

Decision regarding Yerevan Haybusak University Institutional Accreditation

22.11.2019

The Quality Assessment Council of Higher Education of the Estonian Quality Agency for Higher and Vocational Education decided to accredit Yerevan Haybusak University for three years with secondary condition

On the basis of clause 38 (3) of the Higher Education Act, point 3.7.3 of the Statutes of the Estonian Quality Agency for Higher and Vocational Education (hereinafter referred to as 'EKKA') and the points 43.5 and 43.7 of the document 'Guide to Institutional Accreditation' authorised in point 3.7.1 of the above-mentioned EKKA Statutes; the EKKA Quality Assessment Council for Higher Education (hereinafter referred to as 'the Council') affirms the following:

1. On 20.09.2018 Yerevan Haybusak University (hereinafter referred to as 'YHU'): and EKKA agreed upon a time frame to conduct institutional accreditation
2. In accordance with point 8 of the document 'Guide to Institutional Accreditation', the following study programmes were assessed during the institutional accreditation:

Law (Bachelor)

Management (Master)

General Medicine (M.D.)

3. The Director of EKKA, on 27.08.2019 by her order no 1-19/70/2019, approved the following membership of the committee for the institutional accreditation of the Yerevan Haybusak University (hereinafter referred to as 'the Committee'):

Helen Thomas (chair)

Freelance Education Consultant, the UK

Tanel Kerikmäe

Director of the Tallinn Law School,



	Tallinn University of Technology Economics, Estonia
Mark Frederiks	NVAO, International Policy coordinator, the Netherlands
Jacques Lanares	University of Lausanne, Vice Rector, Switzerland
Andrea Olschewski	Professor of Anaesthesiology at the Medical University of Graz, Austria. Former Dean for Doctoral Studies, Medical University of Graz. Former Director, Ludwig-Boltzmann Institute for Lung Vascular Research, Austria
Arus Harutyunyan	Armenian State University of Economics, MA student, Armenia
Davit Ghazaryan	Assistant Professor in YSMU Pathophysiology Department Head of the Practice department of Yerevan State Medical University, Armenia

4. YHU submitted a self-evaluation report to the EKKA Bureau on 10.07.2019 and the assessment coordinator forwarded it to the Committee on 11.07.2019
5. An assessment visit was made to YHU during 10.-13.09.2019.
6. The Committee sent its draft assessment report to the EKKA Bureau on 22.10.2019, EKKA forwarded it to the YHU for its comments on 22.10.2019 and YHU delivered its response on 4.11.2019.
7. The Committee submitted its final assessment report to the EKKA Bureau on 11.11.2019. That assessment report is an integral part of the decision, and is available on the EKKA website.
8. The Secretary of the Council forwarded the Committee's final assessment report along with the YHU self-evaluation report to the Council members on 11.11.2019
9. The Committee presented the following assessments of the standards:

Standard	Assessment
Strategic management	Does not conform to requirements
Resources	Partially conforms to requirements
Quality Culture	Partially conforms to requirements
Academic Ethics	Partially conforms to requirements
Internationalisation	Partially conforms to requirements
Teaching Staff	Partially conforms to requirements
Study Programme	Partially conforms to requirements

Learning and Teaching	Partially conforms to requirements
Student Assessment	Partially conforms to requirements
Learning Support Systems	Partially conforms to requirements
Research, Development and/or other Creative Activity	Does not conform to requirements
Service to Society	Partially conforms to requirements

10. The Council with 9 members present discussed these received documents in its session on 22.11.2019 and, based on the assessment report, decided to point out the following strengths, areas for improvement, and recommendations regarding the YHU.

