

**Approval of the Application
by National Center for Public Accreditation (NCPA)
for Renewal of Inclusion on the Register**

Register Committee
16 March 2020

Ref. RC26/A80
Ver. 1.0
Date 2020-03-19
Page 1 / 9

Application of:	12/10/2018
Agency registered since:	17/11/2015
External review report of:	20/06/2019
Review coordinated by:	European Association for Quality Assurance of Higher Education (ENQA)
Review panel members:	Nora Skaburskiene (Chair), Ronny Heintze (Secretary) academic, Tatjana Volkova (academic), Francisco Joaquín Jiménez González (student)
Decision of:	16/03/2020
Registration until:	30/06/2024
Absented themselves from decision-making:	none
Attachments:	<ol style="list-style-type: none"> 1. Confirmation of eligibility, 23/10/2018 2. External Review Report, 20/06/2019 (see separate file) 3. Request to NCPA, 30/09/2019 4. Request to the Review Panel, 30/09/2019 5. NCPA clarification and statement, 4/10/2019 6. Clarification by the Review Panel, 14/10/2019

1. The application of 12/10/2018 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 23/10/2018.
3. The Register Committee considered the external review report of 20/06/2019 on the compliance of NCPA 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 NCPA (letter of 30/9/2019 and statement of 4/10/2019).

6. The Register Committee invited NCPA to make additional representation on the grounds for possible rejection on 11/11/2019. The Register Committee considered NCPA's additional representation of 17/01/2020.

Register Committee
16 March 2020

Analysis:

Ref. RC26/A80
Ver. 1.0
Date 2020-03-19
Page 2 / 9

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

- Accrediting educational programmes
- Accrediting institutions of further education
- Accrediting programmes of further education

8. NCPA's project work and activities geared at raising public awareness are not within the scope of the ESG and, thus, not pertinent to NCPA's registration on EQAR.

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

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

ESG 2.1 – Consideration of internal quality assurance

11. The review panel considered that ESG 1.10 was not well reflected in the standards for public accreditation of professional education institutions and the study programmes delivered by those institutions. At the same time, the panel noted that the time-limited accreditation periods in practice embed a cyclical approach in the procedures.

12. While the Register Committee took note of the review panel's suggestion to make explicit reference to the provisions of ESG 1.10 in all standards, it considered that a time-limited accreditation period suffices to embed the principle of cyclicity in NCPA's external QA.

13. The Committee therefore concurred with the panel's conclusion that NCPA complies with the standard.

ESG 2.2 – Designing methodologies fit for purpose

14. The Register Committee noted the panel's critical assessment of NCPA's current approach to the accreditation of several programmes in one cluster not being fit for purpose.

15. The Committee took note of NCPA's statement on the review report, where the agency pointed out that it had been reflecting on the experiences of other accreditation agencies in order to refine its methodology of cluster accreditation, and was currently developing new regulations that would

distinguish cluster accreditation as a separate process with its own methodology.

16. At the time of the statement the new methodology was, however, not yet finalised and implemented.

17. In its additional representation, NCPA reported that it had now adopted a set of new regulations on the accreditation of clusters. Essentially, these regulations would enable excluding programmes from the cluster where needed, leading to a separate evaluation and decision on those programmes.

18. The Register Committee noted that the new regulations seemed to directly and exactly respond to the review panel's concerns. At the same time, the representation did not address whether and how NCPA's stakeholders were consulted in developing the new regulations. The Committee considered that the short time within which they were adopted raised questions in that regard.

19. The Register Committee noted that two procedures were carried out under the new regulations according to NCPA. The Committee underlined that analysing these reports in detail to assess the new regulations in practice would be beyond the scope of the re-registration process, which is based primarily on the external review report. The full effect of the new regulations should thus be addressed in the next external review of NCPA.

20. While the Register Committee welcomed the progress made by NCPA it therefore concurred with the panel's conclusion that NCPA partially complies with the standard, pending a full external review of the new regulations and their implementation in practice.

ESG 2.3 – Implementing processes

21. The follow-up procedures of NCPA were flagged for attention when the agency was admitted to the Register in 2015.

22. The Register Committee noted that a new follow-up procedure was implemented following the recommendation of the previous review of NCPA and thus concluded that the flag has been addressed.

