subjected to the review of the SCQ
- The drafting of the annual performance report to MESTI and to the Government, as well as the coordination of thematic analyses and information to MESTI and other authorities on the state of QA in HE in Kosovo
- The representation of the agency in Kosovo and abroad, concerning relevant international organisations and agencies and local and international institutions, as well as KAA's participation in international cooperations

The same law in Article 28 about accreditation procedures, criteria and standards states clearly that KAA drafts and reviews "accreditation standards, procedures and regulations" and that those "are

determined by internal acts issued and approved by the SCQ". Moreover, the law already establishes a broad framework for the standards and procedures, guaranteeing KAA clear conditions for its independent work.

<u>Independence of formal outcomes</u>

The panel considers strong evidence of independence of formal outcomes to be provided by the relatively high number of negative decisions by the SCQ, which became necessary during the last years, in a phase of strong consolidation of the HE sector in Kosovo after the initial proliferation especially of private HEIs. This clearly shows the independent work of the agency. According to the SAR (Chap. 4):

	2021		2022		2023	
	public	private	public	private	public	private
Institutional accreditations						
Positive decision	0	3	1	11	4	3
Negative decision	0	3	0	2	1	2
Withdrawn	0	0	0	3	0	2
Programme accreditation						
Positive decision	124	74	57	56	32	24
Negative decision	12	15	4	2	2	6
Withdrawn	0	9	0	7	0	4
Evaluation of Doctoral Programmes						
Positive decision	1	0	2	0	2	0
Negative decision	4	0	3	0	0	0
Withdrawn	0	0	0	0	0	0

Table 5 - Overview of SCQ decisions 2021-2023

These negative decisions, according to the meetings during the site visit, were thoroughly respected by all stakeholders; even in cases where appeals and complaints were filed, the HEIs accepted the final decisions and even reported being satisfied with the overall procedure and its transparency and fairness. Moreover, stakeholders actively commented on the positive role played by KAA more recently in enhancing the overall quality of HE in Kosovo.

Analysis

The standard requires that agencies be independent and autonomous and have full responsibility for the operation of and the outcomes of their processes.

The 2019 external review recommendation also stressed the importance of ensuring operational independence and independence of the outcome of evaluations according to the Accreditation Manual.

The agency together with some of its main stakeholders (MESTI, HEIs, civil society and international donors) have made significant progress during the last years in terms of establishing and ensuring independence. The new Law on KAA of 2023 is the main result, granting formal independence to the agency and its Board, the SCQ. While the form of evaluations it must organise and the composition of the external evaluation panel it deploys are set in law, the panel found that the agency is supported by MESTI and the HEIs to act independently in its work. Indeed, all actors that the panel met concurred with the notion of the agency's independence. A long process of developing and establishing consensus in the HE sector and, in the society, makes sure that there is a broad basis supporting the Law and its implementation, so that the panel considers that formal independence is fully provided.

The same Law and KAA's internal rules especially as defined in the Accreditation Manual, as well as the development of the work of the agency and of its Board, strongly support the operational independence of KAA, of its staff and of its Director. The exchange with the stakeholders in the meetings during the site visit confirmed that the work of the agency is particularly appreciated as supporting the development of a quality culture in the whole HE sector in Kosovo. From the point of view of the panel, operational independence is thus ensured by the framework conditions, by the procedures and regulations, and in the day-by-day cooperation with the stakeholders of the agency.

Despite the number of negative decisions made during the last years by the SCQ based on the results of external evaluation processes as defined and conducted by the agency, the HEIs that the panel met indicated satisfaction with the outcomes of the evaluations and frequently referred to the concept of transparency and fairness, as part of the work of the agency. No stakeholder expressed concern with interference in the current work of the agency, either by political or institutional actors. Therefore, the panel feels confident that the independence of outcomes as required by the standard and stressed by the 2019 recommendation is fulfilled.

Panel conclusion: 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.

2019 review recommendation

Use data collected during accreditation processes and other activities to carry out thematic and system-wide analysis in order to support further development of the HE system in Kosovo.

Evidence

Based on the 2019 ERR recommendation, in 2021 a project funded by the US Embassy in Kosovo led to the support of a group of international experts to the preparation of two documents:

- Review of good practices on the carrying out of thematic analysis by the accreditation agencies in selected European countries, and
- Guidelines on conducting thematic analyses by Kosovo Accreditation Agency (linked to the SAR)

The second document sets the framework for future thematic analyses by KAA, in terms of definition, concept, methodology, tools, outcomes and dissemination of the results.

Following this approach, in the years 2021-2024 according to KAA's website, the following thematic analyses were developed and published:

- Thematic Analysis Preparation of the Kosovar Graduates for the Labor market – Employer and Alumni Perspective (supported by the US Embassy in Kosovo, by the same group of international experts): this document reflects on the perception of the employability of graduates from the point of view of employers and on the preparation of graduates with digital skills for the 21st century from the point of view of alumni, based on surveying these

stakeholders. The purpose is to provide evidence for policy makers and for stakeholders involved in the framework of cooperations between HEIs and industry
-   Thematic Analysis for Institutional Accreditation of Kosovar Higher Education Institutions (2021, supported by the US Embassy in Kosovo, by the same group of international experts): this document is based on external review reports of institutional accreditation procedures from 2019/20 and 2020/21, and reflects on the standards related to public mission and institutional objectives; quality management; research; staff, employment processes and professional development; institutional cooperation. The analysis is intended to support HE-policy decision making.
-   Thematic Analysis of Processes Involved in Accreditation/Reaccreditation of Study Programs (2024, supported by the US Embassy in Kosovo, carried out by an international expert): this document provides a review of self-assessment and external review reports of 6 HEIs (public and private) for programme (re-)accreditation, over a period of three years at Bachelor and Master level. It identifies overarching and diverging issues, areas of improvement and challenges, and trends, with the aim of contributing to the improvement of quality in the HE sector.
-   Research Report about Increasing Student Participation in Internal and External Quality Assurance Processes in Kosovo (supported by the US Embassy in Kosovo, by a group of international experts): the document provides a theoretical and practical background for corresponding guidelines, based on an international benchmarking analysis of best practices from other European countries, on the analysis of external review reports from KAA's accreditation procedures, and on a national survey on students from HEIs in Kosovo (public and private).

To the knowledge of the panel, there is no information at the moment about specific plans (topic and release date) for future thematic analysis.

According to the information provided in the SAR (§6.4), KAA disseminates the results of these activities in meetings with the participation of national stakeholders and international experts. The documents are published on the website and there are examples of news in the corresponding section of the website, but the panel has no evidence of the stakeholders being aware of these activities.

Analysis

The standard requires that agencies regularly publish reports that analyse the general findings of their external quality assurance activities.

KAA published guidelines for its thematic-analysis activities as well as some examples of such documents during the last years, thus following the recommendation from the 2019 external review. Nevertheless, based on the SWOT-analysis in the SAR, KAA itself considers the current situation to deserve improvement (see SAR Chap. 10), as the policy is not consistently implemented yet and KAA still needs to increase its staff capacities (with corresponding skills) and its data collection tools to carry out thematic analysis on a more regular basis and with a desirable frequency in the future.

Based on the evidence presented, the panel feels that the agency is currently overly dependent on contributions from donors to support such activities and on the expertise and capacity of international experts to carry out the analyses. The panel considers that the agency needs to develop more expertise in analysis of the outcomes of its processes and in systematic data collection. While the commitment from the donors was very evident in the meetings that the panel had with some of them, the panel members still feel that it is important that the agency builds its own capacity to develop its analytic expertise. It is therefore important that the skills required for both qualitative and data analytic capacity be developed by the agency itself. This further emphasises the need for a workforce plan that

clearly identifies the activities that need to be undertaken over the next number of years and the skill set that will be required of its employees, both current and new. It was clear from discussions with the agency leadership that they share this view, but the panel realistically would have expected this to have come through more clearly in the self-evaluation process.

Panel recommendations

The panel recommends that thematic analyses are developed more regularly, that they build upon the standardisation of the agency's activities and procedures and the data collected from its external QA procedures through the agency's developing IT-platforms and that such analyses be created with the participation of KAA's staff to ensure knowledge transfer and capacity building, and that the topics address the needs of the Kosovo HE sector as identified by KAA itself.

Panel conclusion: Compliant

ESG 3.5 RESOURCES

> Standard:
>
> Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.

2019 review recommendation

Take all necessary actions in order to assure adequate human and financial resources needed for conducting the activities expected from KAA.

Evidence

Financial resources

According to the SAR (§6.5.1), KAA's own resources, especially in terms of human resources / salaries and infrastructure are partly covered by budget from the Government. This is planned over a three-year period (based on Kosovo Medium-Term Expenditure Framework, the governmental three-year policy and budget planning document) and published on KAA's website, as summarised in Table 3 - KAA's budget 2021-2024 (see section on KAA's funding). The currently available version of the budget contains data for the years 2021 to 2024, which show a growth of the total budget (made up of Government grant and own revenues from fees and procedure costs covered by the HEIs).

During the site visit, MESTI representatives emphasised that the ministry is willing to fulfil KAA's financial needs, as the funding provided over recent years testifies to, and KAA's Director confirmed that the requests from the agency in terms of budget have been approved by MESTI.

Most of KAA's budget is covered by own-source revenues, consisting of fees from the HEIs undergoing accreditation and of funding from donors. The costs from the HEIs cover accreditation procedures, international experts and the related costs. Costs for monitoring and follow-up procedures, where until now international experts are not actually involved, are covered by KAA.

Own-source revenues have been sinking significantly through the last three years based on the overview data provided, as the HE sector underwent consolidation and the number of HEIs was reduced, but still make up more than 65% of KAA's budget. The panel could not find any information

on the specific amount of the own-source revenues derived by international grants and activities with the donors. Allocated and approved for appropriation but unspent budget resources from own-source revenues are carried over to the budget of the following year. Own-source revenues exceeding the amount agreed upon for appropriation get deposited in the national budget fund.

The total revenues (from Government and from own-source revenues) were and are more than sufficient to cover KAA's expenditures so far.

<u>Human resources</u>

KAA's staff consists currently of eighteen employees according to the SAR, including two new employees who started shortly before the site visit and whom the panel met with. During the site visit, the Director and the Heads of the two Departments explained that two further employees have already been selected and will commence work at the beginning of August 2024. The number of KAA's employees has been continuously growing, from 10 employees in 2018 according to the SAR (§3.2) respectively 9 employees in 2021 according to the table of expenditures 2021-2023 published on the website, to 10 employees in 2022 and 11 in 2023 (according to the same table), then to the current 18 employees at the time of the site visit. Of these eighteen employees, beside KAA's Director, nine are involved in evaluations and follow-ups (these are the areas where the largest increase in resources took place over the last years), three work in the finance area, two in legal issues and two in internal administration, and one person is responsible for the IT infrastructure.

The planned complement of thirty-two positions according to the SAR was confirmed during the site visit by the representatives of MESTI and has already been included in the budget allocation (mostly covered through the Government grant) starting with the year 2021. As the agency has not yet been fully staffed, the actual expenditures so far do not require the full drawdown of the budget, as shown in Table 4 - KAA's expenditures 2021-2023 (see section on KAA's funding). All KAA employees are classed as civil servants. The SAR mentions that the objective of thirty-two employees is to be reached by September 2024 but the evidence provided does not confirm this time plan to be realistic.

In 2024, in the context of the QAINT international project supported by the Austrian Development Agency, the Regulation on Internal Organization and Systematization of Jobs in the Kosovo Accreditation Agency has been approved and published, which contains a definition of the main tasks of each of the units of KAA and fixes the final number of staff for each unit (when KAA will reach its stated complement of 32 employees).

Concerning staff development, the following activities are reported in the SAR:

- Attendance at ENQA leadership development programme by two of KAA employees
- Attendance at a training event about alignment with the ESG Part 3, provided in the framework of the Technical Assistance and Information Exchange instrument of the European Commission
- Participation in a twinning project with AQ Austria providing training by senior staff and Board members about the improvement of evaluation procedures
- Staff exchange with ASIIN, consisting of one employee of KAA spending one month at ASIIN to get familiar with the processes of other agencies
- Participation of KAA's staff as peer reviewers in USA study programme evaluation procedures through ATMAE

For the onboarding process of new staff, the panel got an opportunity to meet with employees who had only recently joined the agency and they expressed themselves satisfied with the documentation that they have access to and the opportunity already to have participated as observers in evaluation processes.

A Manual on Staff Internal Evaluation has been developed in 2021 but not implemented yet.

