

**Rejection of the Application
by Independent Kazakhstan Center of Accreditation
(IKCA)
for Inclusion on the Register**

Register Committee
17-18 November 2025

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Application of:	2024-04-29		
Agency registered since:	n/a		
Type of review:	Focused	Site visit:	2024-11-06
External review report of:	2025-02-24	Submitted:	2025-04-14
Review coordinated by:	European Association for Quality Assurance of Higher Education (ENQA)		
Review panel members:	Gaga Gvenetadze, Heli Mattisen, Pegi Pavletic		
Decision of:	2025-11-18		
Registration until:	n/a		
Absented themselves from decision-making:	n/a		
Attachments:	<ul style="list-style-type: none"> 1. External Review Report, 2025-02-24 2. Applicant's statement on the report, 2025-04-14 3. Clarification by the Review Panel, 2025-06-17 4. Additional representation by the applicant, 2025-09-09 		

1. The application of 2024-04-29 adhered to the requirements of the EQAR Procedures for Applications
2. IKCA applied for registration on EQAR based on a focused review, addressing those standards against which the agency was found to be partially compliant (ESG 2.1, ESG 2.2, ESG 3.3, ESG 3.4, ESG 3.6) and non-compliant (ESG 2.5) in the Register Committee decision of 2023-12-12. The Register Committee confirmed eligibility of the application on 2024-07-02.
3. The Register Committee considered the focused external review report of 2025-02-24 on the compliance of IKCA with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee further considered IKCA's statement on the external review report of 2025-04-14 and the supporting documentation for the statement.
5. The Register Committee sought and received clarification from the chair of the review panel on 2025-06-17.
6. The Register Committee invited IKCA to make additional representation on the grounds of possible rejection on 2025-07-11. The Register Committee considered IKCA's additional representation (of 2025-09-09) on its meeting on 2025-11-18.

Analysis:

7. In considering IKCA's compliance with the ESG, the Register Committee took into account the following activities:

- Institutional accreditation of higher education organisations (incl. post-accreditation monitoring)
- Specialised (programmatic) accreditation of educational programs (incl. post-accreditation monitoring),

8. Activities *Institutional and program accreditation of technical and vocational education* and *Accreditation of organizations of additional (further) education* are not within the scope of the ESG and, thus, not pertinent to the application inclusion on the Register.

9. The Register Committee found that the report provides sufficient evidence and analysis on IKCA's level of compliance with the ESG.

10. With regard to the specific European Standards, the Register Committee considered the following:

ESG 2.1 – Consideration of internal quality assurance

11. In its rejection decision for registration on EQAR of 2023-12-12, the Register Committee found IKCA to be partially compliant with ESG 2.1, noting that while ESG Part 1 was formally addressed in the agency's standards, its implementation in practice was inconsistent.

12. The Register Committee learned from the panel's analysis that the challenges identified in the previous review have persisted. In particular, while the agency's methodologies reference ESG Part 1, these are not consistently addressed in both institutional and programmatic accreditation reports. This is especially evident in the coverage of ESG 1.2, 1.4, 1.5, 1.7, and 1.9 within the agency's reports.

13. In its additional statement on the report (Annex 2) as well as the additional representation (Annex 4), IKCA provided additional information on the mapping IKCA's standards to ESG Part 1 by highlighting where each IKCA standard directly corresponds to the ESG. The Register Committee, however, found that neither the additional statement on the report nor the additional representation addressed the key issue of inconsistent coverage of some of the ESG Part 1 standards in practice.

14. Following the panel's findings, the Register Committee concluded that IKCA has not demonstrated full coverage of ESG Part 1 in its external quality assurance reports. The Committee therefore concurred with the panel and found IKCA to be partially compliant with ESG 2.1.

ESG 2.2 – Designing methodologies fit for purpose

15. In its rejection decision for registration of IKCA of 2023-12-12, the Register Committee found the agency to be partially compliant with ESG 2.2, due to unclarity regarding the clustering of programme accreditation procedures and lack of systematic stakeholder involvement in the development and review of its methodologies.

16. The Register Committee learned from the panel's analysis that while IKCA has developed criteria for clustering programmes, their application is not

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sufficiently transparent and is in need of further clarification. The panel further noted that the stakeholders were not sufficiently involved in the design and improvement of IKCA's standards, guidelines, and methodologies.

17. The Register Committee additionally learned from the report that there are inconsistencies between the areas covered in IKCA's standards and the accompanying guidelines, which may affect the clarity and coherence of the agency's methodologies.

18. In the additional statement on the report and the additional representation, IKCA argues that the clustering criteria, as well as the alignment between IKCA's standards and related guidelines are clear, explicit and transparent. The Register Committee found, however, that neither the additional statement on the report nor the additional representation provided any additional evidence which would effectively counter the panel's analysis.

19. IKCA further presented the minutes of the Expert Councils responsible for developing IKCA's external quality assurance methodologies which demonstrate involvement of stakeholders in discussions on the design and review of such IKCA's methodologies. While the Register Committee welcomed such an approach of stakeholder inclusion, it found that the effective impact of such measures could only be verified through an external review of the agency after a sufficient period of implementation.

20. Considering the persisting issues of unclear application of clustering criteria and limited stakeholder involvement, the Register Committee concurred with the panel and found IKCA to be partially compliant with ESG 2.2.

ESG 2.5 – Criteria for outcomes

21. In its rejection decision for registration of IKCA of 2023-12-12, the Register Committee found IKCA to be non-compliant with the standard due to the absence of consistent use of predefined judgement levels, incomplete coverage of criteria in reports, and a lack of thorough analysis and evidence to support conclusions.

22. The Register Committee learned from the panel's analysis that these issues persist: IKCA's reports still did not systematically apply predefined categories of judgement, failed to address all IKCA's criteria, and often lacked sufficient analysis and evidence to substantiate conclusions regarding the level of compliance.

23. The Register Committee also noted that the evaluation scale used in the reports did not always align with the one in the guidance materials provided to the experts, and that inconsistencies in terminology further undermine the clarity and comparability of outcomes.

24. In the additional statement on the report and the additional representation, IKCA argued that it has already implemented significant changes before the completion of the site visit: additional tools for ensuring consistency in applying the criteria and decision-making have been implemented, specific reports that contained errors were rectified, training for experts has been organised and IKCA's guiding documents were revised to ensure appropriate use of predefined judgement levels.

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25. The Register Committee welcomed these steps taken but emphasised that changes related to the consistency require a period of implementation and demonstration of impact before they can be properly externally evaluated.

26. The Register Committee therefore considered that while IKCA has made certain steps to improve consistency and criteria for outcomes, it cannot be verified that there is a formal and systematic procedures in place to ensure consistency across reports and decisions. **Considering the continued absence of a formal consistency-ensuring mechanism, the misalignment between reporting practices and internal guidance, and the lack of robust evidence in reports, the Register Committee concurred with the panel and found IKCA to be non-compliant with ESG 2.5.**

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ESG 3.3 – Independence

27. In its rejection decision for registration of 2023-12-12, the Register Committee found IKCA to be partially compliant with ESG 3.3, due to concerns about the founder’s influence and the lack of safeguards ensuring the agency’s organisational and operational independence.

28. The Register Committee learned from the panel’s analysis that while IKCA appeared to be organisationally independent from third-party influence, there is still a lack of transparency and clarity in the appointment procedures of key bodies. In particular, the role and structure of the Working Group, a key collegial decision-making body responsible for selecting members of other IKCA’s bodies, is insufficiently clear and regulated.

29. In the additional statement on the report, IKCA presented revised regulations on the Working Group composition which now includes a higher number of different external stakeholders, thereby limiting the influence of any single actor. The Register Committee commended the change but emphasised that its impact on the agency’s independence remains to be verified through external review after a period of implementation. The Committee further noted that the revised regulations only outlined the current composition of the Working Group, rather than the specific profiles and the nominating organisations.

30. In its additional representation, IKCA reflected on a number of issues that are not referred to in the Register Committee decision and reiterated its argumentation regarding the composition of the Working Group.

31. The Register Committee acknowledged that IKCA has made progress in reducing the founder’s influence and noted the efforts on revising the Working Group regulations. However, the Committee also found that IKCA could not demonstrate that issues identified in the last decision for registration in 2023 related to organisational and operational independence of the agency have been resolved. Therefore, the Register Committee concurred with the panel and found IKCA to be partially compliant with ESG 3.3.

ESG 3.4 – Thematic analysis

32. In its rejection decision for registration of IKCA of 2023-12-12, the Register Committee found the agency to be partially compliant with ESG 3.4, due to the absence of systematic procedures for producing thematic analyses and publicly available thematic analyses.

33. The Register Committee understood from the external review report that IKCA has made progress in this area, particularly by incorporating thematic analysis into its strategic development plan. In the panel's view, however, the documents produced so far lack sufficient analytical dimension which would make them useful and relevant for higher education stakeholders.

34. In its additional representation, IKCA argued that the two examples of thematic analysis (of the reviews taken between 2020 and 2024) possess all the characteristics of a proper thematic analysis as required by the standard. The Register Committee, however, reiterated that the provided documents consist mainly of aggregated results of individual procedures and therefore lack the analytical dimension required for these documents to be considered thematic analyses.

35. Following continued absence of proper thematic analysis produced by the agency, the Committee could not concur with the panel and found IKCA to be partially compliant with ESG 3.4.

ESG 3.6 – Internal quality assurance and professional conduct

36. In its rejection decision for registration of IKCA of 2023-12-12, the Register Committee found IKCA to be partially compliant with ESG 3.6, due to underdeveloped internal quality assurance mechanisms and unclear internal workflows.

37. The Register Committee learned from the panel's analysis that key issues identified in the last Register Committee rejection decision persist. In particular, the roles and responsibilities of the different groups and committees remain unclear.

38. The Committee also noted the panel's concern that IKCA's revised internal quality assurance policy lacked a clear description of feedback loops and monitoring stages. In addition, the panel found no evidence that IKCA analyses the feedback it collects or uses it to improve its structures and activities.

39. In its additional statement to the report, IKCA argued that it regularly collects feedback from stakeholders (educational organisations and review experts), but so far, no critical feedback was received which would require revision of IKCA's procedures. The Register Committee reiterated the panel's view that without demonstration of impact, the effectiveness of IKCA's internal quality assurance arrangements cannot be verified.

40. In its additional representation, IKCA clarified its internal quality assurance mechanisms and the role of each of its bodies in the internal quality assurance workflows. However, the Register Committee noted that this remains to be evaluated through an external review since proper understanding of the system and impact on different actors cannot be demonstrated solely based on delivered documentation.

41. IKCA further argued that based on the comments from the review panel, it reversed its decision on the revised internal quality assurance policy and returned to the version effective until 2022 which included the necessary elements. The Register Committee welcomed this change but emphasised that the return to the previous policy is not in itself sufficient to demonstrate that core issues have been resolved since, in its last rejection decision, the Committee found the agency to be partially compliant with the standard.

42. Considering continued weakness in the distribution of responsibilities within IKCA regarding its internal quality assurance, deficiencies in closing the feedback loop, and issues identified in relation to the agency’s policy on its internal quality assurance, the Register Committee concurred with the panel and found IKCA to be partially compliant with ESG 3.6.

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

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Conclusion:

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

Standard	Previous decision (2023-12-12)	Review panel conclusion	Register Committee conclusion
2.1	Partial compliance	Partial compliance	Partial compliance
2.2	Partial compliance	Partial compliance	Partial compliance
2.3	Compliance	Not applicable	Inherited
2.4	Compliance	Not applicable	Inherited
2.5	Non-compliance	Non-compliance	Non-compliance
2.6	Compliance	Not applicable	Inherited
2.7	Compliance	Not applicable	Inherited
3.1	Compliance	Not applicable	Inherited
3.2	Compliance	Not applicable	Inherited
3.3	Partial compliance	Partial compliance	Partial compliance
3.4	Partial compliance	Compliance	Partial compliance
3.5	Compliance	Not applicable	Inherited
3.6	Partial compliance	Partial compliance	Partial compliance
3.7	Compliance	(not expected)	Compliance (by virtue of applying)

45. Since IKCA only achieved partial compliance with a number of standards and does not comply with one standard, thus failing to meet some of the key requirements of the ESG, the Register Committee was unable to conclude that IKCA complies substantially with the ESG as a whole.

46. The Register Committee therefore rejected the application.

47. IKCA has the right to appeal this decision of the Register Committee in accordance with the EQAR Appeals Procedure. Any appeal must reach EQAR within 40 days from receipt of this decision.

**Comments of the Non-Profit Institution Independent Kazakhstani
Center of Accreditation on the text of the ENQA expert commission report on
the results of the external audit on November 2-5, 2024 and on the final report
of the ENQA expert commission as of March 3, 2025.**

A thorough study of the ENQA expert committee report allows us to state that it has done a significant amount of work on a deep study of all our work on ensuring the quality of higher education in higher and postgraduate education organizations of the Republic of Kazakhstan, a detailed analysis of all our documents, down to the "full stops" and "commas". *At the same time, in our opinion, the expert committee violated one of the ENQA principles laid down in the ENQA Review Guidelines, namely: "ENQA reviews are conducted in accordance with the following principles (5 principles), among which the following is: "The level of ESG compliance required for ENQA membership is "general compliance" rather than "strict compliance"."*

A careful reading of the ENQA expert commission report allows us to state that our agency was required to strictly comply with the requirements of all standards and guidelines during the inspection; the slightest deviation from them was considered a comment, indicated in the text of the report; even two reasonably unfilled lines in one of the secondary tables were indicated as a shortcoming of our work.

In addition, when preparing our comments on the ENQA expert committee's comments and recommendations, we were based on what the expert commission wrote in its report: **"Since the commission bases its assessments on information available up to the end of the assessment visit.....»**. Therefore, we present in the text of the comments individual changes in the documents of the IKCA, procedures that were introduced during the commission's audit, i.e. before the end of the assessment visit.

**Based on the findings of the ESG 2.1 standard committee,
CONSIDERATION OF THE ISSUE OF INTERNAL QUALITY
ASSURANCE**

In general, agreeing with the results of the assessment of this standard by the ENQA expert group, which conducted a very deep, thorough analysis of several reports of the IKCA ESG for compliance with the requirements of ESG standards (we have not encountered such a thorough, detailed analysis of the agency's ESG reports in any report based on the results of reviews of other Kazakhstani agencies conducted by other ENQA commissions, which obviously strictly followed the above-mentioned principle of ENQA agency verification, namely: "The level of ESG compliance required for ENQA membership is "general compliance", not "strict compliance""). Nevertheless, in this part of our comments, we consider it necessary to express categorical disagreement with a number of the commission's

comments on this standard:

1. According to the remark on page 31 of the report text: “The listed standards are accompanied by separate guidelines, but the panel noticed a mismatch between the criteria described in the standards and the respective guidelines, for both documents. This is further described under standard ESG 2.2. Designing methodologies fit for purpose.”

“The listed standards are accompanied by separate guidelines, however the expert group noted a discrepancy between the criteria described in the standards and the corresponding guidelines for both documents.

This is described in more detail in ESG 2.2. Developing fit-for-purpose methodologies.”

This remark is not true, since our Accreditation Standards for Medical Education Organizations and the corresponding guidelines on the content of criteria are completely identical. Perhaps the members of the expert group did not understand our approach to the formation of the Guidelines, where after presenting each criterion of a particular accreditation standard, we provided recommendations on what and how to evaluate according to the criterion of the standard. Only due to this, the experts could see the difference in the texts. But this is how it should be, the Guidelines should provide recommendations, comments to help universities and experts write a self-assessment report or a EEG report.

<https://nkca.kz/en/standarty>

<https://nkca.kz/storage/app/media/1NKCA/Akkred/Rukovodstvo/IaMed/2/RukovodSamoIAMEDen.pdf>

2. According to the remark on page 34 of the report text (at the end of the 1st paragraph): “For example, additional criteria 6.4 Medical research and scientific advances, 6.5 Educational expertise and 6.6 Exchange in education is still present in the guidelines, not mentioned in the standards. Additionally, criterion description 8.3.3. was missing from the guidelines”.

“For example, additional criteria 6.4 Medical research and scientific achievements, 6.5 Pedagogical expertise and 6.6 Exchange of experience in the field of education are still present in the recommendations, but are not mentioned in the standards. In addition, the guide does not describe criterion 8.3.3.”

This remark is not true, since the above criteria are presented in exactly the same way in the Standards for the Accreditation of Medical Education Organizations (institutional and specialized) and in the relevant Guidelines.

<https://nkca.kz/en/standarty>

<https://nkca.kz/storage/app/media/1NKCA/Akkred/Rukovodstvo/IaMed/2/RukovodSamoIAMEDen.pdf>

3. As noted on page 34 (in the second paragraph): “The titles of standards 2-9 were different in standards, compared to the guidelines. Standard 3 had 12 criteria with no subsections, while in the guidelines, the criteria were only divided

into 2 sections with multiple subsections. Same issue was noted for standards 4-9.

Additionally, the biggest issue was the lack of correspondence in the content of the criteria between the standards and the guidelines (eg 4.1- 4.4; 5.1; 5.2; 6.1-6.6; 7.1-7.4; 8.1-8.5). Additionally, the guidelines contained standard 9. Continuous improvement, which was not present in the standards. The content between the new standards and the existing guidelines corresponds, with slight differences in interpretation due to translation. Criterion 5.2.2. was skipped in both documents, therefore, the content matches, but the numbering should be corrected".

"The titles of standards 2-9 differ in the standards from the titles in the guidelines. Standard 3 had 12 criteria without subsections, while in the guidelines the criteria were divided into 2 sections with several subsections. The same problem was noted for standards 4-9.

In addition, the biggest problem was the lack of consistency in the content of the criteria between the standards and the guidelines (e.g. 4.1-4.4; 5.1; 5.2; 6.1-6.6; 7.1-7.4; 8.1-8.5). In addition, the guide contains standard 9. Continuous improvement, which was not in the standards.

