

Approval of the Application
by High Council for Evaluation of Research and Higher Education
(HCERES)
for Renewal of Inclusion on the Register

Register Committee

Ref. RC19/A38

Ver. 1.0

Date 2017-06-27

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Application of:	18/01/16
Agency registered since:	14/05/2011 ¹
External review report of:	February 2017
Review coordinated by:	ENQA
Review panel members:	Jean-Marc Rapp, (chair, academic), Patricia Georgieva, Maiki Udam, Blazhe Todorovsk (student)
Decision of:	20 June 2017
Registration until:	28/02/2022
Absented themselves from decision-making:	Eric Froment (Chair of the Register Committee) Hélène Lagier (Observer of the Register Committee)
Attachments:	<ol style="list-style-type: none"> 1. Confirmation of eligibility, 12/02/2016 2. External review report, 02/2016 3. Substantive change report, 23/02/2017 4. Applicant statement on the report, 20/03/2017 5. Request to the review panel, 21/04/2017 6. Clarification by the review panel, 21/04/2017 7. Request for clarifications to HCERES, 12/05/2017 8. Clarification response by HCERES, 22/05/2017

1. The application of HCERES adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 12/02/2016.
3. The Register Committee considered the external review report of February 2017 on the compliance of HCERES with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version) and HCERES' statement on the review report (of 20/03/2017).
4. The Register Committee further considered the Substantive Change Report of 23/02/2017 and the information provided on the newly developed procedure for *the evaluation of foreign study programmes* and

¹ The agency was registered under the name "Evaluation Agency for Research and Higher Education (AERES)" until 17/11/2014.

evaluation of foreign higher education institutions and HCERES' updated appeals procedure. The Register Committee noted that these changes occurred after the external review and considered them in conjunction with the application.

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Analysis:

6. In considering HCERES' compliance with the ESG, the Register Committee only took into account *evaluation of programmes and degrees, evaluation of French higher education institutions; evaluation of foreign programmes or institutions*.
7. The Register Committee considered that *evaluation of research units* is not within the scope of the ESG, notwithstanding their role in supporting programme evaluations at master and doctoral level (i.e. criterion 5: Research involvement in training).
8. *Conception of quantitative indicators (OST)* is not an activity within the scope of the ESG and, thus, not pertinent to the application for renewal of registration on EQAR.
9. Considering the decisions made by HCERES on the basis of reviews carried out by other agencies, the Register Committee underlined that such decisions are expected to be in line with the ESG, especially in case the agency is not registered on EQAR.
10. The Register Committee found that the report provides sufficient evidence and analysis on HCERES's level of compliance with the ESG for the above-mentioned activities.
11. The Register Committee noted that HCERES introduced *evaluation of sites* in addition to evaluations of (single) institutions and programmes, and that the agency is transitioning to integrated site evaluations, which will incorporate the evaluation of (single) institutions, research units and programmes (review report p. 5, p. 15, p. 18). As the *evaluation of sites* were not addressed in the external review as an activity within the scope of the ESG, the Register Committee sought further clarification from the review panel.
12. The panel clarified (e-mail of 21/04/2017) that *site evaluations* were not addressed as the activity was not included in the terms of reference of the review and due to the fact that at the time of the review *site evaluations* were still in a developmental stage.
13. As the panel's response did not fully elucidate the status of *site evaluations*, the Register Committee requested further clarifications from HCERES.
14. HCERES explained (letter of 22/05/2017) that the nature of *site evaluations* depends on the administrative status chosen by the higher education institutions part of the site. The status could be: (a) merger of

institutions, (b) association of institutions defining a CHERP (Coordinated Higher Education and Research Policy) or (c) the establishment of a COMUE (in French: communauté d'universités et établissements – COMUE).

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15. The Register Committee noted that in case (a) the site is evaluated as one merged institution, the agency follows the methodology for institutional evaluations, which is within the scope of the ESG and was thus addressed by the review report.
16. HCERES considered that *site evaluations* in case of a CHERP (b) or a COMUE (c) are at “macro-level”, and that ‘learning and teaching activities’ were already assessed at institutional and programme level. The agency therefore regarded ‘site evaluations’ as activities outside the scope of the ESG.
17. HCERES, however, stated that institutions within a COMUE might delegate responsibilities for learning and teaching in higher education, including the learning environment and relevant links to research and innovation, to the COMUE. While this has not happened to date, the Register Committee underlined that in such a scenario the *site evaluations* would be within the scope of the ESG.
18. Considering the case of ‘bottom-up approach’, the Register Committee noted that *site evaluations* take into account reports from different programmes and research units, but do not address learning and teaching in individual higher education institutions. They are therefore not within the scope of the ESG.
19. Considering the case of *site evaluations using a ‘top-down approach’*, where the agency examines if the implementation by the individual institution is in line with the learning and teaching aspects of the site strategy, the evaluations are within the scope of the ESG, as they address the quality assurance of learning and teaching in higher education.
20. **The Register Committee therefore underlined that HCERES is expected to make a Substantive Change Report as soon as it starts to perform *site evaluations*, which follow a *top-down approach* and to provide information on how these evaluations comply with Part 2 of the ESG.**
21. With regard to the specific European Standards and Guidelines, the Register Committee considered the following:

ESG 2.3 – Implementing processes

In its decision of initial inclusion (18/05/2011) the Register Committee flagged the introduction of site visits as well as follow-up procedures undertaken by HCERES. The panel noted that since its last review HCERES did not ensure a consistent follow-up in its EQA activities due to a prolonged process of succeeding evaluations (that included the introduction of site evaluations). The agency replaced the follow-up with a progress report that higher education institutions would prepare as part of their self-evaluation so as to facilitate and speed up the process.