<u>Infrastructure</u>

A growth in terms of the area reserved for KAA's offices at its premises in a building near the campus of the University of Prishtina in a central part of the city was reported in the SAR (§6.5.3) and was confirmed by the panel during the site visit. The panel members had the possibility to visit newly refurbished offices (in another floor of the same building where KAA is located), which offer modern workplaces appropriate to the planned growth in human resources at the agency. As a next step, the first floor, where the "old" offices are located, will be renovated as well. The IT-infrastructure for all the planned staff (32 people) is already available according to the SAR.

Improvement in the available IT-Infrastructure has taken place progressively with the support of international donors (especially the US Embassy and the Austrian Development Fund), whereas a possible roadmap has been sketched out in the Digitalization Feasibility Study (2021). KAA makes use of a central IT platform for the administration of all its activities, users being not only KAA's staff and staff of QA units in HEIs, but also all other players involved in the accreditation and in the monitoring procedures, including academic staff of HEIs and international experts working as reviewers. The availability and use of this platform was confirmed by members of the HEIs during the site visit.

Analysis

The standard requires that agencies have adequate and appropriate human and financial resources to carry out their work and the recommendation from the 2019 external review asked KAA to take appropriate action to this aim. The SAR indicates that the agency wishes to significantly expand its human resources and MESTI indicated that they are supportive of the request that the agency has placed with it for more resources, so that they already approved the requested budget growth starting with 2021. From this point of view, KAA acted on reaching appropriate human and financial resources.

For the last three years KAA has had by far more budget allocated than it could reasonably spend, resulting in budget carry-over to the following year from the own-source revenues (as approved by MESTI in the agreed budget appropriations) and in deposit of excess funds in the national budget fund of Kosovo. Part of this surplus has already been dropping during the last three years due to consolidation in the HE sector in Kosovo (resulting in less accreditation procedures and thus less fees by the HEIs) and part is expected to be used in the near future for the planned significant increase in staffing and infrastructure. Also, the engagement of international donors can be expected to slowly decline over the next years as the whole HE sector in Kosovo gets more mature and independent, so that the long-term sustainability of the system cannot be assessed yet.

The expected staff increase is significant in a short period of time and could not be realised yet.

One week prior to the review visit, the staff complement was sixteen, exactly half of the number of staff that the agency and MESTI has agreed are necessary to undertake the functions of the agency. While the addition of two more staff more recently is welcome, there was still a significant, recognised deficit in staffing at the time of the review visit. Moreover, it is important that the staffing structures are appropriate to deliver on the future needs of the agency. It is disappointing that the SAR does not clearly outline the agency's intentions on the skills profile of staff required for the future and an implementation plan for the Strategic Plan does not exist, explaining how the growth in human resources is going to be realised. The agency clearly understands that it needs to enhance its own expertise and to reduce the dependence on donor funds and on the skills of external experts for its development. While the panel met with staff who have just joined the agency in recent weeks, the ambition of the expansion in human resources must be matched by a clear plan on how such staff are to be deployed in the work of the agency. As the QA system in Kosovo HE moves from QA (and

control in some cases) to quality enhancement, it will be important that the agency matches the changed nature of its future work with the skillsets of its workforce. It is hoped that the monitoring / inspection of such activities as the deployment of academic resources by the HEIs and their adherence to programme timetables can be replaced by a more trust-based system of follow-up to the recommendations of evaluation outcomes and ultimately to the enhancement of the academic programmes on offer.

Until recently, the agency had a relatively small complement of staff. This can have the effect of relying on the governance body, the SCQ, to perform a significant amount of work. The SCQ following the Law on KAA approves the experts list and membership of the evaluation panels, is involved in the screening of accreditation applications to see whether the evaluation can proceed, approves the outcomes of all evaluation processes, noting that there are a significant number of negative decisions. The Council also has to reconsider any appeals that are referred back to it. The Council also includes three international members whose time is necessarily limited. Moreover, as the agency has indicated that it wishes to expand its staff complement and presumably to expand the number of its evaluations (especially for a thorough implementation of the defined monitoring and follow-up procedures), the panel believes that this will place even more work on the Council over time.

The Council is the sole governance entity of KAA and therefore has to oversee the agency's performance in all areas including its strategic performance and operation. In many other agencies, governance is further devolved to other bodies established, for instance, to monitor the evaluation processes that the agency conducts, and this can free up the governing board to perform its essential role of strategic oversight of the agency and the executive.

While the panel understands that the SCQ is the only governance entity established in law, the panel members would like to establish whether it is possible for the agency to create sub-council structures that could assist in its deliberations. It may be useful to evaluate the effectiveness of the current governance system and to determine whether it could be expanded to alleviate the current burden on the council. External expertise could usefully assist in this audit process.

Panel recommendations

The panel recommends matching the planned expansion in human resources by a clear and specific plan on how such staff are to be deployed in the future, where more enhancement-oriented work of the agency could take place and consequently which skills are needed for such activities.

The panel strongly recommends establishing whether it is possible for the agency to create sub-council structures to assist the SCQ in its deliberations. The effectiveness of the current governance system is to be evaluated, and it is to be determined whether the SCQ can be expanded. External expertise should assist in this audit process.

Panel conclusion: Partially 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.

2019 review recommendation

In order to collect feedback KAA should increase and describe in documents the implementation of formal rather than informal mechanisms to create solid routines of internal quality assurance based on principles like closed-loop practices and the four-eyes system.

Evidence

In 2024, KAA updated its own internal QA, defined in the Internal Quality Assurance Policy document and published on the website (section on Legal Provisions and Responsibilities). The policy describes the planned implementation of a PDCA approach to internal QA. However, before and during the site visit, no evidence of a specific cycle/example was available to indicate that a beginning / pilot implementation phase of this policy had commenced.

The described yearly work plan (§3 of the Policy) is not implemented in the required form yet and there is no evidence as to when and how it will be developed by the agency. The defined annual work Plan (§4) is a list of the accreditation and monitoring procedures to be carried out by KAA during the following year, not a comprehensive list of internal and external activities (including indicators and responsibilities), to be implemented in order to gradually reach the objectives of the Strategic Plan. The external QA activities list for 2025 was being drafted during the site visit.

The SCQ meets monthly to keep up with the high amount of work, but there is no calendar of the planned meetings over a longer period, which could be used for the yearly schedule and for a better distribution of workload. The defined yearly evaluation report about the performance of KAA with respect to the established work plan (not existing yet) is not yet implemented.

Concerning the procedures (accreditation, follow-up, monitoring, evaluation) carried out by KAA, all stakeholders confirmed during the site visit in the respective sessions that they have been involved by KAA in workshops or consultations (e.g. with an email invitation to express their opinion) for feedback and further development of the procedures, and that they witnessed changes and improvement of the procedures based on their feedback. Beside open consultations and stakeholder workshops, formal and extensively used questionnaires for the target group of the institutions and stakeholders directly involved in every process instance (international reviewers, academic staff, students, student experts, employers/industry) are only available in a rudimentary form. While the agency indicates that it has surveys in place for evaluators and for HEIs, and that it plans to deploy them automatically based on a new IT platform which is being implemented, the discussions and the available evidence show a more differentiated picture:

- Questionnaires for the target group of the HEIs are in place and an example of a completed questionnaire was provided. Nevertheless, the sample and the interviews with HEIs during the site visit demonstrated that not all HEIs get promptly asked for specific and timely feedback after the end of each procedure and that there is not a systematic process in place to seek their feedback on the processes.

- Some questionnaires are in use, but feedback is only collected yearly (the panel got evidence for 2022), not after every procedure. For international reviewers and student reviewers, a completed example has been provided, however the questionnaires were not related to a specific instance of a procedure. Review panel members involved in accreditation procedures with KAA indicated that they are only surveyed on an annual basis but that feedback is not sought from them after each accreditation process has concluded.
- Some questionnaires exist in draft form but have not been deployed yet (e.g. for students and employers/industry), as they have not yet been approved by the SCQ.

The standardisation of the implementation of the defined procedures has only improved recently, with reviews of procedures and documentation based on the feedback from the international experts and from the HEIs, as confirmed by the participants during the site visit, and with the provision of templates for the reports (for the HEIs and for the experts). The following documents describe the activities, whereas the year refers to the last adaptation of the document:

- Manual for External Evaluation of Higher Education Institutions (2021)
- Accreditation Manual (2024, for institutional and programme accreditation of Bachelor and Master programmes, whereas the main steps are also valid for Doctoral Programmes)
- Standards for Evaluation of Doctoral Programmes (2020)
- KAA Methodology on Monitoring and Post-accreditation Procedures (2022)

Templates for the HEIs have been developed and are available for:

1. Application for Accreditation (2021)
2. List of Publications (2024, to be provided for accreditation procedures)
3. Self-Evaluation Report for Institutional Accreditation (2021)
4. Self-Evaluation Report for Programme Accreditation (2021)

As part of a cooperation agreement with the Coalition for Integrity and Transparency in the University (KITU), according to the SAR (§6.5.6) and as confirmed by the ORCA representative during the site visit, ORCA monitors the work of the SCQ and produces annual reports, the last one is available for 2022 and linked to the SAR.

Analysis

The standard requires that agencies have in place processes for internal QA related to defining, assuring and enhancing the quality and integrity of their activities.

From the conducted interviews, the panel concludes that the agency acts in a professional manner in all its activities and that there has been effort towards standardisation and improvement of the definition, application and documentation of the procedures for external QA activities of KAA over the last years, based on input and feedback provided by the stakeholders participating in those procedures as well as by international experts.

Nevertheless, there is always a danger, that in a relatively small agency, there is a comfort to the level of informality that can permeate the interactions between staff. With the significant planned expansion of staff resources, it will be important to develop more systematic approaches to the internal quality assurance of the agency. The evidence shows that feedback is not sought in a regular and systematic manner from all involved stakeholders (HEIs, panel members, students) through well-structured and comprehensive surveys right after every procedure and procedure specific. For some of the stakeholders, surveys have not been approved and implemented yet. For others, surveys are performed only on a yearly basis, with no connection to a specific procedure (in the case where the institution or individual stakeholder were involved in more than one single procedure during the last year). There is also no evidence of the results of these surveys being collected and analysed in a

structured way, leading to pertinent, adequate and documented adaptations in the procedures or in their implementation, and disseminated to the sector to close the quality loop. This is state of the art and is necessary to ensure thorough standardised implementation of all required steps and a consistent improvement of the quality of the procedures.

The panel feels that further work needs to be done to systematise and improve the feedback mechanisms on the outcomes of its evaluations. Despite the 2019 external review recommendation having been addressed and a policy on internal quality assurance having been defined and published, no evidence could be provided of first implementation steps happening or of an implementation plan being drafted or discussed. There is no example of the described PDCA approach, no draft and no time plan for a comprehensive annual work plan with internal and external activities, indicators and responsibilities, which could be yearly evaluated and reported, so that in this sense, some of the essential components of the defined internal QA policy seem not to be in place or at least planned for implementation yet.

The involvement of monitors from education transparency bodies (ORCA and KEC) in the work of the agency to demonstrate the independence of their activities is to be commended. The panel met with several such actors during the site visit, and they clearly expressed their confidence in the trajectory of the agency over the past number of years.

Panel commendations

The involvement of education transparency bodies from the civil society of Kosovo as active stakeholders in the work of the agency is to be commended, as it shows the strong commitment to independence and transparency.

Panel recommendations

The panel strongly recommends developing more systematic approaches to the internal QA of the agency and to implement them in a structured and systematic way.

The panel recommends regular, standardised, timely surveys to be directed to all involved stakeholders after the conclusion of every procedure conducted by KAA, and the results to be analysed and used for the further development of KAA's activities.

Panel conclusion: Partially 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.

Evidence

According to the Law on KAA (Article 4), "KAA ensures that its standards and procedures for the quality of higher education in Kosovo in all its processes, are in line with European standards and guidelines for quality assurance in higher education" (a very similar sentence is also contained in Article 7 of the Law on Higher Education).

KAA has already undergone two ENQA reviews, one in 2014 (which resulted in subsequent listing on EQAR) and one in 2019. At the time of the second review, KAA had already been excluded from

EQAR because of the instance of political interference. Based on the 2019 ERR, KAA was excluded from ENQA membership.

In 2022, KAA submitted its follow-up report to ENQA and became an affiliate. The current review (2024) is therefore the agency's third and follows the required interval of five years.

Chapter 8 from the SAR lists specific progress on each recommendation from the 2019 ERR.

Analysis

The standard requires that an agency undergoes an external review at least once every five years to demonstrate their compliance with the ESG.

