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Master of Science Thesis:

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**EFFECTS AND IMPLICATIONS OF  
THE ACCREDITATION PROCESS AT  
POSTSECONDARY VOCATIONAL SCHOOLS IN SERBIA**

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## **ABSTRACT**

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### **Abstract:**

The study explores and analyzes the outcomes of the very first accreditation initiative in Serbian higher education primarily based on the body of knowledge found in literature on policy implementation and organizational change. The chosen topic owes its high relevance to the fact that it deals with one of the crucial moments in Serbian higher education, largely triggered by the prevailing European tendency towards achieving comparable HE systems through the development of national and international quality assurance mechanisms. The scope of research is limited only to postsecondary vocational schools, which have been given the status of vocational HE institutions after the first cycle of accreditation. Main research problems are all centered around critical factors and variables that affect successful policy implementation, i.e. organizational culture, institutional leadership, clarity and consistency of standards, normative dimensions etc. Semi-structured interviews were utilized as the primary source of information, but were supported by some relevant documents and reports related to the accreditation process. Illustration of statistical data is also included in the study, providing some extremely interesting findings in terms of quantifiable outcomes and opening some intriguing questions related to the evident disproportion in the number of accredited public and private institutions. One of the main aims of the study was to touch upon the possible implications for the building and development of quality culture in Serbian higher education, while drawing invaluable lessons for the upcoming accreditation of faculties and universities. Some valuable observations and possible conclusions refer mainly to the need for achieving a higher degree of transparency in the process and some further refinement of accreditation standards, paying thus due consideration to institutional differences in terms of size, age, field of study, mode of financing etc. The phase of policy formation should perhaps be understood more as a negotiating process between all the different stakeholders in Serbian higher education. Nevertheless, this pioneer accreditation initiative in Serbia can be seen as a much needed step toward integration into the wider European education area and a great leap forward in terms of national HE system development.

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# 1 FOREWORD

## Reasons behind the Selected Research Topic

Ever since quality assessment and accreditation of higher education<sup>1</sup> institutions and programs were declared as the top priority on the national (education) policy agenda in 2006, accreditation has remained a hot topic in the discourse community of higher education in Serbia.

The predominant Bologna rhetoric of the wider European context has stirred up a great deal of controversy and public disputes in Serbia, mainly having to do with the profound changes the implementation of such reforms would have to induce. Evidently triggered by the European tendencies for establishing comparable higher education systems through developing national and international quality assurance mechanisms, but also resulting from nation-specific conditions which only fueled the process, the accreditation initiative has evolved and materialized in its recently completed first cycle, comprising postsecondary vocational schools in Serbia.

Emphasizing the fact that this was only just a pioneer step towards a fully developed accreditation scheme and that universities and faculties are now well in the midst of evaluating activities awaiting the second cycle of external reviews, this study aims at providing an up-to-date picture of the accreditation procedure(s) in Serbian higher education, hoping to reveal little known facts concerning the nature, characteristics, and outcomes of the process. Analysis and publication of research results and conclusions they may lead to will supposedly contribute to raising the awareness of all stakeholders in higher education to the most pressing problems and potential areas for improvement regarding the current quality assessment practice in Serbia. The assumed high relevance of the topic will also derive from the lack of any similar study in the context of Serbian higher education at this moment.

What is more, its usefulness and applicability for the upcoming cycles of accreditation, as well as follow-up evaluation processes, can perhaps lead to publishing a practical one-of-a-kind guide to achieving formal academic recognition and renewal, which would help institutional leaders and their closest associates in strategic planning and organizing self-evaluation activities, writing self-study reports, and better preparing for external review team visits. By highlighting major challenges and obstacles along the way to achieving official approval, and at the same time building upon success stories of some institutions, valuable lessons could be learnt from recent experiences of all postsecondary vocational schools, public and private alike.

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<sup>1</sup> In further text also used as an acronym 'HE'

Given all the reasons mentioned above, the research into the effects and implications of the first cycle of accreditation in Serbia seems like a perfectly justified choice, hoping to give contribution by expanding the existing national knowledge base and integrating it into the wider European and even world-wide framework dealing with standards and quality in higher education.

## **2 ACCREDITATION IN THEORY**

### **2.1 Accreditation: Terminological and Conceptual Framework**

#### **2.1.1 Terminology Distinction and Definitions**

Much of the language used to talk about issues related to quality assurance and evaluation activities in higher education appears to be pretty confusing and problematic, if not totally obscure. This is mainly on account of the presence of often variable and inconsistent names and translation equivalents used in different languages to refer to usually quite similar or even identical practices. Hence, the need for terminological disambiguation and clarification on this occasion will also lead to building a conceptual framework that lays foundation for this research. Since the focal part of the study is accreditation, it seems only appropriate to start with finding the best and most comprehensive operational definition to rest upon in further text.

By and large, accreditation has been mentioned throughout literature as the “*main mechanism for ensuring accountability and [quality] improvement in higher education*” (Alstete, 2004, p. 11) and also a primary tool for earning the trust of all stakeholders. A nice definition of accountability was found in Neave’s article (1987, p.70), where it is said that sometimes both individuals and institutions are required to render periodically accounts for tasks performed, to a superior authority that can modify their performance subsequently, either by use of sanction or reward. The word accreditation is also frequently related to and sometimes even used interchangeably with achieving academic recognition and renewal (Schwartz & Westerheijden, 2007). When talking about benchmarks in higher education and the requirement to meet set standards and be in accordance with specific criteria, accreditation is again the first thing that comes to our mind. Even when some contemporary authors write about institutional development and change, they frequently mention accreditation as a unique method of problem-based learning (e.g. Alstete, 2004). According to them, accreditation is a way of posing certain challenges in front of higher education institutions, which requires a lot of strategic planning and devotion for tackling those problems, but eventually results in recommendations for improvement, based on peer reviews or external review team’s visits.

In short, all these different contexts in which the word accreditation can appear are perfectly reasonable and well-grounded. Due to the fact that many quality evaluation practices and activities tend to fall under the umbrella term “accreditation”, it is perhaps better to talk of the “*accreditation*

*scheme*” (Schwartz and Westerheijden, 2007, pp. 1-41) instead. This concept basically refers to *all institutionalized and systematically implemented evaluation activities that assess the quality of degree types, study programs, and institutions of higher education, resulting in some sort of formal approval or recognition regarding the respective unit of analysis and evaluation*. This definition encompasses not only the so-called “official” accreditation, conducted by governmental authorities or their agencies and leading to formal approval decisions, but also “private” accreditation wherein institutions voluntarily seek an independent judgment or assessment of their quality and confirmation that they substantially operate in accordance with the defined objectives, mission and vision statements. In the latter case, the process of accreditation is seen as a way of improving reputation and achieving competitive advantage over the different providers of education. In countries where higher education is predominantly state-funded, the observable tendency is still somewhat toward the official i.e. governmental recognition of programs and/or institutions, as the ultimate decision shaping the future of educational providers (Schwartz and Westerheijden, 2007).

