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Review report of the current external quality assurance system in Georgia

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Introduction

The present report is based on the goals and structure set by the Terms of reference provided by the Georgian authorities. The overall goal of the exercise is to provide assistance to review the current external quality assurance (QA) system in Georgia. More specifically, the team was asked to provide 'initial assistance to develop feasible and effective tools to overcome the following discrepancies of the current QA system' (Terms of reference, annex 1). The composition of the Council of Europe experts team was the following:

- Katja Dolgova Dreyer, Head of the Unit for Regional and Bilateral Co-operation in CIS and Central Asia, Education Department, Directorate of Democratic Citizenship and Participation, Council of Europe;
- Achim Hopbach, Managing Director, Agency for Quality Assurance and Accreditation Austria (AQ Austria);
- Ligia Deca, Researcher at the University of Luxembourg and Policy expert at the Executive Agency for Higher Education, Research, Development and Innovation (UEFISCDI), Romania.

The site visit took place on 2-3 June 2014 and was organised by the National Education Quality Enhancement Center (NCEQE). The team would like to thank Elene Jibladze, NCEQE Director, as well as all other Ministry and NCEQE representatives for their extraordinary openness and constructive approach, as well as for the comprehensive information provided while on site.

The conclusions drawn by the experts and the recommendations made by them are based on the analysis of several documents provided by the NCEQE (the 2013 Report and the Analytical Review 2011-2013, the Report regarding the NCEQE compliance with ENQA membership criteria and the ESG by Josep Grifoll Sauri, the PICQA project report, as well as other documents available on the NCEQE website) and on the discussions during the visit. The experts appreciated the constructive atmosphere of the meetings, the openness of the interviewees enabled the experts to draw a picture about key issues of the current status of the agency and about some of the main topics in terms of possible future developments. The experts want to emphasize that, different from a typical external review, the basis of this recommendations is not a comprehensive self-evaluation report of the agency with a detailed SWOT analysis. Hence, the conclusions and recommendations presented in this report focus on certain topics which are deemed to be critical as regards the deficiencies mentioned in the terms of reference; they do not cover the agency and its operations in its totality and should thus not be considered as exhaustive.

The report contains three chapters. The introduction is followed by a chapter on general findings and recommendations, which refers to some fundamental aspects of the position and role of the agency. The conclusions and recommendations in the third chapter address the various items listed in the ToR. The experts want to emphasize that the agency was only analysed as far as its tasks in external quality assurance in the narrow sense are concerned. Neither its function as national ENIC/NARIC centre, nor other functions outside external quality assurance were taken into account.

General conclusions and recommendations

Procedures for external quality assurance

Without having analysed every detail of the legal basis of the agency and its organisational structure, and finally of the quality assurance procedures conducted by the agency, the experts confirmed the findings of Josep Grifoll and concluded that, by and large, the agency complies with the ESG. Also to be mentioned in this respect is the 2013 NCEQE Report and Analytical Review 2011-2013, which stands out as a good example for system-wide analysis and which the panel wants to comment the agency for.

In what follows, some comments from the perspective of European foreign experts that will be presented in the hope that they might inspire further work on the current procedures.

- The involvement of students as experts in the panels seems to develop only slowly. The current revision of the ESG puts even more emphasis on this distinctive feature of external quality assurance in the EHEA. Hence, the agency is advised to strengthen its efforts in this respect, including empowering students to be active participants in both internal and external quality assurance processes (via training sessions for example). It is worth mentioning that the new ESG also point to the involvement of employers or other labour market experts in in review panels. The agency might also wish to deliberate whether this is a road for further development. (The case of involvement of international members is dealt with separately below.)
- It is to be considered as standard practice that universities have the opportunity to comment on draft experts' reports, at least in order to point to factual errors or inaccuracies. Experience shows that these statements can serve as valuable additional source of information in the decision-making process.
- The public hearing of applicant universities right before the accreditation and the authorization decisions are taken is a unique feature of external quality assurance in Georgia. The experts learned that the main purpose of the public hearing is to create transparency and to give universities an opportunity to react on the findings of the accreditation or authorization experts. The public hearing obviously fulfils both purposes. However, the agency might wish to evaluate whether other approaches could serve these two purposes even better and whether the disadvantages of the public hearing might outweigh the advantages, in particular with view to future developments aimed at developing the quality enhancement features of the external QA system in Georgia. One disadvantage is obviously the lack of a written comment of the university on the experts' report. The Council members are dependent on oral information on the spot given as response to certain questions. This setting might, on the one hand, hinder the universities to convey that information which they consider relevant, on the other hand, it is more difficult for the Council to give reasons for its decisions in those cases where relevant information was gathered only orally. In case the agency would follow European standard practice and introduce the step of a written statement of the universities on the experts' report, one function of the public hearing loses its relevance. Also the publication of the decision, including the experts' report and the universities' statement would serve the purpose of ensuring transparency for the Georgian academic community and the wider public.