The content of the new standards and existing guidelines corresponds to each other, with minor differences in interpretation due to translation. Criterion 5.2.2. was omitted in both documents, so the content is the same, but the numbering should be corrected"

None of these comments are true, because,

First, the titles of Standards 2-9 exactly match the titles in the corresponding Guidelines;

Secondly, the above criteria of Standards and Guidelines (4.1-4.4; 5.1; 5.2; 6.1-6.6; 7.1-7.4; 8.1-8.5) are also identical in content;

Third, Standard 9. Continuous improvement is found in both the Standards and Guidelines;

Fourthly, criterion 5.2.2 is also found in both the Standards and Guidelines.

<https://nkca.kz/en/standarty>

https://nkca.kz/storage/app/media/INKCA/Akkred/Ruko_vodstvo/IaMed/2/RukovodSamoIAMEDen.pdf

Based on the findings of the ESG 2.2 standard committee DEVELOPING METHODOLOGIES CORRESPONDING TO THE SET GOAL

1. ENQA recommendation:

IKCA should prioritize aligning standards with the guidelines for both programme and institutional accreditation procedures in medicine and education.

Comment:

A thorough comparison of the texts of the IKCA Standards and Guidelines for the Preparation of Self-Assessment Reports on Institutional and Specialized Accreditation of Pedagogical Education showed that they are mutually consistent with each other, with only individual deviations that arose, as confirmed by the expert commission, in connection with the translation from Russian into English. At

the same time, there are no discrepancies either in the number of criteria or in their content in the versions of these documents used in actual accreditation practice in Kazakh, Russian, and English.

We have indicated this in detail in the comments on the ESG Standard 2.1.

2. ENQA recommendation:

IKCA should actively engage external stakeholders (including students), the Accreditation Council and the Review Board in making changes to accreditation standards related to higher education.

Comment:

The IKCA actively involves external stakeholders in the work on introducing changes and additions to accreditation standards.

The IKCA has an internal document, "Instructions for Ensuring Interaction with Stakeholders," where paragraphs 1-4 clearly describe the procedure for providing feedback to improve the IKCA processes. In addition, paragraphs 6-7 of the document, "The Instructions for organizing the process of developing and improving the Standards and Guidelines of the Independent Kazakhstani Center of Accreditation also clearly present the procedure for the participation of the IKCA Councils and interested external parties in improving the standards and guidelines of the IKCA. <https://nkca.kz/storage/app/media/1NKCA/Akkred/Instruct/InstrRazrabotStanRukoven.pdf>

We provide evidence of this below:

There are minutes of meetings of the Expert Council on Pedagogical Education on work with standards for accreditation of organizations/programs of pedagogical education:

Minutes No. 1 of December 25, 2022 of the meeting of the Expert Council on Pedagogical Education of the Non-Profit Institution "Independent Kazakhstani Center of Accreditation" with the following agenda:

Agendas:

1. About the professional standard "Teacher".
2. On the development of standards for accreditation of educational programs in pedagogical education.

At this meeting, the members of the Expert Council were presented with the professional standard "Teacher" and were tasked with taking part in the development of the Standard for the accreditation of pedagogical education (institutional and programmatic).

At the next meeting No. 2 on March 3, 2023, a discussion of the standards of institutional and program accreditation of pedagogical education developed with the participation of stakeholders took place at a meeting of the Expert Council on Pedagogical Education. Doctor of Pedagogical Sciences, Professor N.A. Zavalko,

professor of the Kazakh National Pedagogical University named after Abay, Deputy Chairman of the Accreditation Council, Candidate of Pedagogical Sciences S.I. Ferkho gave her proposals for inclusion in the standards.

(Minutes of the meetings of the Expert Council are available).

Regarding the participation of the Supervisory Board in the work on accreditation standards, we would like to clarify that the functions of this IKCA body do not include work related to the development of a regulatory framework, including accreditation standards. Members of the Accreditation Council directly work with accreditation standards, studying self-assessment reports of educational organizations and their programs, reports of external expert groups, making decisions on them, and experiencing in practice how individual criteria of a particular accreditation standard work or do not work. They actively participate in training seminars on IKCA standards and procedures, making individual proposals for updating the Guidelines for organizing and conducting external assessment. For example, in March 2024, a special meeting of the Accreditation Council was held, at which, among other items on the agenda, the issue of a possible update of the IKCA accreditation standards and amendments to the Regulation on the Accreditation Council was considered. (**minutes of the meeting are attached**)

3. ENQA recommendation:

Clustering procedures should be standardized for all documents where clustering of the mentioned principles is used and ensure consistent application of these principles in all procedures.

Comment:

The ENQA expert commission was presented with a document that describes a unified process for combining educational programs into clusters. In accordance with it, the so-called clustering of programs is carried out. The single deviation from this Regulation specified in the commission's report arose due to the university's proposals in view of the need to optimize the work of the EEG and the university, when conducting an external audit, to take into account the inclusion of individual programs in the faculty, the territorial location of the graduating departments.

In any case, in the actual practice of accreditation work in the IKCA there is no experience of writing a EEG report for the entire cluster, as is done, for example, by the Kazakhstan agency IAAR, the European agency ASIIN. In the IKCA, a EEG report is prepared for each program for each individual program included in the cluster, and only by an expert who corresponds in education and qualification to the accredited program.

The ENQA commission report text provides an example where, in the commission's opinion, they saw violations in the clustering of programs.

The audit of this comment showed that institutional accreditation at the Regional Innovation University was carried out by the IKCA expert group from June

12 to 14, 2024, and program accreditation began on June 13 and ended on June 14. Institutional accreditation was carried out by an expert group consisting of 5 experts: Ermekbaev S.B. - head of the EEG, Madanbekov N.Zh. (Bishkek, Kyrgyz Republic) - international expert, Kylyshbaeva G.B. - national expert, Taldakhmetov B.Sh. - employer expert and Seidaly Nurasyil - student expert. This group worked separately, dealing only with institutional accreditation from June 12 to 14, as required for 3 days.

Independently of this group, specialized accreditation was conducted from June 13 to 14 for 13 programs, united in full compliance with the relatedness of the areas of the Classifier of educational programs in three clusters. At the same time, by other experts, not those who were part of the EEG on institutional accreditation, as it is written in the commission's report. As proof of the erroneousness of the commission's conclusions, we present the assignment of programs in each cluster:

For the 1st cluster (6 programs in the 6B04 direction – Business, Management and Law):

Sabyrova M.E. - candidate of economic sciences - for programs 6B04106 - Economics and 6B04108 - Accounting and auditing;

Mustafayeva B.U. – PhD in Economics – for programs 6B04109 – Finance, 6B04107 – Management;

Elikbai Maksat – candidate of legal sciences – for programs 6B04206 – Jurisprudence and 6B04202 – Customs.

For the 2nd cluster (2 programs in the 6B06 direction – Information and Communication Technologies):

Krykbaev M.M. – Candidate of Technical Sciences (in the Department of Automation and Telecommunications) for the program 6B06202 – Radio Engineering, Electronics and Telecommunications;

Berkinbaev K.M. – Doctor of Pedagogical Sciences, Professor for the program 6B06154 – Computer Engineering and Software.

For the 3rd cluster (5 programs in the direction 6B07 – Engineering, manufacturing and construction industries):

Artykbaev D.Zh. – PhD in construction – for program 6B 07303 – Construction;

Daribaev Zh.E. – PhD – for program 6B07104 – Chemical engineering and processes;

Rustamov N.T. – Doctor of Technical Sciences – for programs 607105 – Electric Power Engineering and 6B07106 – Automation and Control;

Esentaeva A.A. – PhD in oil and gas engineering – for program 6B07203 – Oil and Gas Engineering.

Thus, in the example of the alleged violation given by the ENQA commission, everything was done in full compliance with the Regulation on Clusters and Selection of Experts:

1. Institutional and specialized accreditation were carried out independently

of each other by different expert groups;

2. The distribution into clusters is based on the relatedness of programs and in full compliance with the Classifier of Directions of Educational Programs;

3. Each of the experts in specialized accreditation was assigned to write the text of the EEG report on one or two similar programs for which he is a specialist;

4. Each expert group includes an international expert, an employer expert and a student expert, all three in the cluster program area;

5. All audit activities, discussions of assessments, development of comments and recommendations are carried out by the entire group of cluster experts, a collective opinion is developed, only the text of the EEG report for each assigned program is prepared by the expert to whom the program is assigned.

Conclusion: the ENQA commission's remark on the violation of the Clustering Regulations does not correspond to reality!

(we attach a scan of the order of the IKCA on conducting an external audit at the Regional Innovation University).

4. ENQA recommendation:

The Group recommends that the principle of 'fitness for purpose' be applied, as far as possible, in the development of external quality assurance methodology and that the workload for both higher education institutions and assessors be reduced.

Comment:

In the practice of the IKCA, universities are allowed to prepare a combined self-assessment report in the case of accreditation of the same-name programs simultaneously in the bachelor's and master's degrees. A separate self-report is written for the doctoral program, since the standards of doctoral studies differ from the standards of bachelor's and master's degrees.

However, when preparing the EEG reports for a more qualitative, objective assessment, maximum consideration of the features of the program content, the resource base, which is significantly different for the master's degree from that needed for the bachelor's degree, a greater focus on deepening the research component, the potential of the teaching staff for the master's degree, the IKCA requires experts to prepare EEG reports separately for each program. Otherwise, perhaps, a certain "saving" of effort and resources when preparing a combined EEG report will in fact significantly reduce the quality of the analysis and assessment of the specific features of different levels of the same-name programs identified above. In practice, studying the experience of other agencies, for example, the Independent Agency for Accreditation and Rating (IAAR), the ASIIN agency, using such a practice, we saw serious shortcomings of these combined reports: cumbersomeness (large volume of texts), the presence of repetitions, the lack of the necessary depth of analysis and assessment of programs of each level according to all criteria of the

standards.

Therefore, we will continue the practice of writing separate ESG reports for each accredited program, which does not contradict ESG standards.

5. ENQA recommendation:

The agency's decision to provide feedback on an institution's initial self-evaluation report is entirely appropriate. However, to avoid conflicts of interest, it is important to ensure that the initial feedback on the self-evaluation report is not provided by the same experts who serve on the institution's or program's evaluation committee.

Comment:

In the actual practice of the IKCA, since 2022, the initial feedback on the self-assessment report is given by the employees of the methodology, monitoring and quality assurance department. They assess the report's compliance with the requirements of the report template in terms of structure and design, check whether all the criteria of each standard have been assessed by the report authors during the self-assessment, and whether there are mandatory Appendices to the report. If there are any deviations from these requirements, the report is returned for revision. For work (study, preparation of a set of questions for interviews, etc.), the EEG experts receive a revised version of the self-assessment report accepted by the IKCA as the final version no later than a month before the audit visit.

The noted practice of remote assessment by experts of the initial version of the self-assessment report was used in the IKCA until 2022, but has not been used since 2022.

Based on the above, we ask that you review the commission's conclusion on the ESG 2.2 standard DEVELOPING METHODOLOGIES CORRESPONDING TO THE SET GOAL from the rating of "partially compliant" to a higher rating of "compliant".

According to the conclusions of the standard commission ESG 3.6 INTERNAL QUALITY CONTROL AND PROFESSIONAL CONDUCT

1. ENQA recommendation:

The agency needs to make additional efforts to improve internal practices based on collective feedback from all stakeholders, ensuring the anonymity of respondents and encouraging them to provide feedback that contributes to the development of the agency.

Comment:

Following the first ENQA inspection in 2022, the IKCA improved its internal practices based on feedback from stakeholders. A survey of educational organizations and experts showed that at the moment, everyone is satisfied with the quality and accreditation procedures of the IKCA and no proposals have been received from them. It should be noted that the survey was conducted anonymously.

This was indicated in the IKCA self-assessment report.

In Section 4. “Quality assurance of the main processes” of the internal document of the IKCA “Guidelines for internal quality assurance”, in the subparagraph “Control”, the procedure for providing feedback through anonymous questionnaires of participants in accreditation procedures: IKCA employees, external audit experts, management of accredited educational organizations, analysis and adoption of appropriate decisions to improve processes is described in detail. https://nkca.kz/storage/app/media/1NKCA/Akkred/Rukovodstvo/Qach/2/rukovvnu_trqachen.pdf

The management of the IKCA and the Deputy Director of the IKCA have developed materials for testing IKCA employees, as well as experts, on the subject of knowledge of the content of accreditation standards, the essence and content of the main accreditation procedures.

Based on the results of monitoring, the management of the Non-Profit Institution "IKCA" takes preventive and corrective actions, in particular, to update the staff and the database of external audit experts.

If low test results are found (less than 50% of the maximum score of 30 units), the question of sending the employee for advanced training ahead of schedule is raised, and experts are invited for additional training in accreditation procedures. If these measures are refused, the question of suspending the employee from work is raised, and the expert is removed from the expert database.

On the IKCA website, in the “About Us” section, there is a “Feedback” tab, which states that any interested person can “... ask a question of interest to you, send comments, remarks or suggestions,” that is, we have given the right to any person to participate in the processes of improving the quality of their activities.

2. ENQA recommendation:

The Agency should review its internal quality assurance rules and improve the quality assurance procedures for various aspects of the core process – the accreditation process – such as the quality assurance methodology for accreditation reports and the establishment of competency-based selection criteria for Accreditation Council members.

Comment:

Following the first ENQA inspection in 2022, the IKCA carried out work on internal quality assurance and is constantly improving it. The IKCA Accreditation Council is competent in the issue of methodology for ensuring the quality of accreditation reports and establishing criteria for selecting members of the Accreditation Council. Based on ENQA's comments and recommendations, the IKCA held a working meeting with members of the Accreditation Council in May 2024, where the requirements for the analysis of each criterion of the standard were additionally discussed. As a continuation of this work, a seminar was held for members of the IKCA Accreditation Council on the structure and content of the EEG reports in December 2024. In the future, the IKCA will continue to work in this

direction.

Suggestions from the group for further improvement

1. ENQA recommendation:

Given the significant increase in the volume of higher education accreditations compared to previous years (while the agency's staff numbers have remained the same), it would be appropriate to improve the skills and knowledge of existing staff to ensure the quality of the accreditation process. For example, regional representatives could be empowered to take on the role of coordinators with expertise in content and processes.

Comment:

In accordance with paragraph 4.3 of the “Guidelines for the organization and conduct of external assessment (audit) within the framework of institutional and specialized accreditation of higher and postgraduate education organizations,” regional representatives of the IKCA carry out work on organizational, technical support and support of accreditation procedures in accordance with the functional responsibilities of the coordinators.

Taking into account the recommendations of the expert commission, the staff of the Department of Methodology, Monitoring and Quality Assurance has been increased.

<https://nkca.kz/storage/app/media/1NKCA/Akkred/Rukovodstvo/240125/1.pdf>

(Order on amendments to the staffing schedule of the IKCA)

Taking into account the above arguments, we ask you to revise the assessment for this standard ESG 3.6 INTERNAL QUALITY CONTROL AND PROFESSIONAL CONDUCT, changing it from the assessment “Partial compliant” to the assessment “Compliant”

According to the conclusions of the ENQA expert commission on ESG 3.3 INDEPENDENCE standard

1. The IKCA should develop a clear procedure for the selection and composition of its Working Group. ENQA recommends that the IKCA Working Group be given more independence in its membership. For example, involving a majority of external stakeholders in its composition could help the agency to increase transparency.

The IKCA has done a great deal of work to increase independence in its activities. In particular, a new independent collegial body has been created to determine the composition of the Company's Councils; the Working Group has been designated as such a body. The activities of the Working Group are governed by the

Regulation on the Working Group, approved on October 10, 2024, No. 38-nk (hereinafter referred to as the Regulation). The Regulation clearly regulates the procedure for the formation of the Working Group, and also ensures the full independence of the Working Group from the influence of the executive bodies of the company and the founder.

According to the provisions of the Regulation:

The composition of the working group is formed from among representatives of interested structural divisions of the Non-Profit Institution "IKCA", with the exception of the director of the Non-Profit Institution "IKCA", by voting in each relevant structural division, selecting a candidate from the division based on the voting (the voting sheet is compiled by the head of the structural division and transferred to the selected candidate for submission to the secretary of the working group), as well as independent representatives of stakeholders (government bodies and/or non-governmental, public organizations and/or educational organizations, associations, employers).

The procedure for involving stakeholders is regulated by the Regulation (Appendix to the Regulation). NU "IKCA" sends requests to government agencies and/or non-governmental, public organizations and/or educational organizations, associations, employers, who provide feedback by sending candidates for inclusion in the working group. It should be noted that requests are sent not to individuals, but to organizations that independently decide on the selection of a candidate.

As an example of interaction within the framework of attracting stakeholders, we are sending requests from NU "IKCA" and responses from the Kostanay Engineering and Economics University named after M. Dulatov, as well as the Kazakh Automobile and Road Institute named after L.B. Goncharov. The candidates are absolutely independent and are disinterested persons. Based on the results of requests from NU "IKCA", representatives of the following organizations were involved as members of the working group:

- National Chamber of Entrepreneurs Atameken (Deputy Director of the Department);
- Kostanay Engineering and Economics University named after M. Dulatov (President);
- Kazakh Automobile and Road Institute named after L.B. Goncharov (professor);
- Medical University of Karaganda (student);
- Institute of Radio Electronics and Information Technology of the Ural Federal University of the Russian Federation (professor);
- Astana International University (Director).

The working group consists of 11 people, 6 of whom are independent involved stakeholders.

We note that independent stakeholder representatives must constitute at least 51 percent. from the total number of members of the working group. This approach completely eliminates the risk of any of the representatives of the NU "IKCA" influencing the decisions of the working group. The chairman of the

working group is one of the members of the working group, elected by general voting.

