Support to APAAL to ensure it matches up to international standards development
(Project APAAL/IC/CS/005/11)

Review Report

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Abbreviations and glossary

APAAL  
*Agjencia Publike e Akreditimit të Arsimit të Lartë* (often translated as ‘Public Accreditation Agency of Higher Education’ or PAAHE)

AC  
Accreditation Council

Accreditation  
The system by which judgements are made on the fitness of HEIs to be responsible for programmes leading to diplomas, or on the fitness of programmes to lead to diplomas.

Assessment  
The system of review used to determine the fitness of HEIs to be accredited or to offer programmes, or for programmes to be accredited. Sometimes called ‘evaluation’.

CHES  
(MOES) Committee for Higher Education and Science

Diploma  
An academic award recognised by the Government.

EHEA  
European Higher Education Area

ENQA  
European Association for Quality Assurance in Higher Education

EQAR  
European Quality Assurance Register (Open to full members of ENQA after a further application procedure. Not all full members of ENQA have applied for registration with EQAR.)

ESG  

HEI  
Higher Education Institution

Licensing  
The system of review used to determine whether new institutions may begin to offer programmes, or new programmes may be offered to students.

MOES  
(Albanian) Ministry of Education and Science

SER  
Self-evaluation report (by HEIs for the purposes of assessment and/or accreditation)
Summary

This report analyses and makes recommendations on what is required for APAAL to make a credible application for ENQA membership, in the light of the Albanian Government’s plans for improving higher education. ESG is its point of reference, not merely as the test for membership of ENQA, but for effective accountability for HEIs and APAAL. The operations of APAAL at present do not match the ESG in a number of areas, some of them outside APAAL’s direct control. Such matters require MOES action.

APAAL has no mission statement: it should consult with MOES to determine and publish one. The Government’s expectations of APAAL are confused. Decision No 368 is about academic quality assurance, but the National Standards, which are to be APAAL’s point of reference in their core activities, are in many cases non-academic and unsuited to a peer-review system. The National Standards should be reviewed to identify which are relevant to an academic peer-review procedure.

APAAL is recognised in law. However, its status and public profile are vitiated by the opportunity for HEIs to be assessed by any ENQA agency for accreditation purposes, and the ambiguity of APAAL’s relationship with AC. MOES is too closely involved in the ratification of APAAL/AC recommendations. APAAL should be established as the national agency with sole responsibility for institutional assessment and accreditation; AC’s role should be redefined; and MOES should delegate more decisions to APAAL.

Currently institutional assessment is an add-on to programme-level assessment. If it were separated many benefits would accrue, but in particular the inclusion of non-Albanians on expert panels would be more feasible. A discrete institutional procedure would entail review of assessment and accreditation procedures for both institutions and programmes. The review should take into account a number of requirements in ESG not currently fulfilled by APAAL procedure, which are relatively technical but would in fact improve the procedures.

APAAL should persuade the HEIs that its activities are to help them improve as well as regulate them. APAAL should undertake system-wide analyses of the outcomes of assessment activities to identify common problems and good practice. They should plan and publicise consultation activities and communicate the results of these analyses.

APAAL will need increased resources, particularly in staffing, to meet ENQA expectations and the recommendations in this report. Though increased income will accrue from the changes proposed, it is unlikely that this will be sufficient without MOES support. APAAL budgets should be proposed against strategic plans, not simply historical activity.

APAAL does not plan sufficiently, and its time and staffing resources are not used to best effect. Routine but necessary tasks such as updating paperwork tends to be neglected in favour of ad hoc and immediate demands. No-one in APAAL co-ordinates the Agency’s work overall. There is little evidence of teamwork in the interests of efficiency. The Agency should routinely draw up strategic and annual operating plans, including all functions for which it is responsible, and there should be a means of tracking progress against objectives.
**Introduction**

This is the report of a review of the operations and organisation of APAAL, with recommendations about changes needed for ENQA membership. It is written in the light of the aims for Albanian higher education stated in the papers of the Education Excellence and Equity Program, and the recent Green Paper and HE Strategy. In the course of the review I have also produced working documents, such as a ‘gap analysis’ of the relation between APAAL practice and the ESG, and an analysis of the various tasks identified for APAAL in Albanian laws and decisions, which I have used in workshops and made available to APAAL. They are not appended to this report, but are available on request.

