KOSOVO ACCREDITATION AGENCY
(KAA)

Self-Assessment Report 2018

Approved by KAA’s Board on November, 2018
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<tr>
<td>AI</td>
<td>Administrative Instruction</td>
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<tr>
<td>BAC</td>
<td>British Accreditation Council</td>
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<td>CEENQA</td>
<td>Central and Eastern European Network of Quality Assurance</td>
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<tr>
<td>CVET</td>
<td>Council of Vocational Education and Training</td>
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<td>ECTS</td>
<td>European Credit Accumulation and Transfer System</td>
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<td>EHEA</td>
<td>European Higher Education Area</td>
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<td>ENQA</td>
<td>European Association of Quality Assurance in Higher Education</td>
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<td>EQAR</td>
<td>European Registry of (credible) Quality Assurance agencies</td>
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<td>EQF</td>
<td>European Qualification Framework</td>
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<td>ERASMUS +</td>
<td>European Region Action Scheme for the Mobility of University Students</td>
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<td>ESG</td>
<td>European Standards and Guidelines</td>
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<td>EU</td>
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<td>EYE</td>
<td>Enhancing Youth Employment</td>
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<td>HE</td>
<td>Higher Education</td>
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<td>HEI</td>
<td>Higher Education Institution</td>
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<td>HERAS</td>
<td>Higher Education, Research and Applied Sciences</td>
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<td>KAA</td>
<td>Kosovo Accreditation Agency</td>
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<td>KESP</td>
<td>Kosovo Education Strategic Plan and Action Plan</td>
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<td>LHE</td>
<td>Law on Higher Education</td>
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<td>MEST</td>
<td>Ministry of Education, Science and Technology (Kosovo)</td>
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<td>MLSW</td>
<td>Ministry of Labour and Social Welfare</td>
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<td>NGO</td>
<td>Non-Governmental Organization</td>
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<td>NQA</td>
<td>National Qualifications Authority</td>
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<td>QA</td>
<td>Quality Assurance</td>
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<td>SER</td>
<td>Self-evaluation Report</td>
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<td>SCQ</td>
<td>State Council of Quality</td>
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<td>SWOT Analysis</td>
<td>Strengths, Weaknesses, Opportunities and Threats Analysis</td>
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<td>VET</td>
<td>Vocational Educational Training</td>
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1. INTRODUCTION

Kosovo Accreditation Agency (KAA) is a public agency responsible for accreditation of higher education institutions and their study programmes in the Republic of Kosovo. Established in 2004 and operationalized in 2009, to date KAA has undertaken more than 400 institutional and programme reviews and has worked with more than 200 international experts.

KAA operates on the basis of provisions of the Law on Higher Education in Kosovo, which recognizes KAA as an independent public body responsible for evaluation and accreditation of Kosovar higher education institutions and their study programmes. KAA work is based on the Administrative Instruction on Accreditation 15/2018 (Annex 1) and on a number of other documents regulating the quality assurance system in Kosovo. European Standards and Guidelines (ESG) have been a very important reference point for the development of a quality assurance framework in Kosovo due to the fact that all actors have made serious efforts to ensure that standards are comparable with those laid out in the ESG.

Over the past years, the context and the needs of higher education have changed because higher education institutions themselves have evolved. Therefore, KAA has responded by ensuring that the national system of quality assurance remains up to date to reflect these changes and that the methodologies and process that it uses are fit for purpose. It has made substantial changes and adaptions to its national legislation and documents in order to reflect the trends and best practices in Europe. It has introduced a dialogue with higher education institutions and has increased the transparency of its decisions. Serious efforts have also been made towards the digitalisation of accreditation services and processes which have significantly helped the work of the Agency and the decision-making of the Board.

KAA received full membership from ENQA in late 2014 after undergoing an external evaluation from an ENQA panel review. In the following year, 2015, it also received full membership from EQAR. These two memberships were an important milestone for the agency as it confirmed that the Agency is developing in the right direction. Undergoing external evaluation from ENQA not only served to prove that the Agency is substantially compliant with the European Standards, but also gave the Agency the opportunity to critically analyse its processes and improve them by building upon lessons learned.

Likewise, the KAA’s membership of ENQA was of utmost importance because:

- it has increased the efforts of the national spectrum to translate the European standards into the national context;
• it has built solid trust among students, parents, academic community and the society at large that the system of accreditation and quality assurance in Kosovo is reliable and credible.

Subsequently, the role of the Kosovo Accreditation Agency (KAA) has become recognised, by national and international authorities, as the most important body for the development and promotion of the quality assurance in the Kosovo higher education system. KAA has been the key mover in setting the national agenda for the quality of higher education in Kosovo.

The reapplication process for ENQA and drafting of this Self-Assessment Report has found the Agency in a challenging situation due to external factors. Substantial changes were made with regard to the management of the Agency impacting upon the continuity of the Agency’s work. On September 2017, the Minister of Education decided to dismiss the entire management of the KAA because of the request it received from the Prime Minister of the Republic of Kosovo. The rationale of this decision was argued to be the irregularities that have accompanied the accreditation process in the last years. While an acting Director was appointed within one month to carry out the regular administrative works, it took about eight months for the MEST and the Kosovo Assembly to appoint and approve a new membership of the State Council of Quality (SCQ). In the meantime, KAA was excluded from EQAR as EQAR was unable to identify any highly exceptional circumstances that would have justified this dismissal. The dismissal of KAA from the European Register called for an extraordinary Parliamentary session, and serious debates took place concerning the importance of safeguarding the independence of KAA. A national consensus was reached through the approval of a Parliamentary Resolution that the necessary changes should be implemented as soon as possible and that the appointment of the new State Council of Quality (SCQ) members should be undertaken in the most transparent, reliable and professional manner. The delays in approving the SCQ’s new composition, impacted upon the regular work and processes of KAA.

However, because over the past years KAA has undertaken consistent actions to work on its processes, methodology, legislative adaptions and improvements in the system to encompass the European standards, the core activities of the Agency have been preserved. On the other hand, the new management of the Agency has quickly addressed important issues facing it and maintained continuity in its work to avoid any delays for HEIs with respect to the accreditation validity and periods.

This Report reflects not only the institutional legacy that the Agency has inherited, but also the strenuous efforts undertaken recently by the new management to address key issues that are important for the operation and improvement of the Agency.
2. DEVELOPMENT OF THE SELF-ASSESSMENT REPORT (SAR)

KAA is undergoing its second assessment from ENQA, with a focus on specific standards. It has, therefore, made great efforts to draft a well-structured, precise and comprehensive report which will clearly reflect the extent of compliance of KAA’s external quality assurance activities with those of the European Standards and Guidelines.

For the purpose of drafting the KAA’s Self-Assessment Report, the State Council of Quality (SCQ) (in the further text the “Board”) established a working group charged with drafting the SAR in compliance with the principles of ENQA and within the time limits as prescribed in the Terms of References and the Contract signed between KAA and ENQA. This working group consisted of 10 people, members of the Board and members of the Agency, who were assisted and supported from external expertise throughout the process from the Austrian project HERAS, under direct supervision from the Board.

Careful consideration was given to external inputs collected from the relevant stakeholders who participated in a workshop organised by the Agency. This workshop was organised with the main stakeholders for the purposes of drafting the KAA’s SWOT analysis, in which KAA was able to identify, in a larger setting, the factors impacting on the work of the Agency.

Secondly, before formally adopting the Self-Assessment Report, the document has been circulated for public consultation among all higher education institutions and relevant stakeholders. Their final feedback was collected at a second workshop which took place on 19th November 2018. The workshop brought together the representatives of HEIs, authorities and organisations, students, donors, as well as national and international experts whose views were an important contribution to the process. Their feedback was integrated into the final report which is being submitted to ENQA.

The KAA’s Self-Assessment Report is based on national legislation and strategic documents, and the European Standards and Guidelines. It has been informed by KAA’s nine years’ experience of internal and external quality assurance processes.
3. HIGHER EDUCATION AND QA OF HIGHER EDUCATION IN THE CONTEXT OF THE AGENCY

3.1. Legal and policy framework in higher education

The Kosovo Higher Education System is governed by the 2011 Higher Education Law and a set of bylaws derived from it. The Higher Education Law is currently being revised. This revision involves a very broad consultation process after which it will be submitted to the government and Parliament for approval. KAA has actively participated in the working group set up from MEST in order to ensure that KAA responsibilities and independence are duly safeguarded.

Higher education development is also supported by a number of other key laws, such as Law on Regulated Professions, no. 05 / L-066, Law No 03/L-060 on the National Qualifications (2008), Law No. 03/L-068 on Education in the Municipalities (2008), and Law No. 04/L-135 on Scientific Research Activities (2013). In order to implement the legislation relating to higher education, the Ministry of Education, Science and Technology (MEST) has developed a considerable number of by-laws, which specify concrete processes and measures to be followed in the implementation and quality control of higher education. Key by-laws supporting quality assurance measures in higher education are presented in the following table.

<table>
<thead>
<tr>
<th>No.</th>
<th>By-law</th>
<th>Explanation of the scope of by-law</th>
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<tr>
<td>1</td>
<td>Administrative Instruction no. 15/2018 for Accreditation of Higher Education Institutions in the Republic of Kosovo (Annex 1)</td>
<td>Sets the rules, process and procedures of the accreditation process, accreditation types, timeline, appeals procedures, as well as accreditation criteria for institutional and program evaluation.</td>
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<tr>
<td>2</td>
<td>AI no. 25/2012 for Licensing of higher education institutions in Kosovo (Annex 2)</td>
<td>Sets the rules, process and procedures of the licensing policy, timeline, as well as licensing criteria.</td>
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<td>3</td>
<td>AI no. 16/2016, for the Principles and Procedures for Recognition of Higher Education Vocational Education and University Diplomas and Degrees earned outside the Republic of Kosovo (Annex 3)</td>
<td>Determines the purpose, process, and steps for the recognition and equivalenting of the diplomas and degrees obtained outside Kosovo, needed to be utilized in Kosovo’s labour market.</td>
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The main document guiding medium-term development of education in the country is the Kosovo Education Strategic Plan and Action Plan 2017-2022 (KESP) (Annex 13) which has separate chapters for higher education and for quality assurance in education. By higher education law, public higher education institutions are obliged to develop and implement their own strategies and associated policies in accordance with national HE priorities, in order to access public funds. These strategies are discussed with national authorities (Ministry), and are subject of scrutiny during the accreditation process. On the other hand, private HEIs are regularly instructed under the accreditation and licensing standards and procedures to develop strategic development policies in order to ensure their longer-term sustainability.

3.2. Higher Education Governance and Governing Authorities

The main responsible authority for the development and implementation of legal and strategic policies in the Higher Education sector in Kosovo is the Ministry of Education, Science and Technology (MEST), and its respective agencies, the Kosovo Accreditation Agency (KAA), and the National Qualifications Authority (NQA). Besides developing, implementing and overseeing the higher education policies, MEST is also responsible for the licensing of higher education institutions in Kosovo.

The KAA, established in 2004, is an independent, public agency responsible for accreditation of all higher education institutions (HEIs) in Kosovo, regardless of their status (public or private, local or international) offering higher education qualifications and degrees, at levels 5 to 8 of the European and National Qualifications Framework. The KAA’s scope, functions, roles and responsibilities, and decision-making process were regulated by the Administrative Instruction No. 11/2004 on Establishment of the Kosovo Accreditation Agency (Annex 7), and the Higher Education Law of year 2002. While, the processes and procedures for the accreditation of higher education institutions are instructed in the Administrative Instruction No 15/ 2018 on Accreditation of Higher Education Institutions in the Republic of Kosovo (Annex 1). KAA is governed by the State Council of Quality (SCQ), which is vested with a decision-making power. Membership of SCQ is proposed by the MEST Minister and approved in the Kosovo’ Assembly. KAA’s daily work is undertaken by its administrative staff, led by an Executive director.
The NQA is a cross-ministry body, charged with developing the National Qualifications Framework, at all levels, to comply with needs of society and economy. NQA is also governed by the Steering Board, a cross-institutional body from Ministries, education institutions, and other social partners, while the implementation of mandated policies is undertaken by NQA administration. The NQA provides regularly updated descriptors of qualifications which guide the development of appropriate intended learning outcomes for study programmes and degrees at levels 5 to 8. These descriptors have been informed by KAA guidelines and seek to help higher education providers in Kosovo develop well-designed and relevant study programs. It is worth mentioning that in December 2016 the National Qualification Framework has been referenced with the European Qualification Framework. KAA was an active member of the working group to draft the Kosovo Referencing Report 2016 concerning higher education and contributed to this process concerning recognition and implementing criteria. (For further information concerning the referencing process and Kosovo report you can visit the following webpage https://akkks.rks-gov.net/uploads/kosovo_eqf_referencing_report_2016.pdf).

The Higher Education Law, and Law no. 03/L-068, on Education in the Municipalities of the Republic of Kosovo, provide municipalities with a role in the support of higher education development, particularly in encouraging and supporting investments and regional development, and participation in governing and advising bodies of higher education institutions.

3.3. Higher Education Institutions, Study Programmes and Students

The HE Law supports a diverse higher education landscape in Kosovo, enabling the development of HEIs in different modalities and formats. An accredited and licensed higher education institution in Kosovo can have the title of university, university-college, college, institute, school, or academy. Their status determines the level of the qualification, academic or professional, they are allowed to provide. The criteria and procedures for assigning the status of institutions are provided in the Al no. 01/2013 for Nomination of higher education institutions in Kosovo (Annex 4).