ESG 2.4 – Peer-review experts

23. The Register Committee noted that student experts were not involved in the public accreditation of further professional education institutions and their study programmes. The review panel underlined that “the characteristics of students might differ from the one in ‘traditional’ programmes” (p. 40), but that “the perspective of the learner [...] brings valuable addition for EQA” (ESG 2.4, p. 40) nevertheless; it thus recommended that NCPA include students in these procedures.

24. In its statement on the review report, NCPA noted that, while stressing that accreditations of further education programmes only made up 3% of NCPA’s work, the agency was “sure to find efficient ways of including students from short programmes into the review panels”.

25. The Register Committee sought and received clarification from the review panel on its conclusion for this standard.

26. While the panel underlined the different status of “listeners”, as opposed to “students”, who enrol into these programmes, the Register Committee considered that the institutions and programmes in question were part of the higher education system and their accreditation thus within the scope of the ESG; this was also NCPA’s own assessment at eligibility stage.

27. While the panel considered that, in light of the small number of these accreditations, a stricter judgement had “overstretched” the relevance of the matter, the Register Committee considered that this was not only a matter of numbers. The practice at the time of review meant that two types of accreditations did not fully comply with the standard.

28. In its additional representation, NCPA explained that it had revised the corresponding regulations and now required the presence of a “listener” (i.e. a student/learner enrolled in a further professional education programme, see above) on the expert panels.

29. The Register Committee considered that the implementation of the new regulations could not yet be verified in practice, but bore in mind that these accreditations are not carried out very frequently.

30. The Register Committee therefore considered that the issue has been addressed and was now able to concur with the panel’s conclusion that NCPA complies with the standard.

ESG 2.5 – Criteria for outcomes

31. The transparency of NCPA’s criteria was flagged when the agency was admitted to the Register in 2015.

32. The review panel analysed that NCPA criteria are fully published on their website. NCPA had further used the recommendations from the last review to clarify its criteria for granting different terms of accreditation (i.e. full term of 6 years or reduced terms of 2 or 4 years).

33. The Register Committee therefore concluded that the flag has been addressed.

34. The Register Committee sought and received clarification from the panel in light of its analysis that “there are also no criteria that allow different assessments of programmes in a cluster and consequently no

criteria for different decisions regarding one cluster” (p. 42) and its critical remarks on the level of evidences on individual programmes in the cluster accreditations.

35. Having considered the panel’s response that these issue have been fully reflected in the panel’s conclusions per standards 2.2 and 2.6, the Register Committee concurred with the panel’s conclusion that NCPA complies with the standard.

ESG 2.6 – Reporting

36. The review panel noted that the report and the decision were not published together. The panel found that – even in the broadest interpretation of the standard – it had to be recognised that it was not easy to find a decision, unless the reader knew exactly where to look for it.

37. The panel further noted that the level of evidence presented and analysed was limited in the reports on clustered accreditations, in that these did not contain sufficient evidence on the individual programmes that are part of a cluster.

38. The additional representation pointed out that decisions were now published together with the report.

39. The Register Committee, however, noted that users still had to find the decisions within the full and extensive minutes of the corresponding NCPA Accreditation Board meeting. The Committee further noted that the reports published on DEQAR did not include the resulting decision.

40. NCPA also pointed out that the reports on clusters of programmes (under the new methodology) now contained sufficient evidence on individual programmes.

41. The Register Committee noted that a detailed analysis of those reports would, however, be beyond the scope of the application process.

42. The Register Committee considered that the accessibility of decisions was only partially addressed, while the changes as regards the evidence presented in reports could not be verified. The Committee therefore concurred with the panel’s conclusion that NCPA partially complies with the standard.

ESG 2.7 – Complaints and appeals

43. The review panel noted that not every decision can be appealed. Specifically, generally positive decisions cannot be appealed. Furthermore, the panel could not identify either a separate complaints procedure nor references to complaints within the regulations on appeals.

44. While NCPA in its statement noted they would establish a separate complaints procedure, such a procedure has not yet been enacted.