ENQA entry requirements are specified in *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG: ENQA, 2009)*. The 23 standards cover internal quality assurance of higher education institutions, external quality assurance of higher education, and quality assurance of quality assurance agencies. The three areas are interdependent and refer to each other. Each ‘standard’ is accompanied by ‘guidelines’, which provide additional information about good practice and in some cases explain in more detail the meaning and importance of the standards. ESG provide a common-sense benchmark for systems of quality assurance for HEIs and agencies, based on peer review, aimed at both accountability and enhancement. For ENQA membership, agencies must demonstrate that they ‘substantially’ meet standards relating to official status; regularity of activities; adequacy of resources; clarity of goals and objectives; independence of decision-making; procedures used for external quality assurance; and accountability.

There is a considerable gap between ENQA requirements and current APAAL practice. The recommendations in this report address all the gaps, and therefore aim at ‘full’ rather than merely ‘substantial’ compliance. They fall into six broad categories: General; Legal; Procedural; Presentational; Resource-related; and Managerial. These categories are used as the framework for the body of this report.

Some of the recommendations require change at APAAL, particularly a much more conscious approach to planning, which in turn demands more active management, and more team activity. Some recommendations (especially those in the General and Legal categories) are for the MOES, and are not within APAAL’s competence. Some of the recommendations are about minor details of ESG, and are more or less easily remedied (e.g. a conflict-of-interest policy for members of AC; the inclusion of students on expert panels); some are about major ESG requirements, such as strategic plans and systems by which APAAL assures its own quality. Perhaps the most important are the matters where the relationship with ESG is indirect, but where change is necessary to make an application credible overall, and (perhaps more important) to effect improvement in Albanian HE; they are mainly aimed at making APAAL more professional, and raising its status with the MOES, the HEIs and the Albanian public. The recommendations, with indications of who is responsible for action, are listed in Appendix B.

ESG is a high hurdle: the standards represent ‘best practice’ in developed nations, most of which have been practising quality assurance for decades. Quality assurance in Albania is relatively new. In addition, Albanian higher education has undergone a period of rapid change over the past five years or so. These developments have necessarily occupied much of APAAL’s time and staffing resources. The recommendations do not imply criticism of the APAAL staff’s commitment; on the contrary, responses from the Director, managers and staff in the Agency to draft forms of the recommendations have been very positive. Meetings with the Chair of the Accreditation Council and the Minister for Education and Science have also reflected their open-mindedness and willingness to consider advice.
General

There is no clear public statement of APAAL’s primary purposes and aims. Lack of a published ‘mission statement’ offends the ENQA principle of providing clear and accessible public information about agency activities; and APAAL cannot ensure its limited resources are concentrated on what is important.

Two major documents concerning APAAL were published by Government in 2011: Decision No 368 (14/04/2011), ‘On the approval of the regulation on accreditation system, organization and operation of institutions of external quality assurance, amended’, and the ‘State quality standards of higher education institutions’, still in draft, but shortly to be ratified. The latter are supported by additional ‘Standards’ and ‘Criteria’ already approved for programmes in the first and second ‘cycles’. Law No. 9741, ‘On Higher Education in the Republic of Albania’ (2007) also makes stipulations about APAAL’s functions.

Most of what is specified for APAAL in Decision No 368 is aligned with what is typically expected of national quality assurance agencies and may be mapped on to ESG. However, the National Strategy for HE states that the National Standards will be used by APAAL as their test for assessment and accreditation. Many of the Standards, though important, are not academic, and have little relationship with ESG. They include, for instance, checks on the extent to which HEIs conform with accounting standards, the sizes of windows and the heights of ceilings. The basic instrument of assessment and accreditation, peer review, is quite unsuited to such matters. On some, expert panels will not be competent; others do not need academic judgement.

There is no guidance about whether some Standards are more important than others, or whether it is necessary for HEIs to meet every one in full. Each of the standards is accompanied by a list of ‘Criteria’, many of which are highly specific. It is not clear whether the Criteria are mandatory, or merely have the status of examples of how the Standards may be met. The separation of overarching National Standards from Standards on programme ‘cycles’ suggests that they are intended for different purposes; however, institutional and programme matters are unhelpfully confused in the different documents.

Without solutions to these problems, unsatisfactory HEIs may be accredited.