The Director has no right to interfere or influence the activities of the Working Group. The Working Group is an independent collegial body.

Conclusion of the IKCA:

The Regulation contains a detailed and step-by-step procedure for the formation of a working group with an indication of all documents regulating this procedure. The risks of a conflict of interest, including the influence of the director and deputy director, are completely mitigated, since:

1) the composition of the Working Group is an independent body formed by voting (when forming the composition from employees of the Non-Profit Institution “IKCA”), as well as by involving third-party independent representatives;

2) more than 51 percent of the Working Group members are independent representatives (disinterested persons);

3) the director is not included in the working group and does not have the right to influence its decisions;

4) any member of the working group has the right to:

- if influenced by the executive bodies of the IKCA, express a special opinion on such influence;

- notify the IKCA Supervisory Board of the fact of influence from the executive bodies of the IKCA (in accordance with the requirements of the Policy on the settlement of conflicts of interest), in turn, the Supervisory Board takes measures to settle the conflict of interest, including the use of administrative measures.

5) According to the Company Charter, the executive body is exclusively the company director, the deputy director, in accordance with the requirements of the Regulation, is an equal member of the working group and has no right to influence the decisions of the working group, since the latter are taken by voting, as well as the procedure for determining the chairman of the working group. In addition, the risk of influence of the deputy director is excluded, since changes have been made to the composition of the working group: the candidacy of the deputy director has been removed from the working group, re-elections have been held and another chairman of the working group has been elected. More than 51 percent of third-party independent representatives, who are disinterested persons, have been involved in the group.

Thus, we believe that the IKCA has fully ensured the principle of transparency, openness, equality of the process, and has also eliminated the risks of conflict of interest in the activities of the Working Group.

(attached is a link to the Regulations on the working group, an order on the composition of the group, letters with proposals for independent members to be included in the working group)

<https://nkca.kz/storage/app/media/1NKCA/Akkred/Polozhenie/ORaboGroup/4/PolozhRabGroupEn.pdf>

2. The IKCA must determine the conditions under which the executive management (director, deputy director) of the IKCA may be dismissed by the founder, and also determine the criteria and procedure for the appointment or election of the director of the IKCA.

The Charter of the IKCA was developed and approved in strict accordance with the legislation of the Republic of Kazakhstan. Thus, in accordance with the order of the Minister of Justice of the Republic of Kazakhstan dated February 24, 2015 No. 106, a standard form of the charter for legal entities was established. The standard form of the charter does not provide for the procedure for dismissal or appointment of the director of the company, it only states that the director is appointed by the founder and is elected or dismissed in accordance with the requirements of the current labor legislation of the Republic of Kazakhstan. The regulation of the appointment of the director is provided for by the job description approved by the order "On approval of job descriptions of employees of the Non-Profit Institution "Independent Kazakhstani Center of Accreditation" No. 155-NK dated December 25, 2021 (Appendix 19), which sets out the criteria for the appointment of the director of the Center.

Conclusion of the IKCA:

Thus, the criteria for appointing a director candidate exist and are set out in the approved job description (Order No. 155-NK dated 25.12.2021). However, the expert commission did not request this document. Therefore, the conclusions of the expert commission about the lack of regulation for the appointment of a director do not correspond to reality.

(attached is the job description of the director of the IKCA)

3. The IKCA should work to identify conflicts of interest for the executive management (Director, Deputy Director) and the founder of the IKCA (Founder).

The risk of a conflict of interest, including that of the executive management and the founder, is excluded. The powers of the director and the founder are maximally limited by the NU "IKCA" (amendments have been made to the company's charter):

- the director is not included in the composition of collegial bodies;
- the composition of collegial bodies is formed and approved by the working group and provided to the founder for review; previously, this functionality was within the competence of the founder.

The powers of the director within the framework of accreditation activities are maximally limited, he has no right to interfere in the activities of the company's bodies. In addition, the director does not interact with the founder within the framework of parallel business processes. In addition, the NU "IKCA" in order to eliminate the risk of a conflict of interest has developed and implemented a new document "Policy for the identification and settlement of conflicts of interest", which regulates the procedure for identifying and settling situations related to a conflict of interest.

At the same time, in order to eliminate the said risk, the candidacy of the Deputy Director of the IKCA was removed from the membership of the working group, and re-elections of the Chairman of the working group were held. (copy of the order)

<https://nkca.kz/storage/app/media/1NKCA/Akkred/Polozhenie/PolitikaInteresov/PolitikaInteresoven.pdf> (Conflict of Interest Identification and Management Policy)

4. The IKCA shall publicly announce the existence of the working group within the agency's structure on its website and/or other public channels.

The NU "IKCA" has posted the Regulation on the working group in the current version on its corporate website. The said document fully reflects the principle and format of the working group's activities and is freely available without any restrictions for viewing and familiarization by any interested person.

It should be noted that the NU "IKCA" is constantly updating and filling its corporate website www.nkca.kz. A comparative analysis of the websites of Kazakhstani accreditation agencies showed that the percentage of filling and detailing of documents of NU "IKCA" is significantly higher than the volume of information posted by other accreditation agencies. For example, NU "IKCA" posts full documents (in particular, constituent documents), while the agencies IAAR, IQAA, ARQA post only excerpts from documents.

<https://nkca.kz/storage/app/media/1NKCA/Akkred/Polozhenie/ORaboGroup/4/PolozhRabGroupEn.pdf>

5. In the interests of clarity, transparency and reliability, it is important to ensure that amendments to agency regulations are recorded with the date of the amendment or include a note stating that the amendment is effective retroactively.

All changes and additions to the internal regulatory documents of the IKCA are made strictly by a separate document, officially registered and dated by the legal service of the IKCA. The originals of the documents are stored in the Legal Service of the IKCA. Making changes and additions without drawing up the relevant document, as well as adjusting documents with a retroactive date is not allowed, i.e. NU "IKCA" does not practice giving retroactive legal force to regulatory documents.

Taking into account the above arguments, we ask you to revise the assessment for this standard ESG 3.3 INDEPENDENCE, changing it from the assessment “Partially Compliant” to the assessment “Compliant”

**According to the conclusions of the ENQA expert commission on ESG 2.5
DECISION CRITERIA FOR RESULTS**

Based on the comments and recommendations of the ENQA Expert Committee on the ESG 2.5 Decision Criteria for Results standard, the IKCA

management can provide the following comments.

1. Even before the start of the work of the ENQA expert commission, operational work was carried out in the IKCA to check and partially correct the EEG reports for 2023 and 2024, which do not affect the decisions taken by the Accreditation Council, with the involvement of the heads of the expert groups who prepared these reports for consideration at the meetings of the Accreditation Council of the IKCA. Here we relied on what the expert commission writes in its report: **“Since the commission bases its assessments on information available up to the end of the assessment visit.....».**

2. Based on the same position of the expert commission, already during the assessment visit We have made a number of changes and additions to our internal documents in order to achieve the “consistency” mentioned by the expert committee between the Accreditation Standards, Guidelines and actions taken on their basis.

To do this:

2.1 The Guidelines for the Organization and Conduct of External Evaluation exclude four levels of evaluation based on the criteria of the standards that are not used in the work of experts: “Strong”, “Satisfactory”, “Suggests improvement”, “Unsatisfactory”.

All documents regulating accreditation procedures (Standards, Guidelines for the Organization and Conduct of External Assessment, Regulations on the Accreditation Council, etc.) place a clear emphasis on a three-level assessment of the criteria of the standards: “Complies”, “Complies with comments” and “Does not comply”.

2.2 The audit program did not include a separate panel interview with experts from the IKCA database, except for student experts and two international experts, so the remark that none of the experts could distinguish between the terms “comment” and “recommendation” is unfounded.

Nevertheless, we have additionally added points to the Guide to Organizing and Conducting External Evaluation that explain the concepts of “comment,” “recommendation,” and types of recommendations, namely, “Recommendations for correcting comments,” and “Recommendations without comments” as proposals for further improvement of work according to the criteria of a particular standard.

During the audit of the ENQA expert commission, we presented slides from seminars that were held for the IKCA experts, where these concepts were explained correctly and in detail (the expert commission itself assessed this as good practice).

2.3 A clause has been added to the Guidelines for the Organization and Conduct of External Evaluation on the mandatory inclusion of evaluation criterion numbers in the texts of the EEG reports for each standard, so that the heads of expert groups and employees of the methodology, monitoring and quality assurance department, when accepting reports from EEG members, could check the availability of accreditation criteria, analysis and evidence for them, as well as the compliance of the analysis and evaluation with the topic of the criterion.

The IKCA, like other accreditation agencies, previously provided a general analysis and assessment for each accreditation standard in the EEG reports until

2022, without trying to highlight each individual criterion of the assessed standard. However, the ENQA expert commission recommended that the EEG reports provide an assessment for all criteria of each accreditation standard, so that there is a report on each criterion of each standard. This is what we have been doing in the IKCA EEG reports since 2023.

<https://nkca.kz/storage/app/media/1NKCA/Akkred/Rukovodstvo/240125/1.pdf>

3. There are also comments on the comments to the ESG standard 2.5 Decision criteria for results:

3.1 Regarding the comments of the ENQA expert committee on two universities whose educational programmes were accredited for 7 years, that the decision was made by the Accreditation Council in the absence of examples of best practice in the EEG reports. This remark concerns the programs of two universities: 5 programs of the Kazakh National Pedagogical University named after Abai (6B02114 - Fine Arts (graphics), 6B02113 - Fine Arts (painting), 6B01606 - History-Geography, 6B01602 - History-Religious Studies, 7M01602 - History-Religious Studies) and 6 programs of Abai Myrzakhmetov University (6B11121 - Tourism, 7M11121 - Tourism, 6B01709 - Foreign Language: Two Foreign Languages, 6M04217 - Jurisprudence, 7M04217 - Jurisprudence, 6B02111 - Design).

A thorough check carried out by us showed that in all the EEG reports for the above-mentioned programs accredited for 7 years for the Kazakh National Pedagogical University named after Abai (December 2023) (5 EP) and for the Kokshetau University named after Abai Myrzakhmetov (6 EP) (April 2024) for each standard there are sections "Good Practice", which indicate examples of best practice, and for KazNPU named after Abai, these best practices are indicated again in Chapter 3. Conclusion. Therefore, this remark on making decisions on accreditation for 7 years in the absence of best practices, in our opinion, does not correspond to reality.

<https://nkca.kz/storage/app/media/1NKCA/VUZ/2023/Abay/en/6%D0%9202119en.pdf>

<https://nkca.kz/storage/app/media/1NKCA/VUZ/2024/AbayMyrzakhmetovKokshetauUniversity/Otchet/en/6B11121eng.pdf>

3.2 Regarding the expert commission's comment on the presence in the standards for accreditation of teacher education programs in the decision-making rules of a clause on making decisions by the Accreditation Council "in exceptional cases", we note that this does not contradict either the ESG standards or the normative documents of national legislation in education, but is dictated by the actual practice of accreditation, in which situations sometimes arise that cannot be foreseen in even the most sophisticated rules.

By the way, in the practice of the Accreditation Council in the period of 2023

and subsequent years, there were no decisions taken in supposedly exceptional cases; the expert commission itself notes that decisions were taken in accordance with the terms approved in the Standards, the Regulation on the Accreditation Council, i.e. for 7 years, for 5 years, for 3 years and for 1 year.

In this regard, we believe that this remark is unfounded.

3.3 Regarding the decision-making by the Accreditation Council in the case of initial accreditation.

The comments in the text of the expert commission's report on the accreditation deadlines for programs 7M01703 - Foreign Language: Two Foreign Languages of the Bolashak Kyzylorda University (June 2024), 8D01540 - Chemistry of the Kuatbekov Peoples' Friendship University (April 2024) concerned the fact that the Accreditation Council, when assessing all the standards as "compliant", made a decision to "accredit for 3 years". We would like to clarify that both of these programs underwent primary accreditation, which is clearly indicated on the title page of the EEG report. According to the rules for making decisions on primary accreditation in effect at that time, when assessing all the standards as "compliant" or when assessing 3 standards as "compliant with comments", the Accreditation Council had to make a decision to "accredit for 3 years", which was done.

This practice was used at that time, since the initial accreditation is usually passed by programs where there are no graduates yet, new programs for which there is no enrollment yet, but in order to enroll for training under a state educational grant, accreditation is needed, that is, programs for which it is impossible to give a full assessment according to all criteria of all standards are accredited. Therefore, in contrast to full accreditation, for initial accreditation, even in the absence of comments on the standards, accreditation was given for a reduced period of 3 years. In accordance with the Regulation on post-accreditation monitoring, after 1.5 years the IKCA could receive a report on the implementation of its recommendations and improvements in the program.

However, taking into account the experience of other Kazakhstani agencies, proposals of the members of the IKCA Accreditation Council, recommendations of our colleagues - partners from the QAA agency, during the work of the commission, the department of methodology, monitoring and quality assurance made changes to the relevant documents (Accreditation Standards, Guidelines for organizing and conducting an external visit, Regulations on the Accreditation Council), so that in the case of primary accreditation, if there are assessments for all standards "Complies" or up to 3 standards with the assessment "Complies with comments", accredit the EP for a period of 5 years. With the condition of annually submitting to the IKCA interim reports on the implementation of the IKCA recommendations, on improvements in the program.

Likewise, accredit to 3 years **in the case of primary accreditation, if the decision is “Compliant with comments” for 4 standards;**

- accredit for 1 year in the case of initial accreditation, if the decision is “Compliant with comments” for 5 or more standards;

3.4 Regarding the noted errors and inconsistencies in the assessment standards in the EEG reports on the Geography-History program of the Central Asian Innovation University (October 2023) (a four-level assessment was used), 6B02119 - Architectural Design of the Kazakh National Pedagogical University named after Abay (November 2023) (a four-level assessment was used), 6B06101 - Applied Informatics in Design of the Aktobe University named after Kh. Dosmukhamedov (June 2024), 6B06106 - Computer Science of the Central Asian Innovation University (October 2023) (a four-level assessment was used), we clarify that the employees of the Department of Methodology, Monitoring and Quality Assurance, together with the heads of the relevant expert groups, made corrections to all EEG reports for 2023 and individual reports for 2024 in the period up to work of the commission and during the work of the commission. Including the above-mentioned reports have been corrected. We have written about this in paragraphs 1, 2, 2.1.

3.5 The IKCA management, the department of methodology, monitoring and quality assurance conducted training seminars for all categories of participants in the accreditation procedures: members of all Councils (Supervisory, Accreditation, Expert Councils, Appeals and Complaints Commission), IKCA employees, regional offices, experts from the IKCA database and new experts on additional clarification of the essence of the criteria of all accreditation standards, standards and guidelines for quality assurance of higher education in the EHEA (ESG), the procedure for preparing self-assessment reports, external visit (audit) procedures, the structure of the EEG report, the essence of the concepts of "Remark" and "Recommendation" in assessing standards, templates for writing EEG reports were presented.

Taking into account the above, and the fact that a significant part of the comments and recommendations of the ENQA expert commission turned out to be unfounded, the management of the IKCA requests to change the assessment according to the ESG 2.5 standard Decision-making criteria for results from the assessment “not compliant” to the assessment “partially compliant”.

Thus, we would like to once again draw the attention of the ENQA Secretariat to the fact that during an external visit by an expert commission ENQA, in our opinion, one of the ENQA principles set out in the ENQA Review Guidelines has been violated, namely: “ENQA reviews are conducted in accordance with the following principles(5 principles), among which the following is: “The level of ESG compliance required for ENQA membership is ‘general compliance’, not ‘strict compliance’.”

We have a clear conviction that our agency was required to demonstrate “strict

compliance” during the inspection.

In addition, when preparing our comments on the ENQA expert committee’s comments and recommendations, we were based on what the expert commission wrote in its report: **“Since the commission bases its assessments on information available up to the end of the assessment visit.....»**, Therefore, we present in the commentary texts individual changes in the IKCA documents and procedures that were introduced during the commission’s audit, i.e. before the end of the assessment visit.

Based on the comments provided, as well as the important reference to the principles of the ENQA Review Guidelines, we ask you to reconsider the assessments proposed by the expert committee for the following ESG standards:

ESG 2.2 DEVELOPING FIT-FOR-PURPOSE METHODOLOGIES – change from “Partially compliant” to “Compliant”.

ESG 2.5 DECISION CRITERIA FOR RESULTS – change from “not met” to “Partially compliant”

ESG 3.3 INDEPENDENCE – change from “Partially compliant” to “Compliant”

ESG 3.6 INTERNAL QUALITY CONTROL AND PROFESSIONAL CONDUCT- change from “Partially compliant” to “Compliant”.

Director of IKCA

Khalmuratov B.O.

Application by IKCA for Inclusion on the Register / Renewal of Registration

Clarification provided by the Panel

Register Committee	
Ref.	A165
Date	2025-06-17
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Date of the conversation: 2025-06-17

Panel members: Heli Mattisen (panel chair)

Representative of EQAR: Aleksandar Šušnjar

1. IKCA has submitted on 2024-04-29 an application for inclusion on the European Quality Assurance Register for Higher Education (EQAR). On 2025-04-14, IKCA submitted the external review panel's report of 2025-02-24.
2. In order to prepare the deliberations of the Register Committee on IKCA' compliance with the ESG, EQAR contacted the Panel to clarify the matter(s) below.

ESG 2.1 – Consideration of internal quality assurance

3. The Register Committee noted that the panel carefully analysed links with all ESG Part 1 standards and provided a detailed table on pp. 31-33 which analyses IKCA's standards for the pedagogical field. While the agency has also revised general institutional and programme accreditation standards and standards for accreditation in the medical field, no table was developed for these two methodologies as it was for the pedagogical field. The Registered Committee inquired why this is the case and based on what the review panel reaffirmed its original judgement.
4. The review panel chair clarified that for these two methodologies certain standards were added, but none of the previously existing standards were removed or modified. Since these two sets of standards (general standards and standards in medical field) were deemed to be properly aligned with ESG Part 1 in the original review and none of the standards were removed or modified, there was no scenario in which these two methodologies could regress in terms of alignment with ESG Part 1. For that reason, the review panel did not repeat the *ex ante* analysis of alignment between ESG Part 1 standards and IKCA's standards.