45. The Register Committee sought and received clarification from the panel on its conclusion in that light.

46. In its clarification, the panel referred to institutions not having seen a need for a complaints procedure thus far. The panel further mentioned linguistic difficulties in finding the correct terms for “appeals” and “complaints” in the Russian language.

47. The panel did not comment further on the fact that only negative decisions are open to appeal.

48. The Register Committee understands the standard to require that both appeals and complaints need to be possible, in the meaning of those terms as described in the guideline to the standard. This is, however, irrespective of how these are called in a local language, whether there are separate terms or not, and whether they are handled according to one combined or two separate processes.

49. Moreover, the Committee understands that the standard requires that all formal outcomes (reports, decisions) need to be open to appeal, irrespective of whether the decision is positive or negative. As noted by the panel, institutions may wish to formally question the findings or conclusions made in a report even if the overall judgement is positive.

50. In the additional representation, NCPA explained that it had developed and approved two separate regulations, one for complaints and another one for appeals.

51. The Register Committee considered that the new regulations provide clear definitions of the two procedures, on the composition and terms of office for the two respective committee, and also introduced the possibility to appeal a generally positive decision.

52. The Committee considered that the new regulations have not yet been tested in practice, but bore in mind that it might take an unpredictable period of time until the first cases arise and could be analysed.

53. Having considered the recent changes the Register Committee was able to concur with the panel’s conclusion that NCPA (substantially) complies with the standard.

ESG 3.1 – Activities, policy and processes for quality assurance

54. The Register Committee noted that, at the time of review, NCPA did not perform any consultancy or similar activities next to external quality assurance, except for responding to practical and procedural questions by institutions, and organising seminars etc. for a wide range of stakeholders.

55. As the Statute of NCPA nevertheless lists the activity “On the request of education institutions provides advisory services and audits of educational quality”, the panel made a future-oriented suggestion in case NCPA were to widen its activities in that direction.

56. **The Register Committee underlined the suggestion by the panel and reminded that NCPA is required to make a Substantive Change Report in case it widens the scope of its activities.**

ESG 3.3 – Independence

57. While concurring with the panel's conclusion, the Register Committee underlined the panel's recommendations to limit membership of the NCPA Board (NAB) to people who are not involved at any other stage of the EQA procedure, and to define more explicit and transparent regulations regarding the composition of the NAB.

ESG 3.4 – Thematic analysis

58. The review panel noted that NCPA regularly produces publications both in English and in Russian, but considered, based on its interviews, that “the concept of thematic analysis is not fully understood” (p. 21). Specifically, the panel considered that the various publications of NCPA did not focus on analysing the findings of the accreditations that NCPA undertakes and thus only “broadly fit” the requirements of the standard.

59. The Register Committee sought clarification from the panel in light of this analysis. The panel underlined that “publications cover a wide range of topics, but are more research based rather than focussed on findings from the accreditation reports”.

60. Based on the panel’s response it remained unclear to the Committee whether or not NCPA’s various publications are based, at least to some extent, on analysing the findings of its accreditations, as required by the standard.

61. NCPA’s additional representation mentions a new report that NCPA produced and published recently. It further provided additional detail on those past publications that had been considered by the panel.

62. The Register Committee was unable to review those reports in depth, but considered the information available and found that the new report – on cluster accreditations – clearly fits the requirements of standard 3.4.

63. The Register Committee found that the explanations on past reports suggest that at least some of NCPA's reports were based in part on an analysis of the findings of its accreditations. The Committee underlined that thematic analysis should be primarily geared towards analysing, on a meta-

level, the agency’s own accreditation reports, whereas some of NCPA’s listed activities rather had the character of general QA research.

64. The Register Committee nevertheless could now concur with the panel’s analysis that NCPA produces analyses that – at least broadly – correspond to the standard’s requirement; it therefore concurred with the panel’s conclusion that NCPA complies with the standard.

ESG 3.6 – Internal quality assurance and professional conduct

65. The Register Committee sought clarification from the panel how its findings re. the fitness for purpose of NCPA cluster accreditation processes were considered in its conclusion on this standard.

66. The panel underlined that it assessed NCPA’s internal quality assurance system as a whole; it concluded that NCPA’s approach of giving relevance to a cyclical external review fitted the setting of the agency well and was sound to its professional environment.

