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Moving Quality Assurance from Programme to Institutional Level

This article analyses the development of the external quality assurance system in Latvia by focusing on the different assessment models that have existed over time. The authors describe the different assessment models, analyse the fitness-for-purpose of each model; highlight the lessons learned; and outline the possible further changes in the system. In analysing the models, the authors look at the perspectives of the quality assurance agency and of the higher education institutions. The changes in the models are analysed in the context of general turning points in the higher education system and significant policy developments not only in Latvia but also in the neighbouring countries and the European Higher Education Area.

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1. Setting the Scene

Since the signing of the Bologna declaration, quality assurance has been one of its priorities, with the aim of building trust between the higher education systems and institutions across the European Higher Education Area. The development of quality assurance systems was crucial to facilitating recognition of degrees, enabling mobility and ensuring the quality of teaching and research. Historically, different European countries have chosen different models for external quality assurance, depending on their national context and goals. As the EHEA and national systems have changed, so have the external quality assurance models. The changes have occurred mainly because of structural changes in the higher education system, political and financial issues, among others.

Each quality assurance procedure must have a clear aim and be aligned with and complement other procedures

When introducing a new quality assurance model, it is important to analyse its overall impact on the system—whether there is a clear aim for each quality assurance procedure, whether the procedures are aligned and complement each other, and whether the burden on the higher education institutions and the overall system is commensurate with the outcomes of the procedure. Many countries refer to the practice of others when introducing new models, but there are several challenges.

First, the available information about other countries is not always comparable without additional analysis and the mappings of the national quality assurance systems do not fully describe the systems.¹ The same term, for example, programme accreditation, has different meanings in different countries. That means that the programme accreditation in Austria is an ex-ante assessment that could be compared to a programme-licencing procedure in Latvia but not to programme accreditation.

Moreover, most of the available system descriptions are static. They describe the system at a certain moment but do not document changes over time. Also, the Bologna Process Implementation Reports that monitor the progress of the quality assurance reforms focus on the general characteristics of the quality assurance system rather than their purpose or design. Only the last Bologna Process Implementation Reports from 2012, 2015 and 2018 contain some analysis about the focus of quality assurance.

Differences between recently developed quality assurance systems and mature systems

However, there are some general conclusions about quality assurance systems that can be drawn. In the early stages of development, the systems tend to be focused on programme evaluation and are based on monitoring and meeting minimum standards. Over time the systems evolve to an institutional focus and elements for support and enhancement are introduced. There is a general pattern that programme accreditations focus more strongly on meeting standards while institutional approaches focus more strongly on processes to maintain and raise them.

The authors assume that external quality assurance usually starts at the programme level because in most higher education systems the study programme is the main operating unit. Minimum standards are

¹ see, e.g. eqar.eu/about/eqar-structure/members.html, last accessed on 26 November 2018.

defined at the programme level: Students are enrolled in a study programme, recognition procedures are performed at the programme level and budget is allocated primarily to a study programme.

The transition from a programme-oriented approach to an institution-oriented approach is a gradual process, through a step-wise introduction of institutional elements (Bischof, Gajowniczek, Maikämper, & Aerden, 2012). Even in countries where the institutional approach is the main or the only quality assurance approach, it includes elements of programme assessment. For example, in Finland, the institutional audit includes a review of the samples of study programmes.

Also, the transition from a control-oriented system to an enhancement-oriented system is a gradual process. It happens either by introducing elements of enhancement and support in programme assessments or by moving towards an institutional approach and giving more autonomy to the whole higher education institution.

Recently, there has been an increasing trend for quality assurance systems to operate both at the institutional and programme level at the same time.

Quality assurance systems now tend to operate both at institutional and programme level at the same time

The 2018 Bologna Process Implementation Report shows that currently 20 systems in the European Higher Education Area combine institutional and programme level evaluation. There has been a slight decrease since 2015 when 26 systems focused on a combination of both assessments. However, there has been an increase in the number of systems that focus exclusively on institutional level assessment—eight systems in 2018 compared to three in 2015 (European Commission/EACEA/Eurydice, 2015; 2018).