However, be that an official or private matter- depending on the subject that initiates the process, accreditation essentially comprises two stages or two constituent elements: *evaluation* and *approval* (Schwarz & Westerheijden, 2007, p. 1). As far as evaluation is concerned, further distinction can be made between *self-evaluation or self-study* activities performed within institutions and resulting in writings of often elaborate self-study reports, and *on-site evaluation and quality assessment* carried out by *external review teams*, delegated by the respective accreditation commissions or agencies. Following the visit, the review team has the task to produce a report that will then be forwarded to the responsible (national) accreditation agency or commission that now has the power to issue formal approval or grant the right to exist (independently or in consultation with the national council for higher education).

Attempts to define the term ‘*accreditation*’ in literature range from those that see it as a *formal, published statement of quality*, to those that prefer to call it a *process of external quality review* designated to scrutinize higher education institutions and programs, while there are also such definitions that prefer to emphasize the *award of a status* as an ultimate outcome of accreditation (Hämäläinen et al.,2001). There are even more subtle definitions and distinctions available in the literature on accreditation-like practices. According to one source, when understood as a function, accreditation is similar in meaning to *approval*, as it implies the act of giving official acceptance to study programs and institutions (Hämäläinen et al.,2001, p. 8). Sometimes there is a specific qualifying process for getting formal approval and in that respect countries can vary significantly. If such a process is systematic, all-inclusive, explicit, based only on academic criteria and removed from any political interference, accreditation and approval can be used interchangeably as terms. On

the other hand, if many other factors are brought into the picture when deciding on granting operating licenses, e.g. geographical distribution of higher education capacities, educational needs, concrete discipline development etc. then we might have justifiable grounds for thinking that some hidden rationales stand behind the quality assurance process. Hence, when political steering becomes noticeably mingled with issuing official acceptance, it is perhaps better to refer to it as *approval*. That could be yet another useful criterion for drawing a dividing line between accreditation and approval. (Hämäläinen et al.,2001)

### **2.1.2 Purpose, Goals and Possible Implications of Accreditation**

According to Gornitzka, the decision to introduce a quality assurance system and build a quality culture in the higher education system of one country can rightfully be referred to as *policy*, provided that it is *a public statement of an objective and the kind of instruments that will be used to achieve it* (1999, p. 14). Accreditation is definitely an important *policy instrument* which can carry severe consequences for providers of education. Decisions of accreditation agencies are typically used as recommendations for governments with respect to budget allocations and can seriously affect funding at various levels- not just in the form of state allowances for the operation of certain programs and determined number of student grants and loans, but also related to the inflow of students' money- clearly mirroring public interest and trust in that particular higher education institution. Unconditional accreditation will obviously attract more students who seek to obtain a recognized degree that is acknowledged and respected on the labor market and will secure them more and better employment possibilities. On the other hand, grave consequences range from cuts on certain non-accredited programs and deprivation of the right to award degrees, to the complete closure of units and whole institutions. Even employers can use accreditation results as decisive arguments in the process of prospective employee recruitment. Needless to say, public perception of an institution and its future existence are for the most part determined by the outcomes of accreditation.

Reasons for initiating accreditation can be several. They are also country and region-specific and depend on the higher education system in question as well as its historical and present conditions. However, it seems that the bottom line is always the need for accountability and delivering a required quality level. When the focus is on accountability, it is pretty evident that the lack of trust in higher education institutions is a pressing issue and a driving force of the whole accreditation scheme.



### 2.1.3 Focus on Accountability or Quality Improvement?

Some authors have also noted a shift from traditional bureaucratic to modern evaluation (in countries such as Norway, Sweden, Finland, and Denmark) that implied the new emphasis on process and output dimensions of quality in education, thus providing a great impetus for *quality improvement*<sup>2</sup>. Nevertheless, this dimension of accreditation is quite problematic for many countries, as it seems to be more rhetoric than reality. Although quality improvement is typically stressed as one of the main reasons for accreditation by accreditation agencies and ministries of education, the prevailing recent tendency towards comparability and harmonization even if only within national borders at the same time brings about more uniformity in attempts to meet the predefined requirements. Needless to say, given such pressure to conform to rigid standards and procedures, little room is left for originality and improvement. Obviously, more attention will have to be paid in the future if systems of higher education aim at developing adequate mechanisms for enabling and stimulating improvement, innovation and diversity while still pertaining to satisfactory quality levels.

Yet another reason for placing accreditation high on the agenda could be the need for transparency and information, in the sense that all stakeholders in higher education deserve to be sufficiently informed to be able to make sound decisions. One of the possible outcomes of accreditation can also be the publicized rankings of educational institutions based on the success they had in the process of quality assessment and evaluation, which is again expected to affect their enrolment figures and financial standings.

However, when trying to define accreditation as a concept, it is important to say that it generally does not prohibit the non-accredited institutions and programs from running. It should rather be regarded as a worthy recommendation and prerequisite for institutions when applying for funding, for students when wishing to transfer to comparable programs and institutions and for graduates when exploring their employability options on the labor market.

Obviously, there is not just a single and straightforward explanation for the concept of accreditation. Behind the mere word, there can be multiple meanings and typically even country-specific variations, nevertheless, all pertaining to the umbrella term '*accreditation scheme*', or simply- *accreditation*.

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<sup>2</sup> Schwarz and Westerheijden (2007), p. 13; *Table 5: Broad emphasis of accreditation and evaluation systems per country- year 2003*

## 2.2 Accreditation: Theoretical Framework

### 2.2.1 Historical Conditions for Introducing Quality Assurance

In the past two decades, issues related to quality assurance have become a central concern in steering higher education in the whole of Europe<sup>3</sup>. In an attempt to better understand the rationale behind the introduction of accreditation as a mechanism for sustaining certain control over the sector of higher education and ensuring the provision of “*value for money*”, it is necessary to go back in time when quality control was first used in businesses as a powerful management tool. The historical context in which educational institutions all of a sudden started emerging in large numbers, providing a whole range of different courses and study programs, and the moment when “wide variability” came in place of the former “state of near homogeneity” (Alstete, 2004, p.7) virtually imposed the need for ascertaining if institutions meet minimal standards. That is how accreditation scheme was first introduced in the United States around 1880s and 90s, but it was not until late 1980s that other West European countries followed in their footsteps. Pioneer initiatives were made in the United Kingdom, France and the Netherlands. Denmark, Nordic countries, Germany and Italy soon followed, while Central and East European countries started introducing quality assurance mechanisms only in the 1990s, after the fall of the Berlin Wall (Schwartz & Westerheijden, 2007, pp. 4-8).

Of the most important reasons often used to justify this newly emerged quality orientation, literature mentions *massification* of higher education, end of central bureaucratic control and shift towards deregulation, as well as scarcity and limitations of government financial resources. With increased autonomy and decreased budgets, educational institutions were forced to seek additional and alternative ways to secure funds for their optimal functioning, but then issues of trust and quality of service soon came to the forefront of policy makers’ agenda. As opposed to the times when the quality of study programs and institutions was not even discussed but was presupposed as their inherent characteristic, a new era for higher education has begun in which even the *European Network/Association for Quality Assurance* in higher education- ENQA was established (in year 2000) with its main mission “*to promote European cooperation in the field of quality assurance*”<sup>4</sup>.