Pursuant to article 4 of the HE Law, higher education degrees are organised as following:

- “First level – three (3) to four (4) years of studies by which the student obtains 180, respectively, 240 /ECTS/, and obtains a Bachelor’s Diploma.
- Second level – one (1) to two (2) years of studies after completion of the first level by which the student obtains 60, respectively, 120/ECTS/ and the student obtains a Master’s Diploma.
- Third level – a programme of doctoral studies with an academic and independent research-scientific character.
- Any other post-secondary education in the levels 5, 6, 7 and 8 of the European Qualifications Framework for Lifelong Learning, for which credits may be given (ECTS).”

Pursuant to article 9 of the HE Law, public higher education institutions in Kosovo may be established by a decision form MEST, subsequently ratified in the Kosovo Assembly. Under article 12 of the Law, private higher education institutions may be ‘founded by a private company, foundation or trust, situated in Kosovo and having a registered office in Kosovo’ (HE Law 2011, p. 8). However, the Law allows the operation of a higher education institution only after it has been granted accreditation and licensed by the relevant authorities in Kosovo under the conditions of HE Law in force at the time.

The first higher education institution in Kosovo, was a teacher training institution, established in 1959. For around 40 years Kosovo had only one higher education institution, the University of Prishtina. Today, Kosovo has nine public higher education institutions, of which seven are universities, one is an Academy, and one is a Faculty. In addition, there are 23 private higher education institutions, most of which are colleges. Together, all institutions of higher education offer 353 study programmes, encompassing the three Bologna cycles, and four EQF levels (5-8), with around 130,000 enrolled students.
4. HISTORY, PROFILE AND ACTIVITIES OF THE AGENCY

4.1. History of the agency

The process of external quality assurance was initially provided for in the 2002 Law on Higher Education. Article 4 of this law, paragraph 4.3., stipulated that the Ministry of Education would establish the Kosovo Accreditation Agency, through an administrative instruction, which would be responsible for promoting quality in the Kosovo higher education sector. This agency would be the main state authority and would carry out licensing, inspecting and accreditation processes through professional and transparent methods, with the aim of helping HEIs to develop their potentials and enhance the quality of their provision. This Law also established the State Council of Quality (SCQ), a body which would take decisions and make recommendations on the licensing and accreditation of higher education providers. Therefore, MEST in 2004, decided to establish the Kosovo Accreditation Agency (KAA), through an Administrative Instruction, which would be responsible to evaluate and accredit institutions of higher education and their study programs. This administrative instruction, defined the establishment, structure, the status, duties and responsibilities of KAA, and soon after it entered into force a number of professional documents started to be drafted in order to support the operations of SCQ.

Even though the administrative instruction entered into force in 2004, KAA became operational in 2009. Until this time, the system of higher education in Kosovo was characterised by a proliferation of private higher education institutions, often operating without clear and robust quality assurance criteria and standards. This was impacting negatively the quality of the study programmes being offered. In order to evaluate these institutions, in 2008, MEST invited the British Accreditation Council (BAC) to assess approximately 30 private higher education institutions. This exercise resulted in the closure of all private institutions of higher education operating at that time, as none of them met the minimum quality assurance criteria thresholds.

In the following year, KAA carried out the first institutional and programme evaluation of HEIs closed down in 2008 in response to BAC’s report. The number of HEIs evaluated in 2009 was smaller reflecting the fact that some were not ready to comply with the established criteria. Given the embryonic nature of Kosovo’s higher education sector, KAA sought to follow the best international practices of assessment and accreditation through engagement of only international experts.

In the meantime, the legal basis of KAA was consolidated. The Administrative Instruction on Accreditation of HEIs was drafted and approved, the Law on Higher Education was revised, and a
number of professional documents, such as Standards and Guidelines were prepared and which have subsequently served as guidelines for the work of KAA and for Kosovo HEIs.

4.2. Mission and tasks

The mandate of the Kosovo Accreditation Agency (KAA) is to carry out the accreditation and reaccreditation of public and private institutions of higher education and their academic and research programmes. Also, KAA is responsible for supervising accredited institutions through follow up procedures.

KAA’s responsibility for the accreditation of public and private institutions of higher education involves:

- The accreditation of public and private institutions of higher education;
- The accreditation of new institutions of higher education and their study programmes (preliminary accreditation);
- The accreditation of new programmes at already accredited institutions of higher education;
- Continuous monitoring of quality assurance of accredited institutions and their programmes (including re-accreditation).

KAA’s mission is “through the accreditation process to support the development of quality among higher education institutions and at the same time to assure society at large that the quality of teaching and learning in Kosovo is of comparable standards”. While performing external quality assurance activities, the aims of KAA are to: open the higher education sector in Kosovo; to assure quality among all institutions of higher education in Kosovo; to promote, encourage and develop quality in the sector of higher education; to create transparency and facilitate comparability for providers, students and the labour market; to encourage innovative content and means of delivery of higher education; to ensure comparability of Kosovo diplomas with international ones; and support Kosovo’s objectives for integration into EHEA.

4.3. Legal framework and other regulating documents

KAA does not have its own particular Law on Accreditation, but its work is based on the Law on Higher Education. Two key documents which regulate and determine the implementation of the system of quality assurance in Kosovo are the Law on Higher Education 2011 (Annex 6) and the Administrative Instruction on Accreditation of HEIs 2018. It is Article 7 of the Law which determines the basis for the functioning of KAA as well as the scope and the competencies of the agency. This article determines that “KAA is an independent agency responsible to evaluate and
promote quality of higher education in Kosovo. Through professional and transparent processes of assessment and control, as well as other appropriate means, which comply with the best international standards, KAA assures that the Standards and the quality of higher education in Kosovo meet requirements and expectations of the European Network for Quality Assurance in Higher Education (ENQA)”. It is this article that determines the internal organisation of KAA, establishing the State Council of Quality (SCQ) as the decision-making body of the agency and the permanent administrative structure responsible for the daily management of KAA.

Moreover, article 15 of this law determined in general what the form of accreditation is. Point 8 of this article, determines that the “quality assessment of accredited providers shall be carried out by KAA within a time cycle that does not exceed more than 5 years. KAA assigns an international group of experts drawn from relevant fields. KAA published on its webpage its procedures, criteria and the outcomes of quality assessment”.

The Administrative Instruction on Accreditation No. 15/2018 is a sub legal act of KAA which determined the criteria and procedures for the accreditation of higher education institutions and their study programmes in the Republic of Kosovo. In this AI, is prescribed in details the whole accreditation process, including time lines, assessment, criteria and expected standards, etc. HEIs are required to comply with these requirements if KAA is to reach a positive decision.

In addition to the legal acts as referred to above, a number of other documents are important in underpinning the quality assurance system in Kosovo. The National Development Strategy 2016 – 2021 from the Prime Minister’s Office of the Republic of Kosovo is a strategic document which determines a couple of activities with respect to quality assurance and KAA. In addition to the National Strategy, there is also the Kosovo Strategic Plan for Education 2017 – 2021 devised by the Ministry of Education, Science and Technology (MEST). The strategic objective of MEST with respect to higher education is to increase the quality and competitiveness of higher education through the promotion of excellence in teaching, scientific research, artistic creativity, innovation and internationalisation. In this respect a number of activities related to quality assurance are identified.

KAA has sought to use the European Standards and Guidelines (ESG) to inform and develop its internal policies. These policies include the KAA Statue, the Regulation of the State Council of Quality (SCQ) (Annex 14), and the Standards and Guidelines. Recently, the KAA Board approved the Accreditation Manual (Annex 8), a revised version of the KAA’s Standards and Guidelines, the Code of Ethics (Annex 10), the KAA Procedures for Complaints and Appeals (Annex 11), and the KAA’s Procedure regulating the activities carried out by foreign recognized accreditation bodies in the Republic of Kosovo (Annex 12).
4.4 Internal organisation, Board and the Secretariat

KAA is governed by the State Council of Quality (SCQ) (in the further text the Board) which is the policy-making and decision-making body of KAA. The Board is composed of at least nine professionals and experts in the area of higher education whose experience has been widely demonstrated in the national and international area. The Law on Higher Education stipulates that there should be at least three international members of the Board.

The provisions on the appointment and election of the Board members are laid down in the Law on Higher Education article 7, paragraph 4, which stipulates that members of the Board should be nominated by the Minister of Education and shall be approved from the Assembly of the Republic of Kosovo. Because there was no detailed procedure in place about the procedures of this process, in May 2018 the Ministry of Education approved a special Administrative Instruction No. 06/2018 on the Criteria and Procedures for the election of the members of State Council of Quality (SCQ) (Annex 9). It was based on this procedure that the current composition of the Board was nominated and approved by the Kosovo Parliament.

The Board has recently revised and adopted the Rules of Procedures which define in detail the duties of the Board members, as well as the remit of meetings of the Board. According to the Procedure, the Board is chaired by the President of the Board, who shall be elected by members of the Board. The President shall be elected with the majority of votes of Board members with a mandate of five years, with the possibility of re-election for one more mandate. Likewise, the Board also elects a Vice President of the Board with a mandate of five years, with the possibility of re-election for one more mandate. Decisions of the Board shall be taken with the majority of votes of total members of the Board (50%+1). Decisions with respect to institutional and programme re/accreditation shall be taken only if at least one of the international board members is present during the meeting, either in person or via a video conference.

In addition to the Board, KAA consist of the Secretariat, which is the permanent administrative structure of KAA. The Secretariat currently consists of the Acting Director and 5 (five) permanent members who according to the Law are civil servants with the procedures for their recruitment defined by the government. The Director of the Agency is also, ex officio a member of the Board but without voting rights.

Currently the Agency is led by an Acting Director as procedures for the election of a permanent Director of KAA have yet to be completed. Within its Secretariat, the Agency currently employs two Officers for Evaluation and Monitoring who are directly linked with the organisation and management of the re/accreditation process; one Legal Officer who is responsible for the overall
applicability of legislation at KAA; one Officer for the Budget and Finances, who is responsible to manage all financial affairs within the Agency, and one Officer for Administration and Recruitment who is responsible to manage all administrative related works with respect to the staff of Agency. Currently, KAA has a shortfall of seven staff due to previous unsuccessful call for applications and because of delays in approving new positions at KAA from the relevant ministries. For clarification, the current vacant positions at KAA are the following: three positions for Senior Officer for Monitoring and Evaluation, three positions for Senior Officer for Evaluation and Accreditation and one position for Senior Officer for IT.
5. HIGHER EDUCATION AND QUALITY ASSURANCE ACTIVITIES OF THE AGENCY

According to the national understanding, accreditation is a formal acknowledgement that a higher education institution and its programmes fulfils internationally recognised quality standards and that its qualifications confer on its holders a number of rights in accordance with applicable law. In Kosovo, accreditation is a means of certifying that quality assurance standards for the operation of the education provider and the study programmes are met. No higher education award can be issued by the providers and be considered valid unless it has been accredited by KAA.

Re/Accreditation is granted on the outcome of the external evaluation of a higher education institution. Accreditation is confirmed by law, promoted by the Government on the initiative of the MEST and ratified by the Assembly, according to Article 6 of the Law no. 04/L-037 on Higher Education in the Republic of Kosovo.

The legislation recognises initial accreditation and re/accreditation. Higher education providers are subject to initial accreditation and to re-accreditation, on a periodic basis in accordance with the duration laid down in SCQ decisions.

The standard procedure of external quality assurance is applied regardless if there is initial accreditation or re/accreditation. According to the AI, only institutions that meet formal criteria in accordance with the AI will have the right to submit a full application for re/accreditation, including submission of a Self-Evaluation Report which forms the basis for review by external evaluators.

Examination of formal criteria is made by the Board who have to approve the list of academic staff submitted for every study programme by the higher education institution. If, according to KAA's summary report, the preliminary assessment by SCQ is positive it is understood that the application meets the formal requirements according to the legal acts in force, and the Board formally approves the application, by authorising the KAA Director to proceed further with the evaluation and accreditation process.

An evaluation report must be submitted by providers in initial accreditation and reaccreditation submissions. The revised Accreditation Manual provides basic guidelines on the required format of the self-assessment report and on the information required by the Expert team to understand how the institution ensures that, at institutional and programme level, the standards and relevant performance indicators are met.
The key difference between initial accreditation and reaccreditation is in the nature of the site visit. At the initial accreditation stage there is no meeting scheduled with students (because there are no students enrolled) and no meeting with academic staff (due to the assumption that no teaching activity has been taking place). On the other hand, during the reaccreditation site visit, a meeting with students and teaching staff is compulsory.

In terms of decision making, according to the Law on Higher Education, the maximum period of accreditation cannot exceed five years. Therefore, when making a final decision, the Board can decide as follows:

In the case of initial accreditation:

- Not to accredit;
- Accredit with conditions;
- Accredit for three years.

In the case of re-accreditation:

- Not to accredit;
- Accredit with conditions;
- Accredit for three years.
- Accredit for five years.

In relation to follow up procedures/ monitoring, the Kosovo Accreditation Agency (KAA), in accordance with Article 7, point 2 of the Law on Higher Education in the Republic of Kosovo No. 04 / L-037, and Article 29 of the Administrative Instruction on Accreditation of HEIs in Kosovo No. 15/2018 is mandated to carry out monitoring and inspection of higher education institutions. Until 2016, KAA conducted monitoring of HEIs through external evaluators and accreditation experts who evaluated whether HEIs, after receiving accreditation, had fulfilled the recommendations within the preliminary assessment and accreditation reports.