Although currently there is a slight trend for systems to become more institution-oriented, the 2012 Bologna Process Implementation Report points out that even if the system is institution-oriented the attention to programmes rarely disappears completely (EACEA/Eurydice/Eurostat/Eurostudent, 2012).

In contrary to what was expected in the early years of the Bologna Process, accreditation has not become the default form for external quality assurance (Gover, Loukkola, & Sursock, 2015). However, the majority of the EHEA countries still use external quality assurance mainly to grant permission to HEIs or programmes to operate based on threshold quality standards (Education International, 2010, p. 24). The numerous national standards and additional requirements that exist in many countries contribute to this.

An emerging trend in some highly developed systems—for example, Norway—is the risk-based approach that allows institutions and programmes to soften some elements of standard procedures if they have already demonstrated sufficient level of quality.

The question of fitness-for-purpose of the existing quality assurance procedures was one of the main catalysts in the further development

Importance of regularly analysing the quality assurance

DEFINITIONS

Risk-based approach

Defined as assessment of the management and resources of higher education institution or study programme which ends with a formal decision to operate for a certain period of time

Accreditation

Defined as assessment of the management and resources of higher education institution or study programme which ends with a formal decision to operate for a certain period of time

Accreditation of higher education institutions

Defined as assessment of the management and resources of higher education institution or study programme which ends with a formal decision to operate for a certain period of time

of the Latvian external quality assurance system. The discussions about the aims, purpose and outcomes of different procedures facilitated new ideas and promoted changes.

In Latvia, the main quality assurance related developments took place between 1991 and 1995 and were among the principal drivers for the development and changes of the national legislation. The first quality assurance reforms were to a large extent inspired by the Council of Europe and other international organisations (Rauhvargers, 2003) and supported by the parallel developments in neighbouring countries (Lithuania and Estonia). In the mid-1990s, the quality assessment procedures in all three Baltic countries included programme assessments, with Latvia being the only one that had introduced accreditation of higher education institutions. In all three Baltic countries, the initially designed quality assurance model was legally binding—designed to evaluate the compliance with minimum quality standards and resulting in licences and accreditation decisions (Valeikiene, 2013, p. 4; Rauhvargers, 2004). The later developments were influenced by the general activities in the EHEA.

2. Development of the Latvian Higher Education Quality Assurance System

The development of the Latvian national quality assurance system was one of the first higher education reforms in independent Latvia, taking place at the end of the 1980s and at the beginning of the 1990s. The aim of the reform was to obtain international recognition for the Latvian higher education system.

In 1991, the first law on education in independent Latvia—the Education law—was adopted. It formally defined the first quality assurance concepts—licencing and accreditation of higher education institutions (The Highest Council of the Republic of Latvia, 1991). While the Education law granted a high level of autonomy for the higher education institutions, a number of important aspects, including a functional quality assurance system, were barely mentioned (Rauhvargers, 2003).

The main catalyst for developing a quality assurance system

The quality assurance system in Latvia was created jointly by the state and the higher education institutions, influenced by two main factors. The first was the major restructuring of study programmes from the former five-year programmes to a two-tier (bachelor and master) structure. This led to a number of practically new study programmes and the need to assess whether these programmes were of sufficient quality.

The other factor was the establishment of private higher education institutions allowed by the Education Law. While this was generally considered as a progressive move, many stakeholders were rather sceptical about the quality of education provision in these institutions (Rauhvargers, 2004).

In December 1994 the first Latvian quality assurance agency—the Higher Education Quality Evaluation Centre (HEQEC)—was founded (Rauhvargers, 2003).

In November 1995 the specialised Law on Institutions of Higher Education was adopted and shortly after, the first national regulations that described procedures for accreditation were approved.

The system described by these regulations can be considered the first quality assurance model in Latvia. The model included three procedures—licencing for private higher education institutions only, accreditation of all higher education institutions and accreditation of all study programmes.

The first quality assurance model in Latvia

Licencing was established as the initial assessment. A positive outcome allowed the higher education institution to implement study programmes and to issue the education certificates to its graduates in the name of the institution (but not in the name of the state). The licencing was initially applied as a gate-keeping procedure only for emerging private institutions in order to monitor their intentions and capacity for education provision (Rauhvargers, 2004). For public institutions, this procedure was not considered relevant because the state as the founder was already aware of the capacity and the intentions of the institution.