Recommendations

1. In consultation with Government and the Accreditation Council, APAAL should define its primary purposes and aims and publish them.
2. The National Standards should be reviewed to establish (ESG 2.3) (A/C/M)
   2.1. Which ‘Standards’ are suitable for testing within an academic peer-review procedure. This could be achieved by mapping the Standards on to ESG Part 1 (ESG 2.3)
   2.2. Which Standards are essential and which merely desirable. The standards regarded as essential should be applied strictly to all HEIs in accreditation decisions (ESG 2.3)
   2.3. Which Standards apply to institutional and which to programme assessment and accreditation. (ESG 2.3)
   2.4. How the ‘Criteria’ apply to decisions on assessment and accreditation. (ESG 2.3)
Legal

APAAL meets the ENQA criterion of being recognised by competent public authorities, having an established legal basis, as specified in a range of statutory instruments. However, the law as it stands inhibits APAAL’s effectiveness.

The law states that an HEI can approach any agency with full membership of ENQA for assessment purposes. It appears that the Government was laudably attempting to realise the ‘overall convergence at European level’ envisaged by the Bologna Declaration. However, the provision fails to recognise practical difficulties: all assessment must be in English, and all the documents informing assessment must be translated; a foreign agency would be required to use Albanian Standards with which it will be unfamiliar or unsympathetic. Accreditation by a foreign agency at programme level is not uncommon, but only Denmark amongst EU members has made the option available for institutional assessment. No Danish university has taken advantage of the option. It is unsurprising that the schedule of accreditation at national level, particularly for the public universities, is seriously behind schedule: the body whose responsibility it is to oversee such matters has limited powers to make the public universities comply. Albania should remove the option, confirm APAAL’s special status amongst agencies in Albanian law, and thus enable the Government’s wider expectations of APAAL to be met.

The law is confused about the relation of APAAL and AC. In the law of 2007, AC is stated to be ‘a part of’ APAAL; but Decision No 368 implies throughout that they are two separate bodies. Should ENQA include AC in its assessment of APAAL, or not?

It is certainly the case that the activities of APAAL and AC overlap. APAAL’s expert panels assess HEIs and their programmes on the basis of the HEIs’ SERs and site visits. AC also conducts an assessment, but on the basis of the SER and the expert panels’ reports, without the benefit of a site visit. This seems inefficient at best, and calls into question the Government’s confidence in peer review, which is fundamental to ENQA procedure.

It would be more efficient and defensible for AC to have the kind of role in relation to APAAL of a board of trustees to a charity, or a board of directors to a company. Such an arrangement is common in EU agencies. AC should be responsible for higher-level functions, such as approving mission statements and strategic plans; approving budgets; acting as final court of appeal against recommendations of APAAL experts; and so on. IN relation to expert panels’ reports, AC’s role should not be to review them but to ratify them, and to provide guarantees on such matters as procedural correctness and validity the light of the evidence.

In addition, AC’s membership is too much like the membership of expert panels. There must be academic members, but a greater range of stakeholders should exercise influence on matters where the national interest is at stake.

On a matter of detail, members of expert panels are bound by APAAL’S no-conflict-of-interest policy; but members of AC are not. This is anomalous and contravenes an ENQA requirement.

One of ENQA’s key tests is in relation to the independence of agencies. They are required have autonomous responsibility for their operations, and their judgements and recommendations must be free from influence by ministries and HEIs. At present the law requires final agreement by MOES on most of APAAL’s/AC’s judgements, even on minor matters such as the annual schedule of assessments and the composition of the list of experts. In addition, the law of 2007 states that CHES, an MOES advisory body, is responsible for the criteria and procedures APAAL uses in assessment. CHES is certainly responsible for the National Standards.
It appears that in practice the Minister almost never reverses judgements, and though Decision No 368 gives him oversight of the list of experts, he chooses not to exercise it. Nonetheless, to meet ENQA expectations, MOES should restrict its direct involvement in decisions to the minimum, and CHES should have no role in APAAL procedure.