Moreover, the panel noted that evaluations of programmes are carried out without site visits.

The Register Committee therefore concluded that HCERES did not resolve the flag and was thus able to concur with the panel's conclusion, that HCERES complies only partially with standard 2.3.

ESG 2.4 – Peer-review experts

In its decision of initial inclusion (18/05/2011) the Register Committee flagged the participation of international experts and students.

The panel noted that usually two experts are involved in the evaluation of bachelor and master programmes, and that these panels do not include students. According to the review panel, HCERES found it very hard to recruit students due to their need for extra time to carry out evaluations alongside their studies.

The Register Committee further noted that in the '*evaluation of doctoral schools*' the agency included a recent doctoral graduate rather than an actual student or doctoral candidate (p. 13 external evaluation report).

The panel further noted that the involvement of students in institutional evaluations is limited to panel discussions.

In its statement to the review report (of 10/03/2017) the agency, however, commented that students have the same role and responsibilities as other members of the panel in institutional evaluations.

The Register Committee concluded that the agency has not addressed the flag and does not meet the requirements of standard 2.4 to involve students in all its external quality assurance activities.

While considering that the failure to meet the requirement of the standard concerns a large proportion of HCERES' activity, the Register Committee noted that due to the immanent transition from programme accreditation to the evaluation of study fields, the involvement of students is to be resolved in this new setting. Taking this into account the Register Committee was able to concur with the review panel's conclusion that HCERES complies partially with the standard.

ESG 2.5 – Criteria for outcomes

With regard to institutional evaluations the panel noted that the application of criteria for outcomes leaves too much room for interpretation and therefore undermines the consistent application of criteria.

Considering the agency's transitioning to evaluation of study fields the review panel further highlighted the need for development of criteria for the outcomes of subject level evaluations.

The Register Committee concurs with the review panel's conclusion that HCERES complies only partially with ESG 2.5.

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ESG 2.7 – Complaints and appeals

The Register Committee flagged in its decision of initial inclusion the procedure for complaints and appeals.

While recognising the agency's efforts in developing regulations for appeals and complaints, the panel found that the current system does not clarify who is the responsible party (ministry or agency) in handling complaints and recommended a coordination with the responsible ministry.

In its statement to the review report (of 20/03/2017) the agency stated that it cannot interfere in the decision-making process of the ministry and that coordinating a complaints procedure with the ministry would affect its independence and confuse its role. HCERES further explained that in case of a complaint that concerns evaluation reports, the case would be handled by the agency, and in case the issue concerns a contract or decision of the ministry, the case will be handled by the ministry.

In its Substantive Change Report (of 23/02/2017) HCERES described further updates to its appeals system that was adopted in October 2016, i.e. after the review panel's visit in June 2016. The agency reported that eight new members have been appointed to the Appeals' Commission who would address complaints concerning all activities of HCERES. The Commission will consider issues regarding the implementation or findings of an evaluation, the selection of experts, the decision of the accreditation commission and the decisions to validate other bodies' evaluation procedure.

The Register Committee noted that the majority of members in the Appeals' Committee are also members of HCERES's other bodies responsible for parts of the evaluation procedure (i.e. Board, evaluation departments) and might thus have a conflict of interest in handling complaints. The Register Committee thus considered that HCERES has only partially addressed the flag and concurred with the panel that HCERES complies only partially with ESG 2.7, despite the additional changes reported.

For the remaining standards, the Register Committee was able to concur with the review panel's analysis and conclusion without further comments.

Conclusion:

22. Based on the external review report and the considerations above, the Register Committee concluded that HCERES demonstrated compliance with the ESG (Parts 2 and 3) as follows:

Standard	Review panel conclusion	Register Committee conclusion
2.1	Substantially compliant	Compliance
2.2	Fully compliant	Compliance

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2.3	Partially compliant	Partial compliance
2.4	Partially compliant	Partial compliance
2.5	Partially compliant	Partial compliance
2.6	Fully compliant	Compliance
2.7	Partially compliant	Partial Compliance
3.1	Fully compliant	Compliance
3.2	Fully compliant	Compliance
3.3	Fully compliant	Compliance
3.4	Substantially compliant	Compliance
3.5	Fully compliant	Compliance
3.6	Substantially compliant	Compliance
3.7	(not expected)	Compliance (by virtue of applying)

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23. The Register Committee considered that HCERES only achieved partial compliance with some standards. In its holistic judgement, the Register Committee concluded that these are specific and limited issues, but that HCERES complies substantially with the ESG as a whole.
24. The Register Committee therefore approved the application for inclusion on the Register. HCERES' inclusion shall be valid until 28/02/2022².
25. The Register Committee further underlined that HCERES is expected to address the issues mentioned appropriately and to resolve them without delay, as well as to inform EQAR through Substantive Change Reports where required.