- The experts concluded also that, in particular with a view to a more developmental approach in the accreditation procedures, it might be worth rethinking whether a public hearing in a court of law style is the appropriate setting for discussing further quality enhancement developments in the universities.
- The various discussions revealed that the link between internal and external quality assurance is not clear, especially for the higher education institutions representatives. Whether the results of internal quality assurance are taken into account in the authorization and particular in the accreditation procedures remains unclear among all parties involved. As stipulated in the ESG a sound internal quality assurance forms the basis of all quality assurance activities. Hence, the results of internal quality assurance processes should be taken into account. This is particularly true when the accreditation procedures are moved into a more enhancement oriented direction. The capacity of the universities to assure the quality of their provision should then be one of the focal points of the reviews, at both institutional and programme level.
- Based on the aim that every external quality assurance procedure, be it compliance-oriented accreditation or enhancement-oriented audits should support further developments in universities, it is key to design the procedures in a way to foster dialogue about further developments. The easiest way to introduce this feature into accreditation procedures is to make extensive use of the tool of recommendations. However, in order to make this tool effective it should be complemented by a follow-up procedure, which the agency can use to discuss with the universities if and how they implemented the optional recommendations. The annual reports might be used for this purpose, so as to enhance their originality and relevance in the entire external quality assurance process.

The independence of the agency

The experts acknowledge that progress has been made regarding some deficiencies in the field of independence of the agency. In particular the recently revised process of selecting and appointing members of the two councils is a step in the right direction. In this respect, the appointment of the Director of the agency caught the attention of the experts. The appointment by the minister might be considered as undue influence and thus affecting the independence of the agency. In case the appointment by the minister is a legal obligation, a public selection process, involving all interested stakeholders and based on a methodology as transparent as possible, might be a way to support the independence of the agency. In addition, consideration might be given to a revision of the term of council members. In the experience of the experts, the shorter the term of such a position is, the more it might be considered as giving room for influence by the minister. In addition, longer mandates of council members might foster the maintenance of an organisational memory and a pool of expertise which support the consistency of decisions and the credibility of the agency.

Finally, the involvement of international experts is an effective instrument for assuring independence of a quality assurance agency. Different options might be applied, either by having international members in the decision-making bodies or by setting-up a (partly) international advisory committee.

Recommendation no. 1

The agency should consider involving international members in its internal governance structures, as a tool to enhance quality of its activities and to ensure its credibility and independence.

Increasing the capacity of National Education Quality Enhancement Center (NCEQE)

The various discussions revealed a mismatch of perceptions of the role of the agency and its purpose. Furthermore, a lack of a shared understanding of the role of quality assurance for higher education and of the regulations and standards applied by the agency has to be acknowledged.

Regulations and standards for authorisation and accreditation are established and publicly available. As regards the standards for programme accreditation one can conclude that they, by and large, cover the same elements as those of comparable agencies in the EHEA. However, the discussion clearly showed that the implementation and the application of the standards are affected by the lack of a joint understanding and a joint interpretation between review panel experts and HEI representatives, as well as between different internal structures of NCEQE. This contributes substantially to some of the deficiencies mentioned in the ToR. One consequence of this status-quo lies in potentially inconsistent decision-making by the two NCEQE councils. HEIs might consider the decisions of the agency arbitrary or, in case a competitor received a more favourable decision, HEI might consider the decision biased. Such a situation negatively affects the credibility of an agency. The full relevance of this issue becomes clear when one takes into account that it also applies internally. Members of expert groups, members of the two councils and the staff also seem to lack of a shared understanding of the existing authorisation and accreditation regulations and standards. Possible consequences are limited confidence of council members in peers and vice versa, limited confidence of experts in NCEQE staff and vice versa and not the least limited confidence between members of the two councils.

