

**Approval of the Application**  
**by the National Centre for Professional**  
**Education Quality Assurance (ANQA)**  
**for Inclusion on the Register**

**Register Committee**

**Ref.** RC19/A41

**Ver.** 1.0

**Date** 2017-06-23

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<b>Application of:</b>	26/02/2016
<b>External review report of:</b>	13/02/2017
<b>Review coordinated by:</b>	ENQA
<b>Review panel members:</b>	Axel Aerden (Chair), Núria Comet Señal (Secretary), Bernard Coulie (academic), Inguna Zarina (student) / Paula Ranne (ENQA coordinator)
<b>Decision of:</b>	20 June 2017
<b>Registration until:</b>	28 February 2022
<b>Absented themselves from decision-making:</b>	Lucien Bollaert
<b>Attachments:</b>	<ol style="list-style-type: none"> <li>1. <a href="#">Confirmation of eligibility, 24/03/2016</a></li> <li>2. <a href="#">External Review Report, 13/02/2017</a></li> <li>3. <a href="#">Request to the panel, 13/04/2017</a></li> <li>4. <a href="#">Clarification by the panel, 5/05/2017</a></li> </ol>

1. The application of 26/02/2016 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 24/03/2016, having considered clarification received from ANQA on 15/03/2016.
3. The Register Committee considered the external review report of 13/02/2017 on the compliance of ANQA with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee sought and received clarification from the chair of the review panel.

**Analysis:**

5. The Register Committee found that the report provides sufficient evidence and analysis on ANQA's level of compliance with the ESG.
6. With regard to the specific European Standards and Guidelines, the Register Committee considered the following:

## ESG 2.1 – Consideration of internal quality assurance

The review panel provided a mapping table between ANQA's criteria (for institutional accreditation and for programme accreditation) and Part 1 of the ESG.

The Register Committee requested the panel to elaborate on its analysis and findings as to how the different standards of ESG Part 1 are reflected in ANQA's criteria. The Committee appreciated the explanations provided, noted that the panel had reviewed ANQA's institutional accreditation reports and came to the conclusion that all standards were reflected in the same measure.

**Having considered the panel's clarification the Register Committee was able to concur with the conclusion that ANQA complies with the standard.**

## ESG 2.3 – Implementing processes

The panel noted that it did not analyse the effectiveness of the monitoring process, normally taking place two years after accreditation, since it had not yet been implemented.

The Register Committee sought and received clarification from the panel on the 6-monthly follow-up processes after conditional accreditations. The Committee understood that the panel did not consider the 6-monthly follow-up effective and, hence, recommended revisiting the 6-month period.

The Register Committee further sought clarification from the panel concerning the programme accreditation process, since only pilot accreditations had been carried out so far. While the panel clarified that it had analysed how ANQA took into account the lessons learned from the pilots, it had not analysed the implementation of the pilots. While the Committee considered that the review report demonstrates that ANQA's process for programme accreditation includes the features required by the standard in theory, no statement could be made on actual practice at this point.

**Given that one of the two follow-up processes appears to be considered ineffective by the panel, that the other follow-up process was not reviewed by the panel and that the implementation of programme accreditation was not analysed by the panel, the Register Committee was unable to concur with the panel's conclusion and considered that ANQA only partially complies with the standard.**

## ESG 2.5 – Criteria for outcomes

The review panel noted that ANQA's evaluation protocols, containing additional details about its standards, and the decision rules, used by the Accreditation Committee to differentiate their different possible

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accreditation decisions, are not published; the panel recommended that they be published.

**The Register Committee concluded that ANQA does not fully publish the criteria it uses and was therefore unable to concur with the panel's conclusion, but considered that ANQA only partially complies with the standard.**

### ESG 2.6 – Reporting

The Register Committee noted that the reports of the pilot programme accreditations were not published on ANQA's website. The Committee sought clarification from the panel as to how it viewed the non-publication of those reports.

The review panel noted that these pilots “were organised under supervision of other EQAR registered QA agencies and therefore the responsibility of these other QA agencies”, without, however, mentioning the agencies and addressing whether or not the reports were published by them.