²Inclusion is valid for five years from the date of the external review report, see §4.1 of the EQAR Procedures for Applications.

EQAR | Oudergemselaan/Av. d'Auderghem 36 | BE-1040 Brussels

High Council for the Evaluation of Research and Higher Education
(HCERES)

Michel Cosnard, President
20 Rue Vivienne

75002, Paris
France

Brussels, 12 February 2016

Confirmation of Eligibility: Application for HCERES Renewal of Registration

Application no. A38 of 18/01/2016

Dear Mr Cosnard,

We hereby confirm that the application by HCERES for renewal of
registration is eligible.

Based on the information and draft terms of reference provided, the
external review coordinated by the European Association for Quality
Assurance in Higher Education (ENQA) fulfils the requirements of the
EQAR Procedures for Applications.

We confirm that the following activities of HCERES are within the scope of
the ESG:

- Evaluation of programmes and degrees;
- Evaluation of French higher education institutions;
- Evaluation of foreign programmes or institutions;

In the application form, HCERES stated that it does not consider the
activity *evaluation of research units* to be within the scope of the ESG. We
considered the information provided and have come to the conclusion
that these evaluations might be within the scope of the ESG as far as they
concern learning and teaching provided by research units (e.g. doctoral
programmes). HCERES' self-evaluation report and the external panel's
report should thus address whether that is the case and, if so, analyse
compliance with the ESG in those evaluations.

Please ensure that HCERES's self-evaluation report covers all the afore-
mentioned activities including all the activities carried out by HCERES
within and outside the European Higher Education Area.

Furthermore, the self-evaluation report and external review report
should also address how HCERES plans to ensure compliance with the
ESG in recognising the reviews that are carried out by other quality
assurance agencies.

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EQAR Founding Members:



We further remind you that the following issues were flagged when HCERES was admitted to the Register and should be addressed in your self-evaluation report and the external review report:

ESG 2.4 Participation of international experts and students [ESG 2005: standard 2.4 & 3.7]

Currently there are no students and international experts involved in the evaluation of bachelor/master degree programmes. The review should give attention to all possibilities explored by AERES to involve students and international experts in these evaluations.

ESG 2.3 Follow-up Procedures [ESG 2005: standard 2.6]

The effectiveness of the newly introduced follow-up procedures, in which AERES analyses how its recommendations are reflected in the performance contracts between institutions and the ministry.

ESG 2.3 Evaluations of degree programmes [ESG 2005: standard 3.7]

How effectively the introduction of on-site visits for bachelor/master degree programme evaluations has addressed the concerns of the external review panel in relation to these evaluations.

ESG 2.7 Complaints procedures [ESG 2005: standard 3.7]

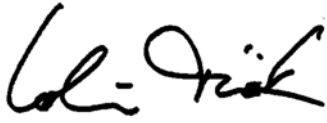
How the new competence of the Disputes Committee to make binding resolutions has benefited the internal complaints procedure of AERES.

We confirm that *conception of quantitative indicators (OST)* is not an activity within the scope of the ESG. While this activity is not relevant to your application, it is HCERES's choice – in agreement with the review coordinator – whether this activity should be commented upon by the review panel.

We kindly ask you to forward this letter to ENQA as the coordinator of the external review and request that ENQA inform the review panel, so as to ensure that all these activities are analysed by the panel.

This confirmation is made according to the relevant provisions of the EQAR Procedures for Applications. HCERES has the right to appeal this decision in accordance with the Appeals Procedure; any appeal must reach EQAR within 90 days from receipt of this decision.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Colin Tück".

Colin Tück
(Director)

Cc: ENQA (review coordinator)

Subject: Substantive Change Report: HCERES**From:** "julien.lecocq@hceres.fr" <form_engine@fs22.formsite.com>**Date:** 2/23/2017 7:29 PM**To:** substantive-changes@eqar.eu

Reference #	11007278
Status	Complete
Login Username	Julien Lecocq
Login Email	julien.lecocq@hceres.fr
Agency #1 *	HCERES
Expiry date #1 *	01/01/2017
Contact #1 *	Julien Lecocq
Phone #1 *	+33 1 55 55 63 86
Email #1 *	julien.lecocq@hceres.fr
Other organisations? *	No
A. Has the organisational identity of the registered agency changed? *	No
B. Has the organisational structure changed? *	No
C.i. Are there new types of activities? *	No
C.ii. Are there changes in existing activities? *	Yes
C.iii. Have some or all existing activities been	No

discontinued? ***Description
new/changed ***

The Law n°2013-660 of July 22nd 2013 on Higher Education and Research substituted the High Council for the Evaluation of Research and Higher Education (Hceres) to the Agency for the Evaluation of Research and Higher Education (AERES).