10.1. STRATEGIC MANAGEMENT

Areas of improvement and recommendations

- 1) The SP (strategic plan) has 11 objectives; four of these link to resources, three to internal and external communication, two to teaching and one to research. Each objective has a number of indicators; however, the panel could find no evidence of targets for these either in documentation or from discussions with senior staff and management. YHU should elaborate fully developed strategic plans, which are based on an in-depth and evidence based analysis, which include specific targets to ensure that priorities are clearly identified and that goals are measurable. This will enable their achievement to be clearly demonstrated.
- 2) The SP's focus is at the institutional level; the panel did not see any strategic plans elaborated for key areas of activity, including research, internationalisation, learning and teaching, resources and service to society. The absence of focussed strategic plans for the core areas of research; teaching and learning, internationalisation, and service to society is a significant weakness in the strategic management of YHU. The panel found that the absence of these impacted on the related standards where there was insufficient development of a strategic approach which resulted in weaknesses across each of these areas. YHU should develop strategic plans for each of its core areas that align with and feed into the main goals of the University.
- 3) The panel concluded from their analysis of interviews and from their scrutiny of the roles of the vice-rectors and of other members of the leadership within YHU that the strategic planning and development process would benefit from consistency of understanding across the University and from more academic leadership at central and faculty level. This would be supported by a review of the decision-making structure. It would also be supported by reviewing and revising the roles of the vice-rectors, which, according to the job descriptions, particularly that of the Vice Rector

Educational Affairs, have more of a co-ordinating and administrative function than a strategic and leadership role. YHU should provide staff development for strategic planning to ensure that those engaged in the process have the appropriate competencies and skills.

- 4) The mid- and short-term action plans outline activities, those involved and deadlines. It was not clear to the panel who held the lead responsibility for overseeing the meeting of each specific activity. The panel could not find any evidence of more detailed action plans such as the identification of resources of time, money and staff needed to meet the objectives. YHU should develop more detailed action plans to ensure that resources (human, financial, time, infrastructure) are available to reach the targets set within the given deadline and to ensure that an individual is identified who holds responsibility for each objective.

Suggestions for further development

- 1) YHU is recommended to prepare an organogram that clearly outlines the structure of the university, decision making bodies and reporting lines so that it is clear to all stakeholders.

10.2. RESOURCES

Strengths

- 1) The new building on the Abelyan Campus which provides up-to-date facilities for practical work in the field of medicine.
- 2) The effective collaborations which YHU has established with several clinics for teaching practical skills to medical students and the provision of the legal clinic.

Areas of improvement and recommendations

- 1) YHU provides a range of professional development activities for academic staff. However, it was not clear to the panel what systems were in place to ensure systematic identification of the needs and aspirations of academic staff and how these were met. A scheme for rating staff has been introduced. However, evidence as to how far this had developed was not consistent; some staff understood the scheme was still being developed. YHU should further systematise staff development processes to ensure that activities support the development of new knowledge, skills and behaviours.
- 2) YHU should further improve the transparency and understanding of the principles of employees' remuneration. The panel did not have sufficient evidence to demonstrate that rating is linked to remuneration. Performance criteria for staff should include both international and research activity and these criteria should be taken into account when filling a vacant position.
- 3) The library is limited in size and holds a number of multiple copies of core texts. At the time of the panel's visit, YHU had started to invest in electronic library resources. Availability was still in the very early stages and did not provide sufficient access to state-of-the-art e-textbooks or dedicated software programmes, particularly in English. YHU should focus investment in the library to extend the digital resources to enable staff to exploit e-learning opportunities for the benefit of students' learning.

- 4) Increase the budget dedicated for research at YHU and establish formal collaborations with research institution in Armenia in order increase research outcome and thus, visibility.

Suggestions for further development

- 1) It is recommended that YHU review the resources for the law programme to ensure that the resources and that the learning environment meet the needs of contemporary legal education.

10.3. QUALITY CULTURE

Strengths

- 1) The further development of the quality infrastructure, including the growth of the Education Quality Assurance Unit (EQA) and the establishment of a quality role in each faculty and administrative unit.
- 2) The production of the Education Quality Assurance Manual.
- 3) The involvement of external experts in the review and approval of study programmes and the documentation supporting their appointment and the remit of their roles.

