Kosovo Erasmus+ Office
Zyra Erasmus+ në Kosovë

Erasmus+

Higher Education Reform Experts Article on:

Quality Assurance Reform in Kosovo

HERE: Bardha Qirezi

September, 2021

Since 2000 Kosovo has witnessed a trend towards mass higher education (HE). By 2017, the number of HE providers increased to 36, whereas the number of enrolments tripled. Over time, this number decreased with 23 HE providers being accredited in 2021. Arguably this increase in the number of HE institutions served government's strategy to cover high unemployment rates among youth.

In the Kosovo Education Strategic Plan (KESP 2017-2021)1the main priority has been given to the upgrade of quality and competitiveness of HEI, promotion of excellence in teaching, research, and internationalisation. Yet, through 12 years since quality assurance processes were institutionalised through the Kosovo Accreditation Agency (KAA), HEI in Kosovo still struggle to fulfil minimum standards resulting in limited outputs in student graduation rates, student employment rates, research, and internationalisation. In the last two years the quality assurance reform targeted concerns for partial compliance of Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) and lack of HE consensus on the role and activities of the KAA. More specifically, the quality assurance reform is hindered by unclear roles and distribution of authority, regulatory inconsistencies, lack of qualified staff and staff development policies, and inconsistent and unreliable data-based decision-making.

According to the Law on Higher Education[2] , KAA is an independent agency responsible for assessing and promoting quality of HE, including evaluation, accreditation, monitoring and periodic control of HEI and their study programs in the territory of the Republic of Kosovo. The main decision-making body is the State Quality Council (SQC) consisting of no less than five and no more than nine members with at least three international experts. The quorum for decision-making regarding programme and institutional accreditation is 50% plus one of the members and at least one of the international members.[3] Institutions and programmes are reviewed based on internationally recognized standards by international evaluation teams subcontracted by KAA or by a recognised accreditation body which is defined in article 3.1.16.[4] All HEI must possess an accreditation or validation of international accreditation by SQC and they are all required to be licensed by MESTI.

Until 2021, the accreditation process was governed by administrative instructions which were frequently changed by the MESTI. The Government of Kosovo has proposed a new Law on

[1] https://masht.rks-gov.net/uploads/2017/02/20161006-kesp-2017-2021-1.pdf
[2] https://akreditimi.rks-gov.net/wp-content/uploads/2020/10/02-ligji-per-arsimin-e-larte-anglisht.pdf

[3] https://drive.google.com/file/d/0B7etG3bh-SBVVkt4T2J5bmZuOTdYVFN4bFZmMnFwakx3Z0tR/view?resourcekey=0-QuhrtZa6eTC2uk1Lt0rUiw

[4]Kosovo Accreditation Agency or any other accreditation body which, in the European Area of Higher Education, is in current membership of the European Network for Quality Assurance in Higher Education (ENQA) or (in the United States) is an accreditation body which has been recognized by the Council for Higher Education Accreditation (CHEA) or by the United States Department of Education (USDE) or from both or (in any other jurisdiction) has been accepted by the Ministry on a reciprocal basis as a properly constituted national or regional accrediting body, which is recognized and authorized by the relevant Ministry within that jurisdiction.

Kosovo Accreditation Agency aiming to prevent frequent changes and to allow better parliamentary oversight. Besides its focus on KAA accreditation deadlines for submitting applications, the new law adds the monitoring processes which was completely lacking in the past and ensures financial independence of KAA. However, the law still pays insufficient attention to main challenges in the accreditation process related to the appointment of NQC members, international experts and local experts and consistence and data driven standard evaluation especially in the area of HEI student outcomes, staff sufficiency, financial sufficiency, and research outputs.

Both, the current law and the proposed Law on the Kosovo Accreditation Agency in Kosovo, are unclear regarding the accreditation of institutions by other agencies than KAA. For example, the validation of programmes under service or franchise agreements lack clear guidelines and procedures. Similarly, the KAA doesn't exercise its authority throughout the territory of Kosovo. Thus, HE institutions located in Northern Mitrovica accredited by the Commission for Accreditation and Quality Assurance (CAQA) in Serbia (succeeded by Entity for Accreditation and Quality Assurance - NEAQA). They do not undergo confirmation procedures by KAA as foreseen by Article 20 of the Law on Higher Education. The KAA became member of ENQA in 2014, but lost its membership both from EQAR in 2017 and from ENQA in 2019.[5] Similarly, CAQA (now NEAQA) lost this membership in 2020.[6]. Currently, none of the quality assurance agencies responsible for accreditation of HEI in Kosovo are members of ENQA. The main improvement in this area is the clarification of legal provisions for validation and accreditation rules and procedures and their consistent implementation throughout the territory of Kosovo.