The subsequent procedure for all higher education institutions that was developed was accreditation that gave to higher education institutions the right to issue state-recognised diplomas. Within the accreditation process, the organisation and resources of the higher education institution were assessed.

The third and the last procedure was the accreditation of specific study programmes. In order to award a state-recognised diploma to graduates of a certain study programme, both the higher education institution and the respective study programme had to be accredited (Parliament of Latvia, 1995).

The regulations stated that in case of serious deficiencies, the institutions and the study programmes could be conditionally accredited for the term of two years but not more than once.

The development of the first external quality assurance model was a significant achievement itself but, in order for the model to be accepted, it was important to test it and see its outcomes.

3. Accreditation of Study Programmes and Higher Education Institutions (1995–2012)

Between the establishment of the external quality assurance system in 1995 and 2001 the first round of study programme assessments took place and nine accreditation procedures of higher education institutions were conducted. At the end of 2000, another mandatory quality assurance procedure was introduced—initial assessment (licencing) for all study programmes offered both by private and state institutions.

In order to facilitate continuous improvement, higher education institutions must have functioning internal quality assurance systems

After the conclusion of the first round of accreditation of study programmes, the existing quality assurance model was intensively discussed. There was agreement that the accreditation procedures had helped higher education institutions to better understand how to manage quality and that in the future more attention should be paid to the internal quality culture at higher education institutions, thus ensuring continuous improvement and facilitating the next accreditation rounds.

These discussions led to the preparation of new regulations where accreditation was recognised as a planned and regular process.

Each new study programme had to obtain a licence first and then be accredited after the implementation of the programme had been started. Each study programme and higher education institution had to be accredited every six years. The possible accreditation terms for a study programme were zero, two and six years. If substantial deficiencies were found, the higher education institution or study programme could be accredited for the term of two years. In cases where there were indications that a programme or an institution did not perform according to standards, the Council of Higher Education had the right to propose an extraordinary accreditation to the minister for education and science.

The assessment criteria

The assessment criteria for these evaluations addressed also the internal quality assurance system of the institution. However, long time there was no national definition of what an internal quality assurance system includes and it was still assessed separately for each study programme. Therefore, the judgement and overall conclusions could differ depending on the interpretation of each group of experts. Additional assessment criteria were defined on the level of the whole higher education institution but had to be assessed separately for each study programme, for example, the availability and quality of university facilities and support services. This changed in 2005, when the definition of *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (EHEA) was introduced and in 2011, when the concept of internal quality assurance system has been included in the Law on Institutions of Higher Education.

Between 1995 and 2011, the external quality assurance model was fully operational and by 2010 general conclusions were drawn. Although the accreditation model for study programmes and for higher education institutions was functioning well, the further development of the higher education system required changes in the quality assurance approach.

By 2010 all the existing higher education institutions had been accredited for an indefinite term and the accreditation of study programmes had become the main quality assurance procedure. The introduction of a mandatory initial assessment (licencing) for study programmes was a successful addition and helped to monitor the increasing number of newly developed study programmes and to reduce the pressure on study programme accreditation. Because the internal quality assurance systems of the higher education institutions were still in the development phase, it was important to ensure that all the new study programmes met the minimum standards before enrolling students.

While the regular accreditation of study programmes reviewed detailed aspects of each study programme, due to the different composition of the experts' groups and timing of assessment procedures it was not possible to compare the assessment results. It was also not possible to draw credible conclusions about the whole higher education institution based on the assessment results of separate study programmes.

There was undoubtedly a need for a model that would look into institutional dimensions and allow comparisons of study programmes and to draw conclusions about the overall national higher education system.

Difficulties to draw general conclusions

4. Assessment of Study Directions (2011–2013)

The first model for assessing groups of study programmes (called study directions) was developed as a voluntary, enhancement-led exercise for analysing the quality of study programmes according to four groups of criteria—quality, resources, sustainability and cooperation. During the exercise, conclusions and recommendations were also formulated at a national level for the higher education system as a whole.