67. The panel noted that it heard no concerns or issues raised by the various stakeholders it interviewed regarding the current practice of cluster accreditation.

68. Based on the panel’s response the Register Committee concluded that appropriate ways to elicit and process external and internal feedback did seem to exist; it understood that it was due to stakeholders not identifying the current approach as problematic that it was not raised, rather than due to a lack of feedback processes provided by NCPA.

69. Having considered the panel’s clarification the Register Committee concurred with the conclusion that NCPA (substantially) complies with the standard.

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

Conclusion:

71. Based on the external review report and the considerations above, the Register Committee concluded that NCPA 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	Partial compliance	Partial compliance
2.3	Substantial compliance	Compliance
2.4	Substantial compliance	Compliance

Register Committee

16 March 2020

Ref. RC26/A80

Ver. 1.0

Date 2020-03-19

Page 8 / 9

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

Register Committee

16 March 2020

Ref. RC26/A80

Ver. 1.0

Date 2020-03-19

Page 9 / 9

72. The Register Committee considered that NCPA only achieved partial compliance with two standards. In its holistic judgement, the Register Committee recognised that steps were already taken in regards of cluster accreditations (ESG 2.2), whereas further steps were clearly necessary with regard to the accessibility of decisions (ESG 2.6). The Committee nevertheless concluded that NCPA continues to comply substantially with the ESG as a whole.

73. The Register Committee therefore renewed NCPA's inclusion on the Register. NCPA's renewed inclusion shall be valid until 30/06/2024¹.

74. The Register Committee noted the very swift adoption of new/changed regulations by NCPA in some areas in order to (substantially) comply with certain standards. The Committee considered that the very short timeframe raised questions regarding the involvement of stakeholders in developing and amending regulations. Moreover, the new regulations could only be analysed in general and in theory by the Committee. All measures taken should therefore be analysed in detail in the next external review of NCPA.

75. The Register Committee further underlined that NCPA is expected to address the remaining issues mentioned appropriately and to resolve them at the earliest opportunity.

¹ Inclusion is valid for five years from the date of the external review report, see §4.1 of the EQAR Procedures for Applications.

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National Center for Public Accreditation (Russia) (NCPA)

206a Volkov Str.

Galina Motova, Deputy Director

424000 Yoshkar-Ola

Russia

Brussels, 23 October 2018

Confirmation of Eligibility: Application for Inclusion on the Register

Application no. A80 of 12/10/2018

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

Based on the information and draft terms of reference provided, the external review coordinated by NCPA fulfils the requirements of the EQAR Procedures for Applications.

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

- *Accrediting educational programmes in alignment with ESG;*
- *Accrediting institutions of further education;*
- *Accrediting programmes of further education.*

Please ensure that NCPA's self-evaluation report covers all the aforementioned activities, including reviews carried out by NCPA abroad e.g. external quality assurance activities carried out by NCPA in China.

We further remind you that the following issues were flagged when NCPA's registration was last renewed:

ESG 2.3: Implementing Processes [ESG 2005: standard 2.6]

It should be addressed whether the follow-up procedures were implemented consistently.

ESG 2.5: Criteria for Outcomes [ESG 2005: standard 3.7]

It should be addressed whether NCPA has published all required documents for its processes and procedures.

While the Register Committee noted NCPA's efforts to address the above flagged issues and took note of the explanations given on how the agency addresses the ESG 2015, the Register Committee nevertheless underlined that the self-evaluation and external review of NCPA should

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consider these revisions in detail (see NCPA's Change Report of 1/11/2016).

We confirm that the following activities are not within the scope of the ESG:

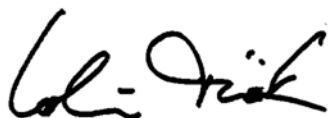
- *Project Best Educational Programmes of Russia*

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

We will forward this letter to ENQA in its capacity of the coordinator of the external review. At the same time we underline that it is NCPA'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.