**Recommendations**

3. The clause in the law that gives HEIs the option of being assessed by any quality assurance agency registered with ENQA should be repealed, and APAAL established as the sole agency responsible for institutional assessment.
4. The role of the Accreditation Council should be redefined. It should:
   4.1. Be unambiguously ‘a part of’ APAAL.
   4.2. Be the senior decision making body of APAAL, akin to a Board of Directors or Trustees, with similar powers.
   4.3. Have a broader membership than at present, with more ‘stakeholders’ (particularly employers).
5. There should be a formal conflict of interest policy for members of the Accreditation Council. *(ESG 3.8)*
6. The laws and decisions relating to the activities of APAAL should be considered in the light of these proposals, and the Minister for Education and Science should seek to delegate decisions on assessment and accreditation matters to APAAL, except where there is an explicit and overriding national interest in retaining final control. *(ESG 3.6)*

**Assessment and accreditation procedures**

Under current arrangements, APAAL manages assessment at both institutional and programme levels. The various laws refer to both, though they do not make any requirement as to a procedural link. As indicated above, the National Standards confuse them.

In practice institution-level assessment is never done independently, and is something of an add-on to programme assessment. No specifically ‘institutional’ activity is specified in APAAL procedure, beyond what is required anyway in programme accreditation. Recommendations on institutional accreditation are delegated to the expert panel chair, who is elected by the other experts from amongst their number, and must therefore combine institutional responsibilities with programme responsibilities.

It would be strongly in APAAL’s interests, and those of Albanian HE, to separate institutional from programme assessment and accreditation. The option for other agencies to undertake accreditation could remain at programme level. There would by definition be far fewer ‘institutional’ than ‘programme’ assessments, making it feasible to include foreign experts. The work of translation would be manageable. The pool of foreign experts would be wider without the constraints of subject. In addition to the added assurance provided by international benchmarks, non-Albanian experts would raise the status of assessment activities and thus go some way to overcome the resistance of public universities.

Additional benefits include opportunities for:

a) Expert panels to produce joint agreed reports on the basis of common experience, reducing the likelihood of bias and increasing the reports’ credibility;
b) Checks on programme-level reports, so that HEIs would not be able to rig assessments with temporary arrangements designed to look permanent;

c) More effective assessment of HEIs’ internal arrangements for quality assurance, which *ESG* suggests should be at the heart of external quality assurance;

d) A review of those institutions who are causing the concern expressed in the HE Strategy and in EU reports (e.g. Council of Europe 2011)

e) More time in programme-level assessment, so that tests of teaching quality can be included.

This revision would have consequences for present assessment practices, and would entail careful consideration of both. A number of features will be required to meet ENQA guidelines. APAAL should consult widely on the changes—which will also encourage ‘buy-in’ from HEIs. There should be provision for formal appeal at APAAL level (appeals are currently permitted only at Ministry level). All reports should be followed up, not just those where accreditation is conditional on fulfilment of conditions. The aims, objectives and procedures should be published before they become operative. APAAL should keep the operation of the procedures under review, and in particular gauge their impact on HEIs after three or four institutional assessments. There should be a commitment to overall review after 6 years.

In keeping with practice across Europe, expert panels at institutional level should include student members.

**Recommendations**

7. Define Institutional Assessment and Accreditation as a discrete procedure, separate from Programme Assessment and Accreditation. The new procedure should have the following features:

7.1. The panel should include international experts. (*ESG* 2.4)

7.2. The panel should include a student. (*ESG* 2.4)

7.3. The event should be conducted in English.

7.4. The event should focus on internal quality assurance, including the way in which the HEI goes about measuring and improving the quality of teaching and assessment. (*ESG* 2.1)

7.5. The report should be the joint report of all members of the panel.

7.6. The report should be publicly available, including being published on the Internet. (*ESG* 2.5)

7.7. Reports should be written in a style that makes them accessible to a wide readership. (*ESG* 2.5)

7.8. The procedure should include arrangements for follow-up whatever the result. (*ESG* 2.6)

8. APAAL should review the procedure for programme assessment and accreditation in the light of these recommendations, and the national HE strategy. The procedure should include explicit consideration of the quality of teaching and assessment. (*ESG* 2.1)

9. APAAL should devise and publish a procedure for appeals against formal judgements concerning accreditation. (*ESG* 3.6)

10. Stakeholders (HEIs, employers, students) should be consulted on the aims and objectives for the new procedures. (*ESG* 2.1)
11. The aims, objectives and procedures of assessment and accreditation should be published in updated documents and on the Internet. \( (ESG\,2.2) \)

12. Following the first three or four assessments under the new procedure, APAAL should evaluate the operation of the new procedure with a view to improving it if necessary. \( (ESG\,2.2) \) (A)

13. After 6 years, the procedure should be assessed to determine what if any amendments are made before the new cycle. \( (ESG\,2.7) \)

Public presentation

APAAL currently has limited recognition at the level of HEIs and probably less at the level of public consciousness. This is in part due to its subsidiary role in relation to AC and MOES. At present it is easy for public universities to neglect assessment and accreditation responsibilities—though the engagement of the public universities would provide an important boost to the practice of quality assurance, which APAAL is supposed to promote.