The main reason for developing this model was the conclusion that the system of individual programme licencing, accreditation and non-regular institutional accreditation in Latvia did not address several aspects that were crucial in assessing the overall system, for example, the sustainability of the study programmes. Although there was no active opposition from stakeholders towards the accreditation of individual study

The assessment of separate study programmes is a time-consuming procedure

programmes, it was generally considered a bureaucratic, time-consuming, rather expensive and very detailed procedure. The first discussions about a possible shift from study programme accreditation to accreditation of study directions started in 2010.

The changes in the assessment model in Latvia were inspired by the Estonian example

The activities in Latvia between 2011 and 2013 were to a large extent inspired by the Estonian example. However, there were differences between the approaches that the two countries took. In Estonia, the assessment of groups of study programme was purposefully developed as the new quality assurance model. It highlighted the transition from a control-oriented system to an enhancement-oriented system and the state's increased trust in higher education institutions (Bauman & Mattisen, 2011). Between 2009 and 2011, the quality assurance system in Estonia underwent a transitional evaluation with the aim of removing low-quality study programmes and ensuring that the study programmes that would later be assessed within study programme groups were of satisfactory quality. While the previous model included the mandatory accreditation of study programmes with a view to controlling the supply of these and a voluntary institutional accreditation, the new model included a control-based evaluation when issuing the initial licence. However, the subsequent assessment of study programme groups and institutional accreditation were essentially developmental evaluations.

The main challenge of transitional evaluation

The main challenge of transitional evaluation in Estonia was determining the extent the decision regarding the entire study programme group should depend on its weakest programme (Bauman & Mattisen, 2011). This question had to be answered also in Latvia when the accreditation of study directions was introduced.

The assessment was carried out between May 2011 and April 2013 within a project financed by the European Structural Funds and administered by the Council of Higher Education in cooperation with the Latvian quality assurance agency—the Higher Education Quality Evaluation Centre (hereinafter ESF project). For the purpose of this assessment, all study programmes were divided into 29 thematic study directions based on the national classification of education. This division revealed the first challenges—the significant number of study programmes in certain study directions, the very diverse composition of some study directions and similar study programmes that have been assigned different codes in accordance with national classification.

The assignment of one group of experts to the assessment of one study direction

The assessment was performed and the reports were prepared on three levels: the study programme, the study direction in one higher education institution and the study direction at a national level. When possible, one group of experts was assigned to assess one study direction in the whole country to ensure the comparability of the assessment results.

Overall, 860 study programmes in 29 study directions in 57 higher education institutions were assessed and 237 experts from Latvia and abroad took part in the assessment.

Extent of overlapping study programmes between different higher education institutions

Based on the assessment results, all programmes evaluated during the project were divided into three groups:

- group I (sustainable and good quality study programmes);
- group II (programmes where certain improvements are necessary for continuous existence); and
- group III (programmes whose sustainability is uncertain).

589 programmes were classified in group I, 215 programmes were classified in group II and 56 programmes were classified in group III. One of the main weaknesses identified by the experts was the significant overlapping of study programmes within one study direction (Mukane, 2011).

In spite of this weakness, the assessment of study directions had proven itself to be an effective and comparable method for assessing the quality of studies. A systemic change from accreditation of study programmes to accreditation of study directions was therefore made, starting from 2012.

Different actions took place based on the results of the system-wide assessment of study directions. As a result of the general agreement that the study programmes with uncertain sustainability should be revised or closed, higher education institutions took actions internally and revised the content and structure of these study programmes.

Internal quality assurance system can become a catalyst for change within the institution

2012 was a major turning point in the higher education quality assurance system. After an unsuccessful external evaluation of the Latvian QA agency, the Higher Education Quality Evaluation Centre (HEQEC), by the European Association for Quality Assurance in Higher Education (ENQA), it was decided not to prolong its mandate to perform the function of a quality assurance agency in Latvia. In addition, the prime minister released a declaration that envisaged the assessment of study programmes followed by the introduction of a new model for accreditation in higher education.

In September 2012, new cabinet regulations for accreditation of institutions of higher education, colleges and study directions were adopted. The regulations included an annex where all 29 study directions that were previously used during the system-wide assessment were fixed.

In April 2013, the previously adopted regulations from September 2012 were amended to include a procedure for making accreditation decisions on the basis of the assessment of study directions performed between 2011 and 2013 within the ESF project.