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<sup>3</sup> Lecture notes of “*Governance and Quality*” by Peter Maassen, as of March 14, 2007, HEM4220: Governance and Change of Higher Education; Higher Education Governance and Policy

<sup>4</sup> ENQA official website at <http://www.enqa.eu/history.lasso>

### 2.2.2 Quality Assurance in the European Context

When speaking of the European countries in general, we might say that all recent reforms in the realm of higher education have been triggered by national developments to some degree, but even more importantly- by *the Bologna declaration* (The Bologna Declaration on the European Space for Higher Education, 1999) and one of its main objectives: to achieve transparency and comparability of degree types and programs and facilitate student transnational mobility across the borderless European area of higher education. In other words, one of the things that Bologna has been promoting is “*European cooperation in quality assurance with a view to developing comparable criteria and methodologies*” (C. Campbell & M. van der Wende, 2000, pp. 19-23). Two years later, *The Prague Communiqué* (The Prague Communiqué, 2001) seems to have emphasized this even more, adding to the Bologna Declaration that certain coordination in the domain of quality assurance is needed (Cerych, 2002, p. 122). However, all countries have their very own, individual contexts in which different mechanisms and instruments of quality assurance are being implemented as the most adequate ones. While some countries take pride in their solidly grounded quality cultures and already pretty sophisticated quality assurance systems, others still struggle to develop them. For the purpose of easier differentiation between varying practices, literature on quality assurance offers an abundance of definitions, but perhaps the most comprehensive list of “accreditation-like practices” could be found on the official ENQA site<sup>5</sup>.

In one of their many publications (Hämäläinen et al., 2001), besides the numerous definitions of accreditation, the authors- who are all from Nordic countries- aim at illuminating quality assurance mechanisms of their own countries while touching upon the role of government in maintaining some control over the realm of higher education. Despite differing country-specific contexts, a universal truth from which the whole accreditation agenda derives could be interpreted, in short, as the extremely pronounced and ever-growing need for responsibility and accountability with respect to certain standards and quality levels in provision of education. In that respect European countries do not differ significantly, but there is a whole continuum of varying quality assurance models, depending on historical conditions, types of governance and power distribution, perceived quality problems etc. Hämäläinen and his colleagues from Denmark, Sweden and Norway (2001, p.6) raised some very interesting questions, quite representative of the current state of affairs in their national HE systems. Namely, they express their concern about the effects that the European higher education policy might have on standardization and uniformity of national (quality assurance) practice and they underscore that the crucial question is *who sets the standards and on*

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<sup>5</sup> Official ENQA website at: <http://www.enqa.eu/history.lasso>

*the basis of what criteria.* They seem to all agree that the concept of quality (used in setting up standards) is impossible to define so that it is applicable to all academic disciplines, institutions, country-specific contexts etc. The point these authors have tried to make is that it is extremely difficult, if not altogether unimaginable, for different countries to apply the same standardized criteria of quality assurance. In their opinion, one of the biggest threats to accreditation processes nowadays is to become overly conservative and thus not allowing for creativity and innovativeness. In line with their main values cherished for years, the crucial task for Nordic countries, as they put it, is to avoid too heavy and standardized procedures that would take away both from institutional and academic autonomy. They also underscore the importance of keeping accreditation/approval processes independent of any political agendas. As for the converging tendency towards bringing cross-national quality assurance systems closer together, the authors of the article expressed their beliefs that cooperative arrangements between countries could well serve the purpose of exchanging practices and deepening understanding of the different quality requirements and recognitions, without the need for achieving absolute uniqueness and uniformity.

Recent developments in some European countries include established contract arrangements- in terms of tasks, processes and outcomes- between higher education and the state. This relatively new steering instrument was introduced with the belief it would achieve balance between the need for public accountability, efficient regulation of higher education and institutional change, and in doing so, reduce the “evaluation overload” in higher education (Gornitzka et al., 2004, pp. 2-20). One advantage of this policy mechanism for accountability and quality assurance is that it usually takes the form of long-term contracts that facilitate strategic thinking of all parties. Contract arrangements between higher education institutions and the state are also a good incentive for strengthening institutional leadership. This policy instrument also has a symbolic value in the sense that it implies negotiating on both sides and reaching a consensus on what should be measured and evaluated. However, the potential downside of these contracts is that they tend to perceive educational outcomes more in quantitative terms and so showing inclination towards the economic dimension of higher education.

### **2.2.3 Accreditation Agenda: From the Perspective of Governmental Policy and Organizational Change**

When it comes to governmental policy issues in higher education and their influence on organizational change, there are some very interesting points made by Åse Gornitzka in one of her articles (1999, pp. 5-29). Some of the most important arguments mentioned in the text are quite applicable to accreditation when treated as a policy instrument. Namely, higher education

institutions do not exist in a vacuum, but have to interact with their environment to achieve some basic objectives (1999, p.6). Drawing from her argumentation, the extent to which accreditation will trigger change on an institutional level depends on how well developed institutions are, and what kind of values, interests and perceptions are shared within. According to Gornitzka, accreditation as any other policy instrument “can be responded to in a routine and non-upsetting manner” only if the changes proposed by that particular policy are compatible with organization’s institutional identity or culture. It is also extremely important that policy makers have sufficient understanding of *why* and *how* HE institutions change- which, for the most part, can explain the relevance of the chosen research topic. If we assume that accreditation is a policy instrument, we can then apply Gornitzka’s findings to further building a theoretical framework, by claiming that accreditation standards are “not simply guidelines for action, but also expressions of faith, values and beliefs and instruments of (civic) education” (1999, p.15). Ideally, policy should be formulated in such manner that HE institutions can negotiate and even create their environments; thus, only if they are allowed to participate in policy making process, can we expect fruitful outcomes and successful implementation of that policy in question.

When broken down to individual stages, we can say that accreditation as a policy instrument first has to start with a certain obvious problem. In that regard, we can treat it as a solution designed to redress that particular problem. Depending on the level of change accreditation is expected to achieve, the desired outcome can be pretty much maintaining the *status quo*, making minor adjustments in the system, or bringing about large-scale and all-encompassing changes. However, for desired outcomes important prerequisites are that the policy in question is clear enough, well defined, focused and not too ambitious in terms of breadth and depth. Practice has proven policies aiming at mid-level changes to be the best.

What will also prove useful in further research is the degree of coherence and consistency of accreditation with former policies in higher education. It has been said that former policies can present the biggest obstacles to successful implementation. If institutions find themselves in the midst of conflicting or contravening agendas, this confusion will negatively affect policy implementation and outcomes.

Accreditation and evaluation are most frequently mentioned in the same context with accountability and, hence, regarded as policy mechanisms or tools created to ensure that educational institutions deliver the right quality of service. It is typically the case that auditing and performance evaluation are initiated and conducted from the same source, i.e. the locus of (financial) control (Winkler, 1993, p. 112). The central government usually provides the revenues for education (at least for public institutions) and so almost inevitably exercises some sort of control over the higher

education sector, which is one of its main beneficiaries. That is why accreditation is often regarded as a policy instrument which implies a special kind of reporting to the public and the State.