This Law came into force with the publication of the implementing decree (November 2014) and the nomination of the new board and its president (November 2015). During this transition period, several projects have been launched but were not finalized in July 2016 at the time of the external evaluation of Hceres. This includes international activities of Hceres and the Hceres appeal process.

These following elements are therefore presented as substantial changes.

i.purposes and development of the activity, involvement of stakeholders (ESG 2.2)

The Research programme law n°2006-450 of 18 April 2006, which established AERES, already provided (in Article 9) that AERES could “take part in evaluating foreign or international research and higher education bodies, under European or international cooperation programmes or at the request of the competent authorities”. That possibility was reiterated in the same terms in law n° 2013-660 of July 22nd 2013 pertaining to higher education and research, which defined the missions of Hceres. The legal missions of Hceres therefore include an international aspect, which are implemented by the Europe and international department (EID).

The International activities include involvement in European and international higher education networks, active participation in European projects, regular dialogue and partnerships with other European and international agencies, assistance in creating local quality assurance agencies and defining related policies, and evaluations of programmes and institutions abroad. Hceres has widened its evaluations offers: evaluation, or evaluation for accreditation purposes, or accreditation. This evolution has been initiated in response to an increase in and diversification of foreign HEIs demand, and to the fact that the concept of accreditation is more widely used abroad than the concept of evaluation.

To get inputs from stakeholders, Hceres consulted the ministry of Higher education on the development and the meaning of an international accreditation by Hceres. This preliminary work led to design an accreditation equivalent to a “label”, since Hceres decisions do not grant any rights in France or abroad. The Hceres accreditation process therefore does not interfere with the process of recognition by France of foreign

diplomas. Indeed, “accreditation” refers here to official recognition by Hceres, after evaluation, that a higher education institution or a study programme is competent to carry out its missions.

As a second step, the accreditation standards were developed by Hceres on the basis of the existing national practices conducted by the Evaluation Department of Institutions (IED) and the Evaluation Department of programmes. Between 2013 and mid-April 2016 only a few evaluations and accreditations (2 institutions and 3 programmes) were conducted as experimental evaluations. For institutional evaluation, the accreditation part of the process was provided by ANECA. Hceres has learned lessons from these experimentations to build its own accreditation process. In addition, this was also enriched with feedbacks from the experts involved.

The methodology: the process, the accreditation committee and the new set of standards were adopted by the Hceres board in the second half of 2016, so they could not be submitted to the ENQA panel in early July, 2016 during the external evaluation of Hceres.

ii.criteria used, how they were developed, measures implemented to ensure consistency, how ESG 1.1 – 1.10 are reflected in the criteria (ESG 2.1 & 2.5)

Two sets of standards were developed: standards for evaluation (programmes and institutions), and standards for accreditation (institutions and programmes). These are attached to the present report and are publicly available on the Hceres’ website (<http://www.hceres.com/Agency/International-work>).

They were built from the last version of the national standards and the last version of the ESG. Sub-criteria corresponding to characteristics proper to the French system were removed. The experimental evaluations conducted in 2014-2015 allowed Hceres to understand the limits of the application of national guidelines abroad, and how to adapt them, for instance, by adding criteria related to ethics, business ethics, corruption, fraud and plagiarism.

To allow a better readability of the correspondence between Hceres criteria and ESG, these documents include a correlation table.

Step 1: As Hceres does not have any commercial or marketing approach, evaluations conducted abroad directly depend on requests made by institutions at any time.

Step 2: For each request, a feasibility study is carried out to examine the available resources of Hceres, the scheduling constraints and the needs expressed by the institution. This feasibility study includes:

- a contact with the local QA authority if any,

- an analysis of Hceres legitimacy: compatibility of Hceres standards with the local context,
- an on-site exploratory visit is carried out to gain a clear understanding of the context, the needs of the institution. Hceres provides all the necessary information related to standards, criteria and process.
- a draft agreement with a financial proposal is sent.

It must be underlined here that, as an independent and public authority, Hceres cannot either finance the activities of evaluation abroad on its own budget, or make financial profits; all the activities of evaluation conducted abroad are thus financed completely by the applicant entity and, since Hceres is a non-profit entity, "at cost price".

Step 3: Signing of the agreement is the basis for the arrangement between the parties with:

- definition of the activity provided by Hceres for the institution: evaluation, evaluation for accreditation purpose or accreditation
- details on the proposed methodology, the appeal process, the legal financial provisions etc...

It is mentioned precisely in the agreement, in the guidelines of the process of evaluation and also in the final decision – and Hceres considers it as a prerequisite to any agreement– that the decision issued by Hceres does not grant any rights whatsoever, whether in France or abroad.

Step 4:

The process implemented abroad follows the same steps as those implemented in France.

In accordance with European principles, entities must conduct their own self-evaluation and are free to prepare their own report based on their own methods.