All accredited HEIs are obliged to submit, at the end of each academic year, to KAA, an Implementation Plan of Recommendations provided by the team of experts in their evaluation report. This is one of KAA’s means of monitoring the responses of HEIs to the outcomes of evaluations. However, a shortage of staff has limited KAA’s ability to undertake field monitoring of HEIs on regular basis.

At the SCQ meeting held on 06.07.2016, SCQ has taken a decision to undertake all actions by the KAA for the monitoring of accredited HEIs in accordance with the legislation in force. According to
this decision, monitoring should begin while KAA prepares the legal basis as well as drafting of the monitoring standards.

The legal adoption concerning monitoring have been made in the AI on Accreditation while the Standards of Monitoring have not been drafted yet.

Currently, the only form how KAA undertakes monitoring of educational providers, is through analysis and verification of academic staff qualifications to ensure that HEIs meet the minimum requirements. Over the last two years KAA has regularly checked whether educational providers are maintaining the minimum criteria concerning academic staff. All staff dossiers of educational providers are submitted to KAA, who, after careful checking and verification to ensure that they meet the formal criteria, send the lists for consideration to the KAA Board. If the Board considers that the minimum criteria have not been met, it has proceeded with the suspension or withdrawal of the accreditation of programme in question.

In the last two years, accreditation of more than 100 study programmes has been withdrawn due to a failure to comply with the formal criteria as prescribed in the national legislation.
6. PROCESSES AND METHODOLOGIES

6.1. The Accreditation Process and Procedures

The process and procedures for accreditation of higher education institutions and their study programmes is instructed in the HE Law, the Administrative Instruction (AI) no. 15/2018 for Accreditation of Higher Education Institutions in the Republic of Kosovo, and the KAA Accreditation Manual, which was recently updated in July 2018 (Annex 8), and other internal KAA documents and regulations.

The accreditation or reaccreditation process, as a form of external quality assurance for HEIs, is applied as:

- Institutional accreditation;
- Programme accreditation;
- Institutional and programme accreditation.

Pursuant to the article 10 of the AI no. 09/2017, the (re)accreditation process in any forms mentioned above, undergoes a step-by-step process, as following:

1. Submission of accreditation request (known as ‘First page’) and list of academic staff (list of staff and their declarations of engagement). For both issues KAA provides relevant forms to HEIs. The application form contains information about the institution (name, address, contact info, legal persons, etc), study programmes (name of programme, length/years, semesters, ECTS, responsible person, academic staff).

2. Approval of academic staff. KAA checks conform published criteria (academic qualification and background) the profiles and dossiers of academic staff submitted by HEI for accreditation, and gives feedback (approval, change, refusal, etc.) to the submitting HEI. The requirement is that at least 50% of academic staff proposed per programme should have regular contract with the institution, and that minimum one qualified staff with PhD should be employed per 60 ECTS (a minimum of three PhDs per three-year Bachelor program, and a minimum of two PhDs for a two-year Master’s program). The decision is issued in writing by the State Council of Quality (SCQ).

3. Formal approval of application. KAA checks whether the submitted application meets the formal requirements of the AI for Accreditation and provides feedback to the HEI on whether it has been approved or rejected (if all requirements are not met). The decision is issued in writing by SCQ.

4. Submission of the Self Evaluation Report (SER) by the applicant HEI. Once the two previous conditions have been met (applicant HEI receives approval of application and academic
staff base), within one month from the date of approval the HEI is invited to submit the full SER with detailed information of the institution and its study programmes in accordance with the legal requirements set out in the AI for accreditation and in the Accreditation Manual. Once the SER accepted, KAA staff check that SER meets the criteria stipulated in the Accreditation Manual.

5. **External evaluation from international experts.** If the SER meets all requirements, it is sent to the external experts for external evaluation of the institution and/or study programmes. The external experts independently review the SER and conduct an onsite visit together with KAA officials to the applicant HEI in order to check the information of SER and respective requirements for accreditation. Finally, the external team of experts prepares an evaluation report on their findings detailing their conclusions and making recommendations regarding the accreditation or non-accreditation of the institution and/or programme(s), as well as recommendations for each accreditation criteria (or group of criteria). The team of experts may vary in number, from two to seven, depending on the number and diversity of the study programmes submitted. The expert team includes at least one student.

6. **Final decision.** SCQ, based on the evaluation report of external experts, makes its final decision on whether (re)accreditation should be granted, and if so, the duration of accreditation.

7. After HEIs receive the final decision on (re)accreditation, they are required to provide a ‘Plan for Improvement’ addressing the recommendations of the evaluation panel. The plan should have concrete actions, with timescales and details of the planned allocation of human and financial resources in order to achieve these recommendations.

KAA has one-year from the application date to review applications for accreditation. More specifically, for accreditation applications submitted before 31st of October, KAA issues an evaluation decision not later than June or July of the following year. This allows HEIs to make preparations for the new academic year which starts in September.

In addition to the program and institutional re/accreditation carried out by KAA, according to the article 23 of the AI on Accreditation, institutions are allowed to propose foreign academic degrees, provided that these degrees coming from international institutions are accredited from an ENQA, EQAR and CHEA recognised quality assurance agency. According to the AI, all these proposals/requests must be approved by KAA through an external evaluation procedure which takes into account:

a) the validity of international accreditation according to the local legislation and ESG 2015
b) that the education and research context as well as conditions offered in Kosovo are of the same quality as of those offered abroad

c) that the minimum quality criteria set out in the AI with regard to the academic staff are met
7. AGENCY'S INTERNAL QUALITY ASSURANCE

KAA operates according to the national legislation and the professional documents as referred to above and its internal procedures of quality assurance are described in those documents. The Agency is part of the general civil service system operating in Kosovo and therefore many of the procedures in terms of timescale, conflicts of interest, ethical behaviour, for example are set by central government.

In addition, KAA has engaged a number of activities such as:

- Conducting surveys with HEIs and relevant stakeholders
- Engaging in continuous dialogue with higher education institutions
- National regulations concerning administrative procedures including ethical behaviour
- Adoption of the Code of Ethics
- Adoption of the Accreditation Manual which encompasses the external quality assurance norms and provides clear guidelines for implementation of the re/accreditation process.

The recent survey conducted with HEIs provided valuable information for the Agency and led improvements in the general methodology and processes employed and, to the internal procedures of KAA.

As concerning the external quality assurance, in order to ensure a smooth re/accreditation process, guarantee the quality of the site visits through objectivity and professionalism and coordinate a close communication between the expert teams and the higher education institutions in all stages of the process, KAA delegates at least one representative of the agency to accompany the expert team for the entire duration of the site visit. The coordinator(s) of KAA does not play an active role in the meetings and does not contribute to the decisions of the expert team but is available to provide administrative support and guidance to the panel and the institution. It is considered that this involvement is to the benefit of the expert team, and the institution, in ensuring a shared understanding of the re/accreditation process.

A Code of Ethics has been adopted providing a set of principles, values, and rules of conduct relating to the behaviour and activities undertaken by members of the State Council of Quality (SCQ), KAA permanent staff and higher education institutions.
While KAA processes are mainly planned through its legal documents, mainly through the AI on accreditation, KAA is currently working on drafting its Strategic Plan 2018 – 2021. This Plan which will be finalised in line with the Kosovo Education Strategic Plan (2017-2021) and the National Strategy for Development, aims at enhancing the contribution of the agency to the quality development in Kosovo.
8. KAA’S INTERNATIONAL ACTIVITIES

8.1. Internationalisation of Kosovar higher education

The internationalisation of Kosovar higher education can be described as highly fragmented; while some parts are internationally exposed, others are of a locally rooted nature.

Due to the historic developments over last decades, Kosovo has built large diaspora communities in Europe and around the world. This has impacted upon student and staff mobility. Several established Kosovar researchers left the country during the war, and today young Kosovars come back with qualifications from countries to which they had migrated. At the same time, economic disparities and the strict EU visa regime limit the international mobility of Kosovo citizens.

Most Kosovars have Albanian as their mother tongue. Consequently, many academic programmes are delivered in this language. The country is also home to several ethnic and linguistic minorities. The Serbian community constitutes roughly 10% of Kosovo’s population and the University of North Mitrovica provides programmes in their language. Some public universities offer selected programmes in languages of smaller communities such as Bosnians and Turks.

Today, English is clearly the number one foreign language in Kosovo, and it is widely spoken throughout academia. However, English was not a mandatory subject in former times, and in the older generation, some people (among them high level university staff) have a limited command of English.

The Albanian population also lives in parts of Macedonia, Montenegro and Serbia. Between all these regions, there are cultural and historic ties that facilitate academic links and exchanges. KAA supports regional exchange, though its memberships to European associations for quality assurance and bilateral activities. However, academic staff from the region have, on occasions, been fraudulently presented by HEIs as full-time faculty members during accreditation procedures. To prevent the quality of Kosovo’s higher education being compromised by such illicit activities KAA is keen to ensure that recruits from beyond the region are of a sufficiently high quality to safeguard its credibility in meeting European standards.

As a potential candidate for EU membership, Kosovo can, in part, participate in the Erasmus+ programme. Many universities participate in Erasmus+ projects with the primary aim of developing capacities through international exchanges. Students can participate in Erasmus+
exchanges only within the projects of their universities, making short- and medium-term student mobility less common than in other European countries.

8.2. Goals of internationalisation

The international nature of Kosovar higher education in general and KAA in particular are stipulated in the legal regulations. The two main international purposes are:

- Establishing international quality standards for higher education and its quality assurance
- International comparability of awards

Among the principles of higher education, the law lists “a European and international focus in all areas of higher education, providing for student and staff mobility and comparability of standards of diploma and qualifications” (Law 04/L-037, Article 2). The legal definition of accreditation includes that institutions and programmes “fulfil internationally recognised quality standards” (Law 04/L-037, Article 3).

The Administrative Instruction 15/2018 for accreditation of higher education institutions regulates that KAA has to fulfil the ESG (AI 09/2017, article 3/2) and KAA has to apply international quality standards (AI 15/2018, article 3/3). In article 6, this is further specified as principle 1.6 which rules “European and international access to all areas of higher education to enable students and staff mobility and comparability of diploma and qualification standards.

8.3. Membership in international organisations

To assure its integration into the European Higher Education Area and to develop its standards according to European and international developments, KAA is member of the leading networks for quality assurance.

- KAA is member of CEENQA. CEENQA enables KAA to cement ties within the region. The network provides a floor to discuss the application of European standards in the specific circumstances of South-East Europe.
  - KAA hosted the 2014 CEENQA annual meeting in Prishtina
  - The Macedonian Accreditation Agency invited KAA to present its practice of accreditation at their national conference in early 2018.
  - An informal agreement was made with the Albanian Accreditation Agency to increase the exchange of international peer reviewers.
- KAA is an ENQA member under supervision. KAA seeks to re-gain full membership after the ENQA review to be held in 2019. Since 2011, the membership status of KAA in ENQA has changed several times:
  - Affiliated member (2011 – 2014)
• Full member (2014 – 2018)
• Member under supervision (2018 -)

KAA is a member of INQAAHE
KAA became members of EQAR in 2015, however due to the reasons explained in the introduction, it lost its membership in 2018

8.4. Internationalisation of the accreditation processes

KAA sees itself as a national agency and concentrates on accreditation procedures within the borders of Kosovo. To date, no cross-border operations have been undertaken and none is planned. At the same time, KAA’s accreditation processes are highly international:

• The original standards and guidelines for accreditation have been developed alongside the benchmark of the Austria Accreditation Council (Österreichischer Akkreditierungsrat, later merged into AQ Austria). This has ensured acceptance by Kosovar stakeholders, but came with the downside that it did not fully reflect Kosovo’s circumstances and characteristics.
• Subsequently, KAA’s standards and guidelines have been revised according to the European Standards and Guidelines and the feedback of stakeholders
• For accreditation procedures, English is the working language. This is, understandably, a prerequisite for international processes, but it also incurs substantial costs (translation of documents and interpretation during on-site visits) and can be a source of misunderstanding and consequent errors.
• KAA invites exclusively international experts as peer reviews. People working within Kosovar higher education cannot be members of a review panels. Analysing the peer reviewers’ origin, the largest group comes from the German-speaking area, from the Western Balkans and Finland and Estonia. In 2018, KAA has agreed with the Albanian and Macedonian accreditation agencies to foster the exchange of international peer reviewers. Many Kosovar HEIs appreciate that peer reviewers come from abroad (and are therefore more independent in their decisions), but they are critical of the fact that international experts often have little understanding of the Kosovar context. KAA seeks to address this by re-engaging the same experts for a number of reviews. In this way reviewers develop a better understanding of the Kosovar context.
• The State Council of Quality (SCQ), as the decision-making body, is mandated to include three international members. There is a quorum of one international board member for the SCQ to the legal right to make decisions Current international board members appointed by the minister are Professor. Dr Magdalena Ziolo (Poland), Professor. Dr Herbert K. Amato (United States of America) and Professor. Msc. Jeffery Butel (United Kingdom).
8.5. International aid

From its foundation, KAA has worked with very limited human and financial resources. To bridge this gap, the Agency has participated in various international projects financed by foreign donors. This provides the opportunity to work with international experts. Projects undertaken include:

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<tr>
<th>Project</th>
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<tr>
<td>HERAS</td>
<td>Higher Education, Research and Applied Science</td>
<td>2017 - 2019</td>
<td>WUS Austria, ZSI and oead (Austria)</td>
<td>• Support realisation of ENQA recommendations</td>
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<td>Austrian Development Cooperation</td>
<td>• Feedback on new laws and regulations</td>
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<td>EYE</td>
<td>Enhancing Youth Employment</td>
<td>2017 - 2020</td>
<td>Helvetas (CH), Managing Development Associates (Kosovo)</td>
<td>• Update KAA Standards and Guidelines</td>
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<td>Swiss Agency for Development and Cooperation</td>
<td>• Produce Accreditation Manual</td>
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<td>• Trainings with HEIs in Kosovo on how to adopt the Manual</td>
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<tr>
<td>Higher KOS</td>
<td>Promoting Institutional Development in Higher Education and Research in Kosovo</td>
<td>2011 – 2015</td>
<td>WUS Austria, ZSI and oead (Austria)</td>
<td>• Draft a KAA Quality Manual</td>
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<td></td>
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<td></td>
<td>Austrian Development Cooperation</td>
<td>• Evaluation of KAA operations (interviews with Kosovar HEIs and international peer reviewers)</td>
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<td>• Series of four workshop for KAA staff (held by i.a. Achim Hopbach, Patricia Georgieva)</td>
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<td>Multidimensional Project for the Implementation of an Institutionalised Partnership between Austria and Kosovo in the Field of Higher Education, Research and Innovation</td>
<td>2007 – 2010</td>
<td>AEI Agency for European Integration (Austria)</td>
<td>• Reform and stabilise the public higher Education System in Kosovo</td>
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<td></td>
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<td>Austrian Development Cooperation</td>
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<td>• Introduce European Values and Standards</td>
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<td>• Integration of Kosovo’s Universities into the European Education Network</td>
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<td>• Interaction between HEIs and local Economy</td>
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9. COMPLIANCE WITH EUROPEAN STANDARDS AND GUIDELINES (Part 3)

9.1 ESG Standard 3.1 Activities, policy and processes for quality assurance

_Standard:_
Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.