The Register Committee, however, noted that both ANQA's self-evaluation report and the external review report repeatedly state that ANQA had implemented the pilot accreditations. The Committee was therefore not persuaded by the panel's point of view that ANQA had no responsibility for the publication of these reports.

**Given that there were no substantial reasons given why these reports are not published, the Register Committee was unable to concur with the panel's conclusion and considered that ANQA only partially complies with the standard.**

### ESG 2.7 – Complaints and appeals

The review panel noted that – while being clearly defined and published – “the process of appeals established by ANQA cannot be considered an appeal, but a second opportunity giving the institution time to improve its situation and then undergo one more evaluation and receive a new decision in a short period of time”.

The Register Committee concurred with the panel that the ANQA process differs substantially from the common understanding of an “appeal” and considered that it was doubtful whether the process was fit to address the type of issues it is expected to address, i.e. “adversely assessed criteria and/or alleged procedural violations against the institution”.

**While the Register Committee considered that the standard does not prescribe a specific appeals procedure, it considered that the review report identified serious shortcomings in the appeals procedure and was therefore unable to concur with the panel's conclusion, but considered that ANQA only partially complies with the standard.**

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### ESG 3.1 – Activities, policy and processes for quality assurance

In connection with ANQA's budget, the panel noted that ANQA is carrying out consultancy activities on a minor scale.

As it was not specifically analysed in the report, the Register Committee sought clarification from the panel on potential conflicts of interest arising from consultancy work.

The Register Committee understood from the panel's response that ANQA provides collective training opportunities to Armenian higher education institutions, but does not render services to individual institutions, and that, therefore, there is no specific potential for conflicts of interest.

**Having considered the clarification, the Register Committee was able to concur with the panel's conclusion.**

**The Register Committee, however, underlined that in case ANQA provides consultancy to individual institutions in the future it would have to implement appropriate policies to prevent that ANQA accredits the same institution to which it rendered consultancy services.**

### ESG 3.3 – Independence

The Register Committee sought and received clarification from the panel as regards ANQA's independence in defining its own procedures and methods.

The Committee appreciated the panel's explanation as to how ANQA developed its Manual independently.

**Having considered the clarification, the Register Committee was able to concur with the panel's conclusion.**

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

### Conclusion:

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

Standard	Review panel conclusion	Register Committee conclusion
2.1	Full compliance	Compliance
2.2	Full compliance	Compliance
2.3	Full compliance	Partial compliance
2.4	Full compliance	Compliance
2.5	Substantial compliance	Partial compliance
2.6	Full compliance	Partial compliance

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2.7	Substantial compliance	Partial compliance
3.1	Substantial compliance	Compliance
3.2	Full compliance	Compliance
3.3	Substantial compliance	Compliance
3.4	Substantial compliance	Compliance
3.5	Substantial compliance	Compliance
3.6	Full compliance	Compliance
3.7	(not expected)	Compliance (by virtue of applying)

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9. The Register Committee considered that ANQA only achieved partial compliance with some standards. The Committee particularly regretted that the evidence and analysis concerning programme accreditation were based on a so far theoretical methodology, and that in the pilot programme accreditations ANQA did not demonstrate compliance with all standards, see e.g. ESG 2.6.
10. In its holistic judgement, the Register Committee, however, concluded that these are specific and limited issues, but that ANQA complies substantially with the ESG as a whole.
11. **The Register Committee therefore approved the application for inclusion on the Register. ANQA's inclusion shall be valid until 28/02/2022.**
12. **The Register Committee further underlined that ANQA is expected to address the issues mentioned appropriately and to resolve them at the earliest opportunity.**
13. **The Register Committee specifically underlined that ANQA is required to make a Substantive Change Report in case ANQA modifies its processes or criteria for programme accreditation, including a possible change to obligatory programme accreditation, as well as in all other cases mentioned in EQAR's related guidance.**

National Centre for Professional Education Quality Assurance, Foundation  
(ANQA)

Ruben Topchyan  
22 Orbeli street

**0028 Yerevan  
Armenia**

Brussels, 24 March 2016

## **Confirmation of Eligibility: Application for Inclusion on the Register** Application no. A41 of 26/02/2016

Dear Mr Topchyan,

We hereby confirm that the application by ANQA for inclusion on the Register is eligible.