The procedure used abroad by the European and International Department (EID) is the same as for evaluation of programmes and institutions and always includes:

- the entity's own self-evaluation,
- an external assessment, which always includes a site visit;
- drafting of a report, with a response phase,
- publication of the report on the Hceres website
- a mid-term follow-up.

The evaluated entity is informed about these processes on several occasions (e.g. prior discussions, exploratory visit, agreement). They are also explained to the experts during the preparatory meetings.

Step 5: For accreditations.

Hceres has an accreditation commission that issues accreditation decisions for foreign institutions and programmes.

The composition, the missions and the methodology of this commission are developed in a document available on the Hceres' website

(International Accreditation Commission - Composition and Working Practices).

Evaluation and accreditation are two separate phases, accreditation starts at the end of the evaluation process. The accreditation commission is independent of experts panels in charge of the evaluations. Accreditation equals the issuance of an “Hceres accreditation label”, which certifies the quality of a study programme or institution. The accreditation commission bases its analysis on the final version of the evaluation reports, the proposal for accreditation of panels, and the accreditation standards. Accreditation criteria are set to design characteristics of accredited entities. These criteria apply to all accreditation applications and are sent to the institution for information.

The accreditation commission makes decision which may take the following forms:

- a five-year accreditation,
- a five-year accreditation with mandatory follow-up visit after 2 years,
- a refusal of accreditation.

iii.review team composition, selection, appointment and training of reviewers (ESG 2.4)

The evaluation phase is prepared and organized with the evaluated entity and the experts.

For evaluations performed abroad, the European and International Department (EID) works with the study programme and institution evaluation departments. It works with the scientific advisors of Hceres and draws on the common pool of Hceres experts. The experts involved in evaluations outside France are recruited according to the general Hceres principles and are registered in the EDM/Pool of experts application. They sign the evaluation charter and complete a declaration of interests via the application.

Experts are carefully chosen for their professionalism independence and their recognized skills, either by the EID team or in partnership with other agencies (agencies in partnership, or from the country of the institution). Once the panel has been constituted, its composition is approved by the director of the EID. The panel is then presented to the institution in order for them to report any connections or conflicts of interest that may have not been detected previously by Hceres.

Each experts panel includes a president (generally an academic), 2 or 3 academics, 1 student, 1 “professional” (representative of the socio-economic sector) and, for institutional evaluations, an administrative representative.

All the experts have the same role (students included) and they are all involved in the writing of the appraisal report.

All along the process, an Hceres representative (project officer) supports them in their mission and remains the institution's permanent contact point. The role of the Hceres representative is to guarantee the process. Significantly, once selected, all the experts follow 1 or 2 days training session at Hceres, not only about the criteria and standards used, but also on the process, its methodology, the report, its writing, the on-site visit and the conduct of interviews. Part of the training time is also used to the presentation of the institution or the programme to be assessed and of the local higher education and research system.

At least, various tools have been developed to ensure the standards and criteria are applied consistently by the experts:

- the experts are always provided with methodological documents;
- the preparatory meetings are used to raise the experts' awareness of the standards;
- the Hceres staff responsible for the evaluation ensure the methodology is properly applied throughout the process;
- the experts are provided with templates (e.g. interview guides, report template).

iv.site visits (ESG 2.3)

An on-site visit (3 to 4 days on average) is prepared by the institution in close coordination with the HCERES project officer. Before this on-site visit, the experts first study the self-evaluation report and the documents supplied by the institution. During the preparatory meeting, the experts share their first individual assessments, the program of the on-site visit is set and tasks are distributed among the experts. The visit schedule is built in order to deal with all the areas and fields of the standards. The visit provides the opportunity to meet all the stakeholders from the institution and add information to the self-evaluation report.

v.publication of reports (ESG 2.6)

After the on-site visit begins the report writing phase, including the drafting of the report, a response phase giving the evaluated entity the opportunity to provide feedback, and the publication of the report or final decision.

Following the on-site visit, the experts draft an initial evaluation report called the provisional report. All evaluation reports conclude with a summary of strengths and weaknesses and recommendations, in the interests of accessibility. It is then submitted by the panel chair to Hceres for assessment by a rereading committee including at least three Hceres representatives. Hceres does not change the content of the provisional report, but checks the precision and consistency of the reasoning and the

compliance with the methodology defined at the start. The provisional report is submitted to the institution for contrary reading, for comment and correction of any factual errors, if required.

Once the institution has replied, any necessary corrections are made, and the report is considered final. Reports are signed by the Hceres President and the chair of the panel of experts.

Reports are then published, including the response of the institution, on the Hceres website, on a dedicated page of the “international tab” of the Hceres website.

In case of accreditation, the decision issued by the accreditation commission is also published on the website, together with the evaluation report. As already said, accreditation is understood as the issue of an “accreditation label”, a “labelling” or “certification” which attests to the quality of a programme or institution, and nothing else.

vi.follow-up (ESG 2.3)

After the evaluation reports or accreditation decisions had been published, opportunity for feedback is organized with the evaluated entities and/or experts for the purpose of continuous improvement. To be in accordance with international standards, whatever are the conclusions of the evaluation report, a follow-up is scheduled 2.5 years after the publication of the report, and this request is mentioned in the agreement with the institution. The follow-up is a follow-up report that highlights how recommendations had been taken into account, but it can also include a light on-site visit, if the accreditation commission made such a proposal.

vii.appeals system (ESG 2.7)

Since the replacement of AERES by Hceres, no complain had been addressed to Hceres. Besides, the update of the appeal process was not finalized in July 2016, and was not submitted to the ENQA panel during the external evaluation of Hceres.