ESG 2.3 – Implementing processes

5. Considering review panel's comments related to, for example, inconsistent application of IKCA's external QA methodologies, the Register Committee sought clarification on whether the review panel discussed and considered the option of including ESG 2.3 in the scope of the review and whether the panel is reasonably assured that ESG 2.3 remains compliant with the ESG.

6. The panel chair clarified that the panel did not see the need to include the ESG 2.3 in the scope of the review. Although the panel acknowledged during the review that it is in some cases difficult to disentangle specific standards of ESG Part 2 (e.g. 2.1, 2.2 and 2.3), the issues related to IKCA's methodologies have more to do with ESG 2.1 than ESG 2.3 because ESG Part 1 standards are not systematically and consistently included in IKCA's standards (as evidenced by their practice) rather than it being an issue of consistent implementation of external QA procedures (which would have been more of an issue under ESG 2.3).
7. Although this was not specifically requested by the Register Committee, the review panel chair also emphasised that the panel encountered difficulties in assessing IKCA's compliance with ESG 2.4. Although IKCA includes students in all of its review panels, the review panels are often composed of a high number of experts tasked with evaluating multiple programmes simultaneously (cluster evaluation), while only one panel member is a student. This brings into question whether the student member of the panel can provide input on all programmes undergoing evaluation.

Additional presentation

The Non-Profit Institution “Independent Kazakhstani Center of Accreditation” (IKCA) has grounds for possible rejection of the arguments set out in the Decision of the Registry Committee on the deferment of consideration of the IKCA’s application for registration in EQAR.

Item No.	Contents of the ENQA Commission's comment	Comments of the Non-Profit Institution “Independent Kazakhstani Center of Accreditation” (IKCA)	Supporting evidence
1	<p>Page 13 of the ENQA commission report:</p> <p>The members of the working group are approved by order of the director of IKCA and consist of at least five people. During the site visit, the commission found out that there are currently eight members of the working group, five of whom are IKCA employees and three of whom are external stakeholders. Students are not currently part of the working group.</p>	<p>During the external audit of the ENQA commission, six external representatives of stakeholders were included in the working group. As an example of interaction within the framework of stakeholder involvement, we are sending requests from NI «IKCA" and responses from the Kostanay Engineering and Economics University named after M. Dulatov, as well as the Kazakh Automobile and Highway Institute named after L.B. Goncharov. The candidates are absolutely independent and are disinterested persons. Based on the results of requests from NI «IKCA", representatives of the following organizations were involved as external members of the working group:</p> <ul style="list-style-type: none"> - National Chamber of Entrepreneurs Atameken (Deputy Director of the Department); - Kostanay Engineering and Economics University named after M. Dulatov (President); - Kazakh Automobile and Road Institute named after L.B. Goncharov (professor); 	<p>IKCA requests with letters to various organizations, for example, responses from the Kostanay Engineering and Economics University named after M. Dulatov, Kazakh Automobile and Road Institute named after L.B. Goncharov</p>

		<ul style="list-style-type: none"> - Medical University of Karaganda (student); - Institute of Radio Electronics and Information Technology of the Ural Federal University of the Russian Federation (professor); - Astana International University (Director of the Pedagogical Institute). <p>The working group consists of 11 people, 6 of whom are independent stakeholders, including a student representative.</p>	
2	<p>Page 14 of the ENQA commission report:</p> <p>The IKCA Expert Council is formed by the Working Group through selection from among external IKCA experts. The Expert Council should be responsible for the formation of expert groups, the assessment of interim reports on program and institutional accreditation and participation in post-accreditation monitoring (according to the regulations). However, from the interviews, the commission found out that this body is mainly responsible for the formation of external expert groups (EEG) and the alignment of IKCA standards with the guidelines</p>	<p>2.1 During the external visit, the relevant amendments were made to the Regulation on the Expert Council, namely, the main areas of activity of the IKCA Expert Councils are defined in paragraph 2.1:</p> <p>1) expert activity:</p> <ul style="list-style-type: none"> - to attract external experts of the Center to expert evaluation of educational organizations and educational programs, their selection within the framework of compliance with the requirements, evaluation of activities as experts, training and retraining of external experts; - to assess the development of pre-school, secondary, technical and vocational, higher and postgraduate (including medical, pedagogical), additional education, as well as similar levels of education in foreign countries, depending on the area of activity of the Expert Councils of the Center. <p>2) information and consulting activities:</p> <ul style="list-style-type: none"> - on the development, analysis and updating of the methodological base of the Center (Standards and 	<p>Regulations on the Expert Council of the IKCA, paragraph 2.1</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Polozhenie/Expert/3/PolozhExpertSovEn.pdf</p>

		<p>guidelines for institutional accreditation of educational organizations and specialized (program) accreditation of educational programs of educational organizations, internal documents of the Center);</p> <p>- on the development of proposals for improving the activities of educational organizations, taking into account the decisions of the Accreditation Council of the Center (in particular, accredited educational organizations and/or educational programs for a period of 1 (one) year and/or non-accredited educational organizations and/or educational programs).</p> <p>As a result, the Regulation on the Expert Council excludes the function of “expert assessment of the interim report of an educational organization on the implementation of recommendations prescribed by an external expert commission approved by the Accreditation Council on the procedure of post-accreditation monitoring.”</p>	
3	<p>Page 14 of the ENQA commission report:</p> <p>After the initial self assessment report is submitted by the HEI, IKCA has the possibility to form an expert panel for the initial review of such report. The members of such an expert panel are later also involved as the expert panel of the review, including the site visit and the preparation of the final report.</p>	<p>In accordance with the recommendations of the ENQA external expert group following the first visit, taking into account the current practice of the IKCA, during the preparation for the second visit of the ENQA commission, changes were made to this part of the Guidelines for the organization and conduct of external audits: The initial version of the self-assessment report is reviewed by the responsible employee of the IKCA, proofread, checked for compliance with the technical requirements for the report, whether all the criteria of the standards were assessed in the self-assessment report. The EEG experts receive the final</p>	<p>Clause 4.4 of the Guidelines for the organization and conduct of external assessment (audit) within the framework of institutional and specialized (program) accreditation</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Rukovodstvo/240125/1.pdf</p>

		version of the self-assessment report, they do not participate in the examination of the self-assessment report!	
4	<p>Page 15 of the ENQA commission report:</p> <p>The composition of the formed external expert groups is sent to universities, which must agree on the proposed composition (based on possible conflicts of interest).</p>	<p>The planned composition of the EEG no later than 20 days before the audit of the IKCA is sent to the educational organization not for approval, but to identify a possible conflict of interest of the planned experts with the educational organization. If a risk of a conflict of interest is identified, the university prepares a justified challenge to the expert with whom a conflict of interest may arise.</p>	<p>Clause 4.4 of the Guidelines for the organization and conduct of external assessment (audit) within the framework of institutional and specialized (program) accreditation</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Rukovodstvo/240125/1.pdf</p>
5	<p>Page 15 of the ENQA commission report:</p> <p>IKCA publishes all accredited programs and institutions on its website, along with reports and certificates. At the time of this review, no reports containing negative accreditation decisions were found on the IKCA website.</p>	<p>No reports containing negative accreditation decisions were found on the IKCA website for the period from 2023 onwards, as no negative decisions were made during this period.</p> <p>Reports with negative decisions for the period up to 2023 are posted on the IKCA website in the “Accreditation” section (page “Archive of negative decisions”)</p>	<p>https://nkca.kz/en/arhiv-otricatelnyh-reshenij?status=arhiv</p>
ESG STANDARD 3.3 INDEPENDENCE			

6	<p>Page 18 of the ENQA commission report:</p> <p>No evidence was found regarding the criteria for the appointment/election of the IKCA Director by the agency's founder.</p>	<p>The IKCA Charter was developed and approved in strict accordance with the legislation of the Republic of Kazakhstan. Thus, in accordance with the order Minister of Justice of the Republic of Kazakhstan dated February 24, 2015 No. 106 The Standard Charter form for legal entities has been established. The Standard Charter form does not provide for the procedure for dismissal or appointment of the company director, it only states that the director is appointed by the founder and is elected or dismissed in accordance with the requirements of the current labor legislation of the Republic of Kazakhstan. The criteria for the position of director are contained in the job description of the director of the IKCA.</p> <p>Conclusion of the IKCA:</p> <p>Thus, the conditions for the appointment and dismissal of the director are a priori provided for by the norms of the Labor Code of the Republic of Kazakhstan and no additional regulation is required.</p>	<p>IKCA Charter, https://nkca.kz/storage/app/media/1NKCA/OCentre/Usstav/2/UstavEn.pdf</p> <p>Order of the Minister of Justice of the Republic of Kazakhstan dated February 24, 2015 No. 106 "On approval of model charters of legal entities related to small, medium and large businesses"</p> <p>https://adilet.zan.kz/rus/docs/V1500010563 Job description of the Director of the IKCA</p>
7	<p>Page 19 of the ENQA commission report:</p> <p>IKCA also provides the opportunity for experts to apply online as a national expert, international expert, employer expert or student expert (all in the field of higher education), but the commission has not heard of any cases where an online application has been considered for inclusion in the roster of experts, and has not encountered any experts (student, international expert or university</p>	<p>In our opinion, such a conclusion of the commission about the absence of experts with an online application is incorrect, since there was no separate interview with a large number of experts from the IKCA database, except for student experts and two international experts!!! (see the External Visit Program). However, on the IKCA website we have provided the opportunity for online applications for inclusion in the IKCA expert database to any person who meets our requirements. Here are several examples of how future experts took advantage of this</p>	<p>Programme of the external visit of the ENQA commission.</p> <p>Copies of online applications from 3 people</p>

	staff) who have applied using this procedure.	opportunity, submitted online applications, and were thus included in the IKCA expert database.	
8	<p>Page 19 of the ENQA commission report:</p> <p>One of the most significant changes for the agency was the transition from an organizational founder to an individual in September 2023. However, the agency mentioned that this transition did not affect the organizational activities as the agency continued to use the same offices and continued to function in the same capacity after the transition.</p>	<p>The most important thing is that complete independence in decision-making on accreditation is ensured from the Founder, the Director of IKCA, and other third parties.</p>	
9	<p>Page 19 of the ENQA commission report:</p> <p>However, the commission noted some procedural inconsistencies that should be addressed. Based on the Articles of Association, Article 3, paragraph 3, the founder has the right to determine the competencies, organizational structure and the procedure for the formation and termination of the powers of the director of IKCA. During this review, no evidence was collected regarding formalized procedures for determining the criteria for the appointment or election of the director of IKCA or the termination of their powers.</p>	<p>The Charter of the IKCA was developed and approved in strict accordance with the legislation of the Republic of Kazakhstan. Thus, in accordance with the order of the Minister of Justice of the Republic of Kazakhstan dated February 24, 2015 No. 106, a standard form of the charter for legal entities was established. The standard form of the Charter does not provide for the procedure for dismissal or appointment of the director of the company, it only states that the director is appointed by the founder and is elected or dismissed in accordance with the requirements of the current labor legislation of the Republic of Kazakhstan. However, in the job description of the director, approved on December 25, 2021, in paragraph 2.1 of section 2 “Qualification requirements”, the criteria for the appointment of the director of the IKCA are given. In full compliance with them, the selection and appointment of the director of the IKCA is carried out on a competitive</p>	<p>IKCA Charter, https://nkca.kz/storage/app/media/1NKCA/OCentre/Usstav/2/UstavEn.pdf</p> <p>Order of the Minister of Justice of the Republic of Kazakhstan dated February 24, 2015 No. 106 "On approval of model charters of legal entities related to small, medium and large businesses" https://adilet.zan.kz/rus/docs/V1500010563</p>

		basis.	
10	<p>Page 20 of the ENQA commission report:</p> <p>There are currently eight members of the IKCA Working Group, five of whom are IKCA staff and three of whom are external experts. The team found that three of the external experts had recently been added to the Working Group and therefore had not had the opportunity to actively participate in its activities at the time of the site visit.</p>	<p>At the time of completion of the ENQA expert commission's work, the working group consisted of 11 people, 6 of whom were independent involved stakeholders.</p> <p>As an example of interaction within the framework of attracting stakeholders, we are sending requests from NI «IKCA" and responses from the Kostanay Engineering and Economics University named after M. Dulatov, as well as the Kazakh Automobile and Road Institute named after L.B. Goncharov. The candidates are absolutely independent and are disinterested persons. Based on the results of requests from NI «IKCA", representatives of the following organizations were involved as members of the working group:</p> <ul style="list-style-type: none"> - National Chamber of Entrepreneurs Atameken (Deputy Director of the Department); - Kostanay Engineering and Economics University named after M. Dulatov (President); - Kazakh Automobile and Road Institute named after L.B. Goncharov (professor); - Medical University of Karaganda (student); - Institute of Radio Electronics and Information Technology of the Ural Federal University of the Russian Federation (professor); 	<p>IKCA requests with letters to various organizations, for example, responses from the Kostanay Engineering and Economics University named after M. Dulatov, Kazakh Automobile and Road Institute named after L.B. Goncharov</p>

		<p>- Astana International University (Director).</p> <p>The working group consists of 11 people, 6 of whom are independent involved stakeholders.</p>	
11	<p>Page 21 of the ENQA commission report:</p> <p>Furthermore, the structure and members of the Working Group are not shown anywhere on the IKCA web pages, resulting in a lack of transparency in public information.</p>	<p>The NI «IKCA" has posted the Regulation on the Working Group in its current version on its corporate website. This document fully reflects the principles and format of the Working Group's activities and is freely available without any restrictions for viewing and familiarization by any interested person.</p> <p>Since the members of the Working Group have a great responsibility for the selection and approval of members of important Councils, in order to exclude the risks of external stakeholders influencing the members of the Working Group, considering this information confidential, information about the members of the Working Group is not posted on the website.</p> <p>It should be noted that NI «IKCA» constantly updates and fills its corporate website www.nkca.kz. A comparative analysis of the websites of Kazakhstani accreditation agencies showed that the percentage of filling and detailing of documents of NI «IKCA» is significantly higher than the volume of information posted by other accreditation agencies. For example, NI «IKCA» posts full documents (in particular, constituent documents), while the agencies NAAR, NAOKO, ARKA post only excerpts from documents.</p> <p>A legitimate question arises: «Where is the</p>	<p>Regulations on the IKCA Working Group</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Polozhenie/ORaboGroup/Polozhenierabgren.pdf</p>

		transparency in the activities of these respected agencies, which were accepted into ENQA and EQAR without any problems?	
12	<p>Page 21 of the ENQA commission report:</p> <p>The agency informed the commission that the Working Group now consists of 11 members, six of whom are independent stakeholders. The Deputy Director remains a member of the Working Group. The commission emphasizes the fact that this amendment was made after the site visit and the commission was not notified either before or during the accreditation process that such a change would be implemented by the agency so soon.</p>	<p>The said planned amendment was reported to the IKCA during the audit. This amendment was made before the end of the audit.</p> <p>In this part, we rely on what the expert commission writes in its report: “Since the commission bases its assessments on information available up to the end of the assessment visit.....”, therefore, we cite in the text, among our arguments, individual changes in the IKCA documents, procedures, which were made during the commission’s audit, i.e. up to the end of the assessment visit.</p>	Order on changes in the composition of the Working Group
13	<p>Page 21 of the ENQA commission report:</p> <p>The Panel considered the Deputy Director's participation in the Working Group to be a conflict of interest, since a member of the IKCA management team heads a body that should be independent of it. The Working Group's regulations state the following: "The composition of the Working Group is approved by order of the Director of NI 'IKCA' or the person replacing him, while the Director has no right to interfere and/or influence the activities of the Working Group. The Working Group is an independent collegial body." Thus, the Deputy Director of IKCA has the authority both to approve the composition of the Working Group and to</p>	<p>The risk of a conflict of interest, including that of the executive management and the founder, is excluded. The powers of the director and the founder are limited to the maximum extent by the NI «IKCA» (amendments were made to the company's charter based on the results of the first visit of the ENQA expert commission):</p> <ul style="list-style-type: none"> - the director is not included in the composition of collegial bodies; - the composition of the collegial bodies is formed and approved by the Working Group and provided to the Founder for review; previously, this functionality was within the competence of the Founder. <p>The powers of the director within the framework of accreditation activities are maximally limited, he has no right</p>	Order on changes in the composition of the Working Group.

	participate in its activities, which should not be the case.	<p>to interfere in the activities of the company's bodies. In addition, the director does not interact with the Founder within the framework of parallel business processes. In addition, in order to eliminate the risk of a conflict of interest, the IKCA developed and implemented a new document "Policy for the identification and resolution of conflicts of interest" before the start of the external audit, which regulates the procedure for identifying and resolving situations associated with the risk of a conflict of interest.</p> <p>Immediately after the external audit of the ENQA commission, the Deputy Director was removed from the Working Group and a re-election of the Chairman of the Working Group took place.</p>	
14	<p>Page 21 of the ENQA commission report:</p> <p>Since the current Working Group is composed mainly of Agency employees (five out of eight members), the decisions taken by this body cannot be considered an “independent collegial body” (Working Group Regulations, p. 2).</p>	<p>Even during the work of the external ENQA expert group, the composition of the Working Group was brought up to 11 people, of which 6 people are external, independent from the IKCA management, representatives of various organizations. Therefore, in our opinion, this is a truly independent body of the agency. The subsequent activity of the Working Group on updating the composition of the Accreditation Council after the external visit clearly showed us: how fundamentally, thoroughly, in a lively discussion the selection of new members of the Accreditation Council, important for the agency, was made by this composition of the Working Group from among possible candidates from state, non-state, public organizations.</p>	Order on changes in the composition of the Working Group.
15	<p>Page 21 of the ENQA commission report:</p> <p>The panel found that the ‘Procedure for engaging</p>	<p>In preparation for the external visit of the ENQA commission, the document "Procedure for involving experts</p>	"The procedure for involving experts in the