Areas of improvement and recommendations

- 1) It is not clear how the objectives of the EQA relate to the objectives of the SP, nor is it clear how these are monitored. The panel learned that although there are short- and mid-term plans for EQA, at the time of the visit no reports had been submitted on progress. In addition, objectives are not formulated in a way that enables progress on them to be clearly tracked nor the meeting of them to be objectively demonstrated. YHU needs to ensure that the EQA leads the way within the University in the review of its structure, its effectiveness and progress made towards the achievement of objectives.
- 2) YHU should ensure that the distribution and analysis of questionnaires to stakeholder groups is consistent and rigorous. At the time of the visit a number of surveys and questionnaires had been developed and distributed to a range of stakeholders. From discussions with a range of stakeholders, including external stakeholders, it was clear that distribution was limited and not consistent and that the number of returns was low. The reports on the analysis of the surveys are somewhat simplistic and it was not possible for the panel to ascertain how these had impacted on the provision.
- 3) The panel did not see any evidence that feedback is given to the stakeholder groups on the outcomes of the survey and actions taken in the light of the survey; in other words, there is no closing of the feedback loop. YHU should develop a process for closing the feedback loop to ensure that stakeholders are aware of actions taken in response to their feedback.
- 4) YHU should update the Education Quality Assurance Manual (EQAM) to ensure that it reflects accurately the structure and processes that are current in the University so that all stakeholders are clear about these.
- 5) EQA responsibilities include the process of programme development and review. The EQAM outlines the process of programme review in some detail. However, the panel did not see formalised evidence of how these reviews

had been carried out and reported; nor was it clear which study programmes have been subject to the described review process. YHU must ensure that the processes are applied and that these are fully documented to ensure that the reviews serve the aims of programme enhancement.

10.4. ACADEMIC ETHICS

Areas of improvement and recommendations

- 1) The Council of Europe recommends that ethical rules should be accompanied by policies, procedures, and regulations that are necessary to ensure the effective implementation of the ethical rules. The panel could find no evidence to demonstrate that appropriate policies and procedures are in place at YHU to ensure the implementation of the ethical rules. YHU should develop appropriate and relevant policies to ensure the implementation of the ethical rules relating to whistle-blowing, anti-corruption and bribery, non-discrimination and anti-harassment, plagiarism and research integrity.
- 2) The panel noted that deans are Ethics Committee (EC) members, although this may hinder full participation of teaching staff and student members in the EC's deliberations and decision-making. As the EC advises senior management, potential conflicts of interest would be better avoided if senior management members were not members of the EC. It is recommended that YHU reconsiders the membership of the Ethics Committee to ensure that it has representation from teaching staff and students. YHU should adopt a conflict of interests' procedure for the Ethics Committee to ensure fair treatment of the issues raised.
- 3) EC meets ad-hoc, whenever there is a complaint, and has dealt with only one case. Currently, complaints concerning ethical issues have to be submitted to the Rector before it can be discussed by the EC. This poses an unnecessary barrier to the filing of complaints. YHU is recommended to review the operating of the Ethics Committee so that it meets more regularly, is transparent about the outcomes of meetings and enables complaints to be filed directly to the Committee.
- 4) The panel learned from discussions with academic staff that plagiarism is a major problem in Armenian higher education. Despite the recognition of the size of the problem, YHU has no system in place, such as detection software, for detecting academic fraud or plagiarism. Academic staff acknowledged that plagiarism could occur but could offer no solutions to dealing with the problem. YHU is encouraged to consider whether a course on ethics could become a mandatory part of the curriculum for students and, introduce a class for teaching staff to discuss ethical issues, to work towards the aim of eliminating academic plagiarism.

Suggestions for further development

- 1) Ten cases of academic dishonesty have been registered since 2016. In discussions neither students nor staff had any awareness of these cases. YHU is encouraged to hold classes on academic (dis)honesty for all faculties

of the University; to broaden the perspective of the class to cover all aspects of the Rules of Ethics.

10.5. INTERNATIONALISATION

Strengths

- 1) The success in growing the international student numbers.
- 2) The pro-active way in which staff meet the needs of international students.

Areas of improvement and recommendations

- 1) YHU adopted an “Internationalization Policy and Strategy” for 2016-2020. The strategy document comprises a vision, principles, goals and ways to achieve the goals. However, all these elements are formulated in a general way. These general formulations do not enable attainment of the goals to be measured. The relationship between the goals and the ways to achieve the goals is not explained, and the ways to achieve goals are often formulated as additional goals. YHU should develop a coherent internationalisation policy with clear and measurable objectives and an associated and realistic action plan.
- 2) YHU should ensure that the policy includes objectives relating to the international mobility of students and staff and the impact of these on the quality of education. The policy should also include objectives for international partnerships, language proficiency and intercultural awareness and competences.
- 3) Policy objectives and related objectives should be monitored and evaluated and resulting improvements should formally be recorded.
- 4) YHU is recommended to identify opportunities for mobility, especially international mobility for students.