This confirmation is made according to the relevant provisions of the EQAR Procedures for Applications. NCPA 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

Brussels, 30 September 2019

Application by NCPA for renewal of registration on EQAR

Dear Galina,

The EQAR Register Committee's rapporteurs have been considering NCPA's application for renewal of registration, based on the external review report of 20/06/2019.

We kindly ask you to clarify the following matters to inform the Register Committee's consideration and decision-making:

1. The panel expressed its concerns as to the **fitness for purpose of cluster accreditations** as they are currently carried out by NCPA (see pp. 33 – 35 of the external review report) and made recommendations on that topic.

Could you please explain whether NCPA has considered the issue and whether it decided to either adapt its methodology to enable and assure a proper separate analysis (and potentially different decisions) of each individual programme in a cluster, or to establish new, specific definitions and methodologies to evaluate clusters as a new type of entity?

2. NCPA did not submit a **statement on the external review report**. We would like to afford NCPA another opportunity to make a statement on the report, in particular if you wish to describe how NCPA plans to respond to the various recommendations.

We would be grateful if it was possible for you to respond **by 15 October**

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EQAR Founding Members:

2019, 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 your application.

I shall be at your disposal if you have any questions in relation to this request.

Kind regards,



Colin Tück
(Director)

Brussels, 30 September 2019

Application by NCPA for renewal of registration on EQAR

Dear Nora,

The National Center for Public Accreditation (NCPA) has made an application for renewal of registration 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 20/06/2019 on which NCPA'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 order to contribute to the consideration of NCPA's application:

1. ESG 2.4 – Peer-review experts

The report noted that student experts are not involved in the accreditation of further education institutions and of study programmes delivered by those. You underlined that, while in further education programmes "the characteristics of students might differ from the one in 'traditional' programmes, [...] the perspective of the learner [...] brings valuable addition for EQA" (ESG 2.4, p. 40) and recommended that NCPA include students in these procedures.

Could you please elaborate on the panel's considerations in concluding that NCPA substantially complies with the standard, despite students not being part of the panels in the mentioned activities?

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2. ESG 2.5 – Criteria for outcomes

Your report raised concerns whether – in general – the reports available to the NAB provide a comprehensive evidence basis and allow an explanation how experts come to recommendations.

The report further noted that “there are also no criteria that allow different assessments of programmes in a cluster and consequently no criteria for different decisions regarding one cluster” (ESG 2.5, p. 42), that there was in particular a lack of individual evidences for individual programmes in the cluster, and that reports consequently did not provide enough evidence to apply criteria, neither to provide consistency.

The panel concluded that it was “impossible to fully comply with this standard without adequately evidenced reports” (p. 43).

Could you please elaborate further on the panel's considerations in arriving at the conclusion that NCPA substantially complies with the standard, despite those concerns?

3. ESG 2.7 – Appeals and complaints

The panel noted that only fully negative (and thus not all) accreditation decisions can be appealed, and that you “could not identify a complaints procedure nor references to complaints within regulations of appeals procedure” (ESG 2.7, p. 46).

Could you please elaborate on the panel's considerations in concluding that NCPA substantially complies with the standard, despite these shortcomings?

4. ESG 3.4 – Thematic analyses

The report stated that the publications considered by NCPA to be thematic analyses (ESG 3.4) did “not focus on analysing the findings of the accreditations that NCPA undertakes” (p. 20), the concept of thematic analysis was thus “not fully understood” (idem).

Could you please elaborate on the panel's considerations in concluding that NCPA substantially complies with the standard, despite a key feature of thematic analyses not being met?

5. **ESG 3.6 – Internal quality assurance and professional conduct**

The panel concluded that NCPA substantially complies with standard ESG 3.6.

Could you please clarify whether the absence of any cyclical review of NCPA's processes and the shortcomings with regard to cluster accreditations (both addressed under ESG 2.2) were considered by the panel as issues reflecting on the functioning of NCPA's internal quality assurance?

We would be grateful if it was possible for you to respond **by 15 October 2019**, 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 NCPA'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: Ronny Heintze (secretary)
ENQA (coordinator)
NCPA

STATEMENT



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Dear Mr. Tück,

The autonomous non-profit organization the National Centre for Public Accreditation (NCPA), established in 2009, is one of the first independent accreditation agencies in Russia, which bases its procedures on Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). NCPA has established itself as a reputable and trusted accreditation agency with the mission of promoting quality culture in Russian higher education and has been recognized as such nationally and internationally.