The agency was last reviewed in 2019, delivered a follow-up report in 2022, and the current 2024 review fulfils the requirement in the standard.

The recommendations from the 2019 ERR have been without doubt a central element of KAA's developments during the last cycle, as the many documents produced, approved and published in recent years and the number of activities carried out with the support and expertise of international colleagues show. There is evidence of sustained effort and of a strategic orientation, at national level and involving not only the agency itself but the whole HE sector with its stakeholders, towards the ESG and the EHEA.

Nevertheless, as also Chapters 9 (SWOT analysis) and 10 (Key challenges and areas for future development) of the SAR points out, further progress still has to be made, especially in terms of a more thorough and overall consistent implementation of all existing approaches and activities and of a long-term planning of substantial improvement steps.

Panel conclusion: 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 1 of the ESG.

2019 review recommendation

Take care that in institutional and programme self-evaluations, in site visits and in review reports the ESG 2015 Standards Part 1 are addressed clearly.

Evidence

KAA implements the following procedures for HEIs in Kosovo, as established by the Law on KAA:

- Institutional accreditation, based on the standards defined in the Accreditation Manual (2024); follow-up procedures are an integral part of the accreditation cycle and are based on the same standards (the process itself is described in KAA Methodology on Monitoring and Post-accreditation Procedures, Part 2). For institutional accreditation, forty-three standards in eleven

areas must be fulfilled, each defined with a list of indicators to be considered. The connection between KAA standards and the ESG is provided in this document at area level (e.g. the area Student Administration and Support Services is defined to cover ESG 1.4, ESG 1.6). The areas of standards for accreditation procedures are defined in the Law on KAA (Article 29).

- Programme accreditation at Bachelor and Master level, based on the same Accreditation Manual (2024) as institutional accreditation; follow-up procedures are also in this case an integral part of the accreditation cycle and are based on the same standards, the process being described in KAA Methodology on Monitoring and Post-Accreditation Procedures. For programme accreditation at Bachelor and Master level 33 standards in seven areas are considered. As for institutional accreditation, the connection between KAA standards and the ESG is provided at area level, while the areas themselves are defined in the Law on KAA (Article 29).

- Evaluation of doctoral programmes, based on the document Standards for Evaluation of Doctoral Programmes: "The Standards cover seven major components. Each component is divided into two types of standards: Core and Supplementary. While core standards must be met in the process of evaluation, supplementary standards offer other desirable features that reflect good practice followed in many European universities." A total of thirty-six core and nineteen supplementary standards are defined.

- Monitoring procedures after criteria defined in KAA Methodology on Monitoring and Post-accreditation Procedures. Monitoring includes three kinds of procedures, following the same structure: (i) General Monitoring, with a focus on study programme holders (9 criteria) and on websites and advertising materials of HEIs (8 criteria); (ii) Monitoring according to the standards of the Accreditation Manual, with a focus on academic staff (13 criteria), lecture and exercise schedule (14 criteria), infrastructure and resources (12 criteria); (iii) Extraordinary Monitoring, either initiated after complaints from external parties (10 criteria), or because of the submission of false evidence to KAA (5 criteria), or in cooperation with the Education Inspectorate (10 criteria).

The correspondence between ESG and KAA standards is analysed by the agency in the SAR (§5.1), indicated explicitly in the Accreditation Manual as far as institutional and programme accreditation are concerned, integrated by the panel based on the description of the standards, and summarised in the following table. For monitoring, the SAR does not specifically establish direct connection with the individual ESG, because monitoring directly builds on the standards for institutional or programme accreditation. Therefore, the corresponding column in the table shows which part of the monitoring procedures directly connects to which ESG, based on the evidence of the description:

ESG	Institutional accreditation	Programme accreditation	Evaluation of doctoral programmes[8]	Monitoring procedures
1.1 Policy for QA	Area 1: 1.1, 1.2 Area 2: 2.1 to 2.3 Area 4: 4.1 Area 5: 5.1 Area 7: 7.1	Area 1: 1.1, 1.2 Area 2: 2.1 Area 6: 6.1	1.1, 1.6 (suppl.)	-
1.2 Design and approval of programmes	Area 5: 5.3, 5.4 Area 6: 6.1 to 6.6	Area 2: 2.2 Area 4: 4.1 to 4.5, 4.8	3.1-3.3 7.3	1.7 Monitoring lecture and

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[8] The addition "suppl." in this column stays for "supplementary," as KAA's standards for the evaluation of doctoral programmes, as explained above, include core as well as supplementary standards, meant to be desirable features.

				exercise schedules
1.3 Student-centred learning, teaching and assessment	Area 6: 6.2 to 6.4, 6.7 to 6.9	Area 4: 4.6, 4.7	3.6, 3.9 (suppl.), 3.10 (suppl.) 5.1	-
1.4 Student admission, progression, recognition and certification	Area 9: 9.1 to 9.3	Area 5: 5.1 to 5.3	2.1 to 2.4, 2.5 (suppl.) 6.1, 6.3 to 6.6 7.1, 7.2, 7.4 (suppl.), 7.5 (suppl.)	-
1.5 Teaching staff	Area 8: 8.1 to 8.5 Area 7: 7.1 to 7.3	Area 3: 3.1 to 3.5 Area 6: 6.2 to 6.4	1.2, 1.3 5.2 to 5.5, 5.7 (suppl.), 5.8 (suppl.)	1.3 Monitoring of study programme holders 1.6 Monitoring of academic staff
1.6 Learning resources and student support	Area 2: 2.1, 2.2, 2.4 Area 3: 3.1, 3.2 Area 9: 9.2 to 9.4 Area 10: 10.1, 10.2	Area 1: 1.4 Area 5: 5.4 Area 7: 7.1 to 7.3	1.2 4.1, 4.4	1.8 Monitoring of infrastructure and resources
1.7 Information management	Area 5: 5.1, 5.2	Area 1: 1.3 Area 5: 5.2	3.5, 3.11 (suppl.)	-
1.8 Public information	Area 4: 4.2	Area 1: 1.1, 1.2 Area 2: 2.4 Area 4: 4.1 Area 5: 5.1	1.5 (suppl.)	1.4 Monitoring of website and advertising materials
1.9 On-going monitoring and periodic review of programmes	Area 5: 5.1 to 5.4 Area 6: 6.1	Area 2: 2.3 Area 5: 5.2	1.4 (suppl.)	-
1.10 Cyclical external QA	By law, HEIs must undergo an institutional accreditation every 3 to 5 years (based on the decision of the SCQ)	By law, programmes must undergo an institutional accreditation every 3 to 5 years (based on the decision of the SCQ)	By law, programmes must undergo an institutional accreditation every 3 to 5 years (based on the decision of the SCQ)	According to the SAR, regular monitoring is to be conducted every 6 months for every institution

Table 6 - Mapping of ESG Part 1 in KAA's activities

Analysis

The standard requires that the agency's external QA processes should address the effectiveness of the internal QA processes described in Part 1 of the ESG, those being the responsibility of the HEIs. To ensure the link between internal and external QA, external QA must include explicit consideration of the standards of Part 1.

It is clear from the SAR and from the sessions during the site visit, especially those with the HEIs, that the ESG are well known and that the procedures for institutional accreditation, programme accreditation and evaluation of doctoral programmes use the ESG part I as a basis for the evaluation.

The 2019 ERR recommended KAA to take care that the ESG 2015 Part I are addressed clearly in the activities of the agency. The panel believes that the mapping in Table 6 shows that the recommendation has been addressed.

In particular:

- ESG 1.1 – Policy for QA – is comprehensively covered by KAA's standards for institutional accreditation in the Areas 1 and 2, with specific additions from the Areas 4, 5 and 7. At programme level, the required aspects are covered in the Areas 1 and 2, with the addition of part 6. Of the more specific standards for the evaluation of doctoral programmes, Area 1 covers ESG 1.1, although one relevant aspect (institutional strategy for doctoral education) is part of the so-called supplementary standards (16 overall, of which at least eleven have to be fulfilled). ESG 1.1 is not part of the monitoring procedures, as their focus lies on the actual implementation (courses, student information, lecturers) still fulfilling the accreditation.
- ESG 1.2 – Design and approval of programmes – is covered at the institutional level by Areas 5 and 6. At programme level, Area 2 establishes the core of ESG 1.2, and Area 4 provides specific aspects. For doctoral programmes, Area 3 covers the required aspects. In the context of the monitoring activities, part 1.7 of the overall procedure covers lectures and exercise schedules, meant to verify if the actual situation matches the conditions of the accreditation in terms of programme implementation.
- ESG 1.3 – Student-centred learning, teaching and assessment – is covered by several of KAA's standards in the Area 6 for institutional accreditations; in the Area 4 for programme accreditation at Bachelor and Master level; in the Area 3, both in core and in supplementary standards, with an addition from Area 5. Based on the understanding of the panel, there is no explicit coverage of ESG 1.3 in the monitoring procedures, as part 1.7 has a strong focus on formal aspects of implementation of the curricula, less so on didactics or student evaluation.
- ESG 1.4 – Student admission, progression, recognition and certification – is covered by Area 9 of KAA's standards for institutional accreditation and Area 5 for programme accreditation at Bachelor and Master level. Concerning doctoral programmes, Areas 2 (both in core and supplementary standards) and six, together with specific aspects relevant to the outcome of research activities from Area 7, cover ESG 1.4. Aspects of this standard are not part of the monitoring procedures.
- ESG 1.5 – Teaching staff – is covered by Area 8 of KAA's standards for institutional accreditation, with specific additions from Area 7 concerning research activities. For programme accreditation at Bachelor and Master level, the coverage is provided by the Areas 3 and 6. At the level of doctoral programmes, Areas 1 and 5 (with both core and supplementary standard) address ESG 1.5. In the monitoring activities, verification of staff is especially important for KAA because of the developments in the HE sector during the last years, so that two parts of the monitoring procedures address this ESG, 1.3 for programme holders and 1.6 for academic staff in general.
- ESG 1.6 – Learning resources and student support – is covered at institutional and programme level by several areas, as the topic of resources is a central one. At institutional level, the relevant standards are in Areas 2, 3, 9 and 10. At programme level (Bachelor and Master) the Areas 1, 5 and 7 cover this ESG. For doctoral programmes, the required aspects are included in standards from the Areas 1 and 4. The monitoring activities cover one specific aspect of ESG 1.6, namely infrastructure and resources in the procedure part 1.8.

- ESG 1.7 – Information management – is addressed by the Area 5 for institutional accreditations and Areas 1 and 5 of the standards for programme accreditation. For doctoral programmes, the standards in Area 3 (both core and supplementary ones) cover ESG 1.7. Aspects of this standard are not addressed by the monitoring activities.
- ESG 1.8 – Public information – is covered by the standards of all activities of KAA: for institutional accreditation in Area 4; for programme accreditation by standards in different Areas (1, 2, 4 and 5); for doctoral programmes by standard 1.5 (although this is a supplementary standard); and for monitoring there is a specific part of the procedures (1.4) devoted to website and advertising materials.
- ESG 1.9 – On-going monitoring and periodic review of programmes – are fully covered by Areas 5 and 6 for institutional accreditation; by Areas 2 and 5 for programme accreditation; by standard 1.4 at doctoral level (although again this is a supplementary standard). For monitoring procedures, there is no part covering this ESG.
- ESG 1.10 – Cyclical external QA – is required by law every 3 to 5 years and implemented in KAA's procedures at institutional as well as at programme level.

The panel considers that institutional accreditation, programme accreditation at Bachelor and Master level, as well as evaluation of doctoral programmes substantially cover the ESG. Concerning monitoring, the panel refers to the considerations included in the Introduction to this document and believes that this cannot be considered a procedure of its own, therefore the question of coverage of the individual ESG cannot be assessed in the same way as for the other procedures.

The QA officers of the HEIs met by the panel indicated that the staff of their institutions have become more accepting of the role of QA in their work thanks also to the activities carried out by KAA. Members of the international evaluation panels commented positively on the quality processes and procedures that were in place in the HEIs.

It is not clear, however, how adequately involved were the students by their HEIs in all QA processes, including during external evaluation events. The panel heard that for the accreditation of new study programmes, it has not been the practice for the evaluation panel to meet with students, as there are no students enrolled in the study programme. The panel feels, however, that it is important that students of the institution are met during the panel's evaluation visit, on all accreditations, except for the accreditation of a new higher education institution. Even though there are no students in a new programme, there are many general aspects of the student experience that can be assessed by meeting with students of the institution as part of any evaluation process.