	<p>experts to serve on the Accreditation Council, Supervisory Board, appeals and complaints committee, and Expert Councils, as well as for involving stakeholders in the development and updating of regulatory documents for the IKCA’ does not offer help in distinguishing among the candidates for IKCA’s governing bodies. The panel finds that the criteria described are very broad and it could complicate the decision process on the selection of members. It could be useful to broaden these criteria with beneficial requirements, which could help the Working Group of IKCA in easier selection of candidates according to more transparent criteria.</p>	<p>in the Accreditation Council, Supervisory Board, Appeals and Complaints Commission, Expert Councils, as well as stakeholders for the development and updating of regulatory documents of the Non-Profit Institution "Independent Kazakhstani Center of Accreditation" (approved on 10.10.2024) was approved, which described and approved the actual process of involving experts in various Councils and commissions of the IKCA, as well as stakeholders in the development of regulatory documents of the IKCA. In accordance with the recommendations of the ENQA commission, the criteria for the selection of experts and stakeholders were clarified, narrowed and specified; this internal document was re-approved on 13.11.2024.</p>	<p>Accreditation Council, the Supervisory Board, the Appeals and Complaints Commission, the Expert Councils, as well as stakeholders for the development and updating of regulatory documents of the Non-Profit Institution "Independent Kazakhstani Center of Accreditation" (approved on 10.10.2024)</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Instrukt/PoryadokExpertEn.pdf</p>
16	<p>Page 22 of the ENQA commission report: IKCA does not have formalized procedures to prevent influence by other institutions or stakeholders on the final accreditation results.</p>	<p>This conclusion of the ENQA Commission is contradicted by the following two sentences from the ENQA Commission report on page 22.</p> <p>From the ENQA commission report:</p> <p>As the decisions on accreditation outcomes are taken directly by the Accreditation Council of IKCA, no external influences are present in the decision-making processes. Additionally, during the site visit, the panel did not receive any information on potential interference of external stakeholders on the accreditation processes. This process was rather seen as transparent democratic, and was appreciated by IKCA’s management and staff members, as well as by</p>	<p>1. Regulations on the Accreditation Council (paragraphs 2.2, 3.4, 4.3);</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Polozhenie/Akkr/PolozhAkkredSovEn.pdf</p> <p>2. Document "Policy for identifying and resolving conflicts of interest of the IKCA”, approved on</p>

		<p>the stakeholders (HEIs, students).</p> <p>Let us emphasize: Mechanisms for preventing the influence of other institutions or interested parties on the final results of accreditation are approved in the Regulations on the Accreditation Council (paragraphs 2.2, 3.4, 4.3), the document “Policy for identifying and resolving conflicts of interest of the IKCA, approved on 01.10.2024, the Guide to internal quality assurance (approved on 03.10.2023 with amendments dated 13.11.2024) (section 3. External assessment experts), the Code of Honor of the IKCA expert.</p>	<p>01.10.2024;</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Polozhenie/PolitikaInteresov/PolitikaInteresoven.pdf</p> <p>3. Internal Quality Assurance Guidelines (approved on 03.10.2023 with amendments from 13.11.2024) (section 3. External assessment experts),</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Rukovodstvo/Qach/2/rukovvnutrqachen.pdf</p> <p>4. Code of honor of the IKCA expert.</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Expert/KodeksExpertEn.pdf</p>
17	<p>Page 22 of the ENQA commission report:</p> <p>Although a collegial body named the Working Group has been established within IKCA, which is granted decision-making authority in the selection of the Accreditation Council members,</p>	<p>We have already emphasized above that during the work of the external ENQA expert group, the composition of the Working Group was increased to 11 people, of which 6 people are external, independent from the IKCA management, representatives of various organizations.</p>	<p>Order on changes in the composition of the IKCA Working Group</p>

	Supervisory Board, and Appeals and Complaints Committee, this is not an independent decision-making body composed of representatives from various stakeholders. Instead, it consists mainly of agency employees who are subordinate to the agency's director in their daily work.		
18	<p>Page 22 of the ENQA commission report:</p> <p>While the principles for forming the Accreditation Council and Supervisory Board are regulated, it remains unclear what criteria the Working Group uses to make its selection. The agency clarified the selection processes for the different bodies of IKCA, but there were still concerns from the panel that these processes are not defined within IKCA's documents for all the bodies in its structure.</p>	<p>It was stated above that the internal document "Procedure for involving experts in the Accreditation Council, Supervisory Board, Appeals and Complaints Commission, Expert Councils, as well as stakeholders for the development and updating of regulatory documents of the Non-Profit Institution "Independent Kazakhstani Center of Accreditation" (approved on 10.10.2024) described and approved the actual process of involving experts in various Councils and commissions of the IKCA, as well as interested parties in the development of regulatory documents of the IKCA; the Appendix very clearly sets out the criteria that are used by the Working Group to form the composition of each Council, Commission.</p>	<p>Document "Procedure for involving experts in the Accreditation Council, Supervisory Board, Appeals and Complaints Review Commission, Expert Councils, as well as stakeholders for the development and updating of regulatory documents of the Non-Profit Institution "Independent Kazakhstani Center of Accreditation"</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Instrukt/PoryadokExpertEn.pdf</p>
<p>Based on what the ENQA expert committee writes in its report: "Since the committee bases its assessments on information available up to the end of the assessment visit...", based on the above arguments of the IKCA on each of the comments, which generally indicate the invalidity of individual comments, the correction of other comments before the completion of the ENQA assessment visit by the committee, the IKCA management requests to change this Standard 3.3. ESG "Independence" from the assessment of "partial compliance" to the assessment of</p>			

	“complies”.		
	ESG 3.4 THEMATIC ANALYSIS		
19	<p>Page 24 of the report</p> <p>The panel acknowledges the importance and the dedication of the agency to conduct thematic analyses minimally once a year, for the period 2023-2027, as described in IKCA’s Strategic development plan. However, the panel deemed that additional effort should be invested into using the results of the thematic analyses for internal improvements within IKCA. This is due to no evidence gathered in the interviews on the improvements done based on thematic analyses, and it became apparent that most members of IKCA’s supervisory bodies were unaware of the concept of thematic analyses, their relevance and topics.</p>	<p>During thematic analyses by the IKCA, it was revealed that some external experts do not fully disclose certain criteria of the standards when analyzing educational programs. To solve this problem and improve the quality of accreditation procedures, the IKCA organized and held additional training seminars for external experts on 15.01.2024, 16.01.2024, 19.12.2024 and 16.01. 2025 on accreditation standards, compliance with reporting requirements, and a detailed analysis of all criteria for assessing the Standards. As a result of these measures, the reports of external audit expert groups managed to achieve the necessary completeness of analysis and assessment for all criteria of accreditation standards, complete uniformity of the terminology used by experts in the reports, uniformity of design, and a single three-level assessment of compliance with accreditation standards.</p>	
20	<p>Page 24-25 of the report</p> <p>The introduction of the Recommendations on the preparation of a thematic analysis is going to help the agency with the structure of the future thematic analyses. However, it should be noted that the content of the listed</p>	<p>In its understanding of the essence and objectives of thematic analysis, the IKCA proceeds from the Guide to the ESG Standard 3.4 Thematic Analysis, namely: “In the course of their work, agencies generate information about programmes and institutions that can also be useful for other purposes,</p>	<p>1. Letter to the Ministry of Science and Higher Education with a thematic analysis based on the results of accreditations in 2020-2023 with an attached</p>

<p>thematic analyses does not contain a deeper analysis which is required under the ESG 3.4 Thematic analysis. Both evaluated thematic analyses contain a summative comparison of reports, but no research analysis was performed based on the results of the accreditation procedures.</p> <p>Thematic analyses should go beyond descriptive summaries to include actionable insights and context for higher education stakeholders. Therefore, the panel found the published documents lacking in this regard. For example, in Thematic analysis. Comparing educational practices in Kazakhstan with international standards, key findings are presented as bullet points, without providing the readers with the context.</p>	<p>providing data for structural analysis of the entire higher education system. These materials can be used to analyse and improve quality assurance policies and processes in institutional, national and international contexts. Careful analysis of such information can demonstrate development trends, areas of good practice and identify existing problems."</p> <p>The IKCA, in strict accordance with this guide, forms its thematic analyses and projects conclusions from the analysis of its results on accreditation of a certain sector of higher education to the entire system of higher education in the country.</p> <p>It has already become an effective practice to send thematic analyses of the IKCA to the Committee for Quality Assurance in Science and Higher Education of the Ministry of Science and Higher Education of the Republic of Kazakhstan, that is, directly to the body that coordinates all work on quality assurance of higher education. In the last two thematic analyses, after a qualitative analysis of the effective practice of higher education organizations or their programs, identifying and grouping common deviations from the IKCA accreditation standards, and therefore from the ESG standards, general recommendations are given to accredited universities and programs, proposals are developed for the Ministry of Science and Higher Education on comments that only the Ministry of Science and Higher Education can help universities correct. We attach copies of letters with proposals sent to the relevant ministry.</p>	<p>thematic analysis (No. 425 dated 11.07.2024);</p> <p>2. Letter to the Ministry of Science and Higher Education with a thematic analysis based on the results of accreditations in 2024 with an attached thematic analysis (No. 480 dated 10.07.2025);</p>
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<p>Taking into account the above arguments, the assessment of the compliance of the IKCA activities by the ENQA commission as “compliant” with this standard, we ask the Registry Committee to agree with the proposed assessment of the ENQA commission as “compliant” with the ESG standard - Thematic Analysis</p>			
<p>ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT</p>			
21	<p>Page 27 of the ENQA commission report:</p> <p>IKCA does not have a described procedure for subcontractors’ adherence to the ESGs, and the panel did not obtain information of any subcontractors hired by IKCA.</p>	<p>Due to the specific nature of the agency’s work, there is no need to involve subcontractors in the accreditation processes.</p>	
22	<p>Page 27 of the ENQA commission report:</p> <p>The roles of some of these bodies are clear (Working Group, Appeals and Complaints Commission) but the Accreditation Council, the Supervisory Board members and the members of the Expert Council at times had difficulties expressing their roles in internal processes. For example, they had difficulties explaining their role in the improvement of standards and guidelines of IKCA (Accreditation Council,</p>	<p>The IKCA actively involves external stakeholders in the work on introducing changes and additions to the accreditation standards. We provide evidence of this below:</p> <p>There are minutes of meetings of the Expert Council on Pedagogical Education on work with standards for accreditation of organizations/programs of pedagogical education:</p> <p>Minutes No. 1 of December 25, 2022 of the meeting of the Expert Council on Pedagogical Education of the Non-Profit Institution "Independent Kazakhstani Center of</p>	<p>Minutes of the meeting of the Expert Council No. 1 dated 13/25/2022</p> <p>Minutes of the meeting of the Expert Council No. 2 dated 03.03.2023</p> <p>Minutes of the meeting of the Accreditation Council (March 2024)</p>

	<p>Expert Council) or providing feedback for improvement of IKCA’s processes (Supervisory Board).</p>	<p>Accreditation" with the following agenda:</p> <p>Agendas:</p> <ol style="list-style-type: none"> 1. About the professional standard "Teacher". 2. On the development of standards for accreditation of educational programs in pedagogical education. <p>At this meeting, the members of the Expert Council were presented with the professional standard “Teacher” and were tasked with taking part in the development of the Standard for the accreditation of pedagogical education (institutional and programmatic).</p> <p>At the next meeting No. 2 on March 3, 2023, a discussion of the standards of institutional and program accreditation of pedagogical education developed with the participation of stakeholders took place at a meeting of the Expert Council on Pedagogical Education. Doctor of Pedagogical Sciences, Professor N.A. Zavalko, professor of the Kazakh National Pedagogical University named after Abay, Deputy Chairman of the Accreditation Council, Candidate of Pedagogical Sciences S.I. Ferkho gave her proposals for inclusion in the standards.</p> <p>(Minutes of the meetings of the Expert Council are available).</p> <p>Regarding the participation of the Supervisory Board in the work on accreditation standards, we would like to clarify that the functions of this IKCA body do not include work related to the development of a regulatory framework, including</p>	
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		<p>accreditation standards. Members of the Accreditation Council directly work with accreditation standards, studying self-assessment reports of educational organizations and their programs, reports of external expert groups, making decisions on them, and experiencing in practice how individual criteria of a particular accreditation standard work or do not work. They actively participate in training seminars on IKCA standards and procedures, making individual proposals for updating the Guidelines for organizing and conducting external assessment. For example, in March 2024, a special meeting of the Accreditation Council was held, at which, among other items on the agenda, the issue of a possible update of the IKCA accreditation standards and amendments to the Regulation on the Accreditation Council was considered. (minutes of the meeting are attached)</p>	
23	<p>Page 27-28 of the ENQA commission report:</p> <p>The roles of some of these bodies are clear (Working Group, Appeals and Complaints Commission) but the Accreditation Council, the Supervisory Board members and the members of the Expert Council at times had difficulties expressing their roles in internal processes. For example, they had difficulties explaining their role in the improvement of standards and guidelines of IKCA (Accreditation Council, Expert Council) or providing feedback for improvement of IKCA's processes (Supervisory Board).</p>	<p>Even before the arrival of the ENQA expert group on 01.11.2024, the ongoing work on providing feedback to stakeholders (educational organizations, experts) was formalized in an internal document called "Instructions for Ensuring Interaction with Stakeholders" as a supplement to the Internal Quality Assurance Guidelines. Both the Guidelines and this Instruction describe the procedures for providing feedback, present forms for providing feedback through feedback questionnaires, in an online form through the IKCA website in the "About Us" section, in the "Feedback" heading..</p> <p>The agency's management regularly holds operational</p>	<p>Guideline for internal quality assurance of the Independent Kazakhstan center of accreditation</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Rukovodstvo/Qach/2/rukovvnutrqachen.pdf</p> <p>Instructions for ensuring interaction with stakeholders</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Rukovodstvo/Qach/2/rukovvnutrqachen.pdf</p>

		<p>meetings to discuss current accreditation issues, where feedback is provided to external audit coordinators, employees of the accreditation department, the methodology department, monitoring and quality assurance.</p> <p>Training seminars are systematically held for members of the Accreditation and Expert Councils, external audit experts, and for regional representatives performing the functions of external audit coordinators.</p> <p>The management of the IKCA and the Deputy Director of the IKCA have developed materials for testing IKCA employees, as well as experts, on the subject of knowledge of the content of accreditation standards, the essence and content of the main accreditation procedures.</p> <p>Based on the results of monitoring, the management of the Non-Profit Institution "IKCA" takes preventive and corrective actions, in particular, to update the staff and the database of external audit experts.</p> <p>If low test results are found (less than 50% of the maximum score of 30 units), the question of sending the employee for advanced training ahead of schedule is raised, and experts are invited for additional training in accreditation procedures. If these measures are refused, the question of suspending the employee from work is raised, and the expert is removed from the expert database.</p> <p>The Regulation on the Accreditation Council includes a clause according to which new members of the Council are required to undergo control questionnaire tests after</p>	<p>ovodstvo/InstrVzaimo/InstrVzaimoEn.pdf</p>
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		conducting training seminars on accreditation procedures and internal regulatory documents..	
24	<p>Page 28 of the ENQA commission report:</p> <p>IKCA’s newly adopted policy on internal quality assurance was seen by the panel as a step back in terms of the comprehensiveness and coverage of internal quality assurance processes, compared to the manual available to the panel at the last ENQA review. The content of the new policy has decreased almost threefold, leading to the lack of descriptions of various stakeholders’ role in accreditation processes. This was one of the issues observed also in the past review, so the panel concluded that the same challenges still persist</p>	<p>Immediately after the external audit of the ENQA expert commission, the Expert Council for Higher and Postgraduate Education proposed that the Department of Methodology, Monitoring and Quality Assurance return to the version of the Internal Quality Assurance Guide that was in effect until 2022, which clearly presented the roles of all structural divisions, Councils, and commissions in the internal quality assurance processes during accreditation (Guidelines are attached).</p>	<p>Guideline for internal quality assurance of the Independent Kazakhstan center of accreditation</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Rukovodstvo/Qach/2/rukovvnutrqachen.pdf</p>
25	<p>Page 28 of the ENQA commission report:</p> <p>For example, an excerpt from the document states: “The answer to question 5 was important for the IKCA: ‘Which of the listed principles, in your opinion, are observed in the procedures for external quality assessment of the IKCA? (You can select several answers from the following: Independence, Objectivity, Transparency, Systematicity and Integrity, Non-affiliation, Confidentiality, Compliance with the Expert's Code of Honor, All of the above principles).’ The analysis showed that more than 83% of experts answered that all of the above principles</p>	<p>The example given by the ENQA commission from the feedback analysis clearly demonstrates that the IKCA staff manages to implement the following measures during external assessment when conducting accreditation procedures:</p> <p>the real effect of the listed immutable principles of assessment, quality assurance by all participants in external assessment procedures. Evidence of this belief is that from 2019 to this day there has not been a single complaint about violations of these principles by experts, coordinators, members of the Accreditation Council, employees of the IKCA, accredited educational organizations.</p>	<p>About Us section of the website</p> <p>https://nkca.kz/en/obratnaya-svyaz</p>