_KAA Compliance_
As described above, KAA’s published mission is accreditation and reaccreditation of institutions of higher education at institutional level and programme level. The detailed procedures, time line, and standards, are made publicly available to all relevant stakeholders via the legislation and other professional documents.

KAA’s responsibilities also include a follow up procedure and the monitoring of HEIs’ responses to the decisions of SCQ. However, as stated earlier, staff shortages have delayed the full implementation of this aspect of KAA’s responsibilities.

9.2 ESG Standard 3.2 Official status

_Standard:_
Agencies should have an established legal basis and should be formally recognized as quality assurance agencies by competent public authorities.

_KAA Compliance_
As described in the above chapters, the formal and legal provisions for the functioning and responsibilities of KAA activities are laid down in the Law on Higher Education 2011. Article 7 of the LHE 2011, states that the only legal authority to undertake the evaluation and accreditation of institutions of higher education and their study programmes is KAA: “Kosovo Accreditation Agency is an independent agency responsible for the assessment and promotion of quality in higher education in Kosovo. Through professional and transparent processes of quality assessment and control or other means that are considered appropriate, which meet the best international practices, KAA ensures that standards and quality of higher education in Kosovo meet the requirements and expectations of the European Association of Quality Assurance in Higher Education (ENQA)".
Accreditation and quality assessment procedures are laid down in article 15 of the Law on Higher Education 2011. Paragraph 1 of this article stipulates that “All licensed providers of higher education shall undergo the procedures of quality control and assessment by KAA in compliance with this Law and other sub legal acts”. Seven other paragraphs of this article specify the accreditation process, the accreditation cycle, as well as nomination of only international experts to evaluation panels, and the obligation of KAA to publish on its website the criteria, standards and formal outcomes of its quality assessments.

The formal outcomes of KAA have legal consequences for HEIs as, without a positive decision from KAA, institutions cannot enrol new students to their study programmes. Article 16 of the LHE, paragraph 1 determines that “…an accredited provider shall be entitled to provide grades and diploma as specified in the accreditation certificate…” whilst paragraph 7 states that “only the grades and diploma issued by accredited and licensed providers of higher education shall be recognized by the Government for employment purposes, undertaking public functions or for the purposes of international recognition…”.

It is only after positive re/accreditation decision has been reached that MEST proceeds with the formal licensing process of HEIs and their study programmes. According to the Law on Higher Education, if an HEI fails to achieve re/accreditation from KAA in two subsequent evaluations, to that institution the license should be revoked.

9.3 ESG Standard 3.3 Independence

**Standard:**
Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.

**KAA Compliance**

**Organisational independence**
Because there is no Law relating specifically to the Agency, the legal provisions governing the functioning of KAA are laid down in the Law on Higher Education. KAA operates independently in accreditation and associated activities, manages its own budget as allocated from the Government and the revenues from the accreditation process, and is independent in recruiting the administrative staff of the Agency. KAA is regarded like any other agency of ministries in Kosovo, and despite that it is independent to organize the recruitment process of the administrative staff, due to shortage of finances is not able to increase the number of its employees, without preliminary approvals from the Ministry of Finances and the Ministry of Public Administration.
Operational independence

According to the Law on Higher Education, HEIs seeking to get accreditation should file a request to KAA at least one year in advance. Moreover, the Law stipulates that “re/accreditation of providers shall be carried out by KAA in a time limit not more than 5 years. Re/accreditation shall not be carried out without the scrutiny of provider’s self-assessment report from experts, except in special circumstances”. Article 7, paragraph 3, of the LHE, stipulates among others that “KAA publishes its policies, criteria and criteria for accreditation as well as decisions, recommendations and guidelines, concerning institutions and programs and publish an annual report”.

Since its establishment KAA has operated in line with its internal professional documents such as the Standards and Guidelines which have recently been revised. These documents are approved solely by the Board after careful consideration of the views of external stakeholders and are made available to all HEIs. These documents describe how the complete accreditation process is organised including the necessary guidelines for external quality assurance, respectively the guideline for self-evaluation, guideline for the re/accreditation process, and guidelines for the roles and responsibilities of those involved during the re/accreditation processes of external experts, namely KAA coordinators and HEI.

The list of expert pools is approved by the Board and is updated from time to time with new experts coming from various European universities and associations. The roles and responsibilities of the international experts during the external quality assurance are clearly described in the revised Accreditation Manual which stipulates that “Expert teams have the duty to gather, verify and exchange information and supporting elements so as to be able to check the statements made in the self-evaluation documentation, as well as during the site visits and to formulate their own assessments on the performance of the education provider against the standards and performance indicators included in the present manual”.

Independence of formal outcomes

The decision making process, based on the expert’s evaluation report is set out in the Law on Higher Education and the Administrative Instruction on Accreditation of HEIs. As provided for in the Accreditation Manual “The results of the evaluation are included in the External Evaluation Report, a document that respects the general structure provided by the manual and its templates”. The External Evaluation Report is discussed by the State Council of Quality (SCQ), which uses it to inform its decision.
9.4 ESG Standard 3.4 Thematic analysis

Standard:
Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities

KAA Compliance

KAA has partially made efforts to produce thematic analyses in specific areas besides of institutional provision, in addition to that of academic staff. This is one of the previous ENQA recommendations which Agency has been unable to follow due to the shortage of resources. KAA in the last three years, has been able to publish reports concerning only the sufficiency of academic staff in the Republic of Kosovo and the extent that HEIs meet the minimum criteria as prescribed in the national legislation. Sufficiency of academic staff is one of the main challenges of higher education institutions and this has a direct impact in the evaluation and accreditation process. In the early days of the Agency, the number of academic staff as required from the AI on Accreditation was not specifically checked, but over the last two years KAA has prepared and published reports on the number of academic staff for every study programme offered in Kosovo. This represents a considerable achievement for KAA, as it has managed to establish a legal requirement for HEIs in relation to the number of employed full time academic staff. This has helped inform the Board’s decisions. These reports are published on the Agency’s website, following meetings of the SCQ.

In addition to this, in late 2016 KAA conducted a project “Development of quality assurance in Kosovo higher education - systemic and institutional approaches”. The project aimed at identifying the characteristics of a national quality assurance system that would contribute to the enhancement of education quality while, at the same time, respond to the needs of the higher education institutions. The main role of the research project was to reflect to what extent the national quality assurance system is fit-for-purpose and responds to the needs of the higher education sector in Kosovo. The outcome of this research project supported KAA in revising its standards and procedures, ensuring that this was based on concrete data. This was achieved by drawing upon contributions from the national academic community, higher education experts, civil society and international good practices. A Research Report was published on KAA’s website. This led to revised Standards and Guidelines and the production of the Accreditation Manual.

In 2017, KAA agreed with the international project HERAS to start a project with regard to thematic analysis on transparency of institutions of higher education. Because of the busy agenda of KAA related to the changes of the management, this particular activity has been postponed for an
indefinite time. As now the Agency has reached full operation, it is expected to reinitiate the discussion with the project in order to produce the analysis as mentioned above.

9.5 ESG Standard 3.5 Resources

*Standard:* Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.

*KAA Compliance*

In terms of human resources, the workload of the current staff is high, as there are only two Officers for Evaluation and Monitoring responsible for assisting the Director of KAA in managing the accreditation process. Two other positions, previously occupied, have been left vacant for some months now and despite a public announcement has been opened, it has not been successful due to the fact that none of the candidates met the criteria. In 2018, four other positions (Officers for Evaluation and Monitoring) have been approved from the Ministry of Public Administration, bringing the total number of seven vacant positions at KAA. However, for the recently approved 4 positions, the budget needs to be allocated yet. Once the budget will be allocated for the additional four positions, which is expected to happen in early 2019, KAA will open the public call in order to recruit as soon as possible the needed staff. For further clarification the seven vacant positions are the following: three positions for Senior Officer for Monitoring and Evaluation, three positions for Senior Officer for Evaluation and Accreditation and one position for Senior Officer for IT.

Regardless, KAA has successfully managed the accreditation process for several years now although the number of staff has been very limited. Two important factors can be mentioned in this respect:

- KAA engages international experts who are responsible to examine the quality standards during the accreditation process, gather evidences and verify to what extent the evidence supports the level of standards’ achievement the provider declares about itself. As stated in the Accreditation Manual, in order to ensure a smooth re/accreditation process, guarantee the quality of the site visits through objectivity and professionalism and coordinate a close communication between the expert teams and the higher education
institutions in all stages of the process, KAA delegates at least one representative of the agency that accompanies the expert team for the entire duration of the site visit. The coordinator(s) of KAA does not play an active role and does not contribute to the decisions on the expert team recommendation to KAA for the education provider.

- KAA has historically supported from international donors who have helped the Agency with external expertise in different areas and activities of the Agency

MEST is currently organising working groups and has initiated the procedures to draft a separate law on Accreditation Agency. By this it means that the resources of KAA will be increased up to 19 positions and new divisions and departments will be created within KAA. Until then, KAA will open as soon as possible the application for the vacant positions in order to recruit the positions before the new accreditation process will start.

In 2017, KAA managed to set up an electronic system (e-accreditation) which aims at gradually replacing many physical processes into electronic forms. While the registration of academic staff into the KAA databases took major time, the electronic system now has shifted this responsibility to HEIs and individual members of academic staff. The system has started to be functionalised in September 2018 and HEIs has been asked to start filling their basic data, register the study programs and their validity periods, and manage the registration process of academic staff. Representatives of HEIs have been invited to a one-day training about the system, a brochure has been produced from the specialized company who has worked on setting up the system, and regular meetings with HEI representatives have been held in order to facilitate the electronic registration of data into the system. Full implementation of this system, would decrease largely the workload of KAA staff because a considerable amount of work will be carried out only in electronic form.

In terms of financial resources, KAA generates its income from the accreditation fees paid by providers and receives a government grant which secures the compensation of KAA’s staff. The budget of the agency is separate from that of MEST and it is entirely managed by the Director of KAA. However, the Ministry of Finance limits KAA’s access to all the funds it accrues.

The accreditation process has, so far, been adequately managed by the Agency, the proposed introduction of a robust monitoring process will be challenging. Monitoring will be the next process to be carried out from the Agency, and similarly to the accreditation process, has been planned to be carried out with international experts. This means that KAA will have to compensate the international expertise from its own budget, and not from that allocated through accreditation fees, as HEIs are not required to pay monitoring fee. KAA has made an initial request to the
Ministry of Education for an additional budget in order to enable the successful implementation of the monitoring component which will take place in 2019.

These financial issues represent budgetary challenges for KAA and have been identified as one of the weaknesses of KAA in its SWOT analysis.

9.6 ESG Standard 3.6 Internal quality assurance and professional conduct

**Standard:**
Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.

**KAA Compliance**
KAA’s internal quality assurance processes and procedures are set out in the Accreditation Manual. A specific chapter stipulates the principles and main procedures underpinning the accreditation process, the preparation of the self-assessment and guidelines for site visits at HEIs.

KAA is paying special attention to the feedback of higher education institutions and as such has introduced a serious dialogue with them. Regular meetings are held with representatives of providers before every Board meeting, in order to ensure that members of the Board are making fully informed decisions and all concerns, documents, evidences, and details of providers are carefully considered in the board meetings.