Panel recommendations

KAA is strongly recommended to ensure that student representatives are met by the panels as part of all activities of institutional accreditation, programme accreditation and evaluation of doctoral programmes, except for the accreditation of new higher education institutions. Students from other programmes of the same institution can assess general aspects of the student experience.

Panel conclusion: 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.

2019 review recommendation

Make sure that during accreditation activities the workability of the methodologies is guaranteed.

Evidence

The specific activities and procedures carried out by KAA are defined in the Law on KAA (2023) and communicated transparently on KAA's website together with the corresponding standards and methodologies. These apply to institutional and programme accreditation (at Bachelor and Master level), evaluation of doctoral programmes, follow-up and monitoring procedures.

According to KAA's own documents, listed in ESG 2.1 and also referenced below for each procedure (available on the website for HEIs and the general public), the objectives of the procedures are set out as follows:

- Institutional accreditation is defined in §3 of the Law on KAA as "a formal process of quality assessment, which determines the official status of recognition granted by the KAA for the institution of higher education which enables the development of academic activity and the right to award qualifications for a certain period of time". The procedure is addressed in the Accreditation Manual (revised in 2024) and aims at (only slightly adapted from Chap. 1 of this document):
    - certify the compliance of the higher education institutions with the standards
    - consolidate the internal QA systems at institutional level
    - support the HEIs in the quality enhancement and continuous development
    - increase the transparency and accountability of HEIs
    - strengthen the involvement of members of the academic community and encourage continuous cooperation with external stakeholders
    - increase the quality of student learning outcomes across the Kosovar HE sector
    - enhance the student learning experience at the HEIs
- Programme accreditation is defined in §3 of the Law on KAA as a "formal process of quality assessment, which determines the official status of recognition granted by the KAA, which enables the higher education institution to award qualifications for the relevant field within a certain period of time". The Accreditation Manual is valid for institutional and for programme accreditation, so that the aims listed above also apply to programme accreditation.
- Evaluation of doctoral programmes: the corresponding document (2020) sets different quality standards than for Bachelor / Master programmes in the Accreditation Manual but otherwise leaves the framework and the procedure unchanged. The definition or programme accreditation in the Law also does not establish any difference based on the programme level.
- Monitoring is defined in the same article in the Law on KAA as "a formal process carried out by the KAA through which it is assessed that the higher education institution meets and implements the accreditation conditions given in the KAA decision and in the evaluation report." Article 42 defines again its aim as ensuring "that the minimum criteria are met by HEIs throughout the

entire accreditation period.".". It is addressed in KAA Methodology for Monitoring and Post-Accreditation Procedures, at institutional and programme level, and aims to "verify and confirm whether the given conditions of accreditation as well as the standards of the Accreditation Manual continue to be applied by the accredited higher education institutions."

The basic principles for the work of KAA and applying to all its activities are given in Article 4 of the Law on KAA: (i) equality, (ii) ethics and integrity, (iii) inclusiveness, (iv) foreseeability, (v) application of European standards with direct reference to the ESG.

Accreditation procedures (applying to the first three kinds of activities carried out by KAA, as stated in Article 26) as well as criteria and areas for standards are then defined in more detail in Chapter III of the Law on KAA. The first accreditation is valid for three years, following re-accreditations can be granted for three or for five years based on the SCQ decision (Article 35). The law describes very specifically the following aspects: application and deadlines; internal evaluation; steps of the external evaluation; external evaluators to be involved; the scope of the decision on accreditation. As a specific step of the accreditation process, Article 44 defines the conditions for follow-up procedures.

Concerning monitoring, the framework is set in Articles 42 and 43 and does not involve external experts (Article 42, §3: "Monitoring is performed by KAA staff"). As mentioned above, monitoring is defined as the formal process that the agency undertakes to ensure that the HEI meets and implements the (programmatic, institutional or doctoral programme) accreditation conditions. It is there a procedure that is consequential on the accreditation procedure, rather than a procedure in its own right.

Stakeholders confirmed during the site visit that they are involved in working groups and open consultations for the development and improvement of procedures and standards by KAA on a regular and repeated basis. HEI' representatives (heads and senior management of the HEIs and their QA officers) and MESTI representatives confirmed being intimately involved as required by KAA and are considered to be the main stakeholders. For students and student representatives from the national HEIs, employer / industry and civil society, examples of involvement have been provided by the agency and confirmed by the stakeholders, but not in a structured and systematic way. International reviewers and student reviewers are involved on a yearly basis through surveys, or in the form of international experts engaged for consulting on standardisation issues. A broader involvement of the national academic community is not part of the activities of KAA yet.

Analysis

The standard requires that all external QA processes be designed to ensure their fitness to achieve the aims and objectives set for them and that stakeholders are involved in the design and continuous improvement of the processes.

There is a wide body of stakeholders with an interest in the quality of higher education. This includes the government, HEIs, students, professions and the world of work. Considering the evidence provided, it is clear to the panel that the local HEIs at the level of senior management and of QA officers as well as international academics and experts are deeply involved in the development and improvement of the QA procedures and methodologies of KAA. This seems to happen mostly in consultations and workshops when KAA is in the process of revising its procedures or preparing new documentation.

Other stakeholder groups are less involved in the design and improvement. The panel believes that the widening of the stakeholder base that KAA formally engages with, is essential to ensure that the voices of all stakeholders in higher education, including local academics, students and student representatives, employers and industry representatives and the professional bodies for regulated professions are sufficiently involved in the ongoing improvement of the agency's processes. The

engagement of local academics and students is even more important when evaluation panels for external quality processes do not contain any local academic or student members.

Following evaluations, the programmes and institutions are accredited on a three- or five-yearly basis. The panel believes that a three-year period is short and with the requirement for follow-up there could be a sense that HEIs feel that they are being subject to continuous evaluation. As more confidence grows in the evaluation process, the panel believes that extending the evaluation period where possible, would give the HEIs a greater chance to enhance their processes in the period between evaluations. At the same time, this would give the agency better conditions for carrying out more meaningful follow-up procedures. Although the agency has made progress during the most recent years in terms of improving and standardising its procedures, also based on the feedback from the stakeholders and also addressing workability as required by the 2019 ERR recommendation (as for example reported by the international experts about the methods to establish compliance), extending the accreditation period would also again help to improve workability.

If legislative amendments are required to achieve this recommendation, the panel believes that engagement from the agency and HEIs and MESTI should take place.

Panel recommendations

KAA is strongly recommended to widen the systematic and structured involvement of all groups of stakeholders, including local students, student representatives and members of the national academic community, in the design and improvement of QA methodologies.

The panel strongly recommends that the agency engages with HEIs and MESTI for a future amendment to the Law on KAA, opening the possibility for further extending the accreditation period at institutional and programme level.

Panel conclusion: 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

2019 review recommendation

- Monitor and evaluate the implementation of accreditation activities from 2019 onwards thoroughly.
- Concentrate on quality improvement, when monitoring the follow-up of recommendations to HEIs provided by expert panels.

Evidence

For institutional and programme accreditation including for doctoral programmes, the structure of the process is regulated by the Law on KAA (Chapter III) and implemented according to the Accreditation Manual, publicly available on KAA's website:

- Article 31 establishes a self-assessment report (Internal evaluation), for which a template is made available by KAA
- External assessment including a site visit is required by Article 32 (External evaluation)
- The report from external assessment is required by Article 32 as well
- All accreditations include a follow-up, as defined in Article 44 (Post-accreditation procedure)

There is no difference in the procedures and their implementation between institutional accreditation, programme accreditation at Bachelor and Master level, and evaluation of doctoral programmes (programme accreditation at PhD level).

In some more detail, the accreditation process consists of:

- Application for accreditation (Article 25 of the Law on KAA), where the possible types of accreditation are listed in Article 26: institutional accreditation and re-accreditation; accreditation and re-accreditation of study programmes; institutional accreditation and re-accreditation of the branch and of the study programmes that are offered in that branch; accreditation of distance programmes and online study programmes; validation of international accreditations, recognized by member agencies of EQAR, CHEA and USDE. Applications must be submitted by 31st July of the previous year (Article 30)
- Internal evaluation (Article 31), resulting in a self-evaluation report by the HEI, to be compiled based on the template made available by KAA and submitted within fifteen working days after the confirmation of the application by KAA
- External evaluation in form of a site visit by a panel of international experts (Article 32), whose composition and criteria are established by law and include 2 to 7 experts, always including one student member
- Preparation of an external evaluation report by the experts
- Decision for accreditation (Article 34) by the SCQ based on the experts' report, including decision about the duration of the accreditation (3 or 5 years, by law)
- Notification of the decision to MESTI, for the ministry to issue licences or changes to existing ones
- In case of a negative decision, a new process follows one year later. During this time, the HEI is not allowed to enrol new students, but can carry on its activities with already enrolled students
- A second negative decision results in a final notification to MESTI, whereas the institution or programme which loses its licence is nevertheless obliged to ensure the completion of the studies for already enrolled students or the successful transfer of those students to another compatible HEI
- After a positive decision, all institutions which underwent an accreditation must submit a plan for the implementation of the recommendations by 30th September of the same year (Article 44), that is no later than 90 days after the site visit (§2.2 of KAA Methodology on Monitoring and Post-Accreditation Procedures)
- Evaluation by one external reviewer should be performed based on this plan (denominated "improvement report" in KAA's Methodology document) to monitor its implementation and result in a report, which has to be submitted to the SCQ for approval. A follow-up procedure must take place at least once in every accreditation cycle for each institution, as defined in KAA Methodology on Monitoring and Post-Accreditation Procedures (§2.1). Either a remote or a site visit should take place for this purpose. Before and during the site visit, no evidence could be

gathered showing that the requirements of the law and of KAA's procedures in terms of follow-up are fulfilled. The meetings showed two main reasons for this: (i) most of the accreditations are only granted for a period of 3 years and there are only about two years between the end of one accreditation process (in September, with the submission of the implementation plan 90 days after accreditation) and the application for the next re-accreditation (two years later in July at the latest); (ii) lack of staff on KAA's side, as well as an overload of the SCQ also play a role here.

- If an HEIs does not put in place the measures defined, the SCQ can withdraw the accreditation.
- In all cases, the experts' reports and the decisions by the SCQ are published on KAA's website.

Details of the process, ensuring consistency over different process instances, are defined in the Accreditation Manual. Each process instance is accompanied by a coordinator from KAA's staff, who ensures consistency and supports the panel. Evidence in the form of an agenda of site visits and of published expert reports shows that formal consistency is implemented, as also confirmed by representatives of the HEI during the site visit.

Based on KAA Methodology on Monitoring and Post-Accreditation Procedures, the monitoring process consists of these steps:

- KAA organises the monitoring procedure at least once within six (6) months at the institutional level and/or study programme for each accredited HEI (§1.1)
- Monitoring is performed by law by KAA's staff
- Monitoring can be carried out remotely (desk-based research and exchange of documentation with the HEI) and / or through site visits. Site visits can take place with or without prior notification to the HEI
- Upon completion of the monitoring visit, KAA's staff draft a report confirming if the HEIs still fulfils the conditions of the accreditation for the monitored aspects
- The report is reviewed and approved by the SCQ, and the institution notified about the results, warnings can be issued by the SCQ

Analysis

The standard requires that external QA processes be reliable, pre-defined, implemented consistently and their outputs published. They should follow the usual 4-stage process of self-assessment, site visit, published report and follow-up.

Moreover, the recommendations from the 2019 ERR have to be considered:

- Monitor and evaluate the implementation of accreditation activities from 2019 onwards thoroughly.
- Concentrate on quality improvement, when monitoring the follow-up of recommendations to HEIs provided by expert panels.

The panel recognises that the processes for institutional accreditation, programme accreditation and evaluation of doctoral programmes are by now well established and largely follow the above 4-stage model.

Nevertheless, in accordance with the 2019 ERR recommendation, the panel is not fully convinced that the follow-up process is working as well as it could and that it provides sufficient opportunity for the institutions to demonstrate how they are enhancing their processes following evaluation. What is described as follow-up appears to involve the writing of an action plan which must be submitted 90 days after the evaluation report is published. The panel believes this is quite a short period to engage

with the governance systems, particularly of larger HEIs, to meaningfully produce a plan to follow-up on the findings and recommendations arising from the evaluations.

The existing process also does not implement the legal requirements of the Law on KAA and KAA's own procedure definition, as there is no follow-up activity after the submission of an implementation plan from the side of the HEI following implementation: there is no further review between an accreditation and the following re-accreditation, no international expert engagement for review purpose, and no follow-up report submitted to the SCQ and published on the website.

