Decision on the Substantive Change Report by Agency for Evaluation and Accreditation of Higher Education (A3ES)

Decision of:	2023-07-31
Result:	Take note
Report received on:	2023-07-13
Agency registered since:	2014-06-01
Last external review report:	2019-06-20
Registration until:	2024-06-30
Absented themselves from decision-making:	none
Attachments:	1. Substantive Change Report, 2023-07-13
	2. Minuted clarification of 2023-06-22

1. The Register Committee considered the Substantive Change Report of 2023-07-13.

2. The Committee took note of the three substantive changes carried out on existing external QA activities. The Committee considered in particular the following:

    ○ A. Simplification of the assessment procedures of study programmes in operation

    ○ B. Simplification of the assessment procedures of non-aligned study programmes

    ○ C. Assessment procedures for online study programmes

A. Simplification of the assessment procedures of study programmes in operation

3. The Committee noted that A3ES employs a simplified procedure for study programmes in operation through the "Green Line" (Via Verde), an approach already in use since 2017/2018, which was already covered in the agency's external review (of June 2019). The "Green Line" approach is open for institutions that have an internal quality assurance system certified by A3ES and its study programmes (within the same scientific domain) are accredited with no further conditions.

4. The Committee understood that A3ES adopted a new simplification procedures starting with the academic year 2022/23. The changes

introduced allow for the use of online site-visits or may simplify the procedure, allowing for shorter site-visits. The changes introduced also extend the "Green Line" approach to institutions whose internal quality assurance system has not been certified by A3ES, but who fulfil all other requirements for accreditation i.e., R&D units of universities are rated at least as 'Very Good'; R&D activities in the scientific areas of the study programme are scientifically relevant, etc.

B. Simplification of the assessment procedures for non-aligned study programmes

5.   The Committee understood that as of February 2023 the "Green Line" approach may be also applied in the assessment of non-aligned study programmes (i.e. programmes non-aligned with the regular accreditation cycle) of institutions whose internal quality management systems has not been certified by A3ES. The programmes must however meet all the other "Green Line" approach requirements (see above).

6.   **The Committee considered that both of the above mentioned changes related to the simplification of the assessment procedures, impact the agency's compliance with standard 2.2 Designing methodologies fit for purpose and 2.3 Implementing processes. The next external review should thus considering how does the agency develop, review and update its processes and criteria, whether the methodologies are fit for the purpose, if stakeholders are involved in the design and continuous improvement, how are the key features in the standard implemented by the quality assurance agency in each of these activities and where no site visits are used, how does the agency validate the evidence provided by institutions and whether the processes are implemented consistently.**

C. Assessment procedures for online study programmes

7.   The Committee took note that A3ES developed a new set of guidelines for online study programmes (in the academic year 2022/2023).

8.   The Committee understood that the newly developed guidelines use as model the guideline for 'regular' programmes, while maintaining specific guidelines related to online education.

9.   The Committee noted that A3ES introduced specific criteria for online education related to the teaching and learning methodologies e.g., the teaching staff for online learning should have theoretical and practical training in online teaching; the institutions should have technical staff specialised that can help both students learning and teachers preparing classes and materials; the institutions must have adequate material and technological means and infrastructure to make online learning possible; remote examinations shall comply with the existing data protection guidelines etc.

10. Based on the information provided on the assessment procedures for online study programmes the Register Committee had no prima facie concerns that the ESG are complied with.