Closely connected with this is the question of who should evaluate programs and institutions in the process of accreditation. Evaluation has to be impartial, avoid self-indulgence of any kind and, on the other hand, should represent a “dialogue between evaluators and key actors which would [ideally] generate self-reflection, criticism and action for improvement” (Henkel, 1998, p. 289) among all participants in the process of accreditation. In the spirit of ‘*state steering*’, European governments of today emphasize the role of peer review and self-evaluation in quality assessment of contemporary higher education, but, again the problem lies in appointing peers (e.g. from what domains and based on what criteria: academic and scholarly merit, or excellence in teaching?). Some countries, on the other hand, prefer to maintain greater control over the accreditation process and so choose to exercise the ‘*rational planning and control model*’. When applied to accreditation, this model is (easily) recognizable by extensive control mechanisms of extremely strong and confident governmental actors and agencies which perceive themselves as “omniscient and omnipotent actors able to steer a part of society according to its own objectives” (Gornitzka, 1999, p.23).

#### **2.2.4 Finding a Balance between Internal and External Needs**

Some vital questions for policy makers when trying to conceptualize the most adequate quality assurance model for their own higher education system are actually closely connected to their definition of quality. The focal part of accreditation can, thus, be on the quality of input factors, quality of process, or quality of output factors (Dill, 2004, p. 5). Whether a state chooses to concentrate their evaluation activities (through accreditation agencies) on one aspect/dimension of higher education or another, will significantly affect the subsequent developments and improvements. In other words, if accreditation standards are clearly placing more weight on certain aspects of higher education programs or institutions, those very aspects will, logically, be influenced the most and regarded as decisive factors in achieving academic recognition and approval. Therefore, one of the hardest tasks for policy makers in developing a sound accreditation framework is exactly in putting all the different quality dimensions in balance, paying attention both to internal and external needs of the higher education system (Smeby & Stensaker, 1999, pp. 3-5). This is important for creating an improvement-oriented climate at educational institutions, while, at the same time, gaining legitimacy from actors on the supra-institutional level. It is possible to analyze the extent to which quality assessment systems have coordinated internal and external

needs, by considering some six indicators, proposed by Smeby and Stensaker (1999, pp.4-5): *the existence of an independent managing agent, the role of initiating QA process and deciding what is to be evaluated, the level of standardization of evaluation methods and procedures, the party that nominates and appoints evaluators, the existence of any other type of QA system and how do the follow-ups of quality assessment process look.*

### **2.2.5 Overview of Literature on Policy Implementation**

Literature dealing with implementation of policy in higher education can also provide plenty of sound arguments and suggestions for the successful implementation of quality assurance mechanisms, in this case accreditation- as a primary matter of concern. One extremely interesting read in this area explores academics' responses to the implementation of a quality agenda (Brunetto & Farr-Wharton, 2005, pp. 161-180). The findings of that research show that there are two main groups of factors, external and internal, which need to be carefully considered when planning any implementation strategy. The presented case-study analysis in the article reveals that the responses of one group of professionals to new policies are mostly affected by an "inter-related impact of resources, accountability, leadership and organizational culture" (2005, p.178). According to the authors, senior management often plays a decisive role in rejecting or facilitating new agenda/policy implementation. Perhaps the most important finding is that policy goals should be in harmony and congruence with the organizational values and work practices in order to be implemented successfully. This observation and conclusion can be really helpful for policy makers when formulating new policies and setting goals.

Perhaps the most comprehensive study on HE policy implementation can be found in Gornitzka, Kyvik and Stensaker's "*Implementation Analysis in Higher Education*", where they provide an overview of implementation literature with their most significant findings. A general concern of most researchers in this area was the causal relationship between the set objectives, utilized policy mechanisms and received outcomes. In other words, the relationship between means and ends in a reform process was given much prominence in literature (2005, pp. 35-56) and the main goal, respectively, was to build a sound theory on effective policy implementation. The mentioned factors that affect policy implementation are:

- 1) Legal (official) objectives
  - a) clarity and consistency
  - b) degree of system change envisaged
- 2) Adequacy of the causal theory underlying the reform

- 3) Adequacy of financial resources provided to implementing institutions
- 4) The degree of commitment to various program objectives among those charged with its implementation within the education ministry and the affected institutions of higher education
- 5) Degree of commitment to various program objectives among legislative and executive officials and affected groups outside the implementing agencies
- 6) Changes in social and economic conditions affecting goal priorities or the programs causal assumptions (Gornitzka, Kyvik & Stensaker, 2005; Cerych & Sabatier, 1986)

Analyses of the factor of clarity and consistency of objectives have given some very interesting results. Despite the logically expected, clear and consistent objectives are not necessarily seen as an advantage, neither can precisely formulated goals serve as any guarantee for successful policy implementation. As a matter of fact, certain ambiguity and vagueness is considered as a normal and natural price to be paid for reaching agreement in policy formation. Ambiguity is, by some, even desirable, as it leaves room for further refinement and adjustment to changing circumstances. As regards the factor of the degree of change, Cerych and Sabatier's (1986) three-dimensional framework was mentioned as a necessary subdivision of the scope of change factor, comprising: *depth of change* (the degree to which new policy departs from existing values and practices), *functional breadth of change* (number of areas in which changes are supposed to happen) and *level of change* (the exact target of change- whole system, specific sector within the system, or individual institution). Invaluable lessons learnt from analyzing the three mentioned dimensions were that the functional breadth of change should be smaller for greater success in implementation and that very low degrees of change (regarding depth and functional breadth) often result in not so successful implementation.

The central debate, according to Gornitzka, Kyvik and Stensaker, is whether to approach the implementation process from a *top-down* or *bottom-up* perspective (2005, pp. 35-56). In short, advocates of the top-down approach recommend more emphasis on prescribing detailed policy theory, clarifying objectives and more control, whereas "bottom-uppers" suggest that the users of policy should assume control over its formulation and implementation and that goals and outcomes be measured against local objectives.

Many other interesting questions were raised as well, concerning the proper way to perceive policy implementation- whether as a continuum of subsequent stages, or an intertwined process with blurring boundaries between defining and negotiating intentions and objectives. The whole body of contemporary literature on policy implementation in higher education obviously offers an



abundance of interesting viewpoints and arguments, aiming at even more successful and smoother policy implementation to the benefit and satisfaction of all stakeholders in higher education. An implicit, but, all the same, strong idea that sometimes reads between the lines is that policies (in higher education) are never fully developed until they are negotiated (Gornitzka, Kyvik & Stensaker, 2005, pp. 35-56), but that is again something that definitely depends on the overall system of country's governance and the choice between steering and controlling higher education.

### **3 ACCREDITATION OF HIGHER EDUCATION IN SERBIA**

#### **3.1 Serbian Higher Education System: Historical Background and Conditions under which it operates**

In order to fully understand the implications of worldwide tendencies currently affecting the primary functions of higher education institutions in Serbia, one must first be acquainted with the socio-economical and political context that inescapably shapes and furnishes both quantitative and qualitative aspects of the provision of higher education. Ever since the democratic changes in the year 2000, Serbia has been struggling to bring back stability and prosperity to its citizens. Deeply rooted in an extremely tumultuous past, the country has been dealing for years with reminiscences of unfortunate events, renewing and reconstructing many of its largely destroyed capacities, and trying to invigorate economic development- much needed for any kind of progress.

Hence, the prevailing worldwide movement towards the massification and internationalization of higher education has been somewhat delayed in Serbia, depending primarily upon the time frame necessary for joining the European Union. However, processes related to higher education are still to a large extent dependent on the country's overall socioeconomic progress. It is frequently overlooked, however, that the only way to follow the today's leaders in higher education is by taking on an active role and pursuing the policy of cooperation and faster European integrations in all areas.