The monitoring process can involve both planned visits and also unannounced visits (termed extraordinary monitoring events) to HEIs to check that the staff are in place for programmes that have been accredited and that the programme timetables are publicly displayed and are being adhered to. While it is understandable that such processes might be required in some cases, it is hoped that, over time, follow-up processes will move towards seeing how HEIs are engaging with the recommendation of quality reviews and how they are using the outputs of such processes to enhance the student experience.

The panel understands that the development of HE In Kosovo has followed similar patterns to other countries in development, either from war or other political upheavals and that the outcome of such changes has often resulted in unchecked growth of new HEIs, particularly in the private sector. It is clear, however, that the accreditation work of KAA over the past number of years has resulted in the number of private higher education institutions going down from 28 to 9 and that over time, it will no longer be necessary to have the inspectoral type of monitoring that has been described above. In their discussions with the leadership and quality officers of the private HEIs, the panel was impressed with their commitment to providing a high-quality learning experience to their students.

The accreditation activities from 2019 onwards have been thoroughly revised in two thematic analyses by KAA, one about institutional accreditation (for the period 2019/20 and 2020/21) and one about programme accreditation (for the period 2021-2023), the results could be used by KAA in a more structured way for the further improvement of the procedures.

Panel recommendations

The panel strongly recommends revising the follow-up process, focusing more on providing sufficient opportunity for the HEIs to demonstrate how they are enhancing their processes following evaluation, and on implementing the processes as required by the laws and by KAA's manuals.

Panel suggestions for further improvement

For the monitoring procedures, the panel suggests moving from a quality control to more focus on enhancement, e.g. integrating monitoring in the follow-up procedures.

Panel conclusion: Partially 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).

2019 review recommendation

- Make sure that the level of degree-work can and will be judged properly by the expert panels.
- Make sure that full students' participation in institutional reviews and program evaluations is guaranteed.
- Build a network of national experts, including students, in order to participate in activities such as monitoring of the follow-up of recommendations provided in review reports.

Evidence

The composition of panels for institutional accreditation and programme accreditation (including doctoral programmes) is regulated by the Law on KAA (Article 32). This requires external evaluations to be carried out by international experts, consisting of:

- from 2 to 7 external evaluators, depending on the number of study programmes being evaluated
- at least one student member
- "evaluators […] shall have the relevant academic and professional degree in the programme field which is undergoing the assessment process": reviewers who are not students are required to hold a PhD.

No involvement of industry / employer representatives is foreseen by the Law.

For monitoring procedures, no external expert is involved, as the Law on KAA (Article 42) foresees that KAA's staff directly carries out this activity. The panel reflected on that in the Introduction to this document.

Further details about the criteria for the selection of reviewers are defined in the Regulation on the Selection, Engagement, and Compensation Procedures of External Experts (2024) in Article 3:

- Relevant academic and professional degree in the field of the programme(s) undergoing the assessment process
- The panel chair should have a good knowledge of QA in HE and be experienced in conducting external QA procedures
- Teaching and /or research experience
- The student expert member should be recognized for his/her continuity of studies and have the fundamental knowledge in QA in HE
- All international experts are expected to have a good knowledge of the English language, good oral and written communication skills, be able to work in a team environment
- The external experts must not have a history of misconduct or malpractice, especially regarding their previous cooperation with KAA or other QA agencies listed in EQAR

Article 7 of the Regulation also defines aspects of avoidance of conflicts of interest. Criteria are listed and the reviewers are required to sign a declaration of non-incompatibility ("Incompatibility and Ethical Statement").

In practice, panels composed by three experts are installed, including one student expert, all of them being international experts. Their tasks are defined in Article 33 of the Law. During the site visit, the necessity to involve only international experts was explained with the relatively small size of the HE sector in Kosovo and with it being relatively young, so that on the one hand the availability of experience in external QA procedures is still limited, and on the other hand potential conflicts of interest could arise. The added value from the point of view of the agency is also that this way knowledge transfer from the international experience of the experts to the HE sector in Kosovo takes place.

In February 2024, KAA adopted a new Regulation on the Selection, Engagement, and Compensation Procedures of External Experts. Experts including students are recruited through open calls, the Regulation defines the modalities and the criteria to be fulfilled. The current list of experts, who can be part of KAA panels, has been approved in February 2024 by the SCQ and published on KAA's website and consists of 191 international experts including student experts. According to Article 32 of the Law on KAA, evaluators for programme accreditation must have a relevant academic and professional degree in the field of the study programme undergoing accreditation; Article 20 foresees that KAA's Director proposes the updated list of international experts, and the SCQ according to Article 11 reviews and decides on it yearly for approval. In 2023, 56 experts were involved in a total of 150 accreditations, eighteen of them being students. A total of eight of these fifty-six experts were involved in five accreditations or more in the same year. The composition of each panel must be approved by the SCQ (Article 5 of the Regulation). According to the SAR (§5.4) experts come from Croatia (42), Germany (14), Russia (13), Austria (10), Georgia (9) and other countries.

An overview of the total number of experts involved in accreditation activities during the years 2021-2023 is provided in Chapter 4 of the SAR, whereas based on the meetings during the site visit most of the student experts seem to be Master or PhD students:

	2021	2022	2023
Experts involved in institutional accreditation	21	28	20
Experts involved in programme accreditation	236	139	150
Student experts involved	105	94	108

Table 7 - Overview of experts' involvement 2021-2023

KAA offers twice per year, before the accreditation procedures start, online training sessions for the experts including students, for them to become familiar with the system before they are deployed. All experts confirmed that the training and support provided by KAA was helpful for them.

After the accreditation procedure is completed, expert panel members submit their feedback to KAA as required by Article 17 of the above-mentioned Regulation. The experts including students that the panel met during the site visit confirmed having been requested in the past to provide feedback via form/survey on a yearly basis (not directly after each procedure).

For follow-up procedures, at least one international expert must be engaged. For monitoring procedures, no external expert is foreseen according to the Law, only KAA's staff.

Analysis

The standard requires that external quality assurance be carried out by groups of external experts that include student members. Furthermore, these experts should be carefully selected, have the appropriate skills, be well trained and supported by the agency's staff.

Moreover, the recommendations from the 2019 ERR require the agency to:

- Make sure that the level of degree-work can and will be judged properly by the expert panels.
- Make sure that full students' participation in institutional reviews and program evaluations is guaranteed.
- Build a network of national experts, including students, in order to participate in activities such as monitoring of the follow-up of recommendations provided in review reports.

On the basis of the reflection included in the Introduction to this document, concerning the question if monitoring activities can be considered procedures on their own, the panel does not take into account monitoring in this analysis.

The panel found that the agency has made strong efforts to ensure that high-quality academic evaluators are used in the external evaluation committees. It is testimony to the ambition of Kosovo and the agency that they have selected and procured academic evaluators from well-established foreign HEIs to benchmark the quality of HE in Kosovo.

All accreditation committees have student members as required in the standard. However, the pool from which the students are drawn is quite narrow compared to the number of procedures to be carried out yearly, especially at programme level. Students are usually Masters or Doctoral students, and, in some cases, these students are mature and have undergone their undergraduate studies sometime in the past. While recognising that these evaluators have much to contribute, the panel believes that it is important to ensure that the students involved in evaluation panels have recent experience of attending HEIs at Bachelor or Master level so that they are in a position to comment on the current student experience for the programme accreditations mostly conducted by KAA.

The HEIs have a role to play here in ensuring that students have an opportunity to participate fully and widely in the QA structures within HEIs. The national students' union usually has a role in ensuring that students are informed about the purposes of QA and the vital role that students can play in the quality of their education. The fact that the national students' union in Kosovo no longer seems to be functioning for the whole HE sector is a liability in terms of ensuring that students are fully engaged in contributing to the quality of their education. The panel recommends that the agency finds a way to expand their engagement with the wider student body through seminars and other dissemination processes, for instance.

Concerning the 2019 ERR recommendations, the panel considers based on the discussion with external evaluators during the site visit and on their feedback about the information and onboarding provided by KAA, that progress has been made about ensuring students' participation in institutional and programme accreditation. There is no evidence on activities addressing the first recommendation (about international experts being able to assess the quality of degree-work because of language and cultural differences and difficulties). A network of international experts including students has been built to be engaged as external evaluators.

The current legal composition of external evaluation panels requires the use only of international academic and student experts. There is no opportunity to involve the world of work such as industry

or employer representatives or evaluators from the regulated professions for programmes producing practitioners in regulated professions. The panel believes that a widening of the stakeholder base to include members from the world of work and particularly from the regulated professions in evaluation panels could contribute to evaluating not only the quality but also the relevance of study programmes. This could form part of any discussions on changes in the legal framework of evaluation that may take place.

The use of international evaluators is understandable for a small, relatively young country. It provides an opportunity for international benchmarking and evaluation from those who have no personal stake in the system, but it does place an onus on the agency to ensure that knowledge of and confidence in the agency accreditation processes is disseminated to local academics and the student body in other ways.

The evaluation panel members involved in the site visit felt that they were well-briefed in advance of being deployed. The process of ensuring that experienced panel members are mixed with first timers is to be commended. The accreditation panel members that the review panel spoke to had conducted a large number of evaluations over the past number of years and are now familiar with the Kosovar system.

The evaluation panel members involved in the site visit also indicated that they are not systematically surveyed after each evaluation. As explained in the section about ESG 3.6, surveys seem to take place on an annual basis, and it is likely that memories of the evaluation could diminish over time. To improve the quality and consistency of evaluations, it is important that the survey process is comprehensive and systematised and takes place in a timely manner.

Panel commendations

The agency has made strong efforts to ensure that high-quality academic evaluators are used in the external evaluation committees. KAA has selected and procured academic evaluators from well-established foreign HEIs to benchmark the quality of HE in Kosovo.

The process of ensuring that experienced panel members are mixed with first timers is also to be commended.

Panel recommendations

The panel strongly recommends ensuring that the students involved in evaluation panels have recent experience of attending HEIs at Bachelor or Master level, so that they are able to comment on the current student experience for the kind of programme accreditations mostly conducted by KAA.

Panel suggestions for further improvement

The panel suggests that the agency widens its stakeholder base for accreditations to include members from the world of work and particularly from the regulated professions. This could form part of any discussions on changes in the legal framework of evaluation that may take place.

Panel conclusion: 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.

2019 review recommendation

Monitor how the existing rules for assessing standards and for decision-making work out in reality. If needed, improvements both in decision rules and by way of training, may have to be considered.

Evidence

For accreditation procedures (institutional, programme including doctoral level) the criteria for decision-making are published in the Accreditation Manual (Chap. 1). Decisions are made and applied separately for each campus / branch of the HEI, for each organisational form of a study programme (full- or part-time) and for each teaching language in the study programme. According to the Manual, these are considered distinct process instances and are subject to separate accreditations.

Monitoring activities concern the areas identified in KAA Methodology on Monitoring and Post-Accreditation Procedures: programme holders, academic staff, lecture and exercise schedules, infrastructure and resources. For these activities, the objective is to verify if the conditions of the last (re-)accreditation are still met and implemented by the HEI.

So far, based on the information provided by senior staff of the agency during the site visit, there has been only one case in which the decision by the SCQ diverged from the report by the external experts.

A four-level compliance scale is defined: fully compliance, substantial compliance, partial compliance, non-compliance, whereas the compliance applies to an area:

- Institutional and programme accreditation at Bachelor and Master level: for each area, specific standards are defined (and for each standard, indicators are provided). For each level, the Manual provides a range in terms of percentage of standards which must be fulfilled for the area to be considered fully/substantially/partially compliant. For example, if 30-70% of the standards in one area are fulfilled, the area is to be considered as partially compliant. The overall compliance is then determined as the most frequent compliance level.
- Programme accreditation at doctoral level: for each area, core standards and supplementary standards are defined. For each compliance level, the Standards for Evaluation of Doctoral Programmes define how many core and supplementary standards are to be fulfilled.

At least a substantial compliance level in the overall judgement is required for an institution or programme to get a positive accreditation. Moreover:

- For institutional accreditation, the areas Learning and Teaching as well as Learning Resources and Facilities are mandatory: substantial compliance is required in both areas.
- For programme accreditation at Bachelor and Master level, the areas Academic Staff and Infrastructure and Resources are mandatory: substantial compliance is required in both areas.

For full compliance, an accreditation for five years will be granted. For substantial compliance, three or five years are possible. For partial compliance, only three years will be granted.