This relative invisibility is made more possible by the fact that APAAL does not publish the reports of its experts, and even AC publishes only its judgements and any conditions. ENQA will expect all reports to be published. The reports would be of interest to students considering enrolment at an HEI under review. The experience of other nations suggests that the reports will be of wider interest too, and may even be reported in the media, though they are not likely to make headline news. Publication will raise APAAL’s profile.

ENQA expects agencies to make ‘system-wide’ reports on the outcomes of their various quality assurance activities. At present, APAAL and AC make a joint Annual Report to MOES, though it is descriptive and largely quantitative, and gives no indication of any sector-wide lessons that might be learned from assessments. The only other general ‘analysis’ is the ranking exercise that has taken a significant amount of time from a small staff complement in the past year. This is so far confined to a few subjects, and based on a paper exercise that is quite separate from APAAL’s assessment and accreditation activities. It provides no opportunities for HEIs to learn from each other or from APAAL. It suggests that APAAL is there to test rather than to help HEIs. Currently APAAL has no Research and Development section (ENQA considers the establishment of such sections to be good practice), but it should find some way to publish system-wide analyses of the good and poor practice it has identified in its assessment and accreditation activities.

APAAL should generally make positive overtures to its stakeholders, consulting them regularly and providing opportunities for them to learn about improvement. These measures will all help APAAL to gain prominence, and for external quality assurance activities to be recognised as of public significance.

Recommendations

14. All assessment and accreditation reports should be published. The reports should be written in a way that makes them accessible to the whole range of potential audiences (students, parents, press, as well as the HEIs themselves). \( (ESG\,3.8) \)

15. APAAL should make system-wide analyses of the lessons to be learned from its assessment and accreditation activities. The outcomes should be widely published to HEIs, and on the Agency’s website. \( (ESG\,2.8) \)

16. APAAL should draw up a regular schedule of consultation activities with HEIs in advance.
Budgets and staffing

These recommendations imply significantly more work for APAAL; though in fact most of them are entailed by the list of functions in Decision 368. APAAL’s staffing level is low in relation to the norms of agencies with full ENQA membership. Bulgaria, for instance, is one of only two Balkan agencies in this category. It has about twice the population and twice the student numbers of Albania, and rather fewer HEIs. However, the Bulgarian agency is more than three times the size of APAAL, and it appears it has no demanding ‘ranking’ exercise to add to its assessment and accreditation responsibilities.

The ENQA guidelines expect agencies to have ‘adequate and proportional resources, human and financial, to enable them to organise and run their quality assurance process(es) in an effective and efficient manner, with appropriate provision for the development of their processes and procedures’. (ENQA 2009) It is difficult to believe that an ENQA panel would consider APAAL’s current staffing sufficient to fulfil this expectation. If the recommendation above were adopted, and APAAL alone were responsible for institutional accreditation, there would be more, and more predictable income from the HEIs, perhaps enabling more staff to be hired, though it is unlikely that this would cover all the activities proposed here. More resources from MOES are likely to be needed.

Moreover, APAAL budgets have to date been developed annually on the basis of the three years previous. The past is clearly an important reference point, but the current practice allows no opportunity for planning or development, and is also a practice, according to the Green Paper on Funding, due to be phased out for universities, in favour of budget-planning against the activities envisaged in strategic plans. The same regime should apply to APAAL.

Recommendations

17. MOES should consider APAAL budget and staffing levels, with a view to increases sufficient to meet ENQA expectations. (ESG 3.4)
18. APAAL should construct its budget by reference to its strategic plans not merely its past activities. (ESG 3.4)

Working practices

APAAL has no strategic plan or operating statement. The 2010 APAAL Annual Report refers to improving the professionalism of the agency, the qualifications of the staff, and improvements to procedure and the physical operating environment. This is an outline sketch rather than a plan, and there is no evidence that it was developed either in consultation with the staff or with the stakeholders. It makes no reference to the significant plans for HE recently published by Government, or to the other Government decisions that bear directly on APAAL operations.