Until the 1990s, Serbian higher education was entirely state-owned. Privately owned institutions only started emerging at approximately that time. It is also important to clarify the difference between private and public institutions in Serbia. Namely, unlike the situation in some developed countries, the private higher education sector in Serbia is by definition 'for-profit' and absolutely on its own in terms of financial resources. The only requirement for private institutions, until this accreditation initiative, was to get approval and operating license from the state. Once they have been granted academic recognition, private institutions maintain full autonomy in all respects, as long as they do not violate the Law on Higher Education (The Republic of Serbia's Law on Higher Education, 2005). State-owned institutions, on the other hand, receive lump sums as budget allocations for higher education.

When it comes to matters of quality assurance, we can say that it was almost nonexistent before the accreditation initiative. Quality in the provision of higher education was hardly even discussed, let alone suspected. The only kind of quality assessment used to be exercised in a pretty

benign form (when compared to today's accreditation standards) as a prerequisite for getting the state approval and operating license.

Serbian higher education today comprises three main types of institutions (according to the Republic of Serbia's Law on Higher Education, 2005):

1) *Universities*, 2) *faculties and academies of arts* within universities<sup>6</sup>, and 3) *vocational higher education institutions*, which include: academies of professional career studies (with at least five accredited study programs for professional career studies in at least three different fields), three-year colleges and three-year colleges of professional career studies. There are 7 public universities in Serbia encompassing 85 public faculties, all of them currently undergoing the process of accreditation. There are also 46 accredited state-owned vocational higher education institutions, 17 accredited privately owned and 1 accredited school owned by the Serbian Orthodox church. Four private universities and 62 faculties are also currently undergoing the process of accreditation<sup>7</sup>.

Serbian higher education offerings in terms of types of studies and degrees are organized in three levels. First level studies include basic academic and professional career studies (at all higher education institutions). Second level studies include diploma academic studies for a master's degree (at universities, faculties and academies of arts), specialist professional career studies (at all types of institutions except three-year colleges) and specialist academic studies (at all types of institutions except three-year colleges of professional career studies). Third level studies are offered only at universities, faculties and academies of arts, in the form of doctoral academic studies (the Republic of Serbia's Law on Higher Education, 2005).

Student participation in Serbian higher education amounts to around 239 000 registered/enrolled students (according to the Statistical Office of the Republic of Serbia, as of year 2006).

A big cornerstone for Serbian higher education was the signing of the Bologna Declaration in September 2003 (Bologna Process, National Reports for 2004-2005), followed by a firm resolution to start a full-fledged reform of Serbian higher education, an important part of which was the creation and adoption of the accreditation agenda.

Another great turning point in the history of Serbian higher education was the passing of the New Law on Higher Education in 2005 when all higher education institutions were given back autonomy and academic freedom of which they were deprived under the Milosevic's regime in the 1990s.

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<sup>6</sup> The distinction between universities and faculties/academies of arts is according to the Law on Higher Education, since there are many private faculties which are not part of any umbrella university

<sup>7</sup> A newspaper article from the Serbian daily paper *Blic*, as of April 22, 2007, page O3

### **3.2 Accreditation Initiative in Serbia: Rationale and Description of Practice**

For countries from Central and East European region, the end of a long period of centralized, state-controlled higher education also signified the phenomenon of largely criticized mushroom growth in the private sector, hereby alluding to the enormous and continuously growing number of programs and institutions- often of questionable quality. Entry to higher education expanded and governments stepped back a little, leaving autonomy and power in the hands of universities. This high degree of decentralization was at the same time conducive to a steep rising in the number and variety of study programs and departments to match the constantly growing public demands, or in other words- diversification of higher education. However, the notions of expansion and diversification also refer to the appearance of new teaching methods and nature of academic life in general, imposing on the teaching staff many new responsibilities, much higher teacher per student ratio, and the extremely challenging situation in which efficiency is emphasized the most. The pressure to increase output with the now much heavier burden of accommodating and implementing changes, while retaining and cultivating the same quality of performance, inevitably inflicted “the most painful change of all” (Brennan, 1997, p. 5) upon systems of higher education. Namely, it has become obvious that the status of teaching staff, their remuneration and working conditions suffered the most, and the logical concern- given such circumstances- is whether it is possible to adequately respond to huge demands with limited (and unbalanced) resources and capacities. On the other hand, all interest groups or stakeholders in higher education have their own ideas and perceptions of what the role(s) of higher education should be. Since social and economic function is indisputably of paramount importance for any country, issues connected with accountability, quality and transparency have outrun and come out on a surface as the most pressing ones.

The alike could be said of Serbia. Just as many other countries from the region nowadays, Serbia is undergoing a period of critical analysis and all-encompassing revision of the way its higher education is operating, particularly in the light of current European dimensions and their implications for the future integrations of Serbia into the much wider and prevalent higher education arena. Accountability, as one of the essential concepts for fully understanding the relationship between higher education and the state, has become a matter of numerous discussions and public debates, which is mostly due to the seemingly thriving private sector in Serbian higher education. In other words, the present-day Serbia is facing some disadvantageous aspects of its

growing market orientation, namely a large and constantly increasing number of private schools and universities, seriously shaking the public trust in higher education and questioning its quality and accountability. Quality assurance has, thus, come to the very forefront of policy makers, as this used to be much of a grey area of law in the past, with no clear-cut rules or set standards to follow and compare against.

Having signed the Bologna declaration, as of September 2003, the Serbian Ministry of Higher Education has obliged to make the necessary improvements and adaptations of its higher education system so as to meet the requirements proposed by this agreement, but also make considerable progress regarding the existing system which had been intact and taken for granted for perhaps even too long a time. Obviously, having been densely overcast by political mishaps for over a decade, the country is now carefully tiptoeing its way to where leaders in higher education already stand. The most recent novelty in Serbia is precisely a step further in the direction of a full-fledged reform in the realm of higher education. By constituting a regulatory body dealing exclusively with the issues of quality assessment and quality assurance, the government i.e. the state has decided to intervene in the area which had for long been assumed as the sole responsibility of educational institutions.

Following in the steps of pioneers when it comes to issues connected with the quality of educational programs and institutions, Serbian Parliament<sup>8</sup> has delegated officials and established the National Council for Higher Education<sup>9</sup>. The Council then established the Commission for Accreditation and Quality Assurance<sup>10</sup> as the main authority for matters of quality assessment and accreditation and appointed its members. The Commission for Accreditation is a relatively new thing, dating back a little less than two years now (established in June 2006). The National Council worked closely with the Commission on setting up standards and regulations for the processes of accreditation and quality assessment, which resulted in the form of three legal documents to take force starting from October 2006: *Standards for self-evaluation and (internal) quality assessment of higher education institutions*, *Standards and procedures for external quality assessment of higher education institutions*, and *Standards for accreditation of higher education institutions and study programs*<sup>11</sup>. According to these standards, the Commission is also expected to provide support and instructions on how to prepare the documentation necessary for filing an official request for accreditation and subsequent external evaluation.