Finally, during the interviews, the experts got the impression that the members of the council did not know how to treat cases such as authorisation/ accreditation of HEIs/ programmes which can be characterised as cross-border HE provision (such as branches of foreign institutions). It might be useful to develop guidance and, if necessary, appropriate legal provisions, for dealing with such increasingly common cases.

Recommendation no. 2

The agency should strengthen substantially its efforts in training of staff, council members and members of expert teams in order to foster a shared understanding of the regulations and standards and to guarantee a consistent application of them in reviews and decision making.

The agency should provide all parties involved with written guidance in interpretation and application of its regulations and standards, in order to foster consistency and transparency of its work.

Recommendation no. 3

The agency should strengthen its communication with stakeholders, in particular with HEIs, in order to familiarize them with the 'official' interpretation of the regulations and standards.

Recommendation no. 4

The agency should organise structured dialogues between the members of its two councils, as well as between the members of its pool of reviewers, in order to facilitate common understanding of the standards and regulations they apply. Similar dialogues should be put in place between the agency and the representatives of the HEIs.

Recommendation no. 5

Legal provisions and guidance should be provided on how to deal with quality assurance of cross-border educational programmes and providers.

Communication and feedback procedures

The agency, since it was assigned the task of authorizing HEIs by Georgian national authorities, played an important role as gate keeper of the national higher education system. It is to be commended for its obvious success in performing this role, which was acknowledged unanimously by interviewees. It is important to know, though, that at the same time the appreciation of the broader quality assurance functions of the agency, particularly those linked with quality enhancement, stay at a significantly lower level. The procedures are deemed to be burdensome and bureaucratic, primarily linked to the authorisation (licensing) function and state funding, without contributing to internal developments and in particular to any quality enhancement processes.

Whereas one has to acknowledge that the criticism regarding the bureaucratic and burdensome nature of external quality assurance is as old as external quality assurance itself, the discussions revealed that the link between external and internal quality assurance seems to be rather loose, which gives more weight to the scepticism from the side of HEIs. Further to this, the agency isn't even perceived as a 'traditional' quality assurance agency, but rather as an authority mandated to preserve minimum standards and protect against disreputable providers, with little competence to deal with actual 'substance' matters regarding quality of higher education.

In particular, in the current situation of discussing future directions of external quality assurance this perception is a point of major concern. On one hand, this should encourage the agency to move in the direction of emphasizing the enhancement dimension of external quality assurance. On the other hand, the agency should be aware of the fact that this needs to be triggered as an establishment of a new task of the agency, rather than as a more or less

slight modification of the existing modus operandi. In conjunction with the conclusions under 2) the agency could explore setting-up an advisory board looking at how to progress towards a more quality enhancement function, which could include international experts, as well as national experts and stakeholders with experience in the functioning of the current system.

Recommendation no. 6

The agency should establish itself as a communication platform for discussions about any questions related to quality of higher education. In order to foster this dialogue, the agency might wish to organise regular round tables with stakeholders and in particular the HEIs, organise workshops on certain specific topics in order to share experience and possibly a Forum on its webpage.

Recommendation no. 7

The agency should organise a consultation process for stakeholders, in particular with HEIs, in order to gather feedback during the process of revising its procedures.

The agency should establish institutionalized links with stakeholders, in particular with HEIs. An option might be an advisory board. This would also strengthen the general accountability of the agency.

Recommendation no. 8

In order to make use of the accumulated experience and know-how of all those involved in quality assurance processes managed by the agency (staff members, review panel experts and members of the Councils), a feedback mechanism should be put in place and regular analysis of such feedback should be discussed with all interested parties.

Shaping the future role of the agency in an enhancement-centred QA system

From the discussions held during the visit, the experts learned that the agency is expected to strengthen the enhancement dimension in its work. In particular, the management of the agency and the ministry clearly pointed in this direction. Such a move might respond to the fact that the HEIs don't perceive the agency as having a quality assurance and in particular an enhancement function.

A look at the existing procedures and tools reveals that, indeed, the accountability dimension dominates. This is obviously the case in the authorization procedure. In a traditional way, compliance with certain standards forms the precondition for getting licence for operating as a HEI. Also, the annual self-assessment reports serve this accountability function since continuing compliance with the authorization standards is at the core of this tool.