APAAL should have a strategic plan both to meet ENQA expectations and to help manage its activities. The plan must start from the statement of purposes and objectives described above. The plan must be published.

APAAL should have an operating statement to cover short-term activities. Staff activity is reactive, and there is no provision for managing routine but essential updating work such as the publication of new procedural documents: the ones still in use were published in 2004 and 2005, though conditions have changed dramatically since then.

Lack of planning is characteristic of the Agency’s activities overall. The omission is partly explicable by reference to the bulge of licensing activity required by the rapid
expansion of Albanian HE, especially private HE, over the past few years. It is partly due to the fact that under current arrangements it is for HEIs to request assessment activity and not vice-versa. However it is clear that it is partly due to the management culture, which appears reactive and not forward looking. I was unable to find any evidence of regular team meetings, or any activity aimed at ensuring that the operations of the Agency were organised as a whole, to ensure that requirements beyond the immediate were met.

APAAL needs more staff, but much could be done with more efficient use of the staff it has. Without a means of co-ordinating staff efforts and ensuring that all requirements are fulfilled, an increase in staff will be ineffective. One way in which this is managed elsewhere is for there to be a senior post reporting to the head of the agency with the title of ‘Operations Manager’ or some such; it could be done by the present Director in regular meetings with his section heads. The section heads should make more use of team meetings to ensure common understanding of routine as well as ad hoc functions.

In addition, ENQA requires that agencies have arrangements for ensuring their own quality, an obvious expectation of a body charged with assuring the quality of others. APAAL should have a means of collecting the view of its ‘clients’, its experts and its staff in relation to its various activities, analysing them and using them to effect improvement. The internal quality assurance activities should include review by another agency at least every five years. These arrangements should be published.

**Recommendations**

19. APAAL should draw up a Strategic Plan, with explicit objectives for the next three to five years, in the light of the responsibilities described in Decision 368 and the recommendations in this report. The Strategic Plan should be published, including on the Agency website. *(ESG 3.3, 3.4, 3.5)*

20. APAAL should draw up Operating Plans annually in advance, specifying in detail the projects it will undertake in the short term, with dates and responsibilities. The Operating Plan should be kept under regular review to check progress by the senior staff. *(ESG 3.5)*

21. APAAL should develop policies and procedures for the internal assurance of the quality and standards of its own operations. These procedures should include a commitment to external review by another national agency or group of international experts at least every five years. *(ESG 3.8)*
Appendix A: Project Terms of Reference

II- Objectives and Scope of the activity

Purpose of this activity (4.2.5) is for an international consultant to advise on the development of the operations and structure of APAAL (Public Accreditation Agency of Higher Education - Agjencia Publike e Akreditimit të Arsimit të Lartë) so that it matches European Network Quality Assurance (ENQA) Standards. The international consultant is likely to be from an Agency of Accreditation which is a member of ENQA. The consultant will advise APAAL and the Accreditation Council (AC) about improvements needed to their methodology, to their operations and to their organization arrangements (separately and together) so that they match the international requirements of ENQA.

The consultant will advise on revisions to the main methodology and procedures for the operations, with the implications for the organizational arrangements, with a view to them being rigorous, robust, transparent, and thus able to achieve an international level for the 'Quality and National Standards for institutional and study program accreditation of HEI’s'. The consultant will also recommend changes to the documents and indicators of APAAL and the AC for the new procedures and, in addition, will provide a workshop (or more than one if needed) to train the relevant staff of APAAL – and members of AC as needed.

The intention is that, as a result, the APAAL and the AC to be able to apply the new standards, (once approved), in its operations in a way that meets the ENQA standards.

III - Tasks and Activities

Preparatory activities

(i) Familiarization with the current position, including the procedures of APAAL and AC, the main policy documents such as Higher Education law, HE Strategy and HE directive, the operational methodology and processes, and the structures and main functions of each directorate etc.

(ii) On the basis of the documents, carry out an evaluation of the current position with European good practice (and the ENQA requirements) with the new standards and an initial identification of weak points and of possible ways of improvement.

First visit to Albania – and subsequent follow up work

(i) Discussions of current position and its shortcomings and of possible directions of change with representatives of all interested parties:

   a. Senior staff at APAAL and a few members of AC (including the Chair)
   b. The Minister of Education and a few relevant officials at the MOES
   c. A small number (perhaps 5) of informed academic staff in Universities
(ii) Development and discussions of draft outline recommendations for changes to the methodology, operations and processes of APAAL and AC.