Between May 2013 and March 2014, 23 meetings of the Commission for Accreditation of Studies took place and 256 applications for evaluation of study directions by the higher education institutions were considered under the new system. As a result, 218 study directions (88%) were accredited for six years, 26 study directions (11%) were accredited for two years, and two study directions (1%) were not accredited.

The results of assessment procedures performed in the framework of the ESF project were analysed by study programmes, but the statistics for accreditation were calculated for study directions; therefore, the results are not fully comparable. However, one conclusion that could be

Following negative assessment results, most of low-level study programmes were closed

drawn is that the number of study programmes in the study directions that were accredited for two years or not accredited is lower than the number of programmes that the experts had previously classified in group II and group III (with improvements needed or with doubtful sustainability). One of the main reasons for this is the fact that between 2010 and 2012 when the experts' assessment took place and in summer 2013 when the accreditation decisions were made, the majority of higher education institutions had taken appropriate internal actions. The quality of the previously low- and medium-quality programmes improved and some of the poorly evaluated programmes were integrated into better quality programmes or closed.

The results of the assessment procedures were analysed by the Ministry of Education and Science

The results formulated by the experts with regard to the overlapping of study programmes within one or several higher education institutions were used by the Ministry of Education and Science in discussions about closing study programmes and consolidating study programmes. The general results of the assessment were also used for planning the number of state-financed study places.

Overall, it could be concluded that the exercise of assessing study directions was valuable for testing the capacity of the system. Its main added value was the overview reports that were prepared by expert groups that had assessed the study direction in the whole country.

Higher education institutions tend to develop their own study programmes

The assessment exercise showed that the study programmes offered by different higher education institutions in different regions overlap to a significant extent. The institutions tend to develop separate study programmes for narrowing thematic subjects rather than establishing several specialisations within one study programme. The institutions also tend to develop their own study programmes rather than cooperating with institutions from other regions or abroad. The management of the whole higher education institution is not always streamlined as the quality of management for different study directions can differ a lot within one institution.

One expert team added credibility to the conclusions

Due to the large amount of information that the experts had to analyse, the conclusions made on the level of study programmes were rather general and could be used only together with the other conclusions.

By introducing the accreditation of study directions, the decision makers expected that the higher education institutions would consolidate their resources in study directions and introduce internal structures for managing programmes in study directions. In practice, this did not work out well. Some of the defined study directions, for example, Geography and Earth Sciences, were rather compact and were implemented within one faculty or even one department. On the other hand, some other study directions included very different study programmes and were implemented across several faculties, for example, Management, Administration and Real Estate Management.

Study directions as the assessment unit

The only required processes for study directions were accreditation and the submission of annual reports about changes in that study direction. As a result, study programmes remained the main operating units for most matters apart from the purposes of accreditation.

5. Accreditation of Study Directions and Higher Education Institutions (Since 2013)

Many changes in the system have occurred since the hectic process of accreditation in 2013. The organisational structure of quality assurance on the national level has been fully restructured and there is a continuous shift to a system that would be more enhancement-oriented.

The cabinet regulations for accreditation of institutions of higher education, colleges and study directions that were adopted in September 2012 listed the criteria for assessing study directions for accreditation purpose. The criteria were divided into two parts—for assessing study directions and for assessing each study programme that belongs to a particular study direction. The criteria for the study direction stated that there must be a strategy/plan for the development of a study direction, a defined and functional management structure, and a unified internal quality assurance system. The criteria for the study programme were focused on its organisation, content and learning outcomes.

With the introduction of regular accreditation of study directions, the system was structured in a way that after licencing, a study programme was automatically included in an accredited study direction. Taking into account that the maximum accreditation term is six years, it was now possible to issue diplomas for study programmes that had undergone only the initial assessment but not the assessment of implementation.

When the first procedures for accreditation of study directions were performed, a number of challenges became visible.

One of the challenges was the concept and definition of a study direction. The study directions were fixed in law and cabinet regulations. The law stated that one study direction must be assessed by one expert group and this left little space for interpretation. For example, the study direction with 20 study programmes had to be assessed with the same number of experts as a study direction with one study programme. In order to perform a thorough assessment that would be beneficial for the higher education institutions, there was a need to either split the study directions in smaller units or design a specific methodology for calculating the number of experts.