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<sup>8</sup> The official site of the Republic of Serbia's Government: <http://www.srbija.sr.gov.yu/>

<sup>9</sup> In further text: *National Council*

<sup>10</sup> In further text: *Commission for Accreditation*

<sup>11</sup> See Appendix: Translated official version of documents

## Process of Constituting Accrediting Bodies and Appointing Members

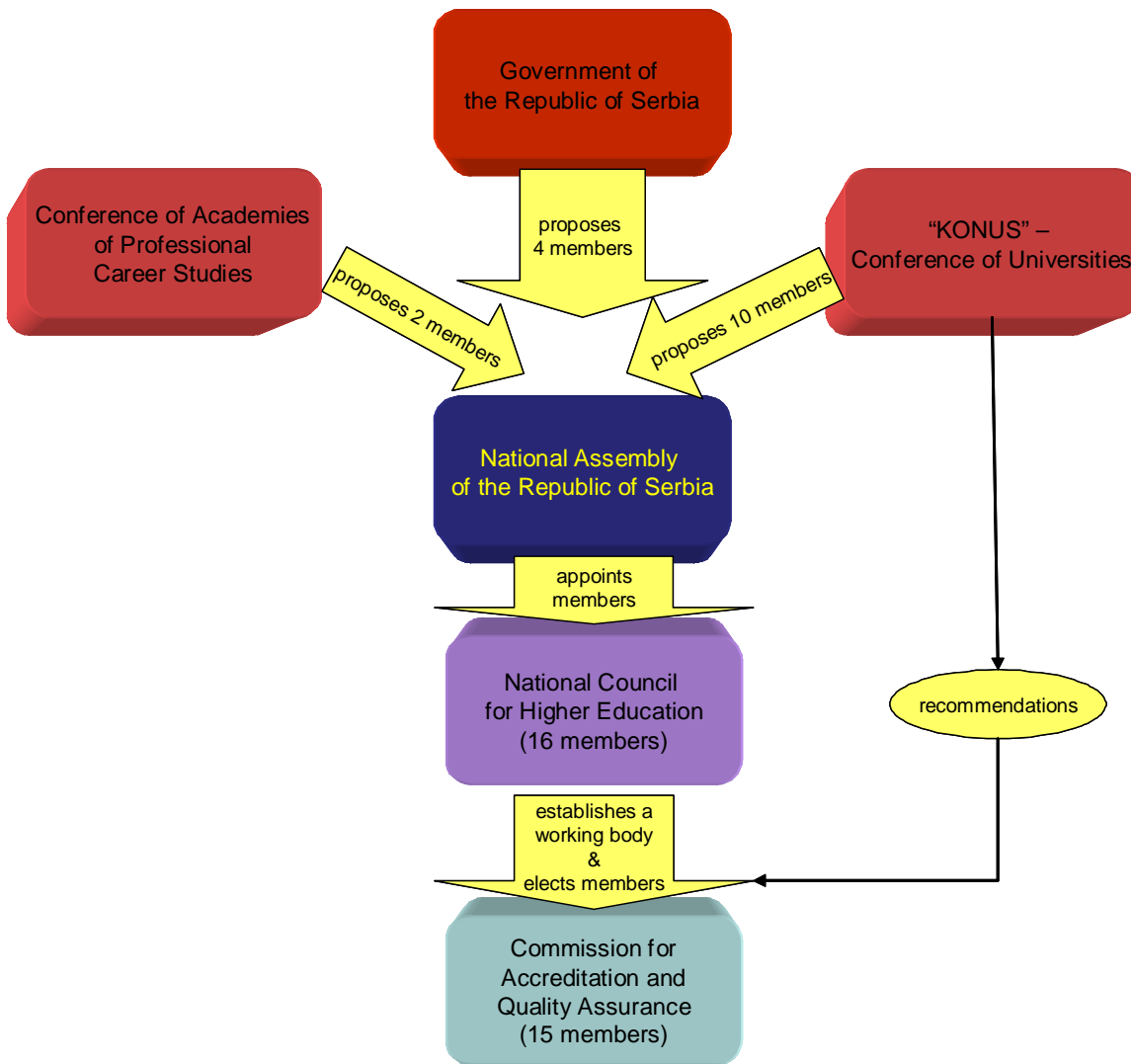


Figure 1

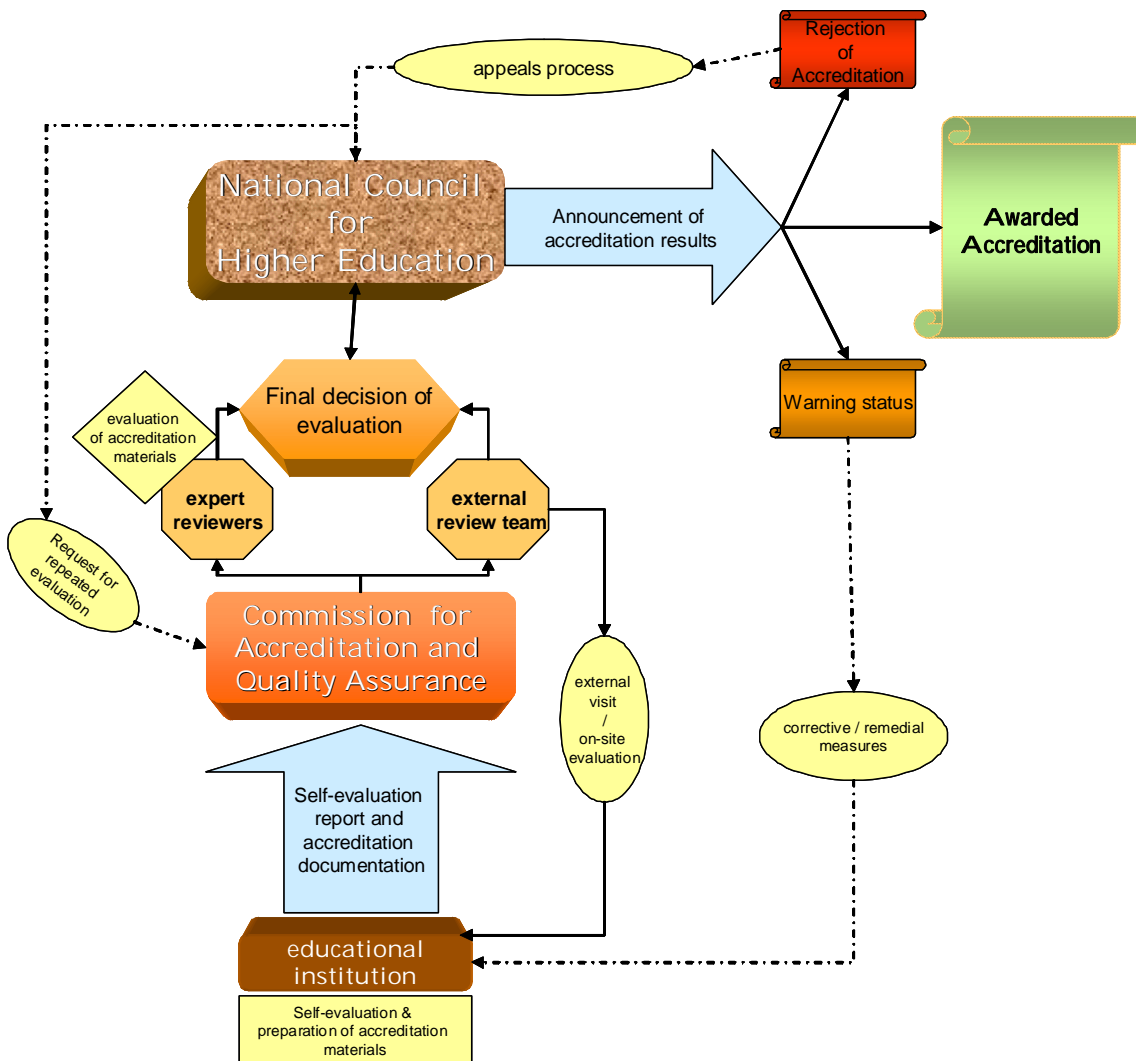
### 3.3 Accreditation Procedure in Serbia