Suggestions for further development

- 1) The panel recommends YHU consider making language courses obligatory so that all those who teach or aspire to teach in English, have an appropriate level of competence in English.
- 2) The panel saw no evidence of any policies or strategies aimed at developing the intercultural competences of students and staff at YHU; nor did the panel see evidence of any courses for students and staff to increase intercultural awareness and competences. YHU should also consider developing a course on intercultural awareness for those staff to support effective teaching in an international, multicultural setting.
- 3) The panel recommends that YHU take steps to facilitate the integration of the international medical students into the wider YHU community. YHU might also like to consider the possibilities for an international classroom where Armenian and international students sit together and learn from each other.
- 4) YHU has a small department of International Relations which is primarily focused on international partnerships and policy, rather than supporting

international students. The panel recommends YHU to extend the functions of the Department of International Relations into an international office that gives continuous support to international students and staff, and everyone participating (or wanting to participate) in international mobility.

10.6. TEACHING STAFF

Strengths

- 1) The high level of student satisfaction with the skills and experience of the teaching staff.
- 2) The strategic move to recruit and support doctoral students to develop the research base of the University.
- 3) The commitment and enthusiasm of staff.

Areas of improvement and recommendations

- 1) In discussions with staff the panel found inconsistent views on the implementation of the teaching staff rating regulation: some staff reported that they understood a system was being developed but had not participated in the process; others indicated that the process was inconsistently implemented. YHU must implement the rating system and review its effectiveness to ensure that it supports the development of staff in a transparent and consistent way.
- 2) The panel did not see any evidence specifying the qualifications or credentials expected for international or visiting teaching staff. YHU is encouraged to make the criteria for the appointment of international and visiting staff explicit and consistent with the relevant regulation on the appointment of teaching staff.
- 3) YHU should invest in staff development related, in particular, to the development of an understanding and implementation of student-centred learning; to the use of digital technologies, and to the development of interdisciplinary and multicultural co-operation.

Suggestions for further development

- 1) YHU is encouraged to continue the practice of recruiting doctoral students to serve the long-term teaching and research goals of the University.
- 2) It is recommended that the Faculty of Law develops a sustainability plan for the development of the body of teaching staff which should include places of doctoral students. The Faculty of Law is encouraged to develop a policy to improve the digital skills of staff.

10.7. STUDY PROGRAMME

Strengths

- 1) There are clearly documented processes for the development and review of study programmes which include clear guidance on the inclusion of external experts.
- 2) Student workloads are realistic and enable the achievement of the programme aims.

Areas of improvement and recommendations

- 1) It was not always clear how feedback from stakeholders had been elicited and how systematic the process had been. External stakeholders met by the panel could provide instances of feedback given, the need, for example, to develop the IT skills of students so that they were readier for employment on graduation. How and whether this feedback had been responded to was not clear. None of the stakeholders met by the panel had received a survey where feedback on the content of study programmes had been requested. YHU should ensure that feedback from stakeholders, both internal and external, is systematically collected, analysed and reviewed so that changes made are transparent and visible to all stakeholders.
- 2) The range of elective courses varies between subject areas. In some areas, the masters in management, for example, students felt that they were able to tailor their programme to reflect their own interests. In other areas, law for example, elective programmes are limited. YHU should ensure that study programmes offer an appropriate and relevant range of electives to meet the external labour market needs.
- 3) The panel found some variation in the articulation and focus of learning outcomes between subject areas. For example, learning outcomes in medicine are clearly defined and appropriate. In other areas, including the law degree and the masters in management, the panel found that learning outcomes were not sufficiently focussed, that they were described in terms of process rather than outcome and that the skills element of the programme were not adequately addressed. YHU should ensure that learning outcomes in all courses are focussed, specific and include outcomes related to skills.
- 4) YHU should ensure that programme review is carried out regularly and systematically and fully documented with the outcomes communicated to stakeholders.
- 5) YHU should monitor the progress and career paths of alumni and use the outcomes of the monitoring to develop the study programme.
- 6) A key feature of higher education programmes is that curricula should be research informed. Guidance on programme development does not include this important criterion. There is no evidence of a systematic approach to ensure that programmes do reflect relevant aspects of current research in the curriculum. YHU should ensure that current research systematically informs the development of study programmes.