	<p>underline the accreditation procedures of the IKCA and are strictly observed.” Therefore, the analysis is limited to stating the result and does not provide separate evaluations of the different aspects of data. Therefore, in panel's view, the principle of conducting an analysis based on feedback results has not been followed by the agency. Furthermore, the panel was unable to ascertain to improvements made within the agency based on the feedback collected from the interviews with IKCA’s executive management and senior management staff</p>	<p>On the IKCA website, in the “About Us” section, there is a “Feedback” tab, which states that any interested person can “... ask a question of interest to you, send comments, remarks or suggestions,” that is, we have given the right to any person to participate in the processes of improving the quality of the IKCA’s activities.</p> <p>An analysis of 50 reviews of the IKCA’s activities during accreditation posted on the IKCA website also shows that there are only positive reviews.</p> <p>During the external visit, the Deputy Director presented a number of improvements in the activities of the IKCA as a result of feedback from participants in the accreditation procedures.</p>	
26	<p>Pages 28-29 of the ENQA commission report:</p> <p>However, in discussions with the coordinators, it became clear that their role was not to provide substantive support to the committees or to ensure continuity in the accreditation process. The expert group believes that in the interests of continuity in the accreditation process, the coordinators should play a much larger, more meaningful role. Given that the number of higher education accreditations has grown significantly in recent years, while the agency’s staff numbers have not increased significantly, the agency should find ways to further support and develop the competencies of its coordinators. This will enable them to play a more meaningful role, advise the IKCA standards and guidelines committees and</p>	<p>For unknown reasons (maybe they didn't understand the questions), regional representatives were unable to fully present their powers during the interview. In fact, they do all the work with educational organizations in their regions to find universities and their educational programs that want to undergo accreditation. During accreditation, they do all the difficult work of coordinators to prepare and conduct an external audit, accurately implement all audit activities, and consult experts on the preparation of EEG reports, without interfering in the process of assigning grades.</p> <p>However, training seminars on all accreditation procedures are regularly held for regional representatives as coordinators of external audits.</p>	<p>Clause 4.3 of the “Guidelines for the organization and conduct of external assessment (audit) within the framework of institutional and specialized accreditation”</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Rukovodstvo/240125/1.pdf</p>

	ensure that there are no conflicts of interest in place.		
27	<p>Based on what the ENQA expert committee writes in its report: “Since the committee bases its assessments on the information available until the end of the assessment visit....., based on the above arguments of the IKCA on each of the comments, which generally indicate the inconsistency of individual comments, the correction of other comments before the completion of the ENQA assessment visit by the committee, the IKCA management requests to revise the assessment for this standard ESG 3.6 INTERNAL QUALITY CONTROL AND PROFESSIONAL CONDUCT, changing it from the assessment “Partially compliant” to the assessment “Compliant”</p>		
	<p>ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE</p>		
28	<p>Page 31 of the ENQA commission report:</p> <p>The listed standards are accompanied by separate guidelines, but the expert group noted a discrepancy between the criteria described in the standards and the corresponding guidelines for both documents.</p>	<p>This remark is unfounded, since the above criteria are presented in exactly the same way in the Standards for the Accreditation of Pedagogical Education Organizations (institutional and specialized) and in the relevant Guidelines.</p> <p>A similar remark on the standards and Guidelines for medical education organizations is also unfounded, since our Accreditation Standards for a medical education organization and the corresponding Guidelines for the content of criteria are completely identical. Perhaps the members of the expert group did not understand our approach to the formation of the Guidelines, where after presenting each criterion of a particular accreditation standard, we provided recommendations on what and how to evaluate according to the criterion of the standard. Only</p>	<p>Standards of institutional accreditation of pedagogical higher education institutions https://nkca.kz/en/standarty</p> <p>Standards for institutional accreditation of medical Organizations of higher and postgraduate education (OHPE) https://nkca.kz/en/standarty</p> <p>Guidelines for the preparation of a self-assessment report within the framework of institutional accreditation of</p>

		<p>due to this, the experts could see the difference in the texts. But this is how it should be, the Guidelines should provide recommendations, comments to help universities and experts write a self-assessment report or a EEG report.</p>	<p>pedagogical higher education institutions</p> <p>https://nkca.kz/storage/app/media/1NKCA/Rukovodstvo/adoki/%D0%98%D0%90%20%D0%9E%D0%92%D0%9F%D0%9E%20%D0%BF%D0%B5%D0%B4%20ENG.pdf</p> <p>Guidelines for the preparation of a self-assessment report within the framework of institutional accreditation of medical education organizations</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Rukovodstvo/IaMed/2/Rukovodstvo/SamoIAMEDen.pdf</p>
29	<p>Page 33 of the ENQA commission report:</p> <p>1. The alignment of the standards for higher education institutions and programmes, as well as the standards for medical educational organizations and medical programmes with the ESG part 1 was reviewed by the panel in the 2022 ENQA’s full-review of IKCA.</p>	<p>1. In 2022, the ENQA expert group made an unfounded conclusion about the inconsistency of the IKCA accreditation standards and the relevant Guidelines. In our opinion, this conclusion was made after comparing the abridged versions of the standards posted on the website with the relevant Guidelines, although we presented the expert commission with full versions of all standards that fully coincided with the Guidelines. The placement of abridged versions of the standards was done based on the experience of the Kazakhstan</p>	<p>Standards for institutional accreditation of medical Organizations of higher and postgraduate education (OHPE)</p> <p>https://nkca.kz/en/standarty</p> <p>Guidelines for the preparation of a self-</p>

	<p>2. Since then, the agency amended the documents for the purpose of alignment between their standards and guidelines</p>	<p>agency IQAA to exclude the possibility of borrowing our Standards by interested competitors.</p> <p>2. Naturally, no special additions were made to the standards; it was simply necessary to post all the full versions of all the standards on the website.</p>	<p>assessment report within the framework of institutional accreditation of medical education organizations</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Rukovodstvo/IaMed/2/RukovodSamoIAMEDen.pdf</p>
30	<p>Page 34 of the ENQA commission report:</p> <p>For example, additional criteria 6.4 Medical research and scientific advances, 6.5 Educational expertise and 6.6 Exchange in education is still present in the guidelines, not mentioned in the standards. Additionally, criterion description 8.3.3. was missing from the guidelines.</p>	<p>A thorough review showed that this remark is unfounded, since the above criteria are presented in exactly the same way in the Standards for the Accreditation of Medical Education Organizations (institutional and specialized) and in the relevant Guidelines.</p>	<p>Standards for institutional accreditation of medical Organizations of higher and postgraduate education (OHPE)</p> <p>https://nkca.kz/en/standarty</p> <p>Guidelines for the preparation of a self-assessment report within the framework of institutional accreditation of medical education organizations</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Rukovodstvo/IaMed/2/RukovodSamoIAMEDen.pdf</p>

31	<p>Page 46 of the ENQA commission report:</p> <p>The titles of standards 2-9 were different in standards, compared to the guidelines. Standard 3 had 12 criteria with no subsections, while in the guidelines, the criteria were only divided into 2 sections with multiple subsections. Same issue was noted for standards 4-9. Additionally, the biggest issue was the lack of correspondence in the content of the criteria between the standards and the guidelines (e.g. 4.1- 4.4; 5.1; 5.2; 6.1-6.6; 7.1-7.4; 8.1-8.5). Additionally, the guidelines contained standard 9. Continuous improvement, which was not present in the standards. The content between the new standards and the existing guidelines corresponds, with slight differences in interpretation due to translation. Criterion 5.2.2. was skipped in both documents, therefore, the content matches, but the numbering should be corrected.</p>	<p>None of these comments are justified, since,</p> <p>First, the titles of Standards 2-9 exactly match the titles in the corresponding Guidelines.</p> <p>Secondly, the above criteria of Standards and Guidelines (4.1-4.4; 5.1; 5.2; 6.1-6.6; 7.1-7.4; 8.1-8.5) are also identical in content.</p> <p>Third, Standard 9: Continuous improvement is found in both the Standards and Guidelines.</p> <p>Fourthly, criterion 5.2.2 is also found in both the Standards and Guidelines.</p>	<p>Standards for institutional accreditation of medical Organizations of higher and postgraduate education (OHPE)</p> <p>https://nkca.kz/en/standarty</p> <p>Guidelines for the preparation of a self-assessment report within the framework of institutional accreditation of medical education organizations</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Rukovodstvo/IaMed/2/RukovodSamoIAMEDen.pdf</p>
<p>Based on what the ENQA expert committee writes in its report: “Since the committee bases its assessments on the information available until the end of the assessment visit.....”, based on the above arguments of the IKCA on each of the comments, generally indicating the inconsistency of individual comments, the correction of other comments before the end of the assessment visit by the ENQA committee, the IKCA management requests to revise the assessment for this standard ESG 2.1 USE OF PROCEDURES FOR EXTERNAL QUALITY ASSURANCE, changing it from the assessment “Partially compliant” to the assessment “Compliant”</p>			
<p>ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE</p>			

32	<p>Page 41 of the ENQA commission report:</p> <p>Only several issues remained concerning institutional assessment of medical institutions. In case of standard 6. Educational resources, criteria 6.4 Medical research and scientific advances; 6.5 Educational expertise, and 6.6 Exchange in education were added to the guidelines, but did not exist in the standards.</p>	<p>This remark is unfounded, since the above criteria are presented in exactly the same way in the Standards for the Accreditation of Medical Education Organizations (institutional and specialized) and in the relevant Guidelines.</p>	<p>Standards for institutional accreditation of medical Organizations of higher and postgraduate education (OHPE)</p> <p>https://nkca.kz/en/standarty</p> <p>Guidelines for the preparation of a self-assessment report within the framework of institutional accreditation of medical education organizations</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Rukovodstvo/IaMed/2/RukovodSamoIAMEDen.pdf</p>
33	<p>Page 41 of the ENQA commission report:</p> <p>The same applies to the standards for programme assessment of pedagogical institutions, related to standards 2 and 5. Under these two standards, there is also a mismatch in the number of criteria. In some cases, for example criteria 6.1 and 6.4 in the guidelines for institutional assessment of pedagogical institutions, no evidence is asked from the HEIs to demonstrate compliance with these criteria</p>	<p>Due to the specific nature of the criteria 6.1 and 6.4 of the standards for institutional accreditation of pedagogical education organizations, it was not necessary to provide documentary evidence; in the column “Evidence that the educational institution meets the criteria of the standard,” an explanation is given of what evidence must be provided according to these criteria!</p>	<p>Page 27-28 GUIDELINES for the preparation of a self-assessment report within the framework of institutional accreditation of higher and postgraduate teacher education organizations</p> <p>https://nkca.kz/storage/app/media/1NKCA/Rukovodstv</p>

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34	<p>Page 42 of the ENQA commission report:</p> <p>Aside from the described clustering practices, the panel found that IKCA sometimes continues to cluster programmes belonging to different study fields, with the production of separate reports. An example of such clustering is the programmatic accreditation at the Institution accredited in November 2023, where the same panel was responsible for the assessment of programmes from different study fields. Those programmes were: ‘Chemistry’, ‘Biology in Education’, ‘Translation studies’, ‘Teacher of chemistry and biology’, ‘Teacher of geography and history’.</p>	<p>This remark is not correct, because These educational programs belong to one area (“Pedagogical Sciences”) of the Classifier of Areas of Personnel Training, that is, in accordance with Instructions for combining educational programs into clusters during specialized (program) accreditation of the IKCA This formation of clusters was correct.</p>	<p>Instructions for combining educational programs into clusters during specialized (program) accreditation of the IKCA</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Instr/InstrClassterEn.pdf</p>
35	<p>Pages 42 of the ENQA commission report:</p> <p>The panel also found that IKCA sometimes combines institutional and programmatic accreditation, for example, in the case of an institution accredited in July 2024. Out of five members of the EEG for institutional accreditation, three simultaneously assessed</p>	<p>This remark of the ENQA commission is incorrect, since in accordance with the order of the IKCA Institutional accreditation was carried out by the IKCA expert group from June 12 to 14, 2024, and program accreditation began on June 13 and ended on June 14. Institutional accreditation was carried out by an expert group consisting of 5 experts: Ermekbaev S.B. - head of the EEG, Madanbekov N.Zh. (Bishkek, Kyrgyz Republic) - international expert,</p>	<p>Scan of the order of the IKCA on conducting an external audit at the Regional Innovation University.</p> <p>Instructions for combining educational programs into</p>

<p>three different programmes (Finance, Economics, Accounting) while two experts assessed five different programmes at the same time (Finance, Economics, Accounting, Management, Customs). Paralelly, during the same site visit, seven experts assessed five different programmes simultaneously (Chemical Engineering, Electroenergetics, Automation and Control, Construction, Oil and Gas Business). The site visit lasted a total of three days, with the interviews conducted mainly during the first day. This means that all programmes were assessed paralelly with the institutional accreditation procedure, in 30-minute interviews, mostly on that first day.</p>	<p>Kylyshbaeva G.B. - national expert, Taldakhmetov B.Sh. - employer expert and Seidaly Nurasyly - student expert. This group worked separately, dealing only with institutional accreditation from June 12 to 14, as required for 3 days.</p> <p>Independently of this group, specialized accreditation was conducted from June 13 to 14 for 13 programs, united in full compliance with the relatedness of the areas of the Classifier of educational programs in three clusters. At the same time, by other experts, not those who were part of the EEG for institutional accreditation. As evidence, we provide the assignment of programs in each cluster:</p> <p>For cluster 1:</p> <p>Sabyrova M.E. - candidate of economic sciences - for programs 6B04106 - Economics and 6B04108 - Accounting and auditing;</p> <p>Mustafayeva B.U. – PhD in Economics – for programs 6B04109 – Finance, 6B04107 – Management;</p> <p>Elikbai Maksat – candidate of legal sciences – for programs 6B04206 – Jurisprudence and 6B04202 – Customs.</p> <p>For the 2nd cluster:</p> <p>Krykbaev M.M. – Candidate of Technical Sciences (in the Department of Automation and Telecommunications) for the program 6B06202 – Radio Engineering, Electronics and Telecommunications;</p> <p>Berkinbaev K.M. – Doctor of Pedagogical Sciences, Professor for the program 6B06154 – Computer</p>	<p>clusters during specialized (program) accreditation of the IKCA</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/InstrClassterEn.pdf</p>
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36	<p>Pages 42-43 of the ENQA commission report:</p> <p>From the evidence provided by the Agency, the introduction of the instruction manual improved the transparency on the involvement of external stakeholders in consultations about changes to the Standards of IKCA. However, the nature of their involvement was not described, and evidences provided in appendices to the self-assessment report demonstrate IKCA formally inviting several stakeholders to provide written feedback on the already adopted accreditation Standards (letters are from January and April 2024, while the Standards were adopted in October 2023).</p> <p>There was no evidence provided that the external stakeholders were invited to actively participate in the amendments to these Standards, or even in the writing process of the development of new accreditation standards in the field of pedagogy.</p>	<p>This conclusion is not substantiated, since there are minutes of the meetings of the Expert Council on Pedagogical Education.</p> <p>Minutes No. 1 of December 25, 2022 of the meeting of the Expert Council on Pedagogical Education of the Non-Profit Institution "Independent Kazakhstani Center of Accreditation" with the following agenda:</p> <p>Agendas:</p> <ol style="list-style-type: none"> 1. About the professional standard "Teacher". 2. On the development of standards for accreditation of educational programs in pedagogical education. <p>At this meeting, the members of the expert council were presented with the professional standard "Teacher" and were tasked with taking part in the development of the Standard for the accreditation of pedagogical education (institutional and programmatic).</p> <p>At the next meeting No. 2 on March 3, 2023, a discussion took place at a meeting of the Expert Council on Pedagogical Education of the standards for institutional and programmatic accreditation of pedagogical education developed with the participation of stakeholders.</p> <p>Thus, external stakeholders were involved in the process</p>	<p>Minutes of the meetings of the Expert Council are available and attached (copies)</p>

		of developing new accreditation standards in the field of pedagogy. The IKCA did not develop any other new standards in the field of higher education during the period 2023-2025.	
37	<p>Pages 43 of the ENQA commission report:</p> <p>The Guidelines for the Organization and Conduct of an External Assessment (Audit) Within the Framework of Institutional and Specialized (Program) Accreditations (clause 4.1) of IKCA state that the members and the chair of the EEG provide feedback on the initial self-assessment report received from the HEI applying to be accredited. Then, IKCA sends the feedback (if necessary) to the HEI, which then has the opportunity to submit the final self-assessment report, taking the feedback into account. The panel asked for further clarifications from IKCA's executive and senior management on this procedure and found out that only two such procedures happened in the past. The panel was also informed that the same panel of experts involved in this procedure is the one later participating in the site visit. This could potentially lead to the conflict of interest, since the self-assessment report gets improved based on the feedback from the EEG, which then performs the final assessment. Additional</p>	<p>In the Guidelines for the organization and conduct of external assessment (audit) within the framework of institutional and specialized (programme) accreditations, updated before the start of the external visit of the ENQA commission, paragraph 4.1 was changed; the function of the initial examination of the self-assessment report, as was done in practice, was assigned to the employees of the methodology, monitoring and quality assurance department (indicated in paragraph 4.4).</p> <p>In the actual practice of the IKCA, since 2022, the initial feedback on the self-assessment report is given by the employees of the methodology, monitoring and quality assurance department. They assess the report's compliance with the requirements of the report template in terms of structure and design, check whether all the criteria of each standard have been assessed by the report authors during the self-assessment, and whether there are mandatory Appendices to the report. If there are any deviations from these requirements, the report is returned for revision. For work (study, preparation of a set of questions for interviews,</p>	<p>Clause 4.4 of the Guidelines for the organization and conduct of external assessment (audit) within the framework of institutional and specialized (program) accreditations</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Rukovodstvo/240125/1.pdf</p>