Accreditation of higher education programs and institutions in Serbia implies the requirement to fulfill a set of academic standards, in order to be recognized as eligible for awarding degrees. All higher education institutions in Serbia, public and private alike are subject to

mandatory evaluation and quality assessment. The whole procedure is initiated by the government and at this point Serbia has enforced only official accreditation scheme. Educational institutions first have to carry out internal evaluation and produce elaborate self-study reports whereby they file official applications for accreditation. What follows is a detailed analysis of such reports by the Commission for Accreditation and yet another evaluation- from the outside. For the purpose of external quality assessment and on-site evaluation, the Commission appoints a review team/team of examiners consisting of at least two representatives selected as experts in a particular educational and/or scientific discipline to which the institution or program belongs. Occasionally, external review teams may include internationally renowned academics or experts, whose appointment is then stipulated in accordance with the Law on Higher Education.

The final decision of the National Council normally depends for the most part on observations and a report produced by the Commission, and is given in the form of approval, denial, or deferment of accreditation with a warning notice. Once given unconditional or straightforward accreditation, higher education institutions are subject to renewal procedures every 3-5 years. As for institutions that did not get accredited, in the approaching five academic years they will be forbidden to enroll students, while those that received a warning notice will have to re-submit accreditation documentation once they have made certain readjustments and ironed out the observed inconsistencies with the standards.

**Accreditation Process in Serbian Higher Education:  
From the Preparatory Stage to the Awarded Accreditation**



**Figure 2**

So far, only the first cycle of accreditation, comprising postsecondary vocational schools in Serbia, has been finished.

To sum up: the current emphasis seems to be on accreditation as a policy instrument to impose quality control and force out institutions which do not meet the previously set standards and requirements. Apparently, the accountability dimension has been highlighted and there are still not



good enough mechanisms to stimulate quality improvement, but that is something that will be investigated in the course of research. Despite the growing internationalization of HE in the wider European area, at this moment we cannot say that accreditation in Serbia really accommodates for cross-border aspects of higher education, but is mainly concerned with internal problems related to higher education provision. Although it is undisputable that the Bologna Declaration, coupled with agreements and decisions that followed in the international higher education arena, exerted great influence on Serbian system of higher education, processes of substantial changes and transformations require considerable time and efforts and cannot be implemented overnight. The accreditation initiative that started with postsecondary vocational schools in Serbia is now well in the second stage, but the hardest work is yet to come.

By and large, the accreditation process appears to be one of the few critical moments, even turning points for Serbian HE, and this research aims at discovering what lies beneath the surface to find out what it meant for institutions, what presented the biggest challenges, and what, if anything, changed in the way post-secondary vocational schools/academies of professional career studies in Serbia now operate. Another motivating factor for choosing this particular topic also lies in the fact that the accreditation process for faculties and universities (the second cycle of accreditation) is not expected to be completed until academic year 2009/2010, according to the chair of the Accreditation Commission<sup>12</sup>. Hence, by that time it would be interesting to observe if universities and faculties have learnt anything from the experiences and conclusions drawn from the first cycle.

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<sup>12</sup> Taken from an online press edition of “B-92” from July 17, 2007

## 4 RESEARCH

### 4.1 Methodological Framework

#### 4.1.1 Research Problem

Thesis title has already tried to capture the essence of this academic pursuit for answers to the research problem, which can be formulated in the following way:

*What were the outcomes of the recently finished first cycle of accreditation in Serbian higher education and to what extent can we see them as truly affecting and/or improving the quality of programs and institutions, and raising standards and accountability level?*

Around that main focus, several research questions can be posed, expecting them to contribute to creating a clearer picture of accreditation process as the subject of observation and analysis, but in relation with the affected object i.e. educational institutions. The following questions have been formulated on the basis of the theoretical framework of the study, deriving mainly from the literature on policy implementation:

- Ø What were the biggest challenges and obstacles for institutions in the process of preparing for accreditation?
- Ø How did HE institutions change in response to or in interaction with accreditation policy implementation?
- Ø What were the reasons why some institutions and/or programs were not accredited?
- Ø What is the impression of the accreditation standards?
- Ø To what extent can we speak of the accreditation process truly affecting the quality of HE and introducing the culture of quality in Serbian higher education?
- Ø What are the implications of the completed accreditation?
- Ø Does the accreditation implementation process follow more a top-down or bottom-up approach?

Research conclusions and the answer to the main research problem will be generated from analyses of interviews and statistical findings, i.e. quantifiable outcomes of accreditation.

*The aim of research* is to reveal what the outcomes of accreditation indicate and imply for the upcoming cycles of accreditation (for faculties and universities), as well as to provide all stakeholders in higher education with invaluable lessons drawn from recent experiences, with the ultimate *purpose* of facilitating smoother implementation of accreditation agenda and improvement in the way higher education in Serbia today operates.

#### **4.1.2. Reasons behind the selection of research strategy and techniques**

By and large, success in scientific research depends on the careful and detailed planning and development of the data-gathering strategy. In the quest to provide accurate and insightful facts with respect to the current state of affairs in Serbian higher education and uncover valuable information connected to the outcomes and responses of institutions to the accreditation agenda, qualitative method of scientific inquiry was utilized. Taking into consideration the limited amount of time- as opposed to the large statistical population (in this case- the number of post-secondary vocational schools in Serbia), it was only feasible to optimize the process of selection and analyze individual cases of post-secondary vocational schools in Serbia, subdivided into three categories based on the completed first cycle of accreditation: *schools that received accreditation without conditions, schools that received deferred accreditation decisions and schools that received a warning notification i.e. accreditation with a request for a follow-up report on specific issues where noncompliance with agency standards was identified.*<sup>13</sup> In other words, the multiple case study analysis was conducted on the chosen sample, aiming at identifying main obstacles in the self-study preparation, ideas and perspectives behind the whole process, relations between the different stakeholders involved, participants' overall impressions, quantifiable and non-quantifiable results, and conclusions and lessons for the upcoming second row of accreditation. Besides, literature on qualitative research methods mentions case-study as an extremely helpful procedure when attempting to evaluate policy (Newman & Benz, 1998, p.65)

As primary sources of data collection all available documentation related to the first cycle of accreditation was used, coupled with first-hand experiences of people who participated in the process. In the preparatory stage preceding semi-structured interviews, three sets of standards and regulations were carefully observed and analyzed<sup>14</sup>. Official letters of final decision that HE institutions received, as the announcement of accreditation outcome, have also been analyzed when made available by HE institutions. Stake (1981) argues that counterbalancing of information from

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<sup>13</sup> Author's classification based on the outcomes of the first cycle of accreditation by December 2007