One of the criteria for QAA agencies is clear procedures and methods for nomination and appointment of Quality Council Members and of external experts independently from HEI, governments and other stakeholders. The main problem leading to the QAA exclusion from ENQA, was the appointment of members by the Ministry based on political affiliation. Although in the last two years, the Ministry made a public call for nominations and self -nominations for local members of the quality council, this has not been done for foreign members whose appointments relies on proposals by development partners such as foreign embassies. In the last two years, 6 international members have resigned as they have not agreed to comply with the requirement to declare their wealth in the Kosovo Anti-corruption Agency. This has resulted in the disruption of the NQC meetings and the appointment of external members in the future. This obstacle remains to be addressed in the new law along with the merit-based decision making for the appointment of KAA members to ensure that all members are qualified and equally responsible and accountable according to Kosovo legislation.

The external evaluators responsible for writing individual institutional and programme reports which are taken as a basis for SQC accreditation decisions are exclusively international. In the past, there have been problems with consistency in evaluation and lack of trust from institutions and the public. Local experts have criticised the method of group composition, inconsistent knowledge and skills of the local context, and improper briefing and training. Very often, the

[5] https://enqa.eu/wp-content/uploads/2019/10/Letter-ENQA-to-KAA_Sep-2019.pdf
[6] https://enqa.eu/wp-content/uploads/2018/03/Letter-ENQA-to-CAQA_190318.pdf
https://enqa.eu/wp-content/uploads/2020/03/Board-letter_NEAQA.pdf

process was excessively guided by KAA officials and mistakes were made in the fact checking the evidence and inconsistent accreditation reports. The KAA with support of international partners has revised the manual for external evaluators and has developed standards for evaluation of PhD Programmes and the manual on the KAA staff internal evaluation. During 2020-2021 accreditation process, KAA also included students in the evaluation teams and organised the accreditation process online due to pandemic restrictions. However, the KAA needs to make all expert recruitment procedures transparent and to create a register of experts who have undergone adequate briefing and training procedures. In addition, it needs to use and develop local capacities to improve evaluation consistency, undertake thematic analysis and regularly review and improve the process. Over-reliance on international expertise will hinder the development of local capacities, whereas engagement of local expertise will facilitate the future monitoring process. While the proposed law foresees engagement of local experts, same safeguards of merit-based appointments are needed to ensure consistency in the process.

Finally, implementation of ESG needs further improvement to address inconsistency and improper use of HEI, ministry or KAA data. Although HEI are obliged to report to MESTI and record student enrolments, staff engagement and student transfers and graduation, this data is not available or properly used to make judgement during the accreditation process. Same can be said for financial, licences, facilities, ownership, and management data. Due to inconsistent reporting, KAA undertakes activities which are not typical for QAA agencies such as issuing certificates to students to verify if their issued diploma is from an accredited programme/institution, and staff declaration procedure and Tax administration confirmation for staff first and second employment. While the first procedure aims to prevent unethical or unlawful diploma issuance, the second procedure aims to prevent false staff sufficiency reporting and multiple engagement of academic staff in different HEI institutions according to minimal criteria[7] allowing for inadequate assessment of staff quality, staff engagement according to the law, and staff sufficiency. Same can be said of inconsistent student, employment and financial reporting upon which expert assessment mainly rely.

While QA is a primarily responsibility of the HEI, further improvement of data reporting is needed to allow for more consistent and effective decision making and to increase competitiveness, accountability and facilitate policy making regarding health and safety, teaching and learning, teach-out procedures in case of HEI insolvency and financial formula for research and internationalisation. All actors, HEI, MESTI and KAA should be accountable and responsibly exercise their roles in QA. The reform needs more quality professionals, data understanding and analyses capabilities to deal with data limitations, data security and data contextualisation to stay focused on the importance and purpose of quality assurance as well ensure that student experience in HE fulfils their expectations for a qualitative education that ensures personal development, employability and professional and international mobility.

---

[7] staff confirmation procedure calculates staff sufficiency for one academic programme according to currently defined minimum criteria as three PhD for a bachelor programme and two PhD s for a master programme