As part of the Agency’s continuing evaluation of its processes and procedures, the Agency collects feedback from HEIs. For the second time, KAA distributed a further questionnaire to all institutions of higher education in Kosovo. This sought to obtain the perception of the higher education institutions on:

- the role of the national system for quality assurance and the relation between its enhancement and compliance roles;
- current and future role of the national system for quality assurance;
- satisfaction and fitness for purpose of the national system for quality assurance;
- internal quality assurance processes and on external quality assurance system – methodological level and system wide;
- definitions of quality related concepts;
- the impact of external regulation/provisions on the functioning of internal processes;

The results collected from the survey have served as a legitimate basis for the process of revision of KAA Standards and Guidelines.
In addition to the Manual, KAA has approved for the first time as a single document the Code of Ethics, which provides a minimal set of principles, values, and rules of conduct for quality assurance activities in Kosovo. The Code is aimed at members of the State Council of Quality (SCQ), other Advisory Boards associated with KAA; the KAA permanent staff and consultants; KAA experts and other external collaborators; higher education institutions, researchers, students, as well as academic and administrative staff at the institutions of higher education.

9.7 ESG Standard 3.7 Cyclical external review of agencies

*Standard:*
Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.

*KAA Compliance*
KAA is undergoing for the second time external evaluation by ENQA. The first assessment took place in 2014 and resulted in a positive outcome for KAA. KAA with this application has, at the same time, applied for renewal of inclusion to EQAR, following its exclusion in April 2018.

Moreover, according to the Administrative Instruction on Accreditation, article 3, paragraph 4, it is stipulated that KAA should regularly undergo external assessment.
10. COMPLIANCE WITH EUROPEAN STANDARDS AND GUIDELINES (Part 2)

10.1 ESG Standard 2.1 Consideration of internal quality assurance

*Standard:* External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

*KAA Compliance*  
KAA external assurance model and methodology, is based upon the aim to promote a quality culture that consistently and continuously contributes to the achievement of a high-quality higher education provision in Kosovo. It should instil public trust and contributes to the personal development and achievement of students, as well as improving the quality of life, culture and the national economy within a European framework.

The standards laid down in the national legislation and in the Accreditation Manual, are drafted in a way that consider the internal quality assurance processes of education providers. KAA undertakes institutional and programme evaluations, which are evaluated against the following standards:

- public mission and institutional objectives;
- strategic planning, governance and administration;
- financial planning and management;
- academic integrity, responsibility and public accountability;
- quality management;
- learning and teaching;
- research;
- staff, employment processes and professional development;
- student administration and support services;
- learning resources and facilities;
- educational process content;
- institutional cooperation.
How KAA addresses standards set out in Part 1 of ESG through its revised Accreditation Manual, Chapter 2 “Standards and performance indicators for external quality assurance” is shown in the following table:

<table>
<thead>
<tr>
<th>ESG Standards Part I</th>
<th>KAA Standards for Institutional Evaluation</th>
<th>KAA Standards for programme evaluation</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.2. Design and Approval of programmes</td>
<td>Standard 5. Quality Assurance</td>
<td>Standard 2. Quality management</td>
</tr>
<tr>
<td>1.3. Student-centred learning – teaching and assessment</td>
<td>Standard 6 Learning and Teaching</td>
<td>Standard 4, Educational process content</td>
</tr>
<tr>
<td>1.4. Student admission, progression, recognition and certification</td>
<td>Standard 5. Quality Assurance</td>
<td>Standard 4, Educational process content</td>
</tr>
<tr>
<td>1.5. Teaching Staff</td>
<td>Standard 8, Staff, employment process and professional development</td>
<td>Standard 5, Students</td>
</tr>
<tr>
<td>1.6. Learning resources and student support</td>
<td>Standard 10, Learning resources and facilities</td>
<td>Standard 5, Students</td>
</tr>
<tr>
<td>1.10. Cyclical external quality assurance</td>
<td>According to the Law on Higher Education, all HEIs in Kosovo must undergo an institutional accreditation process at least every 3 to 5 years (regular duration) from the Kosovo Accreditation Agency in order to</td>
<td>According to the Law on Higher Education, all HEIs in Kosovo must undergo a programme accreditation process at least every 3 to 5 years (regular duration) from the Kosovo Accreditation Agency in order to</td>
</tr>
</tbody>
</table>
As reported above, KAA has recently adopted a revised Accreditation Manual, setting out KAA Standards and Guidelines. Before adoption, KAA organised a workshop with quality assurance officers of education providers in order to assist them in incorporating the revised standards into their internal quality systems.

10.2 ESG Standard 2.2 Designing methodologies fit for purpose

Standard:
External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.

KAA Compliance
In December 2016, the Kosovo Accreditation Agency (KAA) conducted a broad process of revising its current standards and guidelines under the project “Development of quality assurance in Kosovo higher education - systemic and institutional approaches”. The project aimed to:

- Identify the characteristics of a national quality assurance system that can contribute to the enhancement of education quality, while responding to the needs of the higher education institutions;
- Determine if the national external quality assurance system is fit for purpose and responds to the needs of the higher education sector in Kosovo;
- Collect and analyse the perception of higher education institutions and other relevant stakeholders regarding the external quality assurance processes and internal quality assurance practices;
- Identify examples of good practice from international study cases across the European Higher Education Area in terms of quality assurance systems, mechanisms and instruments;
- Align the Kosovo quality assurance model to the Standards and Guidelines for Quality Assurance in the European Higher Education Area (revised and adopted in 2015);
- Revise the KAA standards and procedures based on the collected data.

On 30 November and 1 December 2016 KAA organised a workshop for quality officers from higher education institutions and a national conference for the development of quality assurance in Kosovo higher education. The purpose of these two events was two-fold. First, to place on the public agenda the debate about the national quality assurance system in Kosovo by engaging the
national academic community, higher education experts and civil society in order to gain fruitful insights that would support KAA in revising its standards and procedures.

Secondly, to invest in capacity building at institutional level by providing suggestions for the development of internal systems for quality assurance in higher education institutions in Kosovo. The two events brought together the representatives of several institutions, authorities and organisations as well as national and international experts. Representatives of higher education institutions included Rectors, Deans, Directors, and Quality Assurance Officers, while representatives of authorities included: The Minister of Education, Science and Technology, Directorate of Higher Education in MEST, Director of the National Qualifications Authority, representatives of the Ministry of Finance etc. A number of representatives from international donors were included, including the Ambassador of Austria in Kosovo, Swiss donors representing the EYE Project and representatives of the EU Office in Kosovo. Also involved were representatives of civil society and representatives of the Kosovo Students Union.

The two events were part of the project aimed at reflecting to what extend the national quality assurance system is fit for purpose and responds to the needs of the higher education sector in Kosovo at both systematic and international level, and secondly to explore future scenarios for the development of quality assurance procedures and regulations.

Once the consultative process ended, the data was analysed and presented under a research report aimed at supporting KAA in revising the current Standards and Guidelines for accreditation, as well as other Agency’s supporting documents. Based on the research results and with the help of several international experts, a revised version of KAA’s Standards and Guidelines for external quality assurance was produced. Before formally adopting the new version, the document was circulated for public consultation among all higher education institutions and relevant stakeholders and was finally adopted by the Board on June 2018.

Given the short timeframe, KAA has not, as yet, evaluated the impact of the revised Accreditation.

10.3 ESG Standard 2.3 Implementing processes

*Standard:*

External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include:

- a self-assessment or equivalent;
- an external assessment normally including a site visit;
- a report resulting from the external assessment;
- a consistent follow-up.

**KAA Compliance:**
The procedure for re/accreditation is set out in article 10 of the Administrative Instruction on Accreditation. The standard procedure for re/accreditation of education providers typically includes four steps: application, site visit, evaluation report and decision. The whole procedure as described above begins with the Submission of Accreditation request (First Pages) and submission of academic staff lists (academic staff declarations). KAA conducts a screening of academic staff before submitting them to the Board for approval. After the Board has approved the academic staff lists, the Board formally approves the application of the educational provider.

Institutions are required to draft a self-assessment report, depending on the number of study programmes for which they are seeking evaluation. The self-evaluation documentation is the starting point for expert team activity. It must provide sufficient data to enable the team to understand how the institution conducts quality assurance through its internal processes and how these relate to the established national standards and performance indicators.

The self-assessment report, according to the Accreditation Manual, should include the following:

- **Introduction** – a general presentation of the institution/study programme, its mission and objectives, leadership, management structures, administration and staffing arrangements, students and their socio-economic background, relevant contextual information about the area in which the institution operates, teaching, learning and curriculum;
- **Main body** - comprises the institution’s perspective on how it meets the standards and performance indicators included in the present manual and, also, a SWOT analysis for each of the general areas. The main body will also include the evaluation of institutional/program level performance during the period following the last external evaluation;
- **Appendices** - all the documents supporting the statements made in the main body.

Subsequent procedures include a site visit, where the expert team evaluates, the compliance of the provider against the standards and performance indicators included in the Accreditation Manual. The site visit includes compulsory meetings typically including an initial meeting with the management of the organisation, a meeting with teaching staff, a meeting with current students, a meeting with the persons responsible for the study programmes, a meeting with graduates, a meeting with employers of graduates, and a final meeting with the senior management of the organisation.
The results of the evaluation after the site visit have taken place are included in the External Evaluation Report, which follows the general structure provided by the Accreditation Manual and its templates. The provider is then offered the opportunity to comment on the factual accuracy of the report before it is submitted to the SCQ for its decisions.

Following the SCQ’s decision, the education provider is required to state how it plans to address the recommendations provided by the expert team. The follow up plan is required to address each of the recommendations in the External Evaluation Report, providing details on how the identified deficiencies will be rectified, including setting out individual responsibilities and the timeframe for completion.

**10.4 ESG Standard 2.4 Peer-review experts**

*Standard:*
External quality assurance should be carried out by groups of external experts that include (a) student member(s).

*KAA Compliance*
The evaluation and accreditation process involves international experts, as it is stipulated by the Law on Higher Education, article 15. KAA appoints an Expert Team from the list of experts held by KAA. The list comprises individuals who have experience in quality assurance and/or higher education management, and, where appropriate, special training in the field of the study programme(s) being evaluated.

Selection of external experts is based on article 13 of the Administrative Instruction on Accreditation. According to this article, the KAA Director drafts a list of external experts and proposes them to the State Council for Quality (SCQ) for approval. The list of external evaluators is drawn up on the recommendation of European accreditation agencies, members of ENQA and/or EQAR, international external evaluation experts as well as international quality assurance experts who are interested/apply to be included in the KAA's external experts lists. The criteria for selection seek to include: professionals in the relevant evaluation field and with experience in quality assessment and accreditation processes; PhD holders, except in arts or professional programmes, where the qualifications of external evaluators should be equivalent to the artistic and professional MA degree. The required qualification of a PhD does not apply for student members of expert panels because, in the main, KAA engaged mainly students who are currently studying bachelor’s or master’s level.
Historically, the Expert team includes a student member nominated by the National Union of Students or by the European Students Union. Previously, their involvement was largely during institutional evaluation and, in specific cases, in programme evaluation at larger educational providers. Taking in to account the recent changes in ESG which require student experts to be included in all panels, KAA has revised the Administrative Instruction on Accreditation, respectively article 14 Composition of Expert Teams, as follows: “In the team of external evaluators at least one student will be appointed to evaluate students matters during the evaluation of the higher education institution.”

During recent accreditation process, KAA has significantly increased the number of student experts in programme evaluation, also in smaller institutions of higher education. At least 20 members of the European Students Union have been invited several times during the last two years. However, since the revision of the AI in August 2017, no reviews have been conducted by expert panels and hence this requirement has not been relevant. However, in future it will be mandatory for all KAA reviews to include a student member.

Student members are full members of the panel and considered on a par with other panel members. While other panel members are recruited, in part, for their expertise in the specific subject areas offered by the institution students are not recruited on the basis of any specific subject expertise. Students are not engaged in evaluating academic components of the study programs however they evaluate another component of the program, give their recommendations, made questions and require information concerning the criteria set by KAA. Students cannot be responsible to provide recommendation whether a study program can be re/accredited or no, but they can jointly recommend, with another PhD expert, a positive or negative institutional re/accreditation.

In order to avoid any conflicts of interest, KAA ensures that the composition of the team is agreed by providers in advance to the evaluation process. The provider may make a formal request that the team composition be modified if it believes that the objectivity and professionalism of the evaluation process may be compromised. If KAA finds the reason(s) acceptable it will amend the team composition accordingly.

Before the site visit take place, Expert Team members are obliged to sign a declaration, which includes the expert’s confirmation that he/she has no actual, or potential, conflict of interest in relation to the institution to be evaluated.

Recently KAA has adopted a Code of Ethics which sets out the norms of behaviour expected of the members of Expert Team and KAA’s other external collaborators. According to this regulation, the
cases of conflicts of interests result from the incompatibilities of the members of KAA Board, experts and external collaborators of KAA and members of higher education institutions involved in institutional self-evaluation. Furthermore, the Regulation states that “the individuals engaged in internal and external quality assurance activities must disclose in advance any information that could potentially limit the capacity to make objective, professional judgments. Those involved in a conflict of interests will avoid engaging with the process of external quality assurance procedures and will abstain from expressing their opinions”.

To date KAA has not involved employers or other representatives from the industry in evaluation panels. According to the Law on Higher Education, it is stipulated that KAA engages only international experts. It is therefore not possible for KAA to include persons from industry in evaluation teams. However, the new Accreditation Manual, provides for meetings with employers of graduates during site visits. However, no accreditation site visits have taken place since the introduction of this provision.

10.5 ESG Standard 2.5 Criteria for outcomes

Standard
Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision

KAA Compliance
The decision-making process of the Board is stipulated in article 18 of the Administrative Instruction on Accreditation. According to these provisions, the SCQ takes decisions on accreditation by a simple majority of votes of its members. Furthermore, it is stipulated that no SCQ decision on accreditation / re-accreditation or refusal of application, non-accreditation of the institution or study programmes can be taken without the participation of at least one international member of the Board.