	<p>clarification was provided by the agency that the Department of methodology, monitoring and quality assurance checks the initial self-assessment report for compliance with the requirements of the report template. However, the panel highlights that this initial check performed by the Department is separate from the abovedescribed procedure on the feedback provision from the EEG.</p>	<p>etc.), the EEG experts receive a revised version of the self-assessment report accepted by the IKCA as the final version no later than a month before the audit visit.</p> <p>The noted practice of remote assessment by experts of the initial version of the self-assessment report was used in the IKCA until 2022, but has not been used since 2022.</p>	
38	<p>Page 43 of the ENQA commission report:</p> <p>In the regulation concerning Supervisory Board of IKCA, the tasks of this body include the ‘development of recommendations and assistance in the priority areas of activities of IKCA’. Similarly, in the regulation concerning the Accreditation Council of IKCA, the ‘objectives of the Accreditation Council are internal and external assistance in creating an effective system for ensuring the quality of education and management systems in the organization of education’. Despite both of these bodies having the potential to participate in developing and reviewing the methodologies of IKCA, the panel found no evidence of such engagement. Additionally, no evidence was collected on the involvement of these two bodies in developing and improving IKCA’s Standards and Guidelines.</p>	<p>Indeed, in accordance with the said Regulation, the Supervisory Board develops recommendations on the priority areas of the IKCA. The IKCA has the minutes of the Supervisory Board meetings of December 25, 2020, April 12, 2022, March 15, 2023, where the Supervisory Board considers and adopts recommendations on partial changes to the IKCA Charter, recommendations on changes to internal documents based on the comments and recommendations of the ENQA external expert commission (based on the results of the first visit of the commission), namely, the Accreditation Standards, the External Audit Guidelines. It was on the recommendation of the Supervisory Board that the document "Policy for identifying and resolving conflicts of interest of the IKCA" was developed and implemented in the work of the IKCA in order to eliminate possible risks in the activities of the IKCA. Unfortunately, the ENQA commission did not request these documents during the audit, otherwise, in our opinion, the ENQA commission would not have had such a comment on the activities of the Supervisory Board.</p>	<p>Copies of the minutes of the meetings of the Supervisory Board and the Accreditation Council are attached.</p>

		<p>Members of the Accreditation Council, by virtue of their appointment, work directly with accreditation standards, studying self-assessment reports of educational organizations and their programs, reports of external expert groups, making decisions on them, experiencing in practice how individual criteria of a particular accreditation standard work or do not work. They actively participate in training seminars on the standards and procedures of the IKCA, making individual proposals for updating the Guide to Organizing and Conducting External Assessment. For example, in March 2024, a special meeting of the Accreditation Council was held, at which, among other issues on the agenda, the issue of a possible update of the IKCA accreditation standards and amendments to the Regulation on the Accreditation Council was considered.</p>	
39	<p>Page 43 of the ENQA commission report:</p> <p>The panel found out, during the site visit, that the standards for the field of pedagogy were used in the accreditation of programmes at one of the universities accredited in December 2023. Due to the issues of alignment of standards with guidelines on programmatic assessment in the field of pedagogy, the panel wanted to check whether the report included the analysis of criteria mentioned in the standards, or those mentioned in the guidelines. However, it was instead established that the report was based on the</p>	<p>The standards for specialized accreditation of pedagogical education programs are not completely new standards. They were developed based on the general standards for specialized accreditation, since the specifics of pedagogical educational programs consist only of minor differences in the content of the programs, where we laid down the requirements for the content based on the professional standard "Teacher". Therefore, in the Accreditation Standards for Pedagogical Programs, there are minimal differences from the general standards only in 3 criteria of standard 2. "Development and approval of educational programs". Therefore, we do not see a serious error in the fact that</p>	<p>Standards for specialized accreditation of pedagogical educational programs</p> <p>https://nkca.kz/en/standarty</p>

	<p>‘Standards for Specialized (Program) Accreditation of Higher Education and Postgraduate Education Based on ESG-2015’. The consistency of reports is described in detail under ESG 2.5 Criteria for outcomes.</p>	<p>accreditation for one pedagogical program indicated in the report was carried out according to general standards. All other pedagogical programs are accredited according to the accreditation standards for pedagogical education.</p>	
40	<p>Pages 44 of the ENQA commission report:</p> <p>However, it remained unclear to the panel whether the students are involved in the other Expert Councils (pertaining to the fields of medicine and pedagogy). In the appendix received by the panel, which contained the minutes of the Expert Council’s meeting, it is not possible to determine whether the teachers and HEI Heads had an active consultatory role on the content of the standards and guidelines, as external stakeholders. From the decisions made, it was apparent that they voted ‘to approve the work of IKCA on updating regulatory documents’, but their level of involvement itself is unknown. IKCA still does not have a policy on consultation developed, and in the interviews with academic staff and the students, they were unaware of the agency’s efforts to consult on the improvements of standards, for example.</p>	<p>In preparation for the external audit, the IKCA drafted an internal document entitled “The procedure for involving experts in the Accreditation Council, the Supervisory Board, the Appeals and Complaints Commission, the Expert Councils, as well as stakeholders for the development and updating of regulatory documents of the Non-Profit Institution "Independent Kazakhstani Center of Accreditation". In Section 3 of this document, entitled "Attracting and selecting stakeholders for the development and updating of regulatory documents of the Non-Profit Institution "IKCA" the actual work carried out is described IKCA on the participation of external stakeholders in the development and updating of the IKCA regulatory framework. In full compliance with this procedureThe IKCA involves teachers and representatives of student youth in the work on updating the content of standards and Guidelines. The ENQA expert commission received feedback on the IKCA documents from the Youth Convention of the Republic of Kazakhstan, the Association of Private Educational Organizations, the Kazakh National Pedagogical University named after Abay, and academics from the IKCA expert base, in which they, having studied</p>	<p>Document "The procedure for involving experts in the Accreditation Council, the Supervisory Board, the Appeals and Complaints Commission, the Expert Councils, as well as stakeholders for the development and updating of regulatory documents of the Non-Profit Institution "Independent Kazakhstani Center of Accreditation"</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Instrukt/PoryadokExpertEn.pdf</p>

		the drafts of updating our documents, gave their opinions on them, their proposals for updating these documents.	
41	<p>Page 44 of the ENQA commission report:</p> <p>The review panel additionally found that the time constraint for performing clustered reviews makes the parallel assessment difficult. It also remains unclear what is the procedure for combining programme assessments with the institutional assessments (as this was not described anywhere in IKCA’s documents). The panel finally concluded that the criteria for clustering of programmes is developed but further clarifications are necessary for clustering according to the study-level or when combining institutional and programme accreditation under one site visit</p>	<p>Clause 3 of the Instructions for combining educational programs into clusters based on the relatedness of training areas does not contradict the inclusion of programs of the same name at different levels (bachelor's, master's and doctoral) in a cluster, which is why the IKCA does this in actual practice.</p> <p>There is no and will not be a unification of institutional accreditation with specialized accreditation in the practice of the IKCA. In the practice of the IKCA, there was a case of parallel implementation with a difference of one day of institutional and specialized accreditation at the Regional Innovation University, while institutional accreditation was carried out by one expert group for 3 days from June 12 to 14, 2024, and specialized accreditation, independently of the first expert group for three clusters, was carried out by completely different experts in 2 days - from June 13 to 14, 2024. Namely: Institutional accreditation was carried out by the IKCA expert group from June 12 to 14, 2024, and program accreditation began on June 13 and ended on June 14. Institutional accreditation was carried out by an expert group consisting of 5 experts: Ermekbaev S.B. - head of the EEG, Madanbekov N.Zh. (Bishkek, Kyrgyz Republic) - international expert, Kylyshbaeva G.B. - national expert, Taldakhmetov B.Sh. - employer expert and Seidaly Nurasyly - student expert. This group worked separately, dealing only</p>	<p>Instructions for combining educational programs into clusters based on relatedness of training areas.</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Instruct/InstrClassterEn.pdf</p> <p>Order on conducting an external audit at the Regional Innovation University</p>

		<p>with institutional accreditation from June 12 to 14, as required for 3 days.</p> <p>Independently of this group, specialized accreditation was conducted from June 13 to 14 for 13 programs, united in full compliance with the relatedness of the areas of the Classifier of educational programs in three clusters. At the same time, by other experts, not those who were part of the EEG for institutional accreditation. As evidence, we provide the assignment of programs in each cluster:</p> <p>For cluster 1:</p> <p>Sabyrova M.E. - candidate of economic sciences - for programs 6B04106 - Economics and 6B04108 - Accounting and auditing;</p> <p>Mustafayeva B.U. – PhD in Economics – for programs 6B04109 – Finance, 6B04107 – Management;</p> <p>Elikbai Maksat – candidate of legal sciences – for programs 6B04206 – Jurisprudence and 6B04202 – Customs.</p> <p>For the 2nd cluster:</p> <p>Krykbaev M.M. – Candidate of Technical Sciences (in the Department of Automation and Telecommunications) for the program 6B06202 – Radio Engineering, Electronics and Telecommunications;</p> <p>Berkinbaev K.M. – Doctor of Pedagogical Sciences, Professor for the program 6B06154 – Computer Engineering and Software.</p>	
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42	<p>Page 44-45 of the ENQA commission report:</p> <p>The panel recommends considering a similar approach for EEG reports prepared for individual curricula. Since there are significant overlaps between reports on curricula within the same field of study, including different levels of the same specialty, we recommend exploring the possibility of addressing curricula of different levels of the same specialty in a single evaluation report (e.g., Sociology BA, Sociology MA, Sociology PhD)</p>	<p>Indeed, in accordance with paragraph 2.3 of the Guidelines for the Organization of External Audit, when preparing a self-assessment report, it is permitted to prepare one self-assessment report for the same-name programs of two levels (bachelor's and master's degrees). A separate self-assessment report is prepared for doctoral programs, since the accreditation standards for doctoral programs differ significantly from the accreditation standards for bachelor's and master's programs.</p> <p>However, when preparing the EEG reports for a more qualitative, objective assessment, maximum consideration of the features of the program content, the resource base, which is significantly different for the master's degree from that needed for the bachelor's degree, a greater focus on deepening the research component, the potential of the teaching staff for the master's degree, the IKCA requires experts to prepare EEG reports separately for each program. Otherwise, in fact, a certain "saving" of effort and resources when preparing a combined EEG report will in fact significantly reduce the quality of the analysis and assessment of the specific features of different levels of the same-name programs identified above. In practice, studying the experience of other agencies, for example, the Independent Agency for Accreditation and Rating (IAAR), the ASIIN agency, using such a practice, we saw serious shortcomings of these combined reports: cumbersomeness (large volume of texts), the presence of repetitions, the lack of the necessary depth of analysis and assessment of</p>	
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		<p>programs of each level according to all criteria of the standards.</p> <p>Therefore, we will continue the practice of writing separate ESG reports for each accredited program, which does not contradict ESG standards.</p>	
43	<p>Page 45 of the ENQA commission report:</p> <p>Based on the past ENQA recommendation, the panel wanted to evaluate whether the Expert Councils participate in the consultation and improvement processes within IKCA. From the interview with the Expert Council members, it was confirmed that they have a role in updating IKCA's standards and guidelines, but even in this case, they could not describe clear procedures to do so. However, the panel noted that the organizational consultants (Convention of Youth of Kazakhstan, Republican association of private educational organizations) were asked to provide their feedback only after the new standards were adopted in late 2023. More specifically, the Convention of Youth of Kazakhstan was contacted via letter (sent by IKCA director) in January 2024, while the Republican association of private educational organizations was contacted in March 2024. Therefore, the stakeholders did not actively participate in the consultation process on the adoption of the standards and guidelines, but were rather requested to provide feedback on</p>	<p>In response to this comment, we inform you that no new standards were adopted in 2023, except for the standards for accreditation of pedagogical educational organizations and their programs. Thus, standards for institutional accreditation of higher and postgraduate education organizations pedagogical education based on ESG-2015, approved by the order of the NKCA No. 25-nk dated 02/23/2023. To develop and approve these standards, interested parties, specialists in pedagogical education were involved, they were reviewed and approved by the Expert Council on Pedagogical Education. We present the evidence once again:</p> <p>Minutes No. 1 of December 25, 2022 of the meeting of the Expert Council on Pedagogical Education of the Non-Profit Institution "Independent Kazakhstani Center of Accreditation" with the following agenda:</p> <p>Agendas:</p> <ol style="list-style-type: none"> 1. About the professional standard "Teacher". 2. On the development of standards for accreditation of educational programs in pedagogical education. <p>At this meeting, the members of the expert council were</p>	2 copies of the Minutes of the meetings of the Expert Council on Pedagogical Education

	<p>the already adopted documents.</p>	<p>presented with the professional standard “Teacher” and were tasked with taking part in the development of the Standard for the accreditation of pedagogical education (institutional and programmatic).</p> <p>At the next meeting No. 2 on March 3, 2023, a discussion took place at a meeting of the Expert Council on Pedagogical Education of the standards for institutional and programmatic accreditation of pedagogical education developed with the participation of stakeholders.</p> <p>All current IKCA Standardswere issued back in 2021, during the preparation for the first external audit of the ENQA commission, and intellectual property certificates were received for them (authors-developers Adilgazinov G.Z., Khalmuratov B.O.).</p> <p>In 2023, during the preparation for the second external audit, all Standards and Guidelines were partially updated and re-approved. These not new, but updated standards received feedback from stakeholders (Conventyouth of Kazakhstan, Republican Association of Private Educational Organizations).</p> <p>We emphasize: the new Accreditation Standards for pedagogical education organizations were developed with the active participation of external stakeholders, as proven above. Also, any new Accreditation Standards will be developed with the participation of external specialists in the field that will be accredited.</p>	
<p>Based on what the ENQA expert committee writes in its report: “Since the committee bases its assessments on information available up to the end of the evaluation visit.....”, based on the above arguments of the IKCA on each</p>			

	<p>of the comments, which generally indicate the invalidity of individual comments, the correction of other comments before the end of the evaluation visit by the ENQA committee, the IKCA management requests revise the ESG 2.2 DEVELOPMENT OF FIT-FOR-PURPOSE METHODOLOGIES committee's assessment from "partially meets" to a higher "meets".</p>		
	<p>ESG 2.5 CRITERIA FOR OUTCOMES</p>		
<p>44</p>	<p>Page 46-47 of the ENQA commission report:</p> <p>The work of EEGs is described in the ‘Guidelines for the Organization and Conduct of an External Assessment (Audit) Within the Framework of Institutional and Specialized (Program) Accreditations, adopted on October 3rd 2023. In guidelines, point 12 states that experts evaluate the fulfillment of criteria on a four-point scale:</p> <ul style="list-style-type: none"> • ‘Strong’- indicates a high level of the indicator according to one criterion, which can serve as an example of positive practice for dissemination among other public organizations; • ‘Satisfactory’ - indicates the average level of the indicator according to one criterion; • ‘Suggests improvement’ - indicates a low level of the indicator according to one criterion; • ‘Unsatisfactory’ - indicates that this criterion of EO and/or EP does not meet the criterion. <p>Moreover, the report template included in the guidelines clearly states that the EEG provides evaluations for each criterion on a four-point scale (page 21): ‘EEG conclusions by criteria</p>	<p>Even during the preparation for the external audit of the ENQA expert commission, IKCA employees made the necessary changes to the Guidelines for the organization and conduct of external audits within the framework of institutional/specialized accreditation of educational organizations/educational programs; the subsection concerning the four-point assessment according to the criteria, which was previously (until 2022) used by experts in their individual records to derive the final assessment for each standard, was excluded. Therefore, in preparation for the second visit of the ENQA commission, changes were made to the assessment tables in individual EEG reports in the reports of external expert groups together with the heads of expert groups, namely, three-level assessments were introduced, according to which the results of accreditation within the framework of both institutional and specialized accreditation have been summed up since 2019.</p>	<p>Guidelines for organizing and conducting external assessment (audit) within the framework of institutional and specialized (program) accreditation</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Rukovodstvo/240125/1.pdf</p>

	<p>(strong/satisfactory/suggest improvement/unsatisfactory).’ In practice, however, most of the reports do not provide evaluations for individual criteria but rather for standards, and they do so, using mainly a three-point scale: complies, complies with comments, does not comply.</p>		
45	<p>Page 47-48 of the ENQA commission report:</p> <p>There are other examples of programme assessment, where two different scales of compliance were used within the text of the report. In the EEG report on ‘Foreign language: two foreign languages’ programme at an institution accredited in June 2024, a three-scale assessment is used with similar meaning ‘Complies; Complies with remarks; Does not comply’. Since the original language of the expert reports is either Kazakh or Russian, it is clear that the variations in the names of the three-point scale arise from the inconsistent use of terminology during translation. Based on the Russian-language reports, it can be stated that the same terms are consistently used for the three-point scale: 'Соответствует - Соответствует с замечаниями - Не соответствует' (Complies; Complies with comments; Does not comply). Therefore, the variations in the names of the three-point scale are due to a translation error. However, it is relevant to note that there were also cases of inconsistent assessment which did not originate from the translation errors. For</p>	<p>The comments in the text of the expert commission's report on the accreditation deadlines for programs 7M01703 - Foreign Language: Two Foreign Languages of the Bolashak Kyzylorda University (June 2024), 8D01540 - Chemistry of the Kuatbekov Peoples' Friendship University (April 2024) concerned the fact that the Accreditation Council, when assessing all the standards as "compliant", made a decision to "accredit for 3 years". We would like to clarify that both of these programs underwent primary accreditation, which was clearly indicated on the title page of the EEG report. According to the rules for making decisions on primary accreditation in effect at that time, when assessing all the standards as "compliant" or when assessing 3 standards as "compliant with comments", the Accreditation Council had to make a decision to "accredit for 3 years", which was done for these two programs.</p> <p>This practice was used by the IKCA earlier, since the initial accreditation is usually carried out by programs that have not yet graduated, new programs for which there is no enrollment yet, but in order to enroll for training under a state educational grant, accreditation is needed, that is, programs for which it is impossible to give a full</p>	<p>EEG report on EP 7M01703 – Foreign language: two foreign languages of Kyzylorda University “Bolashak” (June 2024),</p> <p>https://nkca.kz/storage/app/media/1NKCA/VUZ/2024/KyzylordaBolashak/Otchet/1/7M01703eng.pdf</p> <p>EEG report on OP8D01540 – Chemistry of Peoples’ Friendship University named after Kuatbekov (April 2024)</p> <p>https://nkca.kz/storage/app/media/1NKCA/VUZ/2024/Kuatbekova/%D0%9E%D1%82%D1%87%D0%B5%D1%82/Otchet/8D01540en.pdf</p>