In addition it is important to note that, an additional accountability function is added to the programme accreditation, even if this quality assurance process is supposed to be more developmental in its nature than compliance oriented. A positive decision for programme accreditation forms the basis for receiving state funding.

It is worth noting that during the various meetings the experts could learn that the agency's accomplishment regarding its gate-keeper function are highly appreciated by all parties involved. Hence deliberations of future directions of the agency should take into account this important role of the agency and assure that this function is served appropriately within the system, especially with the high influx of incoming and outgoing educational providers.

Accountability and enhancement are, indeed, the 'traditional' twin purposes of external quality assurance, as it developed in Europe since the mid-nineties. Consequently the current version of the ESG, as well as the draft of the new version of the ESG emphasise the dual role of quality assurance to ensure trust and foster quality enhancement. It is equally true, though, that accommodating both purposes of external quality assurance within one single procedure is challenging and bears risks, as HEIs find it difficult to reveal their weaknesses and challenges in managing their IQA systems to a body issuing an evaluation which bears financial or licencing consequences. Also, the way in which compliance-oriented and enhancement-oriented processes are designed is also suited for their purpose, which means that they will differ both structurally and functionally.

When reforming external quality assurance systems it is therefore advisable not to take the existing quality assurance procedures and tools as the starting point of the discussion, but to first and foremost analyse and define functions that shall be performed in the higher education system. Only as a second step the discussion should follow about what actors and what tools and procedures might be appropriate to serve this function.

Part of this deliberation should also be the link between accreditation and funding. The current voucher system adds a purpose to the accreditation decision, which is not directly linked to quality. For those universities that are heavily dependent on the voucher system, any type of self-critical, developmental accreditation procedure might rather be risky than favourable because they would understandably have to try, by all means, to receive accreditation and, thus, might rather camouflage any fields of necessary development.

Recommendation no. 9

Before the restructuring of the external quality assurance system, a thorough analysis should be carried-out, with a view to define what functions should the quality assurance system play, before designing new procedures or amending the existing ones.

Recommendation no. 10

The ministry should evaluate whether the current financing system could be modified in order to decouple the allocation of funds from the accreditation decision.

Findings and recommendations according to the Terms of reference (points 1-7)

- 1. The QA process and specifically the final decisions need to be focused on the improvement and development. The decision-making council should not be bound to the binary decision-making process, but has to have an option of a conditional accreditation/authorization.**

The various discussions revealed a unanimous wish to introduce the instrument of conditional accreditation into the system. The nature of the possible decisions at the end of an external quality assurance procedure is a crucial component of assuring that a procedure meets its purpose. It is obvious that a report with recommendations, as the 'traditional' result of a formative and enhancement-oriented quality assurance procedure, suits best the purpose of giving advice for developing further. However, also summative quality assurance procedures bear some potential to support the enhancement dimension.

Experience from many accreditation systems in Europe tells that the instrument of giving conditional accreditation bears a lot of advantages. The instrument of conditional accreditation does not really convert an accreditation procedure into a pure improvement-oriented quality assurance approach but it at least puts in place necessary mechanisms for enabling programme developments.

In addition to guaranteeing that a programme develops further in order to meet the accreditation standards, this instrument can also contribute to avoiding one of the most critical pitfalls of accreditation, which is the danger of reluctance of universities to introduce any changes to a programme once the accreditation decision is made, in order not to risk the accreditation status. Conditional accreditation can at least support a culture of programme development according to the needs identified by the HEI.

It is a tricky thing to define the cases when conditional accreditation as opposed to denial of accreditation shall be granted. Various approaches exist:

- Specific areas of deficiencies can be dealt with by imposing certain conditions for resolving the non-essential pitfall. That means in return that certain areas which are deemed to be of crucial importance are excluded from this instrument.
- The relevance of the deficiency. That means that the decision making body has to judge how serious the problem is.
- Expected time period necessary for fulfilment of the condition. That means that irrespective of the area or the relevance of the deficiency conditions can be given only in those cases when the problem can presumably be solved in a defined period of time.

There are pros and cons for each of the approaches. They all have in common that decisions are not totally objective binary (yes/no), but different parties might have different interpretations. In order to avoid fruitless discussions about how severe a problem is, the time-related approach seems to be the most pragmatic one in the current Georgian context, but this is of course a matter of deliberation by those directly involved in authorisation/accreditation decision-making thus far.