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

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

- *Institutional Accreditation;*
- *Programme Accreditation.*

Please ensure that ANQA's self-evaluation report covers all the aforementioned activities. While programme accreditations have only been initiated, we expect the agency will have concluded the pilot phase before the external review.

We confirm that the *review of non-higher education providers* is not an external quality assurance (EQA) activity within the scope of the ESG as long as the courses or degrees do not belong to any cycle of the Qualifications Framework of the European Higher Education Area.

While this activity is not relevant to your application, it is ANQA's choice – in agreement with the review coordinator – whether those activities should be commented upon by the review panel.

We will forward this letter to ENQA in its capacity of coordinator of the external review. At the same time we underline that it is ANQA's responsibility to ensure that the coordinator and review panel take account of the present confirmation, so as to ensure that all activities mentioned are analysed by the panel.

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

Yours sincerely,

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

Colin Tück  
(Director)

Cc: ENQA

Axel Aerden

– via email –

Brussels, 13 April 2017

## Application by ANQA for inclusion on EQAR

Dear Axel,

The National Center For Professional Education Quality Assurance (ANQA) has made an application for inclusion on the European Quality Assurance Register for Higher Education (EQAR).

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

The EQAR Register Committee's rapporteurs have been considering the application and the external review report. We would be obliged if you could clarify, in consultation with the panel members as necessary, some matters in relation to ANQA's application:

1. Under **ESG 2.1** (consideration of internal quality assurance), the panel provided a mapping table between ANQA's standards and ESG Part 1, based on ANQA's own mapping exercise.

In addition to your overall conclusion that "ANQA covers all the standards of ESG part 1", could you please elaborate how you came to the conclusion and provide examples, if any, of specific elements of ESG Part 1 that the panel considered to be particularly pronouncedly incorporated in ANQA's standards, or others that are less clearly reflected?

2. In relation to **ESG 2.3** (implementing processes), the panel did not assess the effectiveness of the monitoring processes and of programme accreditation, since they had not yet been carried out.

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While we understand that the follow-up two years after accreditation will not have taken place, we assume that the 6-monthly follow-up after conditional accreditation should have been carried out at least a few times. While the panel commented on the appropriateness of the 6-month delay, could you please elaborate on how the panel regarded the effectiveness of this follow-up process?

3. We further understand that 7 pilot programme accreditations have taken place. Could you please comment whether the panel considered that the pilot accreditations were carried out in compliance with the ESG 2.3, and whether you expect any changes in methodology between the pilots and the “real” accreditations in the future?
4. Also in relation to **ESG 2.6** (reporting), the panel noted that it only reviewed the reports from institutional accreditation, and thus not those from the pilot programme accreditations.

Could you please explain why the panel did not review the reports from the pilot programme accreditations, as well as how the panel considered the fact that these do not appear to be published?

5. We understand from the report (see list on page 10, item 7, or table under ESG 3.5, page 18) that ANQA offers consultancy services to higher education institutions. The panel did not discuss those further under **ESG 3.1** (activities, policy and processes for quality assurance) or elsewhere in the report.

Could you please elaborate on how the panel assessed those activities in terms of clear separation from ANQA’s external quality assurance activities and possible conflicts of interest? In particular, could the panel establish that ANQA does not offer consultancy to the same institution that it accredits, or, if this is not ruled out, does the panel consider it appropriate that ANQA does so?

6. With regard to **ESG 3.3** (independence), could you please elaborate on how ANQA’s independence with regard to defining its procedures and methods of external quality assurance?

We would be grateful if it was possible for you to **respond by 3 May 2017**, and we would appreciate if you get in contact with us should that not be feasible.

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

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

Kind regards,

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

Colin Tück  
(Director)

**Cc:** Núria Comet Señal  
ENQA (coordinator)  
ANQA

**Subject:** RE: Clarification re. ANQA's application for inclusion on EQAR

**From:** Axel Aerden <a.aerden@nvaio.net>

**Date:** 05/05/2017 14:27

**To:** Colin Tück <colin.tueck@eqar.eu>

**CC:** Nuria Comet <ncomet@aqu.cat>

Dear Colin

Here are our clarifications.