(iii) Identification of main implications for the organization arrangements and structure of APAAL and of any developments needed in staff skills.

(iv) Design of a plan for one or more workshops for training APAAL staff and members of AC.

(v) Preparation of power point presentation and other support documents for the workshop(s). (Part of the presentations will be the practical examples with arguments for why they are suitable and beneficial in the Albanian context).

**Second visit to Albania – and subsequent conclusions and report**

(i) In further discussion, the development of the outline recommendations into final ones and clarification of the implications for the organizations in terms of methodology, processes, management arrangements, operations and structure.

(ii) Based on the plan for the workshops, delivery of the planned training to APAAL staff and members of AC; the training will be based on interaction, brainstorming and concrete samples.

(iii) After the training workshop(s), the consultant will produce a final report including details of all the recommendations for change and an outline of the next steps that APAAL and/or AC will need to take to secure full ENQA status.

**IV - Expected outputs**

- An evaluation of the current procedures, operational structure, indicators by reference to those needed for international ENQA status;

- Recommendations for change and improvements needed for APAAL’s new methodologies, processes, operations and structure and also the changes needed to the activities of the AC.

All the changes suggested will have been discussed and formalized between the consultant and APAAL.

**V - Information and Publication of the report/ outcomes/ results**

After the activity, the APAAL should publish the final report of the consultant, and their proposed implementation of it, on the official web site.

**VI - Duration**

The period of this activity will be in two phases:

a) Phase I, comprising the preparatory work, the first visit and the subsequent preparation: 20 working days, of which at least 5 and perhaps 10 full working days will need to be in Albania, during May – July 2011.
b) Phase II, comprising the second visit and the finalization of the report: 10 working days, of which about 5 full working days will need to be in Albania, during July-October 2011.

In total, the working days are not likely to exceed thirty (30) (including any travel time).

VII - Administrative support

The APAAL will provide the Consultant with the specific documents and data regarding:

- National Strategy for Education
- Quality National Standards for institutional and study program accreditation of HEI's
- Higher Education Law and Directives
- Documents and Guidelines of External Quality Assurance
- Documentation on the current activities of the APAAL and of the Accreditation Council
## Appendix B: APAAL Review Recommendations

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<td>2.3. Which Standards apply to institutional and which to programme assessment and accreditation. <em>(ESG 2.3)</em></td>
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<td>2.4. How the ‘Criteria’ apply to decisions on assessment and accreditation. <em>(ESG 2.3)</em></td>
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<thead>
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<th>Legal</th>
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<tr>
<td>3. The clause in the law that gives HEIs the option of being assessed by any quality assurance agency registered with ENQA should be repealed, and APAAL established as the sole agency responsible for institutional assessment.</td>
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<td>4. The role of the Accreditation Council should be redefined. It should</td>
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<tr>
<td>4.1. Be unambiguously ‘a part of’ APAAL</td>
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<tr>
<td>4.2. Be the senior decision making body of APAAL, akin to a Board of Directors or Trustees, with similar powers.</td>
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<tr>
<td>4.3. Have a broader membership than at present, with more ‘stakeholders’ (particularly employers).</td>
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<td>5. There should be a formal conflict of interest policy for members of the Accreditation Council. <em>(ESG 3.8)</em></td>
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<td>6. The laws and decisions relating to the activities of APAAL should be considered in the light of these proposals, and the Minister for Education and Science should seek to delegate decisions on assessment and accreditation matters to APAAL, except where there is an explicit and overriding national interest in retaining final control. <em>(3.6)</em></td>
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### Assessment and accreditation procedures