Further to this, introducing the instrument of conditional accreditation is highly recommended because it fosters transparency and honesty in the reports and the decisions. Experience shows that without the existence of such an instrument already in the experts' reports and in the accreditation decisions, smaller deficiencies are often not mentioned in order not to risk a certain inconsistency between minor negative findings and the positive overall decision.

During the discussions the experts learned that the instrument of giving recommendations as the 'traditional' enhancement-oriented result of an external quality assurance procedure is not used to its full potential. It seems that universities consider recommendations as being of very limited relevance, if at all. However, this instrument should be at the core of moving the accreditation procedure towards a more enhancement-oriented approach. Both universities and the agency should use recommendations as tool for inspiring internal developments in the universities that are followed-up in the next accreditation procedure or in a modified version of the annual assessment reports. It is important to mention from the outset that the agency has to make sure recommendations do not turn into compliance tools, but rather serve as a basis for dialogue about the best way to move forward.

Recommendation no. 11

The current legal framework should be amended in order to allow for conditional accreditation.

Recommendation no. 12

The agency should base the reasons for giving conditional accreditation on the expected period of time necessary for fulfilling the existing standards.

Recommendation no. 13

The agency should make non-binding recommendations as a regular component of all its procedures and should also introduce a follow-up, as part of a dialogue with the universities (via the annual self-reports or other instruments).

2. The QA standards have to foster a results-based evaluation as opposed to the input-based assessment.

In an external quality assurance process, the choice and the nature of the applied standards play a crucial role. Dependent on the purpose of the quality assurance approach, certain types of standards might be applied. An example could be to use minimum standards for setting the overall minimal requirement and using further reference standards which push towards more enhancement and result oriented behaviours of the HEIs.

The experts conclude that the subject and the formulation of the six broad accreditation standards cover the usual areas of assessing study programmes, although they are not formulated as standards but rather as description of the area of assessment. However, the additional explanations of what would be expected for meeting the standards fulfil the guiding purpose of a standard very well.

The link to the results or the outcomes of a programme is made in sections a), b) and in particular in section d) of the standard “Teaching Methodology and Organisation, Adequate to programme mastering Evaluation”. Section d) could be elaborated more in terms of the relevance of the programme with reference to the National Qualifications Framework and with regard to the attainment of the intended learning outcomes and/or graduates’ success on the labour market etc. This should also link to the internal quality management of the universities and to ensuring that enough time has passed between the authorisation process and the accreditation, so that the process of ensuring the attainment of the learning outcomes can actually be observed by the review panels.

Recommendation no. 14

The agency should add to the accreditation procedure a component of evaluating whether graduates reached the expected qualification level by taking into account samples of written exams and thesis. In addition empirical data on the success of graduates on the labour market to be provided by the universities should be taken into account. In the same vein, a sufficient timeframe should be allowed between initial authorisation and accreditation so that attainment of learning outcomes procedures can properly be assessed.

The experts emphasize that the choice and nature of the standards is only one component of making the accreditation procedure more enhancement oriented. The design of the procedure is of equal importance. The instrument of recommendations can be a useful tool in the process of moving towards a more results-based evaluation.

3. The quality of the reports needs to be improved and a plausible mechanism for the institutions to appeal the decisions of the council has to be in place.

The quality of the reports is crucial since reports are the basis for decision making. Further to this, published reports play a crucial role in creating trust in the quality assurance system. Hence they have to be comprehensive, diligent in terms of application of the standards and also readable for the intended audience. In order to make full use of their potential, reports should be able to serve as a major source for the universities to work on continuous improvement of the programmes.

Therefore, reports need to be precise in terms of compliance of the university or the programmes with the standards and should also contain commendations and recommendations by the experts. Writing reports is a skill that needs to be taken seriously. Templates can give guidance in order to assure completeness and to support consistency. Writing reports should also be a major component of training experts.

Recommendation no. 15

The agency should provide the experts with written guidance about structure, content and style of reports and should provide them with templates. Training sessions are also essential in developing the capacity of the review panel experts to deliver valuable reports following their assessment activities.