NCPA is a learning organization with the focus on the quality enhancement of its own activities. Internal self-assessment and external evaluation are paramount to its development. A periodic external review is also a requirement for agencies wishing to maintain their credibility and to demonstrate their compliance with ESG and renew full membership in ENQA and inclusion in EQAR. With these objectives in view NCPA applied for external evaluation and has undergone its second external review against ESG. An added value of this review process has been NCPA's in-depth internal reflection on implementing its mission and statutory functions and developing its internal quality culture. As a result of this procedure NCPA's membership in ENQA has been reconfirmed and the Agency has been given valuable recommendations from international experts for continuous improvement of its performance.

Following up on the outcomes of this external review NCPA has been reflecting on ways of improving areas identified by the review panel and a plan of actions has been developed in order to fulfill the recommendations of the international experts.

Of paramount importance for NCPA is ensuring fitness for purpose of its procedures. NCPA has been reflecting on the experiences of other accreditation agencies (ZEvA, AEQES, EKKA, HCERES, ACQUIN, AQ, HAC) in order to refine its methodology of cluster accreditation. At the moment NCPA is developing new regulations and practice in cluster accreditation which will distinguish cluster accreditation as a separate process with its own methodology.

A challenging issue for NCPA remains including student representatives in public accreditation of study programmes delivered by further professional education institutions, as well as in the accreditation procedure of further education institutions.

Although we firmly believe that the “learner perspective brings valuable addition to external quality assurance” (ESG 2.4., p.40), and this is testified by the fact that in over 773 accreditations of HEIs’ programmes each panel included a student representative as compared to less than 3% of accreditations of further education programmes without students, we are sure to find efficient ways of including students from short programmes into the review panels.

NCPA believes that thematic analysis is an important element of reflecting on the developments in QA. However, the focus of the Agency was mainly on system-wide-analysis. As suggested by the panel and required by the Standard (ESG 3.4), in further enhancement of its activities NCPA is planning to focus more on systematic analyses of its accreditation reports, which will help the Agency to identify common themes of successes and weaknesses between institutions and highlight the opportunities for sharing good practice and bringing enhancement. Moreover, the thematic analysis of the material available in accreditation reports will support further development of quality assurance in higher education institutions and will also contribute to IQA system of NCPA.

NCPA will be working towards improving the evidence base in the expert reports in order to allow consistency in the decision-making process and assuring that reports contain an adequate evidence basis and analysis in order to explain recommendations in a comprehensible way.

NCPA will also continue to refine its appeals procedure and establish a separate complaints procedure.

ENQA membership and inclusion in EQAR is very important to NCPA as it gives the Agency a different perspective on its activities through placing it into a wider European context, thus, contributing to the enhancement and innovation of NCPA’s performance.

NCPA is honored to be part of the reputable expert community. and, in its turn, the Agency is committed to being actively involved in ENQA’s diverse activities and promoting ENQA’s values, goals and objectives in Russia and internationally.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'V. Navodnov', written in a cursive style.

Prof. Vladimir Navodnov
Director
National Centre for Public Accreditation, NCPA

The National Center for Public Accreditation (NCPA) has made an application for renewal of registration 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 20/06/2019 on which NCPA'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 order to contribute to the consideration of NCPA's application:

- 1. ESG 2.4 – Peer-review experts** The report noted that student experts are not involved in the accreditation of further education institutions and of study programmes delivered by those. You underlined that, while in further education programmes “the characteristics of students might differ from the one in 'traditional' programmes, [...] the perspective of the learner [...] brings valuable addition for EQA” (ESG 2.4, p. 40) and recommended that NCPA include students in these procedures. Could you please elaborate on the panel's considerations in concluding that NCPA substantially complies with the standard, despite students not being part of the panels in the mentioned activities?