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<th>APAAL</th>
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<td>7.</td>
<td>Define Institutional Assessment and Accreditation as a discrete procedure, separate from Programme Assessment and Accreditation. The new procedure should have the following features:</td>
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<tr>
<td>7.1.</td>
<td>The panel should include international experts. <em>(ESG 2.4)</em></td>
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<td>7.2.</td>
<td>The panel should include a student. <em>(ESG 2.4)</em></td>
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<td>7.3.</td>
<td>The event should be conducted in English.</td>
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<td>7.4.</td>
<td>The event should focus on internal quality assurance, including the way in which the HEI goes about measuring and improving the quality of teaching and assessment. <em>(ESG 2.1)</em></td>
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<td>7.5.</td>
<td>The report should be the joint report of all members of the panel.</td>
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<td>7.6.</td>
<td>The report should be publicly available, including being published on the Internet. <em>(ESG 2.5)</em></td>
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<td>7.7.</td>
<td>Reports should be written in a style that makes them accessible to a wide readership. <em>(ESG 2.5)</em></td>
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<td>7.8.</td>
<td>The procedure should include arrangements for follow-up whatever the result. <em>(ESG 2.6)</em></td>
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<td>8.</td>
<td>APAAL should review the procedure for programme assessment and accreditation in the light of these recommendations, and the national HE strategy. The procedure should include explicit consideration of the quality of teaching and assessment. <em>(ESG 2.1)</em></td>
<td>✔</td>
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<td>9.</td>
<td>APAAL should devise and publish a procedure for appeals against formal judgements concerning accreditation. <em>(ESG 3.6)</em></td>
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<td>10.</td>
<td>Stakeholders (HEIs, employers, students) should be consulted on the aims and objectives for the new procedures. <em>(ESG 2.1)</em></td>
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<td>11.</td>
<td>The aims, objectives and procedures of assessment and accreditation should be published in updated documents and on the Internet. <em>(ESG 2.2)</em></td>
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<td>12.</td>
<td>Following the first three or four assessments under the new procedure, APAAL should evaluate the operation of the new procedure with a view to improving it is necessary. <em>(ESG 2.2)</em></td>
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<td>13.</td>
<td>After 6 years, the procedure should be assessed to determine what if any amendments are made before it begins again. <em>(ESG 2.7)</em></td>
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### Public presentation

| 14. | All assessment and accreditation reports should be published. The reports should be written in a way that makes them accessible to the whole range of potential audiences (students, parents, press, as well as the HEIs themselves). (*ESG 3.8*) | ✔ |
| 15. | APAAL should make system-wide analyses of the lessons to be learned from its assessment and accreditation activities. The outcomes should be widely published to HEIs, and on the Agency’s website. (*ESG 3.8*) | ✔ |
| 16. | APAAL should draw up a regular schedule of consultation activities with HEIs in advance, in the light of its operating plans. (*ESG 2.8*) | ✔ |

### Budgets and staffing

| 17. | MOES should consider APAAL budget and staffing levels, with a view to increases sufficient to meet ENQA expectations. (*ESG 3.4*) | ✔ |
| 18. | APAAL should construct its budget by reference to its strategic plans not merely its past activities. (*ESG 3.4*) | ✔ |

### Working practices

| 19. | APAAL should draw up a Strategic Plan, with explicit objectives for the next three to five years, in the light of the responsibilities described in Decision 368 and the recommendations in this report. The Strategic Plan should be published, including on the Agency website. (*ESG 3.3, 3.4, 3.5*) | ✔ |
| 20. | APAAL should draw up Operating Plans annually in advance, specifying in detail the projects it will undertake in the short term, with dates and responsibilities. The Operating Plan should be kept under regular review to check progress by the senior staff. (*ESG 3.5*) | ✔ |
| 21. | APAAL should develop policies and procedures for the internal assurance of the quality and standards of its own operations. These procedures should include a commitment to external review by another national agency or group of international experts at least every five years. (*ESG 3.8*) | ✔ |
Appendix C: References and documents consulted


(APAAL 2005c) Accreditation Agency for Higher Education.

(APAAL 2005d) Aspects and Indicators for Quality Evaluation in Higher Education.


(Council of Europe 2011) Assessment of the licensing, regulation and inspection of private educational institutions within Albania. Professor Ian Smith and Tom Hamilton.


(MOES, n.d.) Reform of public funding for Higher Education (DRAFT II).

(MOES 2007) Instruction No 30 of 26 September 2007. On the definition of procedures and documentation, a juridical entity must produce when establishing a private higher education institution or introducing study programmes, of primary and secondary study cycles, as well as ‘second level master’ study programmes.


(MOES 2011b) State quality standards of higher education institutions (HEI).


(Republic of Albania 2011). Decision No.368, date 14.4.2011. For some amendments and changes in decision no. 424, date 06/02/2010, of the council of ministers ‘on the approval of the regulation on accreditation system, organization and operation of institutions of external quality assurance, amended.


On the definition of procedures and documentation, a juridical entity must produce when establishing a private higher education institution or introducing study programmes, of primary and secondary study cycles, as well as ‘second level master’ study programmes.