An appeals procedure is one of the core elements of an agency's accountability. It should be natural that a HEI can file an appeal in case it thinks that it was treated unfairly. Examples show that appeal procedures also make sense in HE systems where the agency is bound by national administrative law which would normally provide for formal legal action. Various agencies put in place an appeals procedure in addition to the regular legal framework. Providing an internal, and not a legally determined procedure, might even be more appropriate in those cases where quality judgements are questioned. In principle there are two approaches:

- an appeals body that deals with the case and takes final decisions, hence may overrule the original decision, or
- an appeals body that analyses the case and gives opinion to the decision making body which has to decide again by taking into account the opinion of the appeals body.

Recommendation no. 16

The law should be amended in order to allow for an appeals procedure for all quality assurance decisions. In case this is not possible due to the legal framework the agency should implement an internal appeals procedure with clear regulations on possible subject matters of an appeal, time frames and results of an appeal.

As a relevant detail and in connection with the possibility to introduce an appeals procedure, the experts want to raise attention to the very restrictive existing timeframe of accreditation decisions. Various interviewed actors signalled that the three months' timeframe is not enough to conduct the legal procedures and take a well-substantiated decision over accreditation of higher education programmes. In addition, the legal possibility for another application to be entered immediately after a negative decision, unnecessarily burdens the existing workload of the decision-making bodies and should logically have little chances to provide a different result than the previous assessment. A well-designed appeals procedure combined with a restriction to re-apply for authorisation or accreditation for a certain timeframe might enhance the coherence of the system, as well as its objectivity.

Recommendation no. 17

The legal framework should allow a more extensive timeframe for authorisation/ accreditation processes, as well as a minimum waiting period before re-applying for the institutional authorisation or programme accreditation.

4. Certain level of consistency has to be ensured within the interpretation of the standards from one peer reviewer to the others as well as among the council members and peer reviewers.

A consistent interpretation and application of the authorization and accreditation standards, as well as consistence in decision-making, are key for the credibility of a quality assurance agency.

The various meetings hinted to a lack of a shared understanding and interpretation of the standards and regulations among universities, experts, members of the bodies of the agency and the agency staff. Such a shared understanding cannot be instantly achieved, but results from supportive means like official guidelines and in particular from transparent communication. This applies both to internal and external communication. A shared understanding within the councils, among the councils, between the councils and the experts and finally between the staff and the councils and experts is of utmost importance for consistent and reliable decision making. This also links to the recommendation about strengthening the role of the agency to serve as a communication platform for all topics related to quality in higher education. In addition sound training and briefing of all individuals involved in the reviews, experts, council members and staff is key for a consistent application of agreed quality assurance standards and procedures.

Recommendation no. 18

The agency should produce official documentation about the interpretation of core terms and standards to be applied in the reviews.

Recommendation no. 19

The agency should organize trainings and joint meetings for all parties involved in order to foster shared interpretation of the standards and regulations.

Recommendation no. 20

The agency should collect cases of relevant precedents in order to support the consistent decision making of the councils.

5. In order to ensure impartiality of the QA process, the chances of biased evaluations must be decreased. The participation of the local academic community needs to be minimized in order to curb possible nepotism

Impartiality is a key element of every external quality assurance procedure. Impartiality is a particular challenge in small higher education systems, where personal acquaintance among members of a discipline and competition between only a few universities reduce the number of potential experts.

The basis for impartiality is first and foremost the shared understanding of standards and regulations based on official documents.

In addition an effective ‘no conflict of interest’ – policy is key. Such a policy should be based on a publicly available set of possible reasons for a conflict of interest, such as previous or envisaged contract of expert with the institution under review, strong personal links to staff of the institution or the programme under review, recent (unsuccessful) job-application of an envisaged expert at the institution under review, professional links of an envisaged expert with the institution such as research projects etc. Such a policy should contain two aspects: the demand for experts to declare any possible case of conflict of interest (or a procedure by which someone else could signal a potential conflict of interest) and also a standard procedure for the agency to exclude envisaged experts from a review.

The experts learned during the various discussions that the use of foreign experts is unanimously deemed to be the key to avoid biased reviews. Indeed, using foreign experts, apart from the additional benefit of broadening the horizon in the review, is a suitable instrument to avoid biased reviews, in particular in a small higher education system. However, it is fair to mention that the use of foreign experts is not the only instrument for guaranteeing impartiality and it also bears challenges and risks.