For all external evaluators (newcomer and experienced) KAA offers every year two training sessions before the start of the reviews (typically in January or February), containing introductions to the national QA system, to the activities and procedures of KAA and to the standards and application of the definitions. These trainings were deemed particularly useful by the evaluators who met the panel during the site visit, in terms of ensuring understanding of the system and consistency across the review teams, and to pass on experiences or adaptations of existing procedures.

The international expert reviewers the panel met during the site visit also confirmed that the rules for judgement and decision-making have been improved based on their feedback, for example in that the description of how to calculate standard compliance has been made more precise, thus making the application of the rules clearer and more transparent, thus leading to a better consistency across the processes.

As monitoring does not include external evaluators (as explained in the Introduction to this document), training and information / involvement only concern accreditation at institutional and programme level (including doctoral programmes).

The discussions with the HEIs during the site visit confirmed that there are no issues with the criteria against which the HEIs are being evaluated and they expressed no concerns about inconsistencies in report findings or recommendations.

Analysis

The standard requires that any outcomes or judgements made as a result of external QA should be based on explicit and published criteria that are applied consistently.

Moreover, the recommendation from the 2019 ERR requires KAA to monitor how the existing rules for assessing standards and for decision-making work out in reality. If needed, improvements both in decision rules and by way of training, may have to be considered.

The evidence shows that during the last years KAA made strong efforts in two directions:

First of all, all KAA procedures have been updated and improved in recent years, in an effort of transparency and professionalisation, leading to clear and explicit criteria and rules for their application. This effort involved HEIs as well as external evaluators and international experts and led to well-defined criteria and mechanisms, all of them publicly available on KAA's website. In this sense, the recommendation from the 2019 ERR is considered to be fulfilled.

On the other hand, KAA made efforts to improve the application of the criteria and procedures in terms of consistency. Attention was paid while updating the corresponding documents to also better explain how decisions (e.g. on the level of compliance) are to be made by the external evaluators. In addition, KAA improved and extended its training offer to the external evaluators, making it more comprehensive and offering it twice per year so that more evaluators can participate. Furthermore, the praxis of mixing on purpose experienced evaluators with newcomers was introduced, as commended by the panel in the section about ESG 2.4.

All these measures contribute to consistency in the application of the defined and published criteria, so that the panel feels confident that the requirements of the standard are met.

Panel conclusion: 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.

2019 review recommendation

Improve the quality of reports and make sure that they contain deeper analysis and a better connection with evidence and that the full reports are regularly published.

Evidence

The publication of the decisions of KAA (in Article 7, §3) and of the results of quality assessments (in Article 15, §8, specific about accreditation) is required by the Law on KAA and defined in the Accreditation Manual as part of the outcomes of the process (§3.2): "KAA publishes its decision together with the External Review Report on its official website not later than two weeks after the meeting of the State Council of Quality and the education provider is being given the final report".

For monitoring, the same is required in this Methodology document (§1.1): "The report of the monitoring procedure together with the decision of the SCQ for the relevant institution of higher education is published on the official website of the KAA.", even if in this kind of procedure, no external expert is involved, as established by the Law.

For external reports of accreditation procedures, templates have been introduced, as indicated in the SAR (§5.6) and the Accreditation Manual (§3.2) and for follow-ups in the Methodology on Monitoring and Post-Accreditation Procedures (§2.4.6 and §2.5.9).

Evaluation reports include the following main elements: (i) introduction, to provide context information; (ii) institution / study programme valuation as the main content of the report, related to each area according to the manuals, including compliance level and recommendations; (iii) overall evaluation and judgement of the panel.

The full reports are published on the website based on their category:

- institutional (re-)accreditation reports and programme (re-)accreditation reports including for doctoral programmes are organised per institution and year; accordingly, the decisions of the Board are published with this same logic
- monitoring reports are organised per year; in this case there is no additional decision by the SCQ, the monitoring report itself is the result of the process.

During the site visit, the panel members noticed that some of the published programme (re-)accreditation reports seem not to fulfil the requirement of having at least two external experts involved, as only one expert is listed in the report itself. The Director and the Heads of the Departments explained that commonly larger institutions apply for (re-)accreditation of a large suite of study programmes. To make things manageable, a panel is nominated for the whole suite, and during the different sessions of the site visit sometimes the panel members get divided up, based on their expertise, for interviews/sessions specific to one study programme. The report in some of these cases shows only the name of this one "dedicated" expert for these specific sessions, while the accreditation was carried out together by the whole panel.

At the time of the site visit, some reports for 2023 were still missing on the website, because they had not yet been approved by the SCQ. For 2024 there are no reports available yet.

Analysis

The standard requires that full reports by the experts are published and are clear and accessible to any interested individuals.

Moreover, the recommendation from the 2019 ERR requires that KAA improves the quality of reports and makes sure that they contain deeper analysis and a better connection with evidence and that the full reports are regularly published.

The panel confirms that the agency publishes its evaluation reports on its website in an accessible manner. Monitoring reports have only been published more recently (and they are not prepared by external experts, as already explained in the Introduction to this document and in reference to other standards).

In general, although there still is potential for improvement in terms of quality, depth, detail of the reports, the panel considers that KAA has put adequate focus on raising the overall quality of the reviews and of the corresponding reports, and in ensuring that the reports from the external experts are regularly published on the website. Thus, the standard and the recommendation from the 2019 ERR are considered fulfilled by the panel.

Nevertheless, an analysis of the published reports (from KAA's website) by the panel member shows that in several cases, it has been the practice where several programmes are being evaluated as part of a site visit (in a bundle), that the panel members are divided up between the different programmes for some sessions of the site visit, meaning that some panel members are assigned to specific study programmes. This leads to some published programmatic reports appearing to indicate that only one external academic expert was present for the evaluation. The panel feels that it is important that the structure of the evaluation process is very clearly communicated to the external audience, who may wish to read the reports of the evaluations. This clarity of communication is even more important, in the case where local academics and students are not involved in the external evaluation processes and are therefore less familiar with how they operate in practice.

Panel recommendations

The panel recommends that follow-up reports and reports of monitoring activities are discussed and approved by the SCQ as well as published on the website in good time after the completion of the procedures.

The panel also strongly recommends that the performed evaluation process and the involved experts as well as their role and specific involvement are more transparently indicated and explained in the published reports, especially in the programmatic and monitoring reports.

Panel conclusion: 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.

Evidence

After drafting a revised version of the Accreditation Manual in February 2024, KAA also adapted the Regulation on the Work of the Appeals Committee, which is also available on the agency's website, together with the role and composition of the Committee and with the possibility of a direct contact via email if needed. The Regulation is based on the conditions defined in the Law on KAA (Article 22, 23 and 24), which establishes rules for the composition, appointment and dismissal of the Committee members, the Committee being a permanent body of KAA. The Committee consists of five members, three being lawyers and two being university professors. No student member is foreseen. The appointment period is four years.

HEIs have 30 days to file an appeal following a decision by the SCQ on any of KAA's procedures (institutional accreditation, programme accreditation, evaluation of doctoral programmes, monitoring). Rules for review and decision-making by the Committee are defined in Articles 5 and 6 of the Regulation:

- a decision has to be made within 30 days from the day of receipt of the appeal and supporting documentation, whereas no evidence or information can be considered which was not made available to the SCQ for the decision which is to be reviewed; in complex cases, one postponement of 30 days is possible;
- decisions require a majority decision among the members of the Appeals Committee; it can either reject the appeal – in this case the decision is a final one; or it can return the case to the SCQ for reconsideration.

Final decision-making (for the cases which the Committee positively decides after examination to return to the SCQ for consideration) is within the competence of the SCQ. According to Article 6 of the Regulation, HEIs can file the decision and initiate an administrative dispute within 30 days of receiving the information about the result.

Due to the large number of negative decisions by the SCQ during the last years, the number of appeals to the Committee was and is still relatively high, as reported in the SAR (§5.7):

	2021	2022	2023
Appeals (total)	18	23	20
approved	0	4	5
rejected	18	15	12
withdrawn	0	4	3

Table 8 - Overview of appeals 2021-2023

HEIs confirmed during the site visit that they have had positive experiences with the Appeals Committee, and they felt that even in case of a negative decision (rejection of the appeal) the institutions were dealt with in a transparent and consistent way.

Nevertheless, based on information collected during the site visit, in the last years fifteen cases were brought to court by the appellate HEI. In thirteen cases the court confirmed the decision by the SCQ.

Beside formal appeals, complaints on minor or operative aspects of the procedures can be delivered by the HEIs to the staff of the agency, for example via email or via a "report" button on KAA's website (publicly available, no login needed). In this case, KAA's staff from the Department(s) involved in the procedures will revise the procedure and provide feedback to the HEI. Institutions confirmed during the site visit that they use this possibility as needed, as part of a general feedback after the procedure or as an exchange e.g. in working groups. There is no statistical or structured analysis or documentation of complaints and of their results.

Analysis

The standard requires that complaints and appeals processes be clearly defined as part of the design of external QA processes and transparently communicated to the HEIs.

There is an appeals commission in place for the purpose of reviewing decisions of the SCQ for which HEIs submitted an appeal. The commission has 30 days for its review and corresponding decision (with one additional postponement of 30 days in complex cases) and can either reject the appeal after reviewing the case or decide that the appeal is well founded and thus return the case to the SCQ for revisiting its decision. Rejection by the appeals commission is a final decision, while when returning the case to the SCQ it is this Board which makes the final decision. Anyway, HEIs can also file these decisions in a civil court. The composition of the appeals commission as well as the conditions of the reviews and of decision making are defined in a Regulation and published on the website. As there are quite a number of negative decisions taken by the SCQ, it is unsurprising that there are a significant number of appeals annually. The quality officers from the HEIs indicated that they had been involved in a number of appeals and that they were satisfied with the appeal process. The process is considered fair, transparent and timely by the HEIs.

For minor or operative issues which occurred during a procedure, HEIs can also directly submit complaints to KAA's staff in a less structured and official manner, simply via email, or use the corresponding button on KAA's website. In this case, there is no specific procedure for dealing with the complaint, and KAA's staff itself will examine it and provide feedback. No documentation is collected in a structured way on such cases, so that no statistics is possible.

The panel considers that the necessary formal process for appeals is in place and well communicated, as well as fairly and transparently implemented, based on the feedback by the HEIs involved in the site visit. For more informal complaints, there is no specific structure in place, but the HEIs confirmed making use of this possibility.

Panel conclusion: Compliant

CONCLUSION

SUMMARY OF COMMENDATIONS

ESG 3.6	The involvement of education transparency bodies from the civil society of Kosovo as active stakeholders in the work of the agency is to be commended, as it shows the strong commitment to independence and transparency.
ESG 2.4	The agency has made strong efforts to ensure that high-quality academic evaluators are used in the external evaluation committees. KAA has selected and procured academic evaluators from well-established foreign HEIs to benchmark the quality of HE in Kosovo. The process of ensuring that experienced panel members are mixed with first timers is also to be commended.