Suggestions for further development

- 1) It is recommended that the Faculty of Medicine foster the further development of the skills-simulation centre for the benefit of the medical curriculum.
- 2) YHU is recommended to broaden the scope of the curriculum of Law, by including comparative legal studies and the challenges facing lawyers, related to globalisation and digitalisation for example, to ensure that the programme is competitive and outward looking. The programme would benefit from a review of courses to ensure that content is appropriate and that the title of the courses reflect the content.

10.8. LEARNING AND TEACHING

Strengths

- 1) The care taken in the interviewing of student to provide a sound basis for the formation of the student body.
- 2) The inclusion of a placement in all study programmes which supports students' individual needs and develops their employment related skills.

Areas of improvement and recommendations

- 1) YHU is encouraged to ensure that admissions criteria and the processes of applying them are consistent, clear and transparent across all faculties and for all stakeholders.
- 2) The Educational Methodical Division (EMD) outlined to the panel a rather simplistic definition of a student-centred approach which cited the need for maximum involvement of students, to put the students at the centre and to use interactive methods. Teaching staff were also able to articulate this same rather simplistic definition. The panel did not hear any evidence of how learning outcomes or assessment practices had been changed in the light of adopting a student-centred approach. YHU must ensure that there is a deep and shared understanding of student-centred learning across the faculties.
- 3) Overall the panel considered that the understanding of a student-centred approach to learning and teaching is still rather limited within YHU and that there is still some way to go towards the achievement of the aspirational objective "to totally enroot" student centred learning. YHU should invest in staff development to support the implementation of the student-centred approach and provide structured opportunities for the sharing of practice across the University.
- 4) Evidence from discussion and viewing resources showed a very limited understanding of how digital technologies can be used to enhance learning and teaching and, in particular, to support student-centred learning. The panel concluded that the use of digital approaches to learning and teaching and the resources to support them are still very rudimentary at YHU. YHU should develop an institutional understanding of the use of digital technologies to support learning and teaching and resource the development of them.

10.9. STUDENT ASSESSMENT

Strengths

- 1) Students reported that they received helpful feedback from staff on their assessments. Feedback could be written or oral. Students were very appreciative of the availability and readiness of teaching staff to provide feedback on their assessments.
- 2) Teaching and administrative staff provide students with information on the procedural and administrative aspects of grade accumulation and how the

final grade is calculated. Students were confident that they knew about grade accumulation.

Areas of improvement and recommendations

- 1) The 2016 regulation includes YHU's assessment principles which are transparency, compliance and assurance of feedback. It is notable that the principles do not include that of objectivity. YHU should consider adding objectivity as a principle for assessment.
- 2) The 2016 Regulation does not clarify how assessment criteria should be linked to the specific learning outcomes of a course or programme. Scrutiny of the study programme documents did not provide evidence for the alignment of course specific learning outcomes with assessment criteria. Discussions with staff and students provided no evidence of awareness of a direct link between assessment criteria and specific learning outcomes nor the necessity for such. Moreover, discussions with students showed that they were not always aware of learning outcomes as the basis for assessment. YHU should ensure that there is clear alignment of assessment criteria to the specific learning outcomes so that students know what learning outcomes they are being assessed on.
- 3) The *basic provisions* of the 2016 Regulation state that the University operates a multifactor system of regular checking and assessment of students' learning outcomes one goal of which is "to improve class attendances". The Assessment Methodology section of the Regulation outlines a number of components, the first of which is "assessment of students' participation during classes with the help of calculation of class attendances". This component of assessment is allocated 10 grade points, i.e. 10% of the marks, and these grade points are awarded depending on the % level of participation. This represents a significant weakness in the YHU's approach to assessment. YHU should review the award of grade points for attendance and participation.
- 4) The panel explored the process for appeals against grades for assessments, apart from the final attestation, with staff and students. There was a lack of a consistent understanding of how appeals against grades could be made; some students seemed to think this was done by undertaking additional exam questions; other students indicated appeals were made to the teacher and others to the dean. YHU should clarify the grounds and processes for appeal so that they align with the processes for attestation and thus that there is consistency across the University.