In October 2016, the board of HCERES adopted a revised organization for appeals and claims. This new organization applies to all activities of HCERES, including activities abroad. This organization is based on an Appeals commission (eight members and its Chair, selected by the President of HCERES from the HCERES Board, or selected among the scientific advisors from the evaluation departments, including one with legal expertise). The appeal commission is supported by a permanent

secretariat which provides administration.

The HCERES Appeals Commission is competent to examine complaints on

- implementation or findings of an evaluation in France or abroad,
- selection of experts,
- decisions by the accreditation commission (for foreign HEI and programmes),
- decisions to validate other bodies' evaluation procedures.

The internal rules of the Appeals commission and the descriptions of the process are presented in the attached document 'Appeals Commission - Internal Rules' also available on the HCERES Website.
(<http://www.hceres.com/PUBLICATIONS/Methodological-documentation/Charter-Procedure-Commissions>). .

viii.embedding in thematic analyses and internal quality assurance of the agency (ESG 3.4 & 3.6)
Not applicable.

File #1 [HCERES Evaluation Standards Accreditation Criteria-Programme.pdf \(279k\)](#)

File #2 [HCERES-Evaluation Standards-Accreditation Criteria-Institution.pdf \(229k\)](#)

File #3 [HCERES-AppealsCommission-InternalRules.v8 EN.pdf \(28k\)](#)

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N. Réf. MC N°177-2017

Paris, March 20, 2017

EQAR

Dear Colleagues,

I am pleased to submit Hceres' application to EQAR register, and I wish to apologize for our late process. As it was defined in the terms of reference, we expected the report of the external review in November last year, but the process coordinated by ENQA was delayed until March this year.

With the recent history of Hceres, its self-evaluation, and even its external evaluation, occurred at a crucial moment of Hceres' development. The self-evaluation outcomes were used to build up the new strategic plan 2016-2020. In the same way, external evaluation outcomes were expected to identify potential sources and ways of improvement. And the final report provides indeed many opportunities for improvement which Hceres has now integrated or will do in its action plan.

Hceres carries out different types of external quality assurance activities, with their own specificities, and operates with the French Higher Education area particularities. To discover and investigate so many activities and information was not an easy task, that's why Hceres' self-evaluation report tried to be as clear and comprehensive as possible. And we thank the experts for their remarkable work.

However we regret to note, that although we pointed out several inaccuracies and approximations in the first version of the evaluation report, the final version still contains some.

We were particularly concerned about the panel's recommendation regarding the appeals system which advises to coordinate complaints procedure with ministries. We considered this advice could endanger Hceres' independence and give way to confusion on the role of Hceres. Hceres' mission is to provide public authorities and Higher education institutions with qualitative evaluation's reports including relevant information to feed their decision-making process. Hceres does not provide proposals for decision to the ministry. It is not in the Hceres missions and responsibilities to interfere in the ministry or in the HEI in the context of decision-making process by the ministry. When institutions or programmes have complaints concerning evaluation reports, they have to address their complaints to Hceres. When institutions or programmes have complaints concerning their contract or a decision of the ministry, they have to address their complaints directly to the ministry.

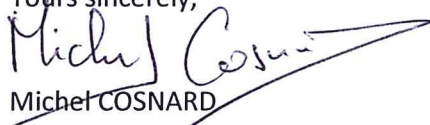
.../...

We also have reservations regarding the panel's interpretation of the role of students in the Hceres experts' panels they participate in. In these panels students have the same position and responsibilities as the other members.

To specify the context, a new Board and a new President took office in November 2015, a self-evaluation report was published in April 2016, then an external evaluation took place in July 2016, several undertaken projects were not finalized and could not be introduced to the review panel. This is the case for the new organization of the Hceres appeal process, and for the quality assurance activities implemented abroad. These new processes have been approved by the Hceres board in October 2016; hence, they have been submitted to EQAR as substantial changes in addition to Hceres application.

I hope this information together with the inherent documents for the application will help EQAR in the analysis of Hceres practices and situation.

Yours sincerely,


Michel COSNARD

Brussels, 21 April 2017

Application by High Council for Evaluation of Research and Higher Education (HCERES) for renewal of registration on EQAR

Dear Jean-Marc,

HCERES has made an application for renewal of inclusion on the European Quality Assurance Register for Higher Education (EQAR).

We are contacting you in your capacity as chair of the panel that prepared the external review report of February 2017 on which HCERES's application is based.

The EQAR Register Committee's rapporteurs have been considering the application and the external review report. We would be obliged if you could clarify, in consultation with the panel members as necessary, the following matter in order to contribute to the consideration of HCERES' application.