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

ESG 3.1	Partially compliant	The agency is strongly recommended to implement as soon as possible the representation of a student (voting) member and of two industry (non-voting) members in the SCQ, as defined by the Law on KAA (2023). These three members should be nominated and directly involved in the meetings and the activities of the SCQ at soon as possible. The panel strongly recommends translating KAA's Strategic Plan in a (multi-year) implementation plan, setting out measures / activities and the corresponding time plan, which are necessary to ensure that the goals are reached in all areas.
ESG 3.2	Compliant	-
ESG 3.3	Compliant	-
ESG 3.4	Compliant	The panel recommends that thematic analyses are developed more regularly, that they build upon the standardisation of the agency's activities and procedures and the data collected from its external QA procedures through the agency's developing IT-platforms and that such analyses be created with the participation of KAA's staff to ensure knowledge transfer and capacity building, and that the topics address the needs of the Kosovo HE sector as identified by KAA itself.
ESG 3.5	Partially compliant	The panel recommends matching the planned expansion in human resources by a clear and specific plan on how such staff are to be deployed in the future, where more enhancement-oriented work of the agency could take place and consequently which skills are needed for such activities. The panel strongly recommends establishing whether it is possible for the agency to create sub-council structures to assist the SCQ in its deliberations. The effectiveness of the

		current governance system is to be evaluated, and it is to be determined whether the SCQ can be expanded. External expertise should assist in this audit process.
ESG 3.6	Partially compliant	The panel strongly recommends developing more systematic approaches to the internal QA of the agency and to implement them in a structured and systematic way. The panel recommends regular, standardised, timely surveys to be directed to all involved stakeholders after the conclusion of every procedure conducted by KAA, and the results to be analysed and used for the further development of KAA's activities.
ESG 3.7	Compliant	-
ESG 2.1	Compliant	KAA is strongly recommended to ensure that student representatives are met by the panels as part of all activities of institutional accreditation, programme accreditation and evaluation of doctoral programmes, except for the accreditation of new higher education institutions. Students from other programmes of the same institution can assess general aspects of the student experience.
ESG 2.2	Compliant	KAA is strongly recommended to widen the systematic and structured involvement of all groups of stakeholders, including local students, student representatives and members of the national academic community, in the design and improvement of QA methodologies. The panel strongly recommends that the agency engages with HEIs and MESTI for a future amendment to the Law on KAA, opening the possibility for further extending the accreditation period at institutional and programme level.
ESG 2.3	Partially compliant	The panel strongly recommends revising the follow-up process, focusing more on providing sufficient opportunity for the HEIs to demonstrate how they are enhancing their processes following evaluation, and on implementing the processes as required by the laws and by KAA's manuals.
ESG 2.4	Compliant	The panel strongly recommends ensuring that the students involved in evaluation panels have recent experience of attending HEIs at Bachelor or Master level, so that they are able to comment on the current student experience for the kind of programme accreditations mostly conducted by KAA.
ESG 2.5	Compliant	-
ESG 2.6	Compliant	The panel recommends that follow-up reports and reports of monitoring activities are discussed and approved by the SCQ as well as published on the website in good time after the completion of the procedures. The panel also strongly recommends that the performed evaluation process and the involved experts as well as their role and specific involvement are more transparently indicated and explained in the published reports, especially in the programmatic and monitoring reports.
ESG 2.7	Compliant	-

In light of the documentary and oral evidence considered by it, the review panel considers that, in the performance of its functions, KAA was not, at the time of the review visit substantially compliant with the ESG. The panel, however, believes that the deficiencies in relation to Standards 3.1 and 3.5 could be rectified relatively quickly. The agency is recommended to take appropriate action to achieve compliance in all standards at the earliest opportunity.

SUGGESTIONS FOR FURTHER DEVELOPMENT

The panel made further suggestions, which KAA may wish to consider when reflecting on its further development, as signalled in the previous sections:

ESG 3.1	The stakeholder basis for the further development of QA in Kosovo should be enlarged. A stronger and wider, regular and structured, involvement of students and student representatives, of employer / industry representatives, of civil society in the work of KAA would be beneficial – beside ad hoc working groups or consultations. This could be realised through consultative bodies, either through an adaptation of the Law, or on a voluntary basis on the part of KAA and SCQ. Industry / professional representatives could also be included in accreditation panels.
ESG 2.3	For the monitoring procedures, the panel suggests moving from a quality control to more focus on enhancement, e.g. integrating monitoring in the follow-up procedures.
ESG 2.4	The panel suggests that the agency widens its stakeholder base for accreditations to include members from the world of work and particularly from the regulated professions. This could form part of any discussions on changes in the legal framework of evaluation that may take place.

ANNEXES

ANNEX 1: PROGRAMME OF THE SITE VISIT

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
**Tue 02.07.2024 (8:30-17:30) – Day 1**		
-	8:30-9:00 (30 min)	Review panel's private meeting	-
1	9:00-9:45 (45 min)	Meeting with the **Director**	Director of Department for Evaluation and Accreditation Director of Department for Follow-up and Monitoring Procedures
-	9:45-10:00 (15 min)	Review panel's private discussion	
2	10:00-10:45 (45 min)	Meeting with the President and the members of the **SCQ**	President of SCQ Vice President of SCQ Member of SCQ (1) Member of SCQ (2) Member of SCQ (3) Member of SCQ (4) Member of SCQ (5)
-	10:45-11:00 (15 min)	Review panel's private discussion	
3	11:00-11:45 (45 min)	Meeting with staff from the **Department of Evaluation and Accreditation**	Director of Department for Evaluation and Evaluation Head of Division for Evaluation and Accreditation Head of Division for Legal Issues Senior Officer for Evaluation and Accreditation Senior Legal Officer
-	11:45-12:00 (15 min)	Review panel's private discussion	-
4	12:00-12:45 (45 min)	Meeting with staff from the **Department of Monitoring and Post-Accreditation Procedures**	Director of Department for Monitoring and Post-Accreditation Procedures Head of Division for Post-Accreditation Procedures Senior Officer for Monitoring Procedures (1)

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
			Senior Officer for Monitoring Procedures (2) Senior Officer for Post-Accreditation Procedures
-	12:45-13:45 (60 min)	Lunch (panel only)	-
5	13:45-14:30 (45 min)	Meeting with KAA staff involved in **internal QA, international projects and training for staff**	Director of Department for Monitoring and Post-Accreditation Procedures Director of Department for Evaluation and Evaluation Head of Division for Evaluation and Accreditation Head of Division for Post-Accreditation Procedures
-	14:30-14:45 (15 min)	Review panel's private discussion	-
6	14:45-15:30 (45 min)	(Hybrid) Meeting with **donors / consultants involved in international projects / activities** with KAA	Austrian Development Agency (1) Austrian Development Agency (2) Kosovo Education Center Bonevet ORCA Responsible for revision of KAA BA and MA Standards and Guidelines **(online)** Head of experts' team for development of thematic analysis for KAA **(online)**
-	15:30-15:45 (15 min)	Review panel's private meeting	-
7	15:45-16:30	Meeting with **employers, industry representatives, local community** involved in working groups / stakeholder activities	American Chamber of Commerce, Industry and employer representative British Gymnasium of Technology Head of the Physiotherapy Chamber of Kosovo EdGuard
-	16:30-17:30 (60 min)	Wrap-up meeting among panel members and preparations for day 2	-
-	Liburnia Restaurant	Dinner (panel only)	-
Wed 03.07.2024 (8:30-18:00) – Day 2			
-	8:30-9:30 (60 min)	Review panel's private meeting	-
8	9:30-10:15 (45 min)	Meeting with **ministry** representatives	Advisor to the Minister of Education, Science and Technology Head of ENIC/NARIC Center

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
			Kosovo Pedagogic Institute at MESTI Senior Officer at MESTI
-	10:15-10:30 (15 min)	Review panel's private discussion	-
9	10:30-11:15 (45 min)	Meeting with the **Heads / Senior staff of public HEI** involved in institutional / programme accreditation	Rector of University of Applied Sciences in Ferizaj Rector at University of Peja Rector at University of Gjilan Vice Rector at IBCM College Dean at University of Prishtina
-	11:15-11:30 (15 min)	Review panel's private discussion	-
10	11:30-12:15 (45 min)	Meeting with the **Heads / Senior staff of private HEI** involved in institutional / programme accreditation	President at Universum College Rector of Heimerer College Vice Rector at UBT College Dean at RIT
-	12:15-12:30 (15 min)	Review panel's private discussion	-
11	12:30-13:00 (30 min)	Meeting with **quality officers of public HEIs and/or programme chairs/coordinators and/or quality committee chairs/members** involved in institutional / programme accreditation	Head of QA at University of Prishtina Head of QA at University of Mitrovica Head of QA at IBCM College
-	13:00-14:00 (60 min)	Lunch (panel only)	-
12	14:00-14:30 (30 min)	Meeting with **quality officers of private HEIs and/or programme chairs/coordinators and/or quality committee chairs/members** involved in	Head of QA at AAB College Secretary at UBT College Head of QA at RIT Kosovo Head of QA at Universum College

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
		institutional / programme accreditation	
-	14:30-14:45 (15 min)	Review panel's private discussion	-
13	14:45-15:30 (45 min)	(Online) Meeting with **(non-student) reviewers / experts** involved in institutional / programme accreditation activities	University of Masaryk, Czech Republic Vice Rector at University of Bucharest EPDAD, Turkey Hohenheim University
-	15:30-15:45 (15 min)	Review panel's private discussion	-
14	15:45-16:15 (30 min)	(Online) Meeting with **student reviewers** involved in institutional / programme accreditation activities	University of Latvia Malmo University University of Warsaw Central European University
-	16:15-16:30 (15 min)	Review panel's private discussion	-
15	16:30-17:00 (30 min)	Meeting with **student representatives** involved in working groups or other stakeholder activities	Former President of Students Union in Kosovo President of Students Union at University of Prishtina President of Students Union at AAB College President of Students Union at UBT College
-	17:00-18:00 (60 min)	Wrap-up meeting among panel members: preparation for day 3 and provisional conclusions	-
-	Swiss Diamond Hotel	Dinner (panel only)	-
Thu 04.07.2024 (8:30-12:30) – Day 3			
-	8:30-9:30 (60 min)	Meeting among panel members to agree on final issues to clarify	-
16	9:30-10:30 (60 min)	Meeting with the **Director** to clarify any pending issues	General Director of KAA Director of Department for Evaluation and Accreditation Director of Department for Follow-up and Monitoring Procedures

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
-	10:30-12:00 (90 min)	Private meeting between panel members to agree on the main findings	
17	12:00-12:30 (60 min)	Final de-briefing meeting with staff and Board members of the agency to inform about preliminary findings	SCQ members KAA staff

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

External review of the Kosovo Accreditation Agency (KAA) by ENQA

Annex I:

TRIPARTITE TERMS OF REFERENCE BETWEEN KAA, ENQA AND EQAR

March 2024

1. Background and context

Established in 2008, the Kosovo Accreditation Agency (KAA) is an independent agency responsible for the external evaluation (accreditation, re-accreditation, validation and follow-up) of higher education institutions in Kosovo.

KAA's mission is to support quality development in higher education institutions through external evaluation processes and to assure Kosovo society that quality of higher education is at international standards level.

Accreditation is mandatory by law and KAA applies two types of accreditation one of them being institutional accreditation and the other being programme accreditation. There are approximately four hundred study programmes being provided from 17 Higher Education Institutions, of which nine are public HEI's and eight are private HEI's. Due to the national context, KAA only provides evaluation which ends up with a final decision issued by the board, hence an institution is accredited. KAA also does recognition of accreditation, with the condition that the evaluating agency is a member of ENQA and registered EQAR. Evaluation is based on a set of standards and additional criteria are added in order to comply with the local context.

KAA has been an affiliate of the European Association for Quality Assurance in Higher Education (ENQA) since 2022

KAA is applying for inclusion on the European Quality Assurance Register for Higher Education (EQAR).

2. Purpose and scope of the review

This review will evaluate the extent to which KAA (the agency) complies with each of the standards of Parts 2 and 3 of the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG) and support the agency in its efforts to continually review and enhance its work. Such an external review is a requirement for agencies wishing to apply for EQAR registration.

2.1 Activities of the agency within the scope of the ESG

To apply and EQAR registration, this review will analyse all of the agency's activities that fall within the scope of the ESG, e.g., reviews, audits, evaluations or accreditations of higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation). All activities are reviewed irrespective of geographic scope (within or outside the EHEA) or whether they are obligatory or voluntary in nature

The following activities of the agency must be addressed in the external review:

- Institutional accreditation
- Programme Accreditation

- Monitoring Procedures
- Evaluation of Doctoral Programmes

Considering the KAAs application to EQAR, the self-evaluation report and the external review report are expected to give specific attention to the issues where the Register Committee concluded in its last decision, that the agency was not compliant with the ESG, namely ESG 3.3[9].

Should any substantive changes occur in KAA between now and the review (e.g., organisational changes, the introduction or changes of activities within or outside of the scope of the ESG), the agency should inform EQAR at its earliest convenience.

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 review procedure consists of the following steps:

- Formulation of, and agreement on the Terms of Reference for the review between KAA, ENQA and EQAR (including publishing of the Terms of Reference on ENQA's website[10]);
- Nomination and appointment of the review panel by ENQA;
- Notification of EQAR about the appointed panel;
- Self-assessment by the agency, including the preparation and publication of a self-assessment report;
- A site visit of the agency by the review panel;
- Preparation and completion of the final review report by the review panel;
- Scrutiny of the final review report by ENQA's Agency Review Committee;
- Publication of the final review report;
- A decision from the EQAR Register Committee on the agency's registration on EQAR;
- Follow-up on the panel's recommendations to the agency, including a voluntary progress visit.

3.1 Nomination and appointment of the review panel

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 potentially a labour market representative (if requested). One of the members serves 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. In this case, an additional fee is charged to cover the reviewer's fee and travel expenses.

The panel will be supported by the ENQA Review Coordinator (an ENQA staff member) who will monitor the integrity of the process and ensure that ENQA's requirements are met throughout the

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[9]See EQAR Register Committee decision from 01/03/2018 https://backend.deqar.eu/reports/EQAR/2018-02_Exclusion_Decision_C22_KAA.pdf

[10] The agency is encouraged to publish the Terms of Reference on its website as well.

process. The Review Coordinator will not be the secretary of the review and will not participate in the discussions during the site visit interviews.