10.10. LEARNING SUPPORT SYSTEMS

Areas of improvement and recommendations

- 1) It is clear that YHU has undertaken a number of developments and also that there are plans for other services to support students. However, these services are not yet embedded in the structure of the University so that it is clear to students what is offered and by whom. Some services are new and, at the time of the panel's visit, some were still in the planning phase, so it was not possible for the panel to assess the extent to which the services

meet students' needs. YHU should develop a clear and integrated structure for the support services for students.

- 2) Students are informed about available services at the beginning of their studies at a time when they are absorbing information about all aspects of their studies at YHU. All information is not available on the website where students could access it easily as need arose. YHU should communicate the offer to students through different channels to ensure that all students have consistent and readily accessible information which they can access as and when they need it.

Suggestions for further development

- 1) YHU is recommended to undertake an in-depth analysis of the retention and withdrawal rates and develop measures to improve the rates.

10.11. RESEARCH, DEVELOPMENT AND/OR OTHER CREATIVE ACTIVITY

Areas of improvement and recommendations

- 1) The number of publications which are in international journals published in English is low. The participation of YHU staff and students in conferences and projects since 2016 is mostly limited to Armenian or Russian speaking international conferences. The panel considered that those research projects that are carried out at the YHU are limited in scope and insignificant in terms of the overall research required at this educational level. Staff reported that YHU does not make proper provision for dedicated research time for full-time staff. These facts restrict the visibility of YHU in research and development. YHU must establish research environment and culture in all study programmes including general medicine.
- 2) The SER includes a statement about expenditure on research and development. The panel cross referenced the statements in the SER with the financial indicators provided and could not align the two or gain an unequivocal picture of what investment is being made in research and development and into what activities. YHU should ensure that the funding to support research is transparently recorded and presented.
- 3) The panel learned that there are no requirements for relevant full-time academic staff at the YHU to undertake research. From the evidence seen and heard, the panel formed the view that not all academic staff with full-time responsibility at YHU are engaged in research. This limits considerably any significant staff and student collaborations in research and, most importantly, is inadequate to ensure the critical need for research-based teaching. YHU is encouraged to develop a more strategic approach to the development of its research capacity and should include specified support for staff to engage in research.
- 4) YHU should develop a strategy for research at departmental level which should encompass research informed teaching and learning. YHU should take steps to embed the teaching of research skills and research activities into the curricula.
- 5) Discussions with students indicated that they had a very limited understanding of research and its link with their education at YHU. The fact that the large majority of students are in the study programmes of general

medicine or dentistry where there is no evidence of the inclusion of research issues weakens the YHU's position as a university in the higher education arena. YHU should develop an institution-wide understanding of the link between research and teaching and foster the link at all curriculum levels and in all faculties.

Suggestions for further development

- 1) YHU is advised to define and focus on two or three research fields of interest to YHU as a whole, preferably interconnecting faculties. These should also take the needs of society into consideration.
- 2) YHU should establish active collaborations with national research institutions.

10.12. SERVICE TO SOCIETY

Areas of improvement and recommendations

- 1) In discussion with students and all categories of staff, the panel found a diverse range of views as to what constituted service to society which ranged from the payment of taxes as an economic benefit to society, to visiting orphanages and opening the gym to members of the public. The panel could find no consistent understanding either of what was meant by service to society or what YHU undertakes under this heading. YHU should provide clear leadership on the meaning and strategy for service to society so that the activities are coordinated and purposeful for the community.
- 2) Although YHU has developed a number of surveys, the panel saw no evidence of surveys designed to elicit regular and systematic feedback from the wider community. Feedback on events undertaken is very limited. The lack of feedback from the community with measurable results which would enable YHU to analyse the impact of its activities and to identify future opportunities, is a weakness. YHU should develop and implement accountability measures to evaluate, analyse and monitor community service activities.
- 3) YHU uses a range of media including TV programmes, the YHU YouTube channel, radio and social sites. These channels can be an effective means of communicating with the public, educating it and supporting more general development in society. However, the panel found that the main focus of the use of these media at YHU is to disseminate information and provide publicity for YHU with the aim of attracting new students. YHU should review its use of media so that it focuses on issues for the public and providing information related to its specialisations and thus educating and developing the wider public.