#### Question 1

The panel has come to this conclusion after reviewing ANQA's methodology and the submitted documentation and after going through **all the reports** (which have the same structure and easily reflect the applied methodology). The panel has found that ANQA has not only incorporated the ESG Part 1 in all its standards but also that these are demonstrably part of their assessments and are all reflected in the same measure.

#### Question 2

The panel recommended to revisit the 6-month period to produce the first follow-up report. On paper this approach does seem effective, but the panel considered that institutions are not able to implement actions to address issues for concern in such a short period. The first written report comes too soon and is then an outline of a potential plan, in essence a stepping stone toward a substantial follow-up.

#### Question 3

These pilot accreditation procedures were carried out within the framework of Tempus or International projects. These procedures were organised under supervision of other EQAR registered QA agencies and therefore the responsibility of these other QA agencies.

The panel did not consider these procedures in detail. The panel did not comprehensively compare and contrast these pilot procedures with the current methodology. The panel did look at what ANQA learned from these pilots and how this contributed to the rationale of the current procedures. For example, the results of the pilot procedures pointed out the lack of the strategic management, and so the current methodology puts greater emphasis on this aspect.

ANQA did publish the overall results of these pilot procedures, including an analysis of its observations. All these findings and a way forward were presented to ANQA's stakeholders during an event and published on their website.

#### Question 4

See question 3. These procedures were organised under supervision of other EQAR registered QA agencies and therefore the responsibility of these other QA agencies.

#### Question 5

The panel did look into this issue since the wording in the self-evaluation report raised a red flag. The panel found that ANQA explicitly differentiates its sources of income for transparency sake (deemed very important given the national context) and for long-term budgeting. Consultancy/Trainings amounted to 0,6% of the budget in 2015 and included very straightforward activities such as trainings for teachers on internal QA, for HEIs' QA staff on internal and external QA, for VET institution's staff on QA in general, and fee-paying HE conferences. The panel did not find any conflict of interest here. All of the stakeholders explicitly welcomed this part of ANQA's outreach. Given the lack of experience with EQA in Armenian HEI, the expertise ANQA has built up in international projects and networks, and the financial burden training abroad or by foreigners would entail for Armenian HE, the panel considered ANQA's Consultancy/Training absolutely appropriate.

#### Question 6

The external quality assurance methodology is laid down in ANQA's Accreditation Manual. This Manual was drafted by ANQA's staff and approved by ANQA's Board of Trustees in 2015. The panel found the Board to act independently from potential external influence. When meeting the panel, members of the Board were not afraid to openly discuss issues on which they did not agree yet (such as the agenda for the implementation of programme accreditation and long-term budgeting).

ANQA independently decided to review the procedures in its Manual after having put the QA methodology into practice, having received feedback from its stakeholders, and taking into account the revision of the ESG in 2015. The panel has looked at ANQA's independence with regard to defining its procedures and methods and the way decisions come to fruition. The unanimous conclusion of the panel was that the current governance structure of ANQA reflects the current national context of Armenia and this seems the only viable and reasonable option to ensure not only its independence but also the perception of independence.

We hope our responses do answer your questions.

Best wishes  
Axel

-----Oorspronkelijk bericht-----

Van: Colin Tück [<mailto:colin.tueck@eqar.eu>]

Verzonden: donderdag 13 april 2017 15:17

Aan: Axel Aerden <[a.aerden@nvaio.net](mailto:a.aerden@nvaio.net)>

CC: Nuria Comet <[ncomet@aqu.cat](mailto:ncomet@aqu.cat)>

Onderwerp: Clarification re. ANQA's application for inclusion on EQAR

Dear Axel,

We are contacting you in your capacity as chair of the panel that externally reviewed ANQA in 2016. ANQA has submitted the panel's report in support of its application for inclusion on the European Quality Assurance Register for Higher Education (EQAR).

Please find attached a request to elaborate on the panel's findings in regard to a few issues.

We would be obliged if you could clarify this matter by 3 May 2017.

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

Best regards,  
Colin

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Colin Tück

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