Another challenge was the volume of the self-evaluation documentation that was required by the cabinet regulations. Despite the fact that the cabinet regulations had listed only the information that is necessary for assessment, the self-evaluation documentation was voluminous, especially for the higher education institutions with a number of study programmes. The information about study direction and study programmes overlapped.

The same applied to the content and structure of the expert report. The experts claimed that the template of the expert report was not clear and not aligned with the structure of the self-assessment report. Some criteria applied to the study direction and the study programme overlapped.

The criteria used for assessing study directions and study programmes

The number of study programmes in a study direction could possibly affect the quality of assessment

The information required from the higher education institutions and the experts must be aligned

As referred to earlier, another challenge in the assessment of study directions was the decision-making. The cabinet regulations stated that there must be one common decision for the whole study direction that would apply to all study programmes that belong to this study direction. If one or several study programmes in a study direction receive low assessment results, in order to minimise the effect that the assessment has on the whole study direction, there are two possible options—either to recommend to the higher education institution to close the study programme or to recommend to the Committee for Licensing of Study Programmes to close the study programme and cancel the licence. In practice, such a situation has not occurred.

The disadvantage of the accreditation of study directions was that the lower-quality study programmes within the study direction endanger the good-quality study programmes. As a result, the whole study direction suffers and receives a shorter accreditation term. The higher education institutions themselves have to consider the quality of their study programmes and close the low-quality study programmes, thus decreasing the number of study programmes. If the study direction contains only high-quality study programmes, it will receive a longer accreditation term. However, if it is recommended that the higher education institution close a study programme, there is no legal mechanism to impose any sanctions if it is not closed. Also, the strict timeframe of the accreditation procedure (up to six months) does not allow postponing the decision on accreditation until there is proof that the study programme has been closed down.

In summer 2015, a new national quality assurance agency was finally established and the new regulations for quality assurance were approved. Subsequently, new assessment guidelines were developed but the assessment criteria did not change much compared to the ones used in 2012. However, the procedures and criteria were streamlined, ensuring that there are no overlapping criteria and that the requirements at the level of study programmes and at the level of study directions are clearly separated. The concept of study directions did not change, nor was there any change to the decision-making approach. However, new methodologies and guidelines tend to ensure a comprehensive and meaningful assessment.

The aspects that are addressed during the quality assurance must be clearly defined

Although the assessment of student directions addresses some issues that were not addressed previously on the study programme level, the issues of strategic development and organisational structure should be addressed on the level of the whole higher education institution, not a separate study direction.

The future challenge is to ensure that a full cycle of study direction accreditation procedures is performed and that the conclusions can be used for further improvement of the overall model.

6. The Way Forward

The quality assurance procedures performed in different countries can differ significantly even if the title of the procedure is the same. There is no one-size-fits-all solution when it comes to the best model for quality assurance at the national level.

However, it is becoming a practice that the quality assurance agencies revise their methodology after a full cycle of quality assurance procedures using a unified methodology. In some cases only the focus of the assessment, for example, governance and research, is revised; in other cases the object of quality assurance, for example, study programmes or higher education institutions, is gradually or fully changed. There is a general tendency to move the quality assurance to the institutional level. The Estonian Quality Agency for Higher and Vocational Education (EKKA) has recently developed a new assessment model that will integrate elements of institutional accreditation and assessment of study programme groups into one procedure. In Lithuania, it was recently decided to move from programme assessment to a regular evaluation of study programme groups (complemented by existing institutional accreditation).

The practice of introducing changes has become so widespread that the European Quality Assurance Register (EQAR) has created a procedure for agencies to report on substantive changes, including the ones in processes and methodologies.

During the last 25 years, the higher education system and also the quality assurance system in Latvia have undergone massive transformations and developments in focus and the assessment object, for example, study directions. Only now, when preparing for the second cycle of accreditation of study directions, higher education institutions have made full use of the concept 'study direction'. The agency's current proposal to conduct the assessment of the same study direction across the whole country over a certain period of time will provide more possibilities to develop conclusions at both institutional and national levels.