11. **The Register Committee however expects that the assessment procedure for online study programmes to be fully analysed against ESG 2.1 – 2.7 as part of the forthcoming targeted review of A3ES.**

Agency #1	Agency for Evaluation and Accreditation of Higher Education
Agency acronym	A3ES
Expiry date #1	30/06/2024
Contact #1	Maria Manatos
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Other organisations?	No
A. Has the organisational identity of the registered agency changed?	No
B. Has the organisational structure changed?	No
C. Changes in EQA activities	2. Substantive changes carried out to one or several existing external QA activities (e.g. changes to their methodology, criteria or procedures)
Description new/ changed	A3ES reports 3 changes carried out on existing QA activities: 1. Simplification of the assessment procedures of study programmes in operation Starting in the academic year 2017/2018, A3ES has adopted simplified and flexible procedures for the assessment of study programmes in operation, through what is called "Green Line" (Via Verde). This 'Green Line' allows the accreditation of study programmes without the need to form an External Assessment Team (EAT). The conditions for the 'Green Line' are the following: the institution has an internal quality assurance system certified by the A3ES; the study programmes of the same scientific area were unconditionally accredited;

R&D units of universities were rated by the FCT at least as 'Very Good' or, in polytechnic institutes, R&D activities in the scientific areas of the study programme are scientifically relevant.

In the academic year 2022/23 A3ES has defined new simplification procedures, with the publication of Order 15/2022. The main changes were: continue with online meetings (introduced in November 2020 with the pandemic) instead of site visits; simplify the assessment of study programmes when the EAT has sufficient information to prepare the reports and does not need clarification meetings; moreover the EAT can request additional information and/or if needed, can ask for some meetings (and not the full "visit") limited to half day per process; and extend the "Green Line" to institutions whose internal quality assurance system has not been certified by A3ES but who meet all the other requirements to be accredited according to the "Green Line" procedures.

2. Simplification of the assessment procedures of non-aligned study ...

...programmes

Starting in the academic year 2022/2023, A3ES has adopted simplified procedures for the assessment of non-aligned study programmes. The deliberation was published on February 3rd, 2023 (Order 1/2023) and from then onwards it is possible to apply the "Green Line" to all processes of assessment of non-aligned study programmes of institutions whose internal quality management systems has not been certified by A3ES but who meet all the other requirements to be accredited according to the "Green Line" procedures, namely, without nominating an external assessment team. The nomination of an external assessment team will still be mandatory whenever the requirements for the "Green Line" assessment have not been met.

3. Assessment procedures for online study programmes
The Portuguese legal framework for online education changed in 2019 (Decree-Law 133/2019) and A3ES lawfully adapted their procedures for the assessment of online programmes, implementing specific guidelines for the assessment of online study programmes in the academic year 2020/21. These guidelines for the assessment of online programmes were then merged with ´regular` programmes (in the academic year 2022/2023). There is now one set of guidelines (one same self-assessment script) for both ´regular` and online education and there are specific guidelines related to online education which are only filled in whenever the study programme being assessed is an online programme. The deliberation

was published on September 21st, 2022 (Order 16/2022) and there is new criteria regarding online education: (1) the teaching and learning methodologies for online or hybrid learning should be different from the ones used in ...

...in-person teaching; (2) the teaching staff for online learning should have theoretical and practical training in online teaching, experience teaching using active learning approaches, and a portfolio of recent scientific publications and/or scientific activities and/or pedagogical activities on themes directly related to online learning; (3) the coordinator of the study programme should fulfil the same legal requirements than those of in-person education and there can be an expert in online learning co-coordinating; (4) the institutions should have technical staff specialized that can help both students learning and teachers preparing classes and materials; (5) the institutions must have adequate material and technological means and infrastructure to make online learning possible, namely to develop experimental, laboratorial and performative activities online; and (6) students should be subject to continuous assessment and the use of surveillance systems for remote examinations shall comply with the existing data protection guidelines. The changes mentioned above did not impact on the agency's substantial compliance with the any of the ESG.