It is stipulated that following the site visit after the expert team has submitted its final report, the KAA Director shall compile a summary of the evaluation and submit it to SCQ. Based on recommendations given in the external evaluators report, SCQ takes a decision on accreditation or non-accreditation. According to the AI, exceptionally, the SCQ may take a decision different from the recommendation of external evaluators if the it determines that final recommendation of the external evaluators is at variance with the content of the report. This, however, is a very
rare occurrence and such a decision is taken only after intense scrutiny of the report. To date, the number of these occurrences is 10.

All criteria for external quality assurance are made publicly available to all relevant stakeholders on KAA’s website. This includes the LHE, AI on Accreditation and the revised Accreditation Manual. The Manual and other KAA documents are published both in Albanian and English.

When judging the accreditation at study programme and/or institutional level, only the institution’s achievement, in relation to the mandatory minimum standards level that is taken into consideration. Performance indicators are offered as examples of good practice aimed at stimulating and motivating continuous quality enhancement across the higher education sector. The overall compliance level is determined by the compliance across all general areas and the most frequent modal achievement level across the general areas determines the overall compliance (achievement) level. In order to be granted a positive decision for the programme and institutional re/accreditation, education providers have to demonstrate at least a substantial compliance level in the overall judgment. Therefore, failure to meet at least an overall substantial compliance level leads to withdrawing or denying accreditation.

KAA decisions for re/accreditation of study programmes are made and apply separately for each geographical location (campuses/branches), form of delivery (full time/part time) and teaching language. These are considered distinct processes and are subject to separate submissions for accreditation to KAA.

10.6 ESG Standard 2.6 Reporting

*Standard:* Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.

*KAA Compliance*  
The obligation of KAA to publish its evaluation report is stipulated in the LHE, article 7, paragraph 3, as follows: “The KAA shall publish its policies, criteria and standards for accreditation and its decisions, recommendations and advice in respect of particular institutions and programmes. It shall publish an Annual Report.” Since its establishment, KAA has published full evaluation reports in English and Albanian language. Publication of reports is done per each institution of higher education according to the year when the site visit took place and the final decision issued from the SCQ for the respective year.
The evaluation reports follow KAA Guidelines for Experts, where guidance was provided to expert about the structure and the standard to evaluate during the site visit and accreditation process. In the revised Accreditation Manual, KAA has produced an External Evaluation Report Template to be used in evaluations of institutions and study programmes. This provides a high level of guidance for evaluation panel member as they are technically guided how and where to insert all comments or observations, commendations and suggestions relating to the general areas and its allocated standards and performance indicators, as specified in the KAA Accreditation Manual. According to the AI on Accreditation, the External Evaluation Report should contain the final recommendation for positive or negative accreditation, as well as other recommendations which aim at improving the quality of the institution.

The external evaluation report according to the Administrative Instruction on Accreditation is sent to the education provider giving it the chance to correct any potential factual errors that might have been included. After receiving the potential comments from the education provider, the expert team decides whether any corrections should be made before finalising the report and submitting it to KAA. This report is sent for approval to the State Council of Quality (SCQ), following which it, and the decision on accreditation are published the Agency’s website.

10.7 ESG Standard 2.7 Complaints and appeals

*Standard:* Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions

*KAA Compliance*  
This standard has proved to be one of the most challenging standards for KAA to meet. Immediately following KAA’s achievement of full membership of ENQA, at its meeting in November 2014 the Board adopted an internal rule for an appeal procedure and established an Appeals Committee. The Appeals Committee was established to review all appeals and to recommend to the Board either a change its decision, to proceed to new investigations or a new evaluation or to reject the appeal. At that time, the Appeals Committee comprised three persons. It was chaired by an international member of the Board and included an external member from an academic background and with experience in quality assurance. The appointment of this external member to the Appeals Committee was seen by KAA as a first step in moving towards greater externality. This Appeals Committee commenced operations in July 2015, and it reviewed a number of requests for reconsideration of negative decisions. All but two of these requests were rejected.
due to a lack of grounds for reconsideration. Two were partly upheld. In one case the Evaluation Team missed some data provided by the applicant institution, and in the other following provision of additional evidence by the institution in its appeal. However, as a public agency KAA is subject to the Law on Administrative Procedures (Law No. 02/ L-28, 2005), which gives the right to appeal to a court of law to any institution which remains dissatisfied after it has exhausted its right of internal appeal to KAA. Therefore, KAA in September 2015 suspended the Appeals Committee, and requested a legal opinion from the Legal Office of the Prime Minister’s Office in order to rule on whether KAA’s Appeals Process violated the Law on Administrative Procedures.

Subsequently, KAA has managed the appeals process, by, as before, first reviewing the provider’s requests for reconsideration. Dissatisfied providers would then have the right to take the matter to the court.

In 2017, KAA made a revision of the Administrative Instruction on the Appeals Procedure. Article 22 was added to the AI which stipulated how KAA should manage the appeals procedure. Another small revision on its Administrative Instruction on Accreditation in September 2018 clarified the process for electing members to the Appeals Committee.

The current legal provisions laid down in the Administrative Instruction stipulate the following:

- The Appeals Committee shall review and decide on appeals submitted by higher education institutions against decisions rendered by the SCQ.
- The Appeals Committee shall review appeals and reach a decision within 30 days from the day the appeal was received.
- Decisions made by the Committee shall be final. The dissatisfied party may initiate an administrative dispute against this decision by the means of a lawsuit to a competent court.
- The Appeals Committee shall consist of three permanent members, and two reserve (alternative) members who will be engaged only in cases when of the members will not be able to exercise his/ her function, either due to a conflict of interest or any other reason which prevents him/ her from participating in the work of the Committee.
- Two out of three permanent members of the commission and two reserve members shall have the scientific degree of Dr and have at least the academic title of Associate Professor.
- The third permanent member shall have a legal background, be qualified in the national jurisprudence, and have at least 10 years’ professional experience in legal issues.
- The KAA Director shall propose to the selection committee a list of 10-15 persons who meet the criteria specified in this AI, and the committee shall select from this list KAA’s permanent Appeals Committee.
Members of the Appeals Committee shall be selected by an interim commission appointed by the Minister of Education with the following compositions:

a) KAA Director, Chairperson
b) One MEST representative, member
c) One representative from the Ombudsperson, member
d) One representative from the EU Office in Kosovo, member
e) One representative of the civil society, member

After having evaluated and selected the members of the Appeals Committee, the KAA Director shall issue a formal decision on the appointment of the Appeals Committee members.

Members of the Appeals Committee shall be appointed for a two-year mandate, with the possibility of re-election for one additional mandate.

The functioning of the Appeals Committee shall be based on the General Administrative Procedure Law, the Administrative Instruction on Accreditation, the Rules of Procedures of this Appeals, which are approved by the SCQ.

The establishment of the Appeals Committee took place only on 20th November 2018. The interim commission appointed by the Minister of Education, reviewed and assessed the list of people proposed by the Director of KAA in line with the abovementioned legal provisions, and reached the decision to appoint three permanent members of the KAA’s Appeals Committee (Prof. Dr. Shukrani Germizaj; Prof. Asoc. Arben Hajrullahu; Msc Burim Abazi) and also two reserve members (Prof. Dr. Bujar Pira; Prof. Dr. Visar Morina) for a mandate of two years, respectively from 20.11.2018-19.11.2020. The formal decision of the KAA’s Acting Director on the appointment of the Appeals Committee members is published in the KAA’s web page and can be found in the following link: http://www.akreditimi-ks.org/docs/LawRegulation/Vendim_per%20emerimin_e_Komisionit_te%20Ankesave_english_1643-18D.pdf

An Appeals Procedure (Rules of Procedure) was formally adopted by the SCQ in June 2018. The Appeals Procedure is based on the Law on Administrative Procedure in the Republic of Kosovo and the Law on Higher Education. This regulation stipulates the permitted nature of appeals, and the procedures to be followed, consequent upon formal outcomes contested by education providers.

*It is important to note that the current Appeals Procedure was drafted based on the Administrative Instruction on Accreditation 2017, which previously stipulated that part of the Appeals Committee shall be one former international SQC member; one former local SQC member and one international expert familiar with the context of higher education in Kosovo. Since the
Administrative Instruction was revised recently in 2018, and now the composition of the Appeals Committee stipulates other rules for members of this Committee, the Board will revise the Appeals Procedure accordingly and specifically as regards the Article 5 of the Procedure.
11. INFORMATION AND OPINIONS OF STAKEHOLDERS

11.1. Stakeholders of higher education / Kosovo Accreditation Agency

Higher education stakeholders are many and diverse. Since KAA plays a central role in the higher education development, these stakeholders can be seen as KAA stakeholders, too. These stakeholders are categorised in the following stakeholder matrix:

<table>
<thead>
<tr>
<th>Stakeholder</th>
<th>Role in higher education development</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kosovo Accreditation Agency (KAA)</td>
<td>Mandated and responsible for ensuring quality assurance and control in higher education, as well as supporting sustainable development of higher education institutions through guidance and monitoring of their development.</td>
</tr>
<tr>
<td>Assembly of Kosovo</td>
<td>Approves higher education legislation, statutes of universities, as well as approves members of State Council of Quality (SCQ), and other important bodies.</td>
</tr>
<tr>
<td>Government of Kosovo / Ministry of Education, Science and Technology (MEST),</td>
<td>Responsible for development, implementation and overseeing of higher education legal and strategic policies, as well as for establishment of and allocation of funds to public higher education institutions, and licensing all higher education institutions in Kosovo. MEST is also responsible for nominating members of SCQ, as well as other bodies responsible for higher education development.</td>
</tr>
<tr>
<td>National Qualifications Authority (NQA)</td>
<td>Mandated and responsible for development of the National Qualifications Framework, descriptors for higher education qualifications, as well as developing and updating the qualifications standards, and accrediting vocational education schools and non-formal training programs at all levels.</td>
</tr>
<tr>
<td>Ministry of Labour and Social Welfare (MLSW).</td>
<td>Provides important inputs from labour market, employment services and non-formal training opportunities to graduates of higher education.</td>
</tr>
<tr>
<td>Municipalities</td>
<td>Provide direct and indirect support to public and non-public higher education institutions, through funding, allocation of land and properties for the use of higher education purpose, as well as representation on bodies within higher education institutions to support enhancement of study programmes to meet employers’ needs.</td>
</tr>
<tr>
<td><strong>State Council of Quality (SCQ)</strong></td>
<td>Responsible for taking accreditation decisions relating to higher education institutions in Kosovo.</td>
</tr>
<tr>
<td>-----------------------------------</td>
<td>--------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td><strong>Council of Vocational Education and Training (CVET)</strong></td>
<td>Approving qualification standards and decisions for accreditation of VET formal and non-formal training programmes.</td>
</tr>
<tr>
<td><strong>Rectors’ Conference</strong></td>
<td>Plays considerable role in boosting development of higher education sector by influencing policy making processes as well as taking into account the respective actions for implementing higher education policies in higher education institutions.</td>
</tr>
</tbody>
</table>

### Higher education institutions

| **Public and private HEIs** | Develop study programmes and provide qualifications and training in formal and non-formal education at levels 5-8 of the EQF/NQF. Undertake labour market analysis and collaborative projects with businesses and industry in order to support the development of the economy and society, by providing evidence-based innovation approaches. |

### Business/industry representatives

- Kosovo Chamber of Commerce
- Kosovo-American Chamber of Commerce
- Kosovo-German Chamber of Commerce
- Kosovo Business Alliance
- Other respective bodies

Serve as a link between the world of work and higher education institutions. Work on collaborative initiatives and projects, and now and then are part of different bodies and mechanisms within higher education institutions (industrial boards, etc.). Their role is to provide feedback on the quality of services in higher education and its relevance to their needs for the development of industry.

### Other stakeholders

- Student organisations / councils
- NGOs
- Others / society

Are direct and indirect beneficiaries of higher education obtaining qualifications, knowledge and skills for employment. They also provide feedback on the quality of services in higher education and its relevance to their needs for individual development, as well as collaborative opportunities through different projects and initiatives.

### 11.2. Consultation processes of higher education stakeholders

KAA undertakes regular and ad hoc stakeholder analysis of views about its policy development and implementation. These activities include studies, roundtable meetings, and workshops, to facilitate information and inform policy formulation. Such activities informed the drafting of the Accreditation Manual and the AI for Accreditation. KAA also holds regular meetings with higher
education institutions to brief them on new policies and processes and to facilitate dialogue in order to forge a shared common understanding of such policies and measures.

At the end of 2016 KAA conducted a wide stakeholder survey to evaluate the present system of quality assurance in higher education and its congruence with the needs and aspirations of higher education institutions and society, as well as to identify best practice and explore opportunities to improve the standards and guidelines. Stakeholders consulted included higher education institutions in Kosovo (public and private), officials from Ministry of Education, Science and Technology, higher education experts, representatives from civil society organizations. International best practice in HE quality assurance was also explored.

Findings of this survey showed that 64% of the surveyed stakeholders declared that the current quality assurance system meets the needs of the higher education sector. Some 55% declared they were very satisfied or satisfied with the system with around 33% ‘undetermined / neutral’ about their satisfaction. Participants referred to: the lack of standards to ensure minimum and consistent threshold among all HEIs, as well as the lack of consistency about the application of quality standards; lack of general functioning of internal quality assurance mechanisms in all HEIs, lack of adequate information and transparency (lack of available adequate reports, data/statistics), etc.