It goes without saying that using foreign experts is a challenge in terms of costs. Another challenge or even risk lies with the fact that familiarity with the national context in terms of legal frameworks, cultural traditions, exact purpose and remit of the review is limited and might thus impact on the depth of the assessment. This is particularly true for quality assurance procedures with direct legal and/or financial implications. A sound knowledge of the national framework is of utmost importance in these cases. It is much easier for foreign experts to serve as panel members in more enhancement-oriented procedures. Experience shows that in an unfortunate case the criticism about biased experts is simply replaced by the criticism about unqualified or not knowledgeable experts. A university that received an unfavourable accreditation decision will not be happier with just because foreign experts were involved. Hence, the use of foreign experts needs to be thought through seriously, and the expected benefits have to be realistic. In addition the use of foreign experts should be only one component of guaranteeing impartiality of the reviews.

Recommendation no. 21

The agency should use foreign experts in the review panels, especially in those type of quality assurance evaluations which are more enhancement oriented and have limited legal/ financial consequences.

The agency should put particular emphasize on training and briefing of foreign experts.

Recommendation no. 22

The ministry should support the implementation of the use of foreign experts by providing additional funding to HEIs volunteering to be involved in the pilot phase.

6. The fee formula of the accreditation/authorization procedure has to be adequate and take into account the specifics of different academic programs, or institutions

Calculating the price for quality assurance reviews is always a matter of balance between various criteria: number of experts (as well as their origin: national or international), size of the institution, number of programmes assessed, complexity etc. The current fees for quality assurance reviews were unanimously considered to be affordable for the institutions. However, it is expected that the potential introduction of foreign experts might increase the financial burden on the institutions. Possible solutions to this challenge were gathered in the discussions held: grouping of QA reviews when foreign experts are brought into the country in order to minimise travel costs or voluntary inclusion of the foreign experts in review panels. This is of course subject to the analysis of the agency's intentions for the use of such experts.

In terms of fee formulas, they also depend on whether or not the agency is self-sustaining and on how much public funding or from other diverse sources it receives. In general, any formula should not make it prohibitive for an institution to undergo quality assessments. In the current case, a combination of coefficients such as the size of the institution (number of students or number of programmes) and the type of experts used could be meaningful for designing a fee formula.

7. A self-assessment report has to foster institutional development

In the current system of external quality assurance the role of the annual self-assessment report is obviously not clear. Various meetings of the experts revealed that none of the parties involved in external quality assurance finds the current way of reporting useful.

Since the report is structured along the authorization criteria and the universities have to demonstrate that the criteria are still fulfilled this report looks like a continuous authorization process, with very similar information from one year to the next. The report is not taken into account in the accreditation or authorization procedures, nor do the universities receive a feedback on it. Very seldom HEIs declare significant changes which have taken place in their structure of functioning. It is obvious that under these conditions this report cannot be anything but a predominantly compliance oriented tool which is very unlikely to support institutional development.

First and foremost clarification of the purpose of the report is necessary. Only afterwards the structure and the expected content can be defined accordingly. What seems obvious already now is that attaching the task of fostering institutional development to the report has to mean shifting its focus away from compliance with the authorization standards. However, it is questionable whether an annual report is an appropriate tool for fostering institutional development. This would only be possible if the report would be based on a self-analysis (not only description) regarding the progress made (and whether the recommendations made by the review panels were considered) and if the university would receive a feedback by experts. Doing this within a one-year-cycle seems to replace the continuous authorization by a continuous self-evaluation. Reports are best for gathering information about certain aspects. Hence the agency might wish to think how to use this tool in a meaningful way.

Annex 1 - Terms of Reference

Needs assessment of the Georgian educational quality assurance system

To: Education Department, Council of Europe

Time frame: Two to three weeks

Desired starting date: April 28, 2014

Aim: This ToR seeks an assistance to review the current external quality assurance (QA) system in the country.

Background: QA system in education is based on the principle of accountability and comprises of four elements. Within the education system there is a National Education Quality Enhancement Center (EQE) – a regulatory body that is responsible for coordination and administration of the quality assessment. A self-assessment that the educational institutions annually undertake based on the standards and procedures set out by the EQE. An external peer evaluation that is based on the institution's self-assessment. The findings of the peer evaluation are included in the published report that lays out the strengths and weaknesses to the institutions. The report is presented to the *Council* for an official decision. Current QA system comprises of two mechanisms: authorization that combines the institutional accreditation and licensing functions and program accreditation.