Current members of the ENQA Board are not eligible to serve as reviewers.

ENQA will provide the agency with the proposed panel composition and the curricula vitarum of the panel members to establish that there are no known conflicts of interest. The reviewers will have to agree to a non-conflict of interest statement that is incorporated in their contract for the review of this agency.

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

The agency is responsible for the execution and organisation of its own self-assessment process and must adhere to 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 expected to contain:
    - a brief description of the HE and QA system;
    - the history, profile, and activities of the agency;
    - a presentation of how the agency addresses each individual standard of Parts 2 and 3 of the ESG for each of the agency's external QA activities, with a brief, critical reflection on the presented facts;
    - opinions of stakeholders;
    - the instances of partial compliance noted in the most recent EQAR Register Committee decision of inclusion/renewal and any other aspects that may have been raised by the EQAR Register Committee in subsequent change report decisions (if relevant);
    - reference to the recommendations provided in the previous review and actions taken to meet those recommendations;
    - a SWOT analysis;
    - reflections on the agency's key challenges and areas for future development.
- All the agency's external QA activities (as defined under section 2.1) are described and their compliance with the ESG is analysed in the SAR.
- The report is well-structured, concise, and comprehensive. It clearly demonstrates the extent to which the agency performs its tasks of external quality assurance and meets the ESG.

The self-assessment report is submitted to the ENQA Secretariat, which has two weeks to carry out a screening. The purpose of a screening 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 rather whether or not the necessary information, as outlined in the *Guidelines for ENQA Agency Reviews*, is present. If 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 ask for a revised version within two weeks.

The final version of the agency's self-assessment report is then submitted to the review panel a minimum of eight weeks prior to the site visit. The agency publishes the completed SAR on its website and sends the link to ENQA. ENQA will publish this link on its website as well.

3.3 A site visit by the review panel

The review panel will draft a proposal of the site visit schedule which must be submitted to the agency at least six weeks 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 must be given to the agency at least one month before the site visit to properly organise the requested interviews.

In advance of the site visit (ideally at least two weeks before the site visit), the panel will organise an obligatory online meeting with the agency. This meeting is held to ensure that the panel reaches a sufficient understanding of:

- The specific national/legal context in which the agency operates;
- The specific quality assurance system to which the agency belongs;
- The key characteristics of the agency's external QA activities.

The review panel will be assisted by the ENQA Review Coordinator during the site visit. The review coordinator will act as the panel's chief liaison with the agency, monitor the integrity of the review process and its consistency, and ensure that ENQA's overall expectations of the review are considered and met.

The site visit will close with a final debriefing meeting in which the panel outlines its general impressions and provides an overview of the judgement on the agency's ESG compliance. The panel will not comment on whether or not the agency would be granted registration on EQAR.

3.4 Preparation and completion of the final review report

Based on the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will follow the purpose and scope of the review as defined under sections 2 and 2.1. It will also provide a clear rationale for the panel's findings concerning each standard of Parts 2 and 3 of the ESG. When preparing the report, the review panel should also bear in mind *EQAR's Policy on Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies*[11] to ensure that the report contains sufficient information for the Register Committee to consider the agency's application for registration on EQAR.

A draft will first be submitted to the ENQA Review Coordinator who will check the report for consistency, clarity, and language, and it will then be submitted to the agency – usually within 10 weeks of the site visit – for comment on factual accuracy and grave misunderstandings only. The agency will be given two weeks to do this and should not submit any additional material or documentation at this stage. Thereafter, the review panel will take into account the agency's feedback on possible factual errors and finalise and submit the review report to ENQA.

The report should be finalised within three months of the site visit and will normally not exceed 40-50 pages in length.

3.5. Publication of the report and a follow-up process

The agency will receive the review panel's report and publish it on its website once the Agency Review Committee has validated the report. The report will also be published on the ENQA website together with the statement of the Agency Review Committee validating external review reports by assessing the integrity of the review process and checking the quality and consistency of the reports. Importantly, during this process, and prior to final validation of the report, the Agency Review Committee has the option to request additional (documentary) evidence or clarification from the review panel, review coordinator or the agency if needed. The review report will be published on ENQA website regardless of the review outcome.

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[11] Available at: https://www.eqar.eu/about/official-documents/#use-and-interpretation-of-the-esg

As part of the review's follow-up activities, the agency commits to react on the review recommendations and submit a follow-up report to ENQA within two years of the validation of the final external review report. The follow-up report will be published on the ENQA website.

The follow-up report may be complemented by an optional progress visit to the agency performed by two members of the original panel (whenever possible). The visit, which normally takes place 2-3 years after the verification of the final external review report (and after submission of the follow-up report), aims to offer an enhancement-oriented and strategically driven dialogue that ordinarily might be difficult to truly integrate in the compliance-focused site visit. The progress visit thus does not have the objective of checking the agency's ESG compliance or how the agency has followed up on the recommendations, but rather provides an arena for strategic conversations that allow the agency to reflect on its key challenges, opportunities, and priorities. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator about this.

4. Use of the report

ENQA will retain ownership of the report. The intellectual property of all works created by the review panel in connection with the review contract, including specifically any written reports, will be vested in ENQA.

The report is used as a basis for the Register Committee's decision on the agency's registration on EQAR. The review report should only be considered final after validation by the Agency Review Committee. After submission to ENQA but before validation by the ARC, the report may not be used or relied upon by the agency, the panel, or any third party and may not be disclosed without ENQA's prior written consent. The approval of the report is independent of the decision on EQAR registration.

For the purposes of EQAR registration, the agency will submit the review report (once validated by the Agency Review Committee) to EQAR via email. The agency should also include its self-assessment report (in a PDF format), a Declaration of Honour, and any other documents that may be relevant for the application (i.e., annexes, statement to the review report, updates). EQAR is expected to consider the review report and the agency's application at its Register Committee meeting as stipulated in the indicative review schedule below.

5. Indicative schedule of the review

Agreement on Terms of Reference	February 2024
Appointment of review panel members	March 2024
Self-assessment completed	26 April 2024
Screening of SAR by ENQA Review Coordinator	April 2024
Preparation of the site visit schedule and indicative timetable	May 2024
Briefing of review panel members	May 2024
Review panel site visit	July 2024
Draft of review report and its submission to ENQA Review Coordinator for verification of its compliance with the Guidelines	July/August 2024
Draft of review report to be sent for a factual check to the agency	August 2024
Agency statement on the draft report to the review panel (if necessary)	September 2024
Submission of the final report to ENQA	September 2024
Validation of the review report by the Agency Review Committee	October 2024
Publication of report	November 2024
EQAR Register Committee meeting and initial consideration	Spring 2025

| Decision on ENQA membership by the ENQA Board | N/A |

ANNEX 3: GLOSSARY

BAC	British Accreditation Council
ENIC/NARIC	European Network of Information Centres / National Academic Recognition Information Centres in the European Union
ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register for Higher Education
ESG	*Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015*
HE	higher education
HEI	higher education institution
INQAAHE	International Network for Quality Assurance Agencies
KAA	Kosovo Accreditation Agency
KEC	Kosovo Education Center
KITU	Coalition for Integrity and Transparency in the University
MESTI	Ministry of Education, Science, Technology and Innovation
ORCA	Organisation for Increasing Quality of Education
QA	quality assurance
SAR	self-assessment report
SCQ	State Council of Quality (KAA's Board)
ZSI	Centre for Social Innovation

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY KAA

1. Self-Assessment Report of the Kosovo Accreditation Agency (KAA)
2. Annex 1 to the SAR: Budget appropriations defined by the Law on Budget Appropriations for the years 2021, 2022,2023 and 2024
3. Annex 2 to the SAR: Expenditures for the years 2021,2022 and 2023 structured according to the Source Funds and Economic Categories
4. Annex 3 to the SAR: Collected own source revenues and the budget appropriations
5. Documents linked in the SAR (in the order of their first appearance):
   5.1. Kosovo Higher Education Law (2011)
   5.2. Administrative Instruction for Accreditation of HEIs in Kosovo (2018)
   5.3. Law on KAA (2023)
   5.4. Standards for Evaluation of Doctoral Programmes (2020)
   5.5. Accreditation Manual (2022, on the website a draft version 2024 is also available)
   5.6. Rregullore mbi punen e Keshillit Shteterore te Cilesise (KSHC) (in Albanian; Work Regulations of the SCQ, 2018)
   5.7. Regulation on the Work of the Appeals Committee of the Kosovo Accreditation Agency (2024)
   5.8. Regulation on Internal Organization and Systematization of Jobs in the Kosovo Accreditation Agency (2024)
   5.9. Template for Application for Accreditation (2021)
   5.10. Template for List of Publications (2024)
   5.11. Template Self-Evaluation Report for Institutional Accreditation (2021)
   5.12. Template Self-Evaluation Report for Programme Accreditation (2021)
   5.13. KAA Methodology on Monitoring and Post-accreditation Procedures (2022)
   5.14. Regulation on the Selection, Engagement, and Compensation Procedures of External Experts (2024)
   5.15. Kosovo Accreditation Agency Strategic Plan 2021-2025 (2020)
   5.16. Manuali per Vlersimin e Jashtem te Institucionevete Arsimit te Larte (in Albanian; Manual for External Evaluation of Higher Education Institutions, 2021 – see the English version in the list of the additional documents below)
   5.17. Increasing Student Participation in Internal and External Quality Assurance Processes in Kosovo – Research Report (2022)
   5.18. Guidelines for Student Engagement in Internal and External Quality Assurance of Kosovo Higher Education (2023)
   5.19. Regulation on the procedures for appointments to senior management positions in the civil service of the Republic of Kosovo (in Albanian; 2018)
   5.20. Law on the Civil Service of the Republic of Kosovo (in Albanian)
   5.21. Guidelines on conducting thematic analyses by Kosovo Accreditation Agency (2021)
   5.22. Preparation of the Kosovar Graduates for the Labor Market – Employer and Alumni Perspective – Thematic Analysis
   5.23. Thematic Analysis for Institutional Accreditation of Kosovar Higher Education Institutions (2021)
   5.24. Thematic Analysis of Processes Involved in Accreditation / Reaccreditation of Study Programs (2024)
   5.25. Manual for Internal Staff Evaluation (2021)
   5.26. Digitalization Feasibility Study (2021)

5.27. Monitoring Report of the State Quality Council in the Kosovo Accreditation Agency (by Organization for the Improvement of Quality in Education – ORCA, 2022)

6. Additional documents requested by the panel and provided by the agency prior to the site visit:
    6.1. List of additional documents (the document itself contains additional information)
    6.2. Detailed overview/breakdown of the HEIs which underwent an institutional accreditation between 2021 and 2023
    6.3. Internal Quality Assurance Policy Kosovo Accreditation Agency (2024)
    6.4. Example of a filled-in Questionnaire for HEIs
    6.5. Example of a filled-in Questionnaire for experts
    6.6. Example of feedback received from stakeholders (HEIs) (in Albanian)
    6.7. Draft questionnaire for employers
    6.8. Draft questionnaire for students
    6.9. Example of the composition of a working group
    6.10. List of experts as of 2024, including student experts
    6.11. Number of experts involved in 2023, including student experts
    6.12. Overview about the countries where the experts come from (as of 2024)
    6.13. Manual for External Evaluation of Higher Education Institutions (2021 – the SAR contained a link to the Albanian version)

7. Additional documents requested by the panel and provided by the agency during the site visit:
    7.1. Template for a site visit agenda for institutional accreditation
    7.2. Template for a site visit agenda for programme accreditation
    7.3. Template for a site visit agenda for evaluation of doctoral programme
    7.4. List of monitoring activities 2023 and 2024
    7.5. Five draft reports of monitoring activities 2024, not yet approved by the SCQ

OTHER SOURCES USED BY THE REVIEW PANEL

8. Website of the agency, English version (https://akreditimi.rks-gov.net/ access on 13.7.2024), especially for examples of reports and for other public documents of the agency
9. ENQA Agency Review: Kosovo Accreditation Agency (KAA) (2019 ERR)
10. Exclusion of the Kosovo Accreditation Agency from the Register (EQAR Register Committee 2018)
11. Website of ENQA (especially for the documentation of the external review 2019)

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ENQA AGENCY
REVIEW **2024**

THIS REPORT presents findings of the ENQA Agency
Review of the Kosovo Accreditation Agency (KAA),
undertaken in 2024.

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