Around 92% of the surveyed stakeholders considered there is a need for improvement in the national system on quality assurance. This improvement is indicated at the level of detailing the constantly measurable indicators of standards, having a more supportive approach in development of internal quality standards within HEIs, since it is a great need for its enhancement.

However, some 94% of surveyed HEI representatives believe that they have a moderate-to very high-quality culture within their institutions.

A number of recommendations for the enhancement of quality assurance system are listed in the survey report. These include: improved clarity in the measurement of accreditation standards and their understanding among HE stakeholders; enhancement of transparency and the clarity of information provided; and increased human resources at KAA. (See the report in more detail for the substantial list of suggestions\(^1\)).

KAA will organise a roundtable event in order to share this SER with stakeholders and to seek suggestions for improvement.

12. RECOMMENDATION AND MAIN FINDINGS FROM THE PREVIOUS REVIEWS AND AGENCY’S RESULTING FOLLOW UP

In the context of the last ENQA review, KAA received some recommendations that helped it in its development and endeavour for continuous improvement. KAA carefully considered these recommendations, analysed the best and most suitable approach to address these in the context of KAA’s operations and strategy and subsequently started implementing these. In addition to its own activities, KAA cooperated in the context of the international donor’s projects such as HERAS and EYE with experts on addressing the recommendations. KAA addressed the recommendations as described and outlined below.

1. **KAA is recommended to ensure that the international, non-Albanese speaking evaluation experts are able to gain sufficient insight in the effectiveness of the internal quality assurance of student assessment.**

KAA operates, as outlined above, exclusively with international reviewers. However, KAA ensures that reviewers take part in several reviews to improve their understanding of the Kosovar context. Whilst none of the reviewers is competent in the Albanian language, KAA ensures that all important documents are translated into English. All institutions of higher education submitting applications for re/accreditation are obliged to translate their documents into English. Also, during a site visit all meetings are held in English language with professional translation services provided by HEIs, if necessary. Student assessment is part of the Self Evaluation Report and experts have meetings with students during site visits. According to the KAA Manual, these meetings are strictly confidential and attended only by students and the experts. Where students’ English language ability is limited, a KAA member present acts as interpreter. The presence of a KAA staff member during each review also ensures that further evidences can be explained to the review teams even if only available in Albanian language.

In addition, the revised Accreditation Manual for the re/accreditation of study programs elaborates the standards and criteria concerning student’s assessments, respectively the Standard 4 “Educational Process content” as well as Standard 5 “Students”.

2. **In view of the rapidly changing needs of Kosovan society and HE, KAA is recommended to involve all relevant stakeholders, including students, teachers and employers, in the process of further developing the QA procedures.**
As outlined in the relevant sections of ESG compliance, as well as in section 11, KAA has places great importance on stakeholder consultations for all its activities. In particular, KAA has started to undertake regular and ad hoc stakeholder analysis to inform its development and enhancement of its services. These activities include studies, roundtable meetings, workshops, and other events that have the purpose of policy formulation and enhancement, information sharing, monitoring and evaluation, and so on. KAA organised stakeholder consultations in the form of roundtables and workshops when the Accreditation Manual was revised. KAA also holds regular meetings with higher education institutions to present information on new policies and processes as they undergo changes, as well as to share common understanding of such policies and measures.

The KAA Manual represents the main document setting out the framework and procedures of quality assurance in Kosovo. KAA made strenuous efforts to canvass the opinions of all relevant stakeholders in order to make sure that its applicability will have full legitimacy and will be endorsed from all HEIs.

As explained earlier, at the end of 2016 KAA conducted a wide survey of stakeholder opinion in order to identify best practice as well as areas in need of improvement, in order to enhance its future provision. Stakeholders that were consulted and included in this study were higher education institutions in Kosovo (public and private), respective officials from Ministry of Education, Science and Technology, higher education experts, representatives from civil society organizations. It is important to mentioned that representatives of Kosovo Students Union were part of this consultation process and their inputs have been taken into account appropriately. Based on the data that have been analysed and presented under a research report aimed at supporting KAA in revising the current Standards and Guidelines for accreditation, respectively the KAA Manual, as well as other agency support documents. Before formally adopting the Manual, the document was circulated for public consultation among all higher education institutions and relevant stakeholders and was finally adopted by the Board on June 2018. In addition, KAA organized a workshop for qualify officers of higher education institutions and held a national conference for the development of quality assurance in Kosovo higher education in which it sought feedback and has used this to inform KAA’s processes.

KAA is paying special attention to the feedback of higher education institutions and has introduced a constant dialogue with them. Regular meetings are held with representatives of providers before every Board meeting in order to:

- make transparent the decision-making of the Board. HEIs will have the opportunity to ensure that the SCQ has all relevant and up-to-date documentation in order to reach an informed decision. Institutions may submit further and/or updated information where it is deemed necessary
- to make sure that Board meetings and their decisions will not be any surprise for any of the institutions of higher education. This would decrease also decrease the number of formally submitted appeals to the Board in case of negative decisions because HEIs are given the opportunity to exhaust all their procedural possibilities and provide the evidences, if they have them.

3. **Students should take part in panels on the (re-)accreditation of study-programmes.**

Taking into consideration, recent changes in the ESG requiring student members for all panels, KAA revised the Administrative Instruction on Accreditation, article 14 “Composition of Expert Teams”, which now stipulates the following: “*In the team of external evaluators at least one student will be appointed during the evaluations of higher education institutions.*” However, the revision of the AI took place in August 2017 there have been no accreditation evaluations with external experts, this has yet to be implemented. However, for all future accreditation events it will be mandatory for students to be full members of review panels.

Within the last three years, KAA has significantly increased the number of student experts involved in the program evaluation, also in smaller institutions of higher education who were evaluated only at program levels. At least 19 members of European Students Union have been invited several times over the course of two years, both in institutional and program level. In 2016, in 33 panels were invited 10 students recommended from the ESU, whereas in 2017, in 30 panels were invited 9 students.

4. **KAA is recommended to be more strict on the coverage and acceptance of the self-evaluation reports as provided by HEIs, in order to facilitate the work of the external evaluators.**

When the ENQA review took place in 2013, no detailed guidelines for HEIs on preparing a self-assessment report were available. Institutions were provided only with a Guideline for Drafting the Self-Assessment Report, which was a very basic document in which guidance was limited to the required chapter heading and the provision of some generic information. Despite this, the majority of self-assessment reports submitted served as a solid basis for review. Some were overly descriptive and lacking in analytical content necessitating detailed investigation during the site visit. Given the limited time available on-site, institutions have been urged to provide as much information as possible prior to the on-site visit. Thus, the Manual, Chapter 3 “Guidelines for external quality assurance”, requires KAA staff to check that submitted self-assessment reports meet the basic requirements before the next stage of the accreditation process is initiated.
As the self-evaluation documentation is a central point of the accreditation process, it must provide sufficient data to support experts in understanding the main characteristics of the institution and how its quality assurance processes compare with the expected norms set out the national standards and performance indicators.

The minimum criteria for the SER are that it contains:

• Introduction – a general presentation of the institution/study programme, its mission and objectives, leadership, management structure, administration and staffing arrangements, students and their socio-economic background, relevant contextual information about the area in which the institution operates, teaching, learning and the curriculum;
• Main body - comprises the institution’s perspective on how it meets KAA standards and performance indicators as set out in the Manual and a SWOT analysis for each of the general areas.
  The main body will also include the evaluation of institutional/programme level performance since the last external evaluation;
• Appendices - all the documents supporting the elements presented in the main body.

Moreover, according to the Manual, the self-evaluation documents must:
• be honest and relevant;
• be concise and supported by the attached documents;
• be publicly available on the institution’s website;
• present an adequate balance between description and self-critical evaluation.

In order to draft its self-evaluation documentation, the institution must:

• describe, in short, the main characteristics of the institutional/programme framework and of its activities for maintaining academic standards, for enhancing the quality of the institution and its study programmes and for the support of teaching and learning, research and community service;
• present and analyse its own observations drawn from internal evaluations on institutional practices, subjects or curricular areas, as well as how challenges and difficulties have been addressed, in order to promote the enhancement of institutional processes;
• describe the teachers’ and students’ internal professional rules and emphasise all the important changes operated at institutional level in response to their application;
• document the use of external reference sources, including the National Qualifications Framework and the Framework for Qualifications of the European Higher Education Area,
as well as the standards, performance indicators and benchmarks associated with its study programmes and the institution as a whole;

• identify the disciplines or curricular areas that represent good practice and provide evidence in relation to the relevant performance indicators;

• describe and comment on its strategy, for the next three years, for consolidating good practice and for addressing the identified challenges and shortcomings;

• create a SWOT analysis for each general area;

• present and analyse the progress recorded since the last external evaluation.

The higher education institution is expected to represent itself honestly and accurately to internal and external constituencies as well as to the general public. Self-evaluation documentation should always be truthful, provide correct, reliable and complete information, and avoid any actual or implied misrepresentations or exaggerated claims. As there have been no accreditations undertaken since the publication of these new guidelines it is not possible to comment on their efficacy.

However, to support institutions in preparing their self-assessments, KAA organized a workshop with representatives of all public and private HEIs in which the new guidelines will be explained and institutions’ questions answered.

5. **KAA is recommended to be more critical at the reports produced by the evaluation experts, and compare the standards of report writing with those of established external evaluation agencies.**

At the time of the ENQA review in 2013, no specific guidelines were provided to assist external experts in writing evaluation reports other than the standards against which HEIs and their study programmes were to be evaluated. In the absence of specific guidelines about the structure and quality of reports, it was difficult for KAA officials to return evaluation reports to experts for fear of appearing to interfere in the experts’ professional judgments. This, on occasions led to the acceptance of reports lacking quality. The absence of a template, meant that reports submitted did not conform to the same format. KAA, has sought to address this issue by briefing external experts before the site visit. This has proved efficient in terms of raising Experts’ awareness of all aspects of the accreditation process, including the preferred report format. The frequent re-employment of the same experts has also aided this process.

In a further development the Manual makes it clear that reports may be returned to experts for clarification where they deviate from the template: “KAA validates the report if: it respects the general structure provided by the present manual and, secondly, if it has a coherent flow between the body of the report and the Expert team recommendation (the recommendation has to be fully
Higher education institutions and their study programmes are judged, on the extent to which, in the stipulated areas, they comply with the relevant standards and performance indicators. The assessment is judged on a four-level compliance scale, as follows:

a. Fully compliant
b. Substantially compliant
c. Partially compliant
d. Non-compliant

The expert teams will report the compliance of the education provider against the stipulated standards and performance indicators at two levels, as follows:

1. Compliance in each general area:
   In order to assess the compliance level in each general area the following guidelines apply:
   1.1. fully compliant – all the standards included in a particular general area are met. If the institution exceeds the standards and meets some of the performance indicators, commendations are appropriate. This recognition provides the institution with motivation to pursue even greater levels of excellence in their quality management practices;
   1.2. substantially compliant – 70 – 90% of the standards included in a particular general area are met; the remainder, are not yet in line with stated expectations. It is possible that some standards may not to be satisfied before the next review, due, for example, to the loss of key academic and management staff due to retirement, declining student enrolment, or projected reductions in financial or personnel resources.
   1.3. partially compliant - 30 – 60% of the standards included in a particular general area are met. The institution lack of compliance with the standards means that the quality of the institution may be compromised;
   1.4. non-compliant – less than 30% of the standards included in a particular general area are met. The institution does not satisfy the requirements of the standards.

2. Overall compliance of the education provider (institutional and/or programme level) across all general areas.
The overall compliance level is determined by the compliance across all general areas. The most frequent (modal) compliance level across the general areas determines the overall compliance level.

In order to be granted a positive decision for the programme and institutional re/accreditation, every education provider has to demonstrate, as a minimum, a substantial compliance level in the overall judgment. Therefore, failure in meeting an overall substantial compliance level results in delaying, withdrawing, suspending or denying accreditation.

The Accreditation Manual further identifies the duties and responsibilities of the experts in ensuring the quality of their reports. It stipulates that “Expert teams have the duty to gather, verify and exchange information and supporting elements so as to be able to check the statements made in the self-evaluation documentation, as well as during the site visits and to formulate their own assessments of the performance of the education provider against the standards and performance indicators included in the present manual”. These provisions are designed to ensure that all External Review Reports are of an appropriate quality, demonstrate a homogeneity of approach and encapsulate international standards.

6. KAA is recommended to further develop the follow-up procedures, in particular the follow-up on improvement plans and the length of re-accreditation cycles, and to become more specific on conditional (re-)accreditations.

All accredited HEIs are obliged to submit to the KAA, at the end of each academic year, an Implementation Plan to address the Recommendations of the team of experts in their report. This plan has allowed KAA to monitor, remotely, an institution’s progress in addressing the Expert Panel’s Recommendations. However, a shortage of staff has prevented KAA from conducting field monitoring on regular basis. These Plans have been provided to Expert Panels conducting the next accreditation site visit in order to inform their judgments.

The Law on Higher Education stipulated that that KAA would conduct monitoring of HEIs following successful accreditation. However, the Administrative Instruction on Accreditation did not specify how this monitoring should take place. The absence of published guidelines on monitoring made it difficult for the Agency to undertake monitoring on site. In response, the last revision of the AI on Accreditation in 2017, included Article 29 which establishes the process of “Monitoring and Control” as follows:
1) KAA performs monitoring and quality control with prior notification at accredited HEIs.

2) Monitoring and quality control is carried out by international external evaluators.

3) The cost of the monitoring process is covered by KAA.