The panel notes that HCERES currently carries out 'evaluation of sites' in addition to evaluations of (single) institutions and programmes and that the agency is transitioning to integrated site evaluations that will incorporate the evaluation of (single) institutions, research units and programmes (p. 5, p. 15, p. 18).

Could you please elaborate why the panel formed the view that 'evaluations of sites' (in their current form) are outside the scope of the ESG? In particular referring to the 'top-down approach' could you please clarify why the panel found that evaluations of sites are beyond the scope of the review considering that they form the basis of programme and institutional evaluations?

We be would grateful if it were possible for you to **respond by 2 May 2017**, and we would appreciate if you get in contact with us should that not be feasible.

Please note that EQAR will publish this request and your response together with the final decision on HCERES's application. We, however, kindly ask you to keep information related to the application confidential until the final decision has been published.

European Quality Assurance
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1040 Brussels – Belgium

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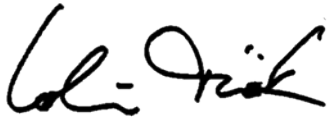
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We acknowledge that it might not be possible to clarify all of the above. However, we appreciate any assistance you may be able to provide and I shall be at your disposal if you have any questions in relation to this request.

Kind regards,

A handwritten signature in black ink, appearing to read "Colin Tück".

Colin Tück
(Director)

Cc: Patricia Georgieva, Panel Secretary
ENQA, coordinator of the application
HCERES

Subject: Re: Clarification re. HCERES's application for renewal of registration on EQAR

From: Jean-Marc Rapp <Jean-Marc.Rapp@unil.ch>

Date: 4/21/2017 5:55 PM

To: Melinda Szabo <melinda.szabo@eqar.eu>

Dear Melinda,

I have checked with Patricia Georgieva, who recalls that our terms of reference did not include the site evaluations. Here is the relevant part:

"sec. 2.1

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

- evaluation of programmes and degrees;
- evaluation of higher education institutions
- evaluation of foreign programmes and institutions;
- evaluation of research units. These evaluations might be within the scope of the ESG as far as they concern learning and teaching provided by research units, e.g. doctoral schools."

During the visits, I asked some questions about the site evaluations, but was told that they were still at a development stage. Given the wording of the ToR, we did not elaborate on this aspect of HCERES' activities, because "sites" are neither teaching institutions nor research units, but territorial groupings for the purpose of financing agreements with the State.

I hope that this answers Colin's questions.

Best regards.

Jean-Marc

Jean-Marc Rapp, Dr H.C.

Professeur honoraire et Recteur émérite de l'Université de Lausanne

Ancien Président de l'Association Européenne des Universités (EUA)

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jean-marc.rapp@unil.ch

Le 21 avr. 2017 à 15:28 +0200, Melinda Szabo <melinda.szabo@eqar.eu>, a écrit :

Dear Mr Rapp,

We are contacting you in your capacity as chair of the panel that externally reviewed HCERES in 2016.

HCERES has submitted the panel's report in support of its application for renewal of registration on the European Quality Assurance Register for Higher Education (EQAR).

Please find attached a request to elaborate on the panel's findings in regard to one aspects, regarding HCERES' 'evaluations of sites',

We would be obliged if you could clarify this matter by 2 May 2017.

Please get in touch with us should that not be feasible.

Best regards,

Melinda

--

Melinda Szabo

European Quality Assurance Register for Higher Education (EQAR)

Project Officer

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Oudergemselaan 36 Avenue d'Auderghem

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Belgium

Brussels, 12 May 2017

Your application for renewal of registration on EQAR

Dear Mr Cosnard,

We would like to thank you for submitting the external review report of February 2017 to complete your application for inclusion on the European Quality Assurance Register for Higher Education (EQAR).

Following an initial scrutiny of the report by the Register Committee's rapporteurs we would be obliged if you could clarify the following query.

The panel notes that HCERES introduced 'evaluation of sites' in addition to evaluations of (single) institutions and programmes and that the agency is transitioning to integrated site evaluations that will incorporate the evaluation of (single) institutions, research units and programmes (p. 5, p. 15, p. 18).

In its self-evaluation report HCERES expressed the view that 'evaluation of sites' were activities outside the scope of the ESG (p. 12). Could you please elaborate why HCERES considered this activity (in its current form) outside the scope of the ESG, considering that the 'top-down approach' forms the basis of programme and institutional evaluations?

Please note that it is the understanding of the Register Committee (see Use and Interpretation of the ESG, p. 2) that external quality assurance related to learning and teaching in higher education, including the learning environment and relevant links to research and innovation, is within the scope of the ESG.

We kindly ask you to also clarify why the agency did not include in its verification of eligibility (i.e. as part of the information about the applicant's activities outside the scope of the ESG) the 'evaluation of sites' although we note from the self-evaluation report these activities were already initiated in 2014 (p. 19 of SER) and standards¹ for these

¹ External evaluation standards for territorial coordination strategies
<http://www.hceres.fr/content/download/25599/396880/file/ETAB-1-3-R%C3%A9f%C3%A9rentiel%20%C3%A9valuation%20externe%20des%20strat%C3%A9gies%20de%20coordination%20territorialeV1.pdf>

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evaluations were finalised (p. 24 of SER) at the time of the agency's application in January 2016.