2. Changed EQA activity

1	Assessment/accreditation of study programmes in operation
2	Assessment/accreditation of non-aligned study programmes
3	Prior accreditation of new study programmes
ESG 2.1	The changes mentioned above did not impact on how the agency ensure the effectiveness of the internal quality assurance system processes described in Part 1 of the ESG.
ESG 2.2	The changes mentioned above were designed to ensure their fitness to achieve the defined aims and objectives. The simplification of procedures of study programmes in operation and of non-aligned study programmes, as well as the development of guidelines for online education had taken into account the needs of institutions and the desired flexibility of the external quality assurance system/ processes.
ESG 2.3	
1	https://www.a3es.pt/sites/default/files/Guidelines%20AACEF%202018-2023-EN_V1.0.pdf

2	https://www.a3es.pt/sites/default/files/PERA_Assessment_Guidelines.pdf
3	https://www.a3es.pt/sites/default/files/Guidelines_PAPNCE_2022_EN.pdf
4	https://www.a3es.pt/sites/default/files/GUIDELINES%20FOR%20REQUESTING%20PRIOR%20ACCREDITATION%20OF%20A%20NEW%20STUDY%20PROGRAMME.pdf
ESG 2.4	As mentioned above, the review team composition, selection, appointment and training of reviewers did not change. In the case of the simplification of the assessment procedures of non-aligned study programmes and of study programmes in operation. What change was the review team activity, which is now potentially more flexible and simpler.
ESG 2.5	Any outcomes or judgements made as the result of external quality assurance are based on explicit and published criteria, as it happened with the assessment of non aligned study programmes and of study programmes in operation before the simplification. With regard to the assessment of online study programmes, they followed the same processes (criteria, criteria' publication and forms of outcomes).
ESG 2.6	
1	https://www.a3es.pt/en/accreditation-and-audit/accreditation-process-results/accreditation-study-programmes
D. Activity outside the scope of the ESG	No
Submit form?	I am ready to submit the change report form

Application by Agency for Evaluation and Accreditation of Higher Education (A3ES) for Renewal of Registration

Minutes of Telephone Conversation

Date of the conversation:	2023-06-22
Representative of A3ES:	Maria Manatos
Representative of EQAR:	Melinda Szabo

1. A3ES has submitted on 2023-06-19 an application for renewal of registration on the European Quality Assurance Register for Higher Education (EQAR).

2. In order to prepare the deliberations of the Register Committee on the eligibility of the application and A3ES's activities within the scope of the ESG, EQAR contacted A3ES via Zoom to clarify the matters below.

3. The agency representative clarified that programme assessment identified in the application is divided into: 'prior accreditation of new study programmes', 'assessments of programmes in operation' and "accreditation renewal of non-aligned study programmes". However, they should be considered separated activities, since they have different procedures and guidelines.

4. The prior accreditation has no visit (neither in sight nor virtual), with the exception of medicine study programmes, which have in sight visits.

5. With regard to the accreditation of programmes in operation, the external assessment teams will decide whether there should be meetings or (virtual) visits (once again with the exception of medicine, which has in sight visits) in order to clarify information presented in the reports filled in by the higher education institutions.

6. The non-aligned study programmes do not have neither in sight nor virtual visits. Since 2022 there are simplified procedures for the assessment of programmes on operation (Order 15/2022). This simplification will be reported as substantive change.

7. Furthermore, since 2019, more particularly, since the legal framework for online education changed (Decree-Law 133/2019), A3ES had to adapt their procedures and has developed specific guidelines for the assessment of online programmes in 2020. In 2022, A3ES has merged the guidelines for online programmes with the 'regular' programmes which means that since 2022, there is one guideline for online and 'regular' education. In these guidelines there are options related to online education, which are only filled in, in case an online programme

is being assessed. These changes with regard to online education will also be reported as substantial changes to EQAR.

8. Considering the agency's procedures for joint programme accreditation, the agency representative explained that the assessment of joint programmes can be employed using the European approach (see change report of 2023-06-19) or based on agreements ('commitment letters') signed by the agencies involved in the assessment process. In these cases, when A3ES is not the leading agency, the assessment processes follow the guidelines and procedures of the leading agency. This was only possible after the Decree-Law 27/2021, which enabled A3ES to follow the criteria of other quality assurance agencies, once they are aligned with the ESG.

9. A3ES intends to keep both assessment processes of joint programmes (based on the European approach and based on commitment letters between agencies and following the assessment criteria of the leading agency).