During the visit, the panel analysed the status of Further professional education institutions and their programmes. These institutions do not offer higher education study programmes awarding higher education degrees, but only educational programs of complementary professional education for training, retraining and advanced training leading to certificate of advanced training or diploma of retraining. The entrants into further professional education institutions already have higher education and aim at gaining new professional knowledge and skills. The duration of studies in the programmes of further professional development is usually short (from 5 months up to 1 or 2 years). The participants of such programmes do not have a status of “student” they are called “listeners”.

When assessing the ESG 2.4 as substantially compliant the panel carefully weighted the fact that all reviews organized by NCPA that are focussed on higher education institutions and programmes awarding higher education degrees include students and that so far, NCPA has organized only a relatively small number of (pilot) reviews of further professional education institutions. The panel is clear in its expectation towards the inclusion of students in all ESG relevant activities, however the panel weighted the quantitative relevance of the case numbers of procedures not including students. In this context the panel did not ignore the absence of students in a comparably small field of activities of the agency, but clearly felt that moving to a stricter assessment than “substantially compliant” would overstretch the relevance of the affected activity as the main activity of the agency clearly lies in the field that includes students.

Additionally, the panel asked NCPA to clarify the presence of students in the reviews of further educational programmes. NCPA provided the following answer: “„There is no student member in the review panel as further education programmes are short and there is a very large turnover of students who come to study for a short period of time.“

Consequently the report provided the recommendation to include students in review of further professional education institutions and their programmes if such process will be carried on in the future. This recommendation is also supported by the confirmation of representatives of Student's union about their readiness to assure participation of students in reviews of further educational programmes.

- 2. ESG 2.5 – Criteria for outcomes** Your report raised concerns whether – in general – the reports available to the NAB provide a comprehensive evidence basis and allow an explanation how experts come to recommendations. The report further noted that “there are also no criteria that allow different assessments of programmes in a cluster and consequently no criteria for different decisions regarding one cluster” (ESG 2.5, p. 42), that there was in particular a lack of individual evidences for individual programmes in the cluster, and that reports consequently did not provide enough evidence to apply criteria, neither to provide consistency. The panel concluded that it was “impossible to fully comply with this standard without adequately evidenced reports” (p. 43). Could you

please elaborate further on the panel's considerations in arriving at the conclusion that NCPA substantially complies with the standard, despite those concerns?

NCPA implements a number of accreditation procedures: accreditation of study programmes, accreditation of study programmes delivered by further professional education institutions and accreditation of further professional education institutions. NCPA has developed standards and criteria for all abovementioned processes.

When assessing ESG 2.5 the panel carefully separated the issues described in your above listed reflection. The challenges arising from the implementation of cluster accreditations were reflected in the “partial compliance” of ESG 2.2 and the lack of individual evidences have been reflected in the “partial compliance” of ESG 2.6. In this combination the panel continues to believe to have addressed the complex situation with the cluster accreditation adequately. The panel decided to address the shortcomings regarding cluster accreditations not primarily under ESG 2.5 but instead concluded that the issue is by far more fundamental and hence critically reflected the “fitness for purpose” of the methodology under ESG 2.2.

The panel also followed the approach that under each standard only the criticism with relevance for this standard should influence its assessment. As the (quite fundamental) criticism regarding methodology (ESG 2.2) and reporting (ESG 2.6) is already reflected in the assessment of these standards, the panel recognized that under ESG 2.5 NCPA has processed a number of improvements by following recommendations of prior standards. Consequently the panel decided to take a balanced approach and explained that the shortcomings have their reasons in other standards while not “double punishing” the agency. At the same time the panel thought it is important to point out the complexity by indicating that the before mentioned shortcomings also impact ESG 2.5.

One of the main tasks of review is to provide recommendations for further development of Agencies' work, panel was of the opinion that criteria as such for a single programme accreditation are applied consistently. But as the number of cluster accreditation was growing, it was advised to separate these processes and develop separate criteria for cluster accreditation. Panel did not take programme evaluation as the process that could be used for cluster accreditation without any changes.

3. ESG 2.7 – Appeals and complaints The panel noted that only fully negative (and thus not all) accreditation decisions can be appealed, and that you “could not identify a complaints procedure nor references to complaints within regulations of appeals procedure” (ESG 2.7, p. 46). Could you please elaborate on the panel's considerations in concluding that NCPA substantially complies with the standard, despite these shortcomings?