4) The monitoring of accredited HEIs is organised twice within one academic year.

5) KAA will publish regulations and policies relating to monitoring

KAA is working on drafting Monitoring Standards and Guidelines with the help of HERAS. This document has not been finalised but will be of great importance in ensuring a more efficient and effective monitoring process.

KAA has collected evidence from HEIs in order to assess their level of compliance with requirements concerning sufficiency of academic staff per study programme. In the last three years these activities have been applied consistently and more than 100 study programmes have been closed as a result of failing to comply with national legislation.

In terms of conditional accreditation, the revised Administrative Instruction on Accreditation, the revised AI on Accreditation stipulates the following duration of accreditation:

   a. The duration of initial (preliminary) institutional accreditation granted is three years and of re/accreditation no longer than five years, unless the team of external evaluators recommends an alternative time limit which is approved by the SCQ.

   b. The duration of the programme re/accreditation granted is between three and five years, unless the team of external evaluators recommend another time limit which is approved by SCQ.

In recent years, SCQ has not granted conditional accreditation; either it has decided to grant full accreditation (3-5 years) or not to approve accreditation. In 2017 SCQ decided to grant accreditation, initially, for one year to new study programmes offered in medical areas within the private sector. This applied to three private institutions of higher education (six one-year decisions all together) and in one case one-year accreditation for institutional evaluation at University of Mitrovica. These institutions need to apply in the next round of accreditation in order to extend their period of accreditation to the normal 3 – 5 years. In order to achieve this, they will need to provide sufficient evidence that they have implemented the experts’ recommendations as stated in the External Evaluation Reports.

In accordance with the revised Manual, if the Board of KAA decides on a conditional accreditation, the following provisions apply:
- The provider is considered substantially compliant, but deficiencies have been detected which are required to be corrected within one year;
- The expert team recommending a conditional accreditation will report whether confirmation that the conditions for accreditation have been met will, or will not, require a follow-up visit;
- In the case of a conditional accreditation of a study programme, the education provider has the right to enrol new students in that particular programme;
- Within one year, the higher education institution has to demonstrate that the conditions for accreditation have been met, and this is verified by KAA, either by analysing the evidence submitted by the education provider or by conducting a new visit, as suggested by the expert team;
- Where KAA confirms the conditions for accreditation have been met, the provider will be granted accreditation for a period of 3 to 5 years, as recommended by the expert team;
- Where KAA confirms that the conditions have not been met, the education provider loses its right to enrol new students in that programme, although already registered students may continue their studies according to the statute of the institution. Within one year of the KAA decision that the provider has failed to meet the accreditation conditions, if the provider wishes to proceed with its submission, the education provider is required to submit a request for a new external evaluation.

There have been no accreditation visits in 2018, and, as a result, these regulations have not been activated.

7. **KAA is recommended to carry out regular in-depth system-wide analyses, eventually also with help of independent outsiders.**

Since the last review, the ESG standard has changed and now focuses on thematic analyses rather than system-wide analyses. A full description on how the Agency has addressed this recommendation can be found on page 33, ESG Standard 3.4 Thematic analysis.

8. **KAA is recommended to act according to its strategic plans and at the same time regularly monitor the workload of its staff in view of the many activities that it intends to carry out.**

Although the Agency has lacked resources, it has managed to allocate specific responsibilities to individual members of the staff, thereby enhancing its efficiency. KAA has managed to undertake the accreditation process for several years now in a successful manner and thus fulfil its core functions. KAA Staff have participated in workshops, seminars, study visits to European universities.
and quality assurance agencies as part of its staff development plan. KAA was also in receipt of support from international donors during this time.

Although a lack of recruitment has increased the workload of the remaining staff, no accreditations have been conducted in 2018 and hence KAA was able to operate efficiently.

While the accreditation process has, so far, been adequately managed by the Agency, the planned implementation of a robust monitoring scheme will be challenging. Like the accreditation process, it is intended to utilise international experts. As HEIs are not required to pay monitoring fees, KAA is required to finance the international expertise from its own budget rather than through accreditation fees. KAA has made several requests to the MEST and the Ministry of Finances for an additional budget in order to enable the successful implementation of the monitoring component.

KAA would like to increase its staffing level, but, like other ministries in Kosovo it is subject to limited public funds and is not able to finance the recruitment of additional staff from its own budget.

9. **KAA is recommended to revise the composition of the Appeals Committee in the direction of committee members being without links to the KAA Board.**

This standard has proved to be one of the most challenging standards for KAA to meet. Efforts were made in order to implement this recommendation fully, which was accomplished in late November. For a full description on the implementation of this recommendation please see page 43, ESG Standard 2.7 Complaints and appeals.
13. SWOT ANALYSIS

With the purpose of drafting a SWOT analysis, KAA established a working group consisting of members of the State Council of Quality (SCQ), members of the Secretariat of the Agency including the Acting Director, as well as representatives from the Ministry of Education, representatives of three public universities in Kosovo and one independent expert in quality assurance. The process was mediated from one external expert representing one civil society organisation related to educational policies. The working group meet in a workshop organised in early September 2018, and inputs from all participants were analysed and incorporated into the SWOT analysis as presented below:

**Strengths**

- KAA performs its activities in accordance with the Standards and Guidelines ESG 2015
- Since the SCQ was constituted it operates independently. This is ensured by the Administrative Instruction for Recruitment of SCQ Members. As a result, SCQ is now composed of members who passed through several filters, thus guaranteeing professionalism and transparency.
- KAA performs its evaluations with foreign international experts only. This assures impartiality.
- KAA performs its activities with reference to the National Qualification Framework, which is referenced to the European Qualification Framework.
- KAA has increased the number of student experts from the European Students Union, in compliance with ENQA’s recommendation.
- The Kosovo Accreditation Agency has advanced its legal framework. As a result, the Agency operates through a revised Administrative Instruction which defines clearly accreditation criteria.
- KAA continuously invests in its staff by offering them training relevant to their work in quality assurance.
- KAA has a devoted and experienced administrative staff
- As a member of international organisations for quality assurance, KAA participates in international events, providing the opportunity to remain up-to-date with developments in higher education.
- KAA enjoys good relations with agencies that are members of ENQA and other agencies in the region.
• KAA continuously publishes its decisions, announcements and other information related to the process of accreditation, ensuring full compliance with ENQA requirement regarding transparency and accountability.
• KAA has increased the transparency and openness to the public and media by requesting that HEIs publish data on their academic activities.
• KAA has digitalised the accreditation process by means of a platform known as “e-akreditimi”. This is a huge step towards demonstrating its efficiency and transparency, as it is accessible to all stakeholders in higher education.
• Higher education has further advanced through the establishment of consultative bodies, such as the Rectors’ Conference and the Students’ Union.
• KAA has ensured the strengthening of student input in to decision-making.
• KAA has increasingly supported HEIs by offering them training in quality assurance matters.

Weaknesses

• KAA has insufficient human resources. Currently KAA operates with only five administrative employees and an Acting Director.
• KAA has limited office and other space.
• On-site monitoring visits remains a challenge due to a shortage of human resources.
• KAA continues to operate without a permanent Executive Director. This has impacted upon the dynamism of the institution.
• Exclusion from EQAR as a result of political interferences.
• Kosovo still does not have a centralised system providing data on market needs, which would facilitate the orientation of study programmes towards maximising employment opportunities for its graduates. Standards and Guidelines for levels 5, 6 and 7 have been undertaken, but revision of the Standards and Guidelines for level 8 is yet to be undertaken.
• KAA is unable to confirm whether its decisions are being fully respected, mainly because of the shortages of human resources and lack of monitoring

Opportunities

• KAA is flexible and responsive to change, adapting and revising policies
• KAA is in the process of drafting the Law which will apply to the Agency, thereby ensuring its independence
• KAA has steadily increased and absorbed international projects which have further supported its work
• Professional and financial support from international donors, with the aim of improving the efficiency of KAA’s work
• KAA is continuously increasing the self-awareness of HEIs about the importance of their internal quality assurance systems
• Strict implementation of criteria concerning academic staff has discouraged proliferation of study programmes among institutions of higher education which do not meet the minimum quality criteria
• KAA is continuously seeking to increase the role of students in higher education institutions
• KAA is increasing its cooperation with civil society organisations and other stakeholders
• KAA is increasing its cooperation with local institutions to inform debate about the relationship between study programmes and employability
• There is high demand for study programmes in higher education from Kosovo youth
• Through its membership of European mechanisms for quality assurance in higher education, KAA has increased the international mobility of academic staff and students
• KAA encourages the involvement of HEIs in Erasmus, Erasmus + and Tempus projects
• KAA contributes to Kosovo’s integration into the Bologna Process
• KAA contributes to Kosovo’s integration into the European Research Area
• Building local capacities for the monitoring process after accreditation
• Financial support to supplement KAA’s budget
• Returning to EQAR, KAA will stimulate its stakeholders and central institutions to allow the KAA to perform in full compliance with the ESGs

Threats

• Damaged reputation as a result of former political interference
• Slow economic development might reflect in the quality of offered study programmes
• Too few university programmes in line with the needs of the labour market
• Lack of acceptable working conditions in Kosovo HEIs, which leads academic staff to seek better opportunities abroad
• The inability to create a system in which research can be promoted and benefited from financially
• Inadequate infrastructure to support study programmes, including libraries and laboratories
• HEIs lack of awareness of opportunities for investment in innovation, research and science
• A tendency to deliver academic programmes for which there are insufficient academic staff
14. CURRENT CHALLENGES AND AREAS FOR FUTURE DEVELOPMENT

KAA has faced challenges since its inception, particularly with respect to its resources, financial restrictions, completion of its legal scope and responsibilities (monitoring). While considerable progress has been made, a number of challenges still remain. In addition to those identified in the SWOT analysis other current challenges facing KAA include:

- **Undertaking the new accreditation process with the revised Accreditation Manual**
  The Accreditation Manual has been revised, approved and published. A workshop with all educational providers has been held and a training was delivered on how the revised Manual should be used by HEIs. This revision represents an evolution of KAA standards and will prove challenging for KAA to ensure the Self Evaluation Reports submitted by HEIs will be of an appropriate quality and that, in their evaluation of HEIs, External Experts adhere to the guidelines (and expectations) set out in the revised Manual. It is expected that, by the beginning of the next round of HEIs seeking new and re-accreditations, KAA staff numbers will have been increased in order to properly manage the process.

  **The work of the Appeals Committee**
  The legal amendments concerning the KAA’s Appeals Procedure have been finalised. However, the recently approved Appeals Committee will involve new procedures and require careful attention to ensure its effective operation. This will include ensuring that its members are fully briefed about the quality assurance processes and their formal outcomes.

- **Implementing the electronic system of accreditation (E-Accreditation)**
  The electronic system of accreditation seeks to decrease considerably the workload of KAA staff. As this system is being used for the first time, there are likely to be teething problems, including technical issues. These will need to be rectified immediately in order to meet the legal deadlines as set out in the legislation. Shifting several responsibilities to HEIs and individual academic staff is challenging as, until now, academic staff have not been involved directly in the accreditation process. Academic staff will now need to register in the system, create their own profile, attach documentation relating to their qualifications, and include information about their employment status, whether it is full- or part-time and name the institution(s) in which they are employed. HEIs will be required to engage fully with the new system and may find it challenging to switch to an electronic system.
- **Drafting the monitoring standards and organisation of monitoring site visits at accredited HEIs**

  Monitoring on-site visits remains a challenge due to a shortage of human resources. In addition to this, clear monitoring standards need to be drafted, approved and published in order to underpin and facilitate efficient monitoring visits and ensure that the ensuing reports set out, clearly and unambiguously, progress made by HEIs in the implementation of recommendations emanating from the previous accreditation inspection.

- **Reapplication for EQAR membership**

  While considerable progress has been made in terms of legal adaptions, such as approval of the AI on Electing the members of the State Council of Quality (SCQ), and the initiation of the MEST procedures to draft the Law on Accreditation Agency, Kosovo needs to provide EQAR with strong evidence of recent developments, if it is to regain membership. This process requires considerable effort, not only from KAA, but also from other relevant national bodies, in order to convince the European Register how seriously the exclusion of KAA has impacted upon policy makers in Kosovo.

Concerning future areas for development, the most important is the adoption of the Law on the Accreditation Agency. As stated above, in order to strengthen KAA’s responsibilities for its own procedures, the Ministry of Education has initiated the procedures to draft a separate Law on KAA. The necessity to regulate the accreditation process, and KAA as an institution, with a special law, is illustrated by the uncertainties generated (for KAA and HEIs) by the frequent change of the Administrative Instruction for Accreditation. Another issue faced by KAA has been the organisational structure, where a small number of staff are required to deal with a large number of HEIs and associated study programmes. If it is intended that KAA should be fully independent in all spheres of its functioning, then the number of staff needs to be increased to at least 20 positions and clearly defined sections within KAA created to facilitate specialisation. Given the importance of the State Council of Quality (SCQ), which is considered as one of the most important bodies in the Republic of Kosovo, this Law would also regulate the reimbursement of SCQ members, and advance procedures for their nomination and election. Approval of the KAA’s special law would also affect the legal certainty of the KAA’s processes, in relation to all HEIs, and in particular the regulation of engagement of academic staff, appeals procedures and monitoring. The approval of this law will have a significant positive impact in enhancing the quality of higher education in Kosovo.
# 16. LIST OF ANNEXES

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Annex 13  Kosovo Education Strategic Plan and Action Plan 2017- 2022 (KESP)

Annex 14  Rules of Procedures of the State Council of Quality