Currently, the quality assurance model in Latvia includes three stages—initial assessment (licencing) of all new study programmes, cyclical accreditation of study directions (every two or six years) and accreditation of all higher education institutions for an indefinite term. The system is heavily reliant on the licencing procedure and the cyclical accreditation of study directions. The accreditation of higher education institutions currently performs the gate-keeping function to ensure that only trusted higher education institutions are allowed to operate. Accreditation of higher education institutions is performed only for the newly established institutions or in extraordinary cases. Therefore, the assessment of a higher education institution to some extent overlaps with the assessment of a study direction, especially in cases where small higher education institutions with one study direction are assessed.

There have been two full cycles of programme accreditation and one full cycle of study direction accreditation in Latvia up to now. As mentioned before, the assessment of study directions between 2013 and 2019 did

Tendency to move the quality assurance to the institutional level

Assessment of the same study direction across the whole country over a certain period of time

not reach its full potential. However, it raised a number of concerns that had to be addressed in order to improve the quality assurance model. Based on the concerns raised, a new assessment methodology was developed and a new cycle of assessments is now needed to evaluate its effectiveness and determine its impact on the higher education system.

If anything changes, the whole system must be revised

An effective quality assurance system must be comprehensive and its procedures must be consecutive and streamlined. The purpose and outcomes of each procedure must be very clear, without creating an unnecessary burden either for the quality assurance agency or for the higher education institution. It is important to define clear aims for each procedure, keeping in mind the general purpose—to have a meaningful impact on the quality of higher education. If additional procedures should be introduced or current ones should be significantly changed, the whole system must be revised.

Based on the previous experience, not all issues that should be evaluated can be properly tackled by programme evaluation or by the evaluation of programme groups (study directions). Already before starting the new cycle of assessments for study directions, there are discussions about further systemic changes that could happen after the current assessment cycle is finished.

The top management of institutions should feel the impact of external quality assurance

In order to change the system, it is important that the top management of higher education institutions feel the impact of external quality assurance and be held accountable for institutional quality. Higher education institutions in Latvia have a rather high level of operational autonomy and this is reflected in the internal processes for quality assurance. In cases when separate study programmes or study directions are assessed, the burden lies mostly on the programme directors. The programme, department and faculty levels are the ones that are affected the most by the result of the assessment. Also, currently the recommendations given to different study directions to a large extent overlap. They should rather be addressed to the institution's senior management; however, there is not always a proper mechanism for doing so. And in general, there is a lack of a regular external quality assurance mechanism that would look deeper into a strategic management, the internal quality assurance system and the development plans on an institutional level.

Importance of assessing the administrative burden

Another problem on the systemic level in Latvia is the fact that currently the assessment of compliance with legal requirements is not always separated from the quality assessment of study programmes and institutions. This leads to an extensive documentation and written proofs that have to be provided by the institutions and reviewed by the agency and the experts. Currently, all assessments are heavily focused on compliance with legal requirements. When the system is revised, it is important to decide which procedure will be focused on legal requirements and which procedure will be focused on quality enhancement. It is also important to assess the administrative burden on the higher education institutions and the agency, to make sure that this is decreased in order to make the process more efficient.

Before initiating changes, costs of assessment should be taken into account

An aspect that must be taken into account when initiating any changes is the costs of assessments. Historically, higher education institutions

in Latvia have been responsible for covering the costs of assessments. During the assessment exercise in 2010 to 2012, the costs of the assessment were covered by the ESF project and only the institutions that did not participate in the project had to cover their own costs. Before that and currently, the higher education institutions must meet the costs of being assessed from their own resources. The assessment of study directions is less costly than the accreditation of separate study programmes. Introducing institutional assessment as the main quality assurance procedure would be less costly than the current system.

All these considerations lead to a conclusion that a regular institutional accreditation could be the future of the external quality assurance model in Latvia, thus confirming public confidence in the quality of education and qualifications awarded.

The introduction of institutional assessment as the main quality assurance procedure will decrease the current overlap among the different quality assurance procedures and reduce the administrative burden as well as the costs of assessment procedures. It will increase the trust in higher education institutions as the providers of quality education, strengthen the internal mechanisms of the institutions and facilitate a quality culture.

However, in order to implement this approach in a meaningful way, it is important to analyse the practice of others while taking into account the lessons learned in past.

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