Suggestions for further development

- 1) YHU might like to consider offering medical services from its medical personnel for the public.
- 2) YHU might like to consider increasing the involvement of staff in inter-university activities in RA.

11. If one to two assessments are provided as 'does not conform', the Council shall analyse the strengths and areas for improvement of the HEI and conclude that there are shortcomings in the management, administration, teaching and research activities or in the environments of learning and research at the HEI, provide guidance for their elimination, and decide to accredit the HEI for three years; or shall conclude that the management, administration, teaching and research activities as well as the environments of learning and research at the HEI do not meet the requirements, and decide not to accredit the HEI.
12. The Council weighed the strengths, areas for improvement, and recommendations presented in point 10 of this document and took into account that:
 - 1) There are clearly documented processes for the development and review of study programmes which include clear guidance on the inclusion of external experts.
 - 2) The high level of student satisfaction with the skills and experience of the teaching staff.
 - 3) The new building on the Abelyan Campus which provides up-to-date facilities for practical work in the field of medicine.
 - 4) The production of the Education Quality Assurance Manual.
13. According to the point 43.7 of the document 'Guide to Institutional Accreditation', if the Council weighs between two accreditation decisions and finds that if the HEI were to satisfy certain conditions, a more positive decision would be possible, the Council may make that decision with a secondary condition, as defined in § 53 of the Administrative Procedure Act.
14. The Council found that the management, administration, teaching and research activities as well as the environments of learning and research at the YHU conform partially to the requirements on the condition that the YHU eliminates the following shortcomings as a matter of urgency:
 - 1) The strategic plan has 11 objectives; four of these link to resources, three to internal and external communication, two to teaching and one to research. Each objective has a number of indicators; however, the panel could find no evidence of targets for these either in documentation or from discussions with senior staff and management. YHU should elaborate fully developed strategic plans, which are based on an in-depth and evidence based analysis, which include specific targets to ensure that priorities are clearly identified and that goals are measurable.
 - 2) There are no requirements for relevant full-time academic staff at the YHU to undertake research. From the evidence seen and heard, the panel formed the view that not all academic staff with full-time responsibility at YHU are engaged in research. This limits considerably any significant staff and student collaborations in research and, most importantly, is inadequate to ensure the critical need for research-based teaching. YHU should develop a more strategic approach to the development of its research capacity and should include specified support for staff to engage in research. YHU should

include requirement to undertake research to the contracts of full-time academic staff.

15. According to clause 53 (1) 2) of the Administrative Procedure Act, the secondary condition of an administrative act is an additional duty related to the principal regulation of the administrative act and, also, according to clause 53 (1) 3), a supplementary condition for the creation of a right arising from the principal regulation of the administrative act. Clauses 53 (2) 2) and 3) of the Administrative Procedure Act stipulate that a secondary condition may be imposed on an administrative act, if the administrative act cannot be issued without the secondary condition or if the issue of the administrative act must be resolved based on the administrative right of discretion. The Council found that without a secondary condition the decision shall be 'to not accredit' and based on points 43.5 and 43.7 of the 'Guide to Institutional Accreditation'

DECIDED

To accredit Yerevan Haybusak University for three years with the following secondary conditions:

- 1) YHU should elaborate fully developed strategic plans, which are based on an in-depth and evidence based analysis, which include specific targets to ensure that priorities are clearly identified and that goals are measurable.**
- 2) YHU should include requirement to undertake research to the contracts of full-time academic staff.**

Yerevan Haybusak University should submit a report in English by 22.11.2020 at the latest about eliminating the shortcomings described in point 13.

The decision was adopted by 9 votes in favour and 0 against.

16. This accreditation will be valid until 22.11.2022. If the Yerevan Haybusak University does not comply with the secondary condition by the due date, the Council will repeal this accreditation decision or establish a new secondary condition.
17. A person who finds that his or her rights have been violated or his or her freedoms restricted by this decision may file a challenge with the EKKK Quality Assessment Council within 30 days after the person filing the challenge became or should have become aware of the contested finding. A judicial challenge to this decision is possible within 30 days after its delivery, by filing an action with the Tallinn courthouse of the Tallinn Administrative Court pursuant to the procedure provided for in the Code of Administrative Court Procedure.