The main reason for conclusion was that NCPA has established a clear appeals procedure and Appeals Committee was appointed. The implementation of the Appeals committee was an important step in the development of NCPA operations, which should be further strengthened. HEIs should also have a way for statement of their dissatisfaction with the process and their participants. NCPA itself recognizes the need of a separate complaint procedure.

In assessing the standard as “substantially compliant” the panel reflects on the fact that until today there has been no appeal and that during the interviews with HEI representatives the panel could not gain any evidence that any of the involved parties felt the need for a complaint procedure. NCPA explained this situation in light of the voluntary character and the enhancement focus of its procedures. In this light the panel concludes the further refinement of NCPA procedures regarding appeals and the addition of a complaints procedure as part of a development that builds on the implemented improvements following the last review.

Also the panel recognized that the differences of “appeals and complaints” require careful attention when translated into Russian language as the panel observed partially an identical translation for both words pointing to a linguistic differentiation that does not facilitate the understanding of the anticipated separation of these two aspects.

- 4. The report stated that the publications considered by NCPA to be thematic analyses (ESG 3.4) did “not focus on analysing the findings of the accreditations that NCPA undertakes” (p. 20), the concept of thematic analysis was thus “not fully understood” (idem). Could you please elaborate on the panel's considerations in concluding that NCPA substantially complies with the standard, despite a key feature of thematic analyses not being met?**

ENQA panel welcomed a lot of work done by NCPA in developing a number of types of reports aimed at providing useful and interesting information to stakeholders. These reports were well known and welcomed by representatives of HEIs. NCPA considers thematic analysis to be one of its priorities, activity is included both in strategic plan as well as in annual plan. Publications cover a wide range of topics, but are more research based rather than focussed on findings from the accreditation reports. It is very important that the Agency highlights best practices that provide valuable inputs to evidence-based policies for higher education at national level.

When concluding on the “substantial compliance” the panel weighted that what was lacking was a focus on analysing the findings (as mentioned in your question). The panel believes that a lack of focus on this aspect does not mean that the aim of this standard is not also addressed. On contrary, the agency defines its role in the dissemination as a priority and has a vast number of publications and reports. However, what is lacking is focus, and this is what the panel pointed at. In its interviews, the panel learned about the awareness of the stakeholders towards NCPA publications and reports and also its contributions to the dialogue in the Higher Education sphere. Consequently, the panel could not identify a major shortcoming under ESG 3.4 but provided a critical reflection of the current practice in order to highlight the need for further focussing towards compliance with ESG 3.4. The panel has found evidence that publications are regularly produced and believes that NCPA has the potential to expand activities in this area by adding thematic analyses based upon the data from accreditation activities.

- 5. ESG 3.6 – Internal quality assurance and professional conduct The panel concluded that NCPA substantially complies with standard ESG 3.6. Could you please clarify whether the absence of any cyclical review of NCPA's processes and the shortcomings with regard to cluster accreditations (both addressed under ESG 2.2) were considered by the panel as issues reflecting on the functioning of NCPA's internal quality assurance?**

While reviewing the Standard 3.6 the panel has focused on all the processes developed and executed by NCPA: accreditation, project and research activities, provision of information, e-support. The panel found evidences of review and improvement of NCPA's activities.

The panel assessed internal quality assurance system as a whole and did not distinguish separate accreditation procedures. It was important to find evidences that the whole cycle of plan–do–study–act was implemented.

The panel also found that NCPA fully supports the enhancement and developmental dimension of the external review by ENQA in light of a cyclical review. In this context (ESG 3.7) there is a cyclical review of NCPA processes in form of an external review (compare your question above “absence of any cyclical review...”).

The panel in deed discussed the issue of the appropriateness of the internal QA system in light of the identified challenges around cluster accreditation. As the panel also raised questions towards different stakeholders, NCPA staff, HEI representatives as well as cooperating agencies the panel found no concerns or issues raised by any of them regarding the practice of cluster accreditation. Consequently, even the involvement of stakeholders did not seem to raise this issue. The panel concluded that for this reason NCPA approach of giving relevance to a cyclical external review fits the setting of the agency well and is sound to its professional environment.