In order to expedite proceedings we kindly ask you for a reply **by 22 May 2017**. Please inform us if any difficulties arise in meeting this deadline. Please also note that this request and your response will be published together with the final decision on your application.

I shall be at your disposal if you have any further questions or inquiries.

Kind regards,

A handwritten signature in black ink, appearing to read "Colin Tück".

Colin Tück
(Director)

Paris, May 22, 2017

Mr Colin Tück
Director of EQAR

Dear Mr Tück,

To follow up on your letter of 12 may 2017, related to you request of clarification, I wish to give you the following information.

In 2013, the act 2013-660 (Higher Education Act) changed the higher education French area. This act created Hceres, and introduced an obligation for higher education institutions (schools, universities), research bodies and other partners, belonging to a same regional area ("sites") to develop a Coordinated Higher Education and Research Policy (CHERP) and common projects.

In order to develop this policy, institutions had 3 administrative ways:

- To merge: as a new large higher education and research institution.
- To build an association: each member stay independent, but together they have to define a CHERP. Then each member is free to define how to apply this strategy.
- To build a COMUE (in French: *communauté d'universités et établissements*). All the members create together a new political institution, with its own governing body, into which every member takes part. The higher education act gave to COMUE at least 2 mandatory missions: to define the coordinated higher education policy and to define the research strategy of the site. The act does not include 'learning and teaching activities' into COMUE missions. But together, the members can define what other responsibilities to give to the COMUE. Then, every member has to follow and implement these policies.

For the last 2 years, the consequences for the evaluation depend on the administrative status of the site structure.

In a case of merging, the new large institution is evaluated as an institution, with our regular institutional evaluation process, in line with the ESG.

In a case of an association, each institution member is evaluated following our regular institution evaluation process in regard of the CHERP of the site. The association could be seen as a strategical and immaterial entity in order to build the CHERP, with no direct responsibility in teaching and learning activities. The evaluation of the 'site' applies only to the decision process between the members to build the CHERP.

In a case of a COMUE, the responsibilities of the COMUE entity can vary, from one site to another. For the moment, no COMUE bears directly teaching activities. Hceres monitors the evolution of responsibilities entrusted to COMUE. If, in the future, a COMUE bears directly teaching activities, instead of its members, Hceres will adapt its process, and obviously apply the ESG.

.../...

Since the implementation of the 2013 Higher Education act, the different French sites have already evolved. Some COMUE have already been transformed into merged institution, some associations have become COMUE, or vice-versa. This reform has initiated the coordination dynamics, but has not freeze the process into static form. The recent changes into the French government will probably confirm this trend, and we can expect new provisions for designing the "site policy".

Our external evaluation standards for territorial coordination strategies does not apply teaching activities, but only the global higher education and research building strategies process, as you can check following the link into your letter. The aims of this evaluation is to provide a strategic analysis for the site authorities and the site's members, to allow the building of common project and of a CHERP. Our mission in this context was to enlighten stakeholders of the sites on their Higher Education and Research strategy. The other level of Hceres Integrated process, in the top-down approach, examines if the institutional strategy is in line with the site strategy, and if its implementation is relevant with all the learning and teaching aspects.

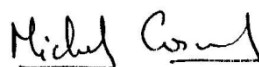
Whatever the type of evaluation: program, research unit, institution, site (territorial coordination strategy), they all apply to the same entity, the site, because each program, research unit, institution is linked to the site structure. Hceres considered the site evaluation as a macro-level, only strategical, that's why we considered this activity outside the scope of ESG, with the idea that every 'learning and teaching activities' are already evaluate at the institutional level and more in details at the program level.

The evaluations of sites in 2014 were still experimentations of the evaluation of the previous form of regional clusters, the "PRES" for "*Pôles de recherche et d'enseignement supérieur*", because evaluation processes are designed more than one year before their implementation. At that time, Hceres did not have any official mandate by the law, nor specifications to conduct them. It should not be forgotten that Hceres officially replaced AERES since November 2014, and that its governing bodies, i.e. its president and its board, had only been nominated in November 2015. So activities conducted before this date were the continuity of AERES activities or experimentations, going to disappear or evolve with Hceres establishment. The first experimentation of the current "site" evaluation process started by the end of 2015. The French Higher Education actors had to build together their way to apply the 'site reform'. A single site could now combine, a merged university, an association, within a COMUE. Moreover, this is still a shifting higher education landscape.

To consolidate our process, we had to test the external evaluation standards for territorial coordination strategies during one year. Before October 2016, Hceres only evaluated 6 "sites". These standards was officially adopted for the first time by the board in October 2016, very late after our self-evaluation, and external evaluation process. Every site evaluation before this date was experimental.

I hope these elements will be of interest to the Register.

Best regards.



Michel Cosnard
President