<p>example, if the assessment Соответствует с замечаниями' (eng. 'complies with comments') is included in the evaluation report, but the expert group still had the possibility to recommend the accreditation of the programme for three years (as occurred in the case of the afore referenced curriculum).</p> <p>However, almost no recommendations were provided by the EEG, and the proposal for the Accreditation Council was to accredit the programme for five years. In the report on the programme 'Chemistry' of the institution accredited in April 2024, the scale used by the panel is 'Compliant; Complies with recommendations; Does not match'. However, the report includes the proposal to the Accreditation Council to accredit the programme for three years, even though, in the conclusion part of the report, all standards are marked as 'Compliant' with 'no comments'.</p> <p>This decision could be consistent with IKCA's standards for programme accreditation in higher education, in case of initial programme evaluation. However, all other programmes evaluated at the same HEI during the same period (and with full compliance for all standards), were accredited for five years, with no (known) previous accreditation by IKCA. According to the regulation on the Accreditation Council, in a case of full compliance for any accreditation except the initial one, a five-year accreditation should be granted. The EEG has not justified its</p>	<p>assessment according to all criteria of all standards are accredited. Therefore, in contrast to full accreditation, for initial accreditation, even in the absence of comments on the standards, accreditation was given for a reduced period of 3 years. In accordance with the Regulation on post-accreditation monitoring, after 1.5 years the IKCA could receive a report on the implementation of its recommendations and improvements in the program.</p> <p>However, taking into account the experience of other Kazakhstani agencies, proposals of the members of the IKCA Accreditation Council, recommendations of our colleagues - partners from the QAA agency, during the work of the commission, the department of methodology, monitoring and quality assurance made changes to the relevant documents (Accreditation Standards, Guidelines for organizing and conducting an external visit, Regulations on the Accreditation Council), so that in the case of primary accreditation, if there are assessments for all standards "Complies" or up to 3 standards with the assessment "Complies with comments", accredit the EP for a period of 5 years. With the condition of annually submitting to the IKCA interim reports on the implementation of the IKCA recommendations, on improvements in the program.</p> <p>Likewise, accredit to 3 years in case of primary accreditation, if the decision is "Compliant with comments" for 4 standards;</p> <p>- accredit for 1 year in case of initial accreditation, if the</p>	
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	<p>proposal provided in the report. The Accreditation Council considered the committee's proposal and decided to accredit the study program for three years without providing any justification for its decision.</p>	<p>decision is “Compliant with comments” for 5 or more standards.</p>	
46	<p>Page 48 of the ENQA commission report:</p> <p>In the report on the program ‘Applied computer science in design’ of the institution accredited in June 2024, three standards (2, 3 and 5) were marked as ‘consistent with comments’, however there are no comments (nor recommendations) under standard 3. Student-centered learning, teaching and assessment. In standard 2. Development and approval of an educational program, the EEG provided two recommendations (‘Continue work on annual updating of the educational programme with the publication of all changes made on the university website; Consider opportunity development joint educational programs with universities near and far abroad.’), but no comments (as non-compliance with one or more criteria’). The panel could not find the evidence on the clear differentiation between the ‘recommendations’ and ‘comments’ provided by the EEGs (in the accreditation reports) across IKCA’s documents.</p>	<p>It was a technical error, but it was corrected before the commission arrived.</p>	<p>Report of the EEG on EP 6B06101 - Applied Informatics in Design" of Atyrau University named after Kh. Dosmukhamedov (accreditation in June 2024)</p> <p>https://nkca.kz/storage/app/media/1NKCA/VUZ/2024/AtyrauUniversityDosmykhamedova/Otchet/1/6B01601.en.pdf</p>

47	<p>Page 48 of the ENQA commission report:</p> <p>According to the guidelines for experts, the EEG should form a proposal on accreditation for the Accreditation Council. The proposal was included in some reports (eg. the report on institutional accreditation of the Institution B), but the majority of the reports the review panel studied, did not include any such suggestion.</p>	<p>In all EEG reports for 2023 and the following years, at the end of Chapter 3 - "Conclusion" there are mandatory EEG Recommendations to the Accreditation Council for making a decision based on the results of accreditation. An additional check was carried out by the Department of Methodology, Monitoring and Quality Assurance to eliminate the shortcoming indicated in the remark in individual EEG reports.</p>	
48	<p>Old 49 of the ENQA commission report:</p> <p>The regulations of the Accreditation Council do not provide possibility for exceptions. However, the possibility of making exceptions is outlined, for example, in the standards for institutional accreditation (p 11): ‘In exceptional cases, a decision of the Accreditation Council may determine a different accreditation period’. The general standards for institutional accreditation do not include clarification on exceptional cases. In the ‘Standards for institutional accreditation of organizations of higher and postgraduate pedagogical education based on the ESG-2015’, the Accreditation Council may define a different accreditation period based on specific examples of exceptional cases, listed below:</p> <p>a) Individual points from articles of legislation in the field of education and science.</p> <p>b) Individual paragraphs of the Model Rules for</p>	<p>Regarding the expert commission’s comment on the presence in the standards for accreditation of teacher education programs in the decision-making rules of a clause on making decisions by the Accreditation Council “in exceptional cases,” we note that this does not contradict either the ESG standards or the normative documents of national legislation in education, but is dictated by the actual practice of accreditation, in which situations sometimes arise that cannot be foreseen in even the most sophisticated rules.</p> <p>By the way, in the practice of the Accreditation Council in the period of 2023 and subsequent years, there were no decisions taken in supposedly exceptional cases; the expert commission itself notes that decisions were taken in strict accordance with the terms approved in the Standards, the Regulation on the Accreditation Council, i.e. for 7 years, for 5 years, for 3 years and for 1 year.</p> <p>The remark in paragraph 11 on the adoption of other</p>	<p>Standards of institutional accreditation of pedagogical higher education institutions</p> <p>https://nkca.kz/en/standarty</p>

	<p>the activities of educational organizations of the relevant type.</p> <p>c) Certain provisions of the State Educational Standard.</p> <p>d) Individual points of qualification requirements for licensing educational activities.</p> <p>e) Individual paragraphs of orders of the authorized body for core activities.</p> <p>f) Numerous violations of the Standard of Academic Integrity by teaching staff, employees or students.</p>	<p>accreditation periods in exceptional cases has been excluded from the Standard for Institutional Accreditation of Pedagogical Higher Professional Education Institutions; there has never been such a clause in other standards.</p> <p>In this regard, we believe that this remark is unfounded.</p>	
49	<p>Page 49 of the ENQA commission report:</p> <p>The Accreditation Council's decisions are published on the agency's website in the format of a letter sent to the higher education institution. The letter includes the name of the institution, the type(s) of accreditation, and a list of accredited curricula. The list is structured based on the accreditation periods of the curricula. The letters do not contain justifications for the accreditation decisions but only refer to the obligation to submit an "action plan" by a specified deadline and to undergo "post-accreditation."</p>	<p>The criteria for making decisions on accreditation by the Accreditation Council are contained in Section 6 - "Decision-making by the Accreditation Council" of the Standards of Institutional and Specialized Accreditation. These standards are sent to universities in advance for writing self-assessment reports, while paying attention to these decision-making criteria. That is, universities know about these decision-making criteria in advance. Along with letters on the decisions made by the Accreditation Council on accreditation, the universities are sent reports of the EEG, discussed by the members of the Accreditation Council, with an approved assessment table for accreditation standards, which is the basis for making the decision on accreditation. These EEG reports with comments (if any) and recommendations are posted on the IKCA website. Therefore, the IKCA does not send special justifications for accreditation decisions to universities.</p> <p>In the event that a university files an application expressing disagreement with the decision taken by the Accreditation Council, the IKCA sends a detailed</p>	<p>IKCA Accreditation Standards</p> <p>https://nkca.kz/en/standarty</p>

		justification for the decision to the appeals committee.	
50	<p>Page 50 of the ENQA commission report:</p> <p>Therefore, it can be concluded that the key to ensuring consistency in accreditation decisions lies in the hands of the EEGs. However, the panel identified a significant mismatch between the guidelines for EEGs and their practical implementation in reports (as shown in the part of evidence), indicating that the use of this key is at times random or even arbitrary. This finding is consistent with the 2022 ENQA full review of IKCA. An application of different or multiple scales of compliance within and across the reports, the occasional absence of accreditation proposals by the EEG to the Accreditation Council, insufficient or missing analysis in several cases, instances of word-for-word copied text in the reports (from the standards), and confusion surrounding terminology (e.g., ‘comments’ and ‘recommendations’) are of particular concern. Especially concerning is the fact that ‘comments’, which were supposed to indicate non-compliance with a criterion, lacked references to the relevant criterion and did not include justification for such decisions.</p>	<p>Even before the ENQA expert commission began its work, the IKCA carried out operational work to check and partially correct the EEG reports for 2023 and 2024, with the involvement of the heads of the expert groups who prepared these reports for consideration at the meetings of the IKCA Accreditation Council. Here we relied on what the expert commission wrote in its report: “Since the commission bases its assessments on information available until the end of the assessment visit.....”</p> <p>Based on the same position of the expert commission, already during the assessment visit we made a number of changes and additions to our internal documents in order to achieve the “consistency” mentioned by the expert commission between the Accreditation Standards, Guidelines and actions taken on their basis.</p> <p>To do this:</p> <p>2.1 The Guidelines for the Organization and Conduct of External Evaluation exclude four levels of evaluation based on the criteria of the standards that are not used in the work of experts: “Strong”, “Satisfactory”, “Suggests improvement”, “Unsatisfactory”.</p> <p>All documents regulating accreditation procedures (Standards, Guidelines for the Organization and Conduct of External Assessment, Regulations on the Accreditation Council, etc.) place a clear emphasis on a three-level</p>	<p>Guidelines for organizing and conducting external assessment (audit) within the framework of institutional and specialized (program) accreditation</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Rukovodstvo/240125/1.pdf</p>

		assessment of the criteria of the standards: “Complies”, “Complies with comments” and “Does not comply”.	
51	<p>Page 50 of the ENQA commission report:</p> <p>The panel received many examples of training materials, and deemed them very useful for the experts, as the training encompasses the introduction to the ESGs and to IKCA’s structure and standards. The training materials are undoubtedly relevant, guiding experts to analyze the fulfillment of criteria and justify their assessment. Unfortunately, these principles have not been consistently implemented in all reports. As already mentioned under ESG standard 3.6, the agency must carefully consider and implement quality assurance mechanisms for EEG reports to assure the consistency of outcomes. The panel found the use of terms ‘recommendations’ and ‘comments’ confusing, as their purpose and distinction between each other was not clear in the reports. During the interview, members of the Accreditation Council mentioned that, according to them, comments are mandatory improvement requirements, while the recommendations are suggestions. However, the panel found out from IKCA’s senior management team, that in the post-accreditation monitoring procedure, the Department of methodology, monitoring and quality assurance checks institutions’ improvements performed based on both the comments and recommendations to determine compliance. The</p>	<p>The audit program did not include a separate panel interview with a sufficient number of experts from the IKCA database, other than the student experts and two international experts, so the remark that none of the experts could distinguish between the terms “comment” and “recommendation” is unfounded. (See Audit Program).</p> <p>The IKCA management, the department of methodology, monitoring and quality assurance conducted training seminars for all categories of participants in the accreditation procedures: members of all Councils (Supervisory, Accreditation, Expert Councils, Appeals and Complaints Commission), IKCA employees, regional offices, experts from the IKCA database and new experts on additional clarification of the essence of the criteria of all accreditation standards, standards and guidelines for quality assurance of higher education in the EHEA (ESG), the procedure for preparing self-assessment reports, external visit (audit) procedures, the structure of the EEG report, the essence of the concepts of "Remark" and "Recommendation" in assessing standards, templates for writing EEG reports were presented.</p> <p>The essence and difference between the concepts of “comment” and “recommendation” are further explained in the Guide to Organizing External Audit.</p> <p>At each training seminar before the experts go on an external audit, at the first meeting with the experts before the immediate start of the audit, the experts’ attention is focused</p>	<p>External Audit Programme of the ENQA Expert Committee</p> <p>Item 12.2 on page 12 of the Guidelines for the Organization and Conduct of External Assessment (Audit) within the Framework of Institutional and Specialized (Programme) Accreditation</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Rukovodstvo/240125/1.pdf</p>

	<p>panel found particularly concerning that none of the experts, excluding the international experts, were able to distinguish between the terms ‘recommendations’ and ‘comments’.</p>	<p>on the essence of the concepts “comment” and “recommendation”.</p>	
52	<p>Page 50 of the ENQA commission report:</p> <p>The panel also noted that, at times, the text from the criteria of the IKCA standards is identical to the one in the EEG reports. One such example is the text of criterion 1.11, from the ‘Standards for specialized (program) accreditation of higher education and postgraduate education based on ESG-2015’, which is identical to the wording under 1.11 in the EEG’s report on the accreditation of the programme ‘International relations in the context of globalization’ at one of the accredited institutions. Another example of a similar approach is present in the report on programme “Computer Science” of an institution accredited in October 2023, where some of the criteria in almost all standards are repeating the wording of the criteria set in the standards for programme accreditation. There are more cases of word-for-word matches (see also examples provided under ESG 2.1) in other reports, leading to the lack of EEG’s addressing the criteria in an analytical and evidence-based way. Moreover, the fact that several criteria in many reports have essentially been left unassessed undermines the credibility and transparency of the accreditation process and ultimately leads to ‘inconsistency of outcomes’.</p>	<p>During the preparation for the external audit of the ENQA commission and after the audit, all reports were checked for the quality of the analysis and assessment according to all criteria of all accreditation standards. Corrections were made with the participation of the heads of the EEG to the reports noted in the report of the ENQA expert commission.</p> <p>Currently, when receiving EEG reports before sending them to members of the Accreditation Council, the employees of the Department of Methodology, Monitoring and Quality Assurance, in accordance with a specially prepared memo, check all EEG reports in detail: whether there is an analysis and assessment for all criteria of each standard, whether the analysis and assessment correspond to the topic of the criterion, how original are the EEG reports for different programs, etc.</p>	<p>Report of the EEG on EP 6B03101 - International Relations in the Context of Globalization (Abai Kazakh National Pedagogical University)</p> <p>May 2023</p> <p>https://nkca.kz/storage/app/media/1NKCA/VUZ/2023/AbayUniver/en/1/6%D0%9203101en.pdf</p> <p>EEG report on EP 6B06106 - Computer Science (Central Asian Innovation University)</p> <p>October 2023</p> <p>https://nkca.kz/storage/app/media/1NKCA/VUZ/2023/CentrAsiaUniver/6%D0%9206106en.pdf</p>

53	<p>Page 51 of the ENQA commission report:</p> <p>If a decision is made, by the Accreditation Council, to accredit HEIs for seven years, examples of broadcasting best practices should be provided, according to IKCA's standards. However, the panel was unable to find any examples of those best practices in cases of seven-year accreditation. Some examples of the decisions missing this information include the ones on the accreditation of programmes at an institution accredited in December 2023, and at the institution accredited in April 2024. The panel wishes to highlight that some good practices identified during the programmatic or institutional accreditation by the EEG are mentioned in the EEG reports.</p>	<p>In all reports on programs accredited for 7 years at the Kazakh National Pedagogical University named after Abai (December 2023) (5 EP) and at Kokshetau University named after Abai Myrzakhmetov (6 EP) (April 2024), for each standard there is a section "Good Practice", which indicates examples of best practice, and for KazNPU named after Abai, these best practices are indicated again in Chapter 3. Conclusion. Therefore, this serious remark on making decisions on accreditation for 7 years in the absence of best practices is incorrect!</p> <p>The IKCA has developed a Methodological Instruction for experts, explaining the criteria for identifying Advanced Pedagogical Experience.</p>	<p>EEG reports on 5 EP of the Kazakh National Pedagogical University named after Abai (December 2023)</p> <p>https://nkca.kz/storage/app/media/1NKCA/VUZ/2023/Abay/reshEN.pdf ,</p> <p>https://nkca.kz/storage/app/media/1NKCA/VUZ2NEW/AbayUniversity2023/6%D0%9202118en.pdf</p> <p>HSE reports on 6 EP of Kokshetau University named after Abay Myrzakhmetov (April 2024)</p> <p>https://nkca.kz/storage/app/media/1NKCA/VUZ/2024/AbayMyrzakhmetovKokshetauUniversity/Resheniye/reshEN%20abaiM.pdf</p> <p>https://nkca.kz/storage/app/media/1NKCA/VUZ/2024/AbayMyrzakhmetovKokshetauUniversity/Resheniye/reshEN%20abaiM.pdf</p>

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	<p>Based on what the ENQA expert committee writes in its report: “Since the committee bases its assessments on information available by the end of the assessment visit...”, based on the above arguments of the IKCA for each of the comments, which generally indicate the invalidity of individual comments, taking into account the work carried out by the IKCA during the external audit of the ENQA committee to correct individual reports, individual internal documents of the IKCA by the end of the visit, we ask to change the assessment according to the ESG 2.5 CRITERIA FOR OUTCOMES standard from the assessment of “not compliant” to the assessment of “partial compliance”</p>		