Problem definition: Over the course of the years, the QA system has been criticized for being rigid, for being focused on audit rather than improvement, for the lack of qualified and objective peer evaluators, i.e. QA experts. Although these concerns are valid, the thorough analysis of the QA practices is not available, which makes it difficult to seek for the appropriate solutions to the deficiencies of the QA system.

Scope: This ToR seeks the initial assistance to develop feasible and effective tools to overcome the following discrepancies of the current QA system:

1. The QA process and specifically the final decisions need to be focused on the improvement and development. The decision-making council should not be bound to the binary decision-making process, but has to have an option of a conditional accreditation/authorization.
2. The QA standards have to foster a results-based evaluation as opposed to the input-based assessment.
3. There quality of the reports needs to be improved and a plausible mechanism for the institutions to appeal the decisions of the council has to be in place.
4. Certain level of consistency has to be ensured within the interpretation of the standards from one peer reviewer to the other as well as among the council members and the peer reviewers.
5. In order to ensure impartiality of the QA process, the chances of biased evaluations must be decreased. The participation of the local academic community needs to be minimized in order to curb possible nepotism.
6. The fee formula of the accreditation/authorization procedure has to be adequate and take into account the specifics of different academic programs, or institutions.
7. A self-assessment report has to foster institutional development.

Expected results: a) review the QA system; b) provide recommendations to address the deficiencies with a special focus to include international reviewers in the authorization and accreditation process; c) provide costing of the internationalized accreditation and authorization processes; d) develop an action plan to introduce the suggested changes.

Annex 2 - Site Visit Agenda

2-3 June 2014

Day 1: Monday, June 2, 2014

9:00 -9:30	<p>Meeting with NCEQE</p> <p>Director - Elene Jibladze Deputy Director – RusudanTavkhelidze</p>
9:30- 10:30	<p>Meeting with NCEQE Staff</p> <p>Department of Authorization and Accreditation and Department for Educational Programmes</p> <p>Lasha Margishvili - Head of Authorization Division Giorgi Tskhvediani - Head of Accreditation Division Marina Zhvania - Head of the Department for Educational Programmes Lali Shaishmelashvili - Deputy head of the Department for Educational Programmes Ketevan Panchulidze - Head of Educational Programmes Development Division Tamar Lortkipanidze – Coordinator at the International Relations’ Division</p>
10:30- 11:30	<p>Meeting with the peer-reviewers’ group</p> <p>Nino Jojua – Accreditation & Authorization peer Tea Nadiradze – Accreditation & Authorization peer Giorgi Ramishvili – Accreditation & Authorization peer Paata Brekashvili - Accreditation peer Manana Moistsrapishvili – Accreditation peer</p>
11:30-12:30	<p>Meeting with HEI Representatives</p> <p>Nino Amiranashvili – Ilia State University Tata Vepkhvadze – Iv. Javakhishvili Tbilisi State University Irina Bakradze - Georgian University of Public Affairs Natia Chigvaria - Georgian University of Public Affairs R. Michael Cowgill - Georgia – American University Romeo Galdava - Sokhumi State University Nino Berdzenishvili - Grigol Robakidze University Elene Mamukelashvili - New Vision University</p>
12:30-14:00	Lunch
14:00-15:00	<p>Meeting with Accreditation Council For HEI Representatives</p> <p>Magda Magradze - Head of Accreditation Council Irakli Machabeli – Member of Accreditation Council Zaza Maruashvili – Member of Accreditation Council</p>

15:00- 15:15	Coffee/tea break
15:15-16:15	Meeting with Authorization Council for HEI Representatives Nino Chinchaladze – Head of Authorisation Council for Higher Education Institutions
19:00	Dinner

Day 2: Tuesday, June 3, 2014

10:00- 11:00	Meeting at the Ministry of Education and Science of Georgia First Deputy Minister - Ketevan Natriashvili Deputy Minister for Higher Education - Giorgi Sharvashidze
11:15- 11:30	Coffee/tea break
11:30-12:30	Meeting with the working group of the QA system review Irine Darchia – Vice Rector of East European University, Associate Professor at Ivane Javakhishvili Tbilisi State University (TSU), Higher Education Reform Expert (HERE) Lika Glonti – Head of Erasmus Plus National Office in Georgia Davit Kereselidze – Head of Academic Council of New Vision University, Higher Education Reform Expert (HERE) Sandro Shelia – Consultant of Business Process Analysis at NCEQE
12:30-14:00	Lunch and Debriefing