<sup>14</sup> Translations of original documents available in Appendix

documents with data from observation and interviews strengthens the validity of case-study analysis. (as cited in Newman & Benz, 1998, p.66)

Obviously, a *multiple data-collection technique* (Newman & Benz, 1998, p.66) was used to increase the scientific and statistical relevance and quality of research. Acknowledging the fact that very little has been written about the accreditation process in Serbia, the topic can rightfully be described as *exploratory*. The selected readings were mainly from the wider European and even world-wide context. (Rubin & Rubin, 2005; Cozby, P.C., 2007) With Serbian higher education in focus, scarce knowledge and materials on the topic investigated only add to the scientific relevance and importance of the conducted study. However, in many parts research justifiably took on a more *descriptive* and *explanatory* note, aimed at providing answers to the “*what*” and “*why*” questions (e.g. *What happened with some institutions and/or programs? Why did they not get accredited?*). On the other hand, the focal part of the study was to identify the future implications of a recent activity i.e. accreditation process related to higher education institutions. Thus, a considerable part of the study was conceptualized as a kind of *social impact assessment*, looking at the results of accreditation and assessing and predicting possible impacts (e.g. *What is likely to happen with Serbian HE now? What are the institutional and social implications/consequences of the just finished first accreditation cycle?*)

Although it is typically expected of a scientific work to evaluate a stated hypothesis in relation to collected evidence, this commonly applied method of scientific inquiry was not utilized here. The idea was to assess the results of the accreditation process and see what lessons can be learnt from recent experiences. Given the nature of the posed research problem(s), interview technique was chosen as the most adequate tool for data collection. Due to the scope and depth of issues to be tackled in face-to-face contact with respondents/interviewees, the preferred form was a semi-structured interview, allowing for a great degree of freedom and resourcefulness, but at the same time making sure the respondents do not deviate too far away from the point. The most desirable form of responses for this particular research was a free flow of ideas, observations and comments that surpass any preconceived structures and anticipated answers but are still aligned with the main aim of the study. The idea was to get as close as possible to the actual social actors’ meanings, interpretations, and accounts of events in which they have participated. Openness and flexibility are probably the most highly valued characteristics of interviews, much needed to achieve an accurate and objective picture displayed from several different angles.

To sum up, the interview technique was chosen since it allows for a great degree of freedom and spontaneity that largely favor the process of data collection when the focus of study is more on attitudes, impressions, and differing individual perspectives, as is the case with this topic. Although

qualitative method of scientific research utilizing interview technique is extremely time-consuming, both in terms of data collection and subsequent analyses and interpretations, the primary goal is to grasp the process of accreditation from the viewpoints of all stakeholders who participated in it, while acknowledging the fact that there can be multiple realities and truths, equally important and significant when talking about outcomes, implications, and drawing lessons for the near future. Thus, the interview technique will allow for free conversation-building within the chosen subject are, while *working questions spontaneously and establishing a conversational style* (Patton, 1980; Newman & Benz, 1998)

#### **4.1.3 Interview Design and Guiding Questions**

As previously explained, the idea was to conduct semi-structured or partially structured interviews (Newman, 1976; Newman & Benz, 1998), allowing for a great degree of freedom and hoping to get impressions from several different perspectives. Only for occasions when interviewees were not sure what to talk about, guiding questions were composed to prompt them when needed and elicit in-depth and right-on-target responses. These operational questions were derived from the previously presented conceptual framework. With due consideration of several different groups of respondents/interviewees, special attention had to be paid to the content of questions and the way they were phrased. The following list of guiding questions has been created to “direct interviews on a path consistent with the purpose” and yet keep the diversity of perspectives and opinions as a big asset of multiple case-study analysis (Newman & Benz, 1998, p.67).

- ∨ Questions for institutional leaders and faculty and staff members who participated in preparing for accreditation:

*How much time was needed to prepare for accreditation?*

*How was all that organized in your institution; who was involved in the process?*

*How did faculty and staff members accept the announcement of mandatory accreditation procedure for all higher education institutions, public and private alike?*

*What do you think of the standards for accreditation?*

*To what extent were they truly measuring the quality of institutions/programs in your opinion?*

*What particular requirements did you find the hardest to fulfill/ What were the biggest obstacles and challenges in the process of preparing for accreditation?*

*(What were the reasons why your institution and/or any of the programs did not get accredited?)*

*Did your institution have to change something in essence, i.e. fundamentally in order to get accredited?*

*Now that the first cycle of accreditation is over, what can you say was the focal part of it?*

*What measures/criteria did the Accreditation Commission emphasize the most?*

*Did your institution develop any particular strategy to tackle the call for accreditation in the preparatory stage?*

*How did you go about securing sufficient funds to cover for expenses that accreditation incurred?*

*Was your institution informed of the exact date of the external review team's visit, its composition, expectations, main areas of concern, purpose of visit etc.*

*Were you able to get timely instructions and advice while preparing for accreditation and writing the self-study report?*

✓ Questions for members of the Accreditation Commission and the National Council:

*This is without any doubt a critical moment for Serbian higher education. What was the underlying rationale behind this first all-encompassing accreditation agenda?*

*Why do you think accreditation was so necessary and who will benefit from it?*

*Do you think outcomes of accreditation will affect student choice and enrollment figures, and if so, could you explain how?*

*Was the focus of accreditation more on input or output dimensions of higher education?*

*To what extent do you think accreditation was a constructive experience for Serbian higher education institutions?*

*How would you describe the positions Serbian HEIs assumed with respect to accreditation? Was it more of a reactive role or were they actually facilitating accreditation?*

*What will be the consequences for institutions that did not get accredited and will there be any implications regarding the approval of federal funds?*

*Would you say there is a link between this accreditation process and systemic institutional improvement?*

*Generally speaking, what were the most frequent cases of inconsistencies and noncompliance with the set standards and reasons why some institutions did not get accredited?*

*What advice and suggestions could you give to institutional leaders, faculty and staff members for the upcoming second cycle of accreditation?*

## 4.2 Collected Research Material

### 4.2.1 Presentation of Interviews as Multiple Case Study Analysis

According to Rubin & Rubin (2005), listening, hearing and sharing social experiences is at the heart of the in-depth interview technique. In an attempt to comprehend the true nature of the accreditation process, but from a number of different perspectives, I have chosen interviewees based on their affiliation to a particular HE institution and considering what the outcomes of accreditation for the respective institution were. Besides the institutional representatives, I have also included respondents from the supra-institutional level, so as to contribute to the research by sharing their knowledge and perspectives as well. Given that the concept of truth is largely dependent of each person's individual perception and interpretation of events/process (Rubin & Rubin, 2005), I felt that it would be only appropriate to conduct as many interviews as time permits and to allow for different accounts of the same subject matter to be expressed.

#### *Case Study I*

*Interview with L.J.M., a full professor and vice-principal of Higher vocational institution of technical education. School was chosen as representative of those that received unconditional accreditation. Main findings are related to: pro-active attitude towards accreditation initiative, numerous benefits of accreditation both for students and teachers. Predominantly positive experiences with accreditation expressed in the interview. February 27, 2008; Novi Sad, Serbia*

An extremely bright example in the realm of Serbian higher education was found the very moment I stepped onto the premises of *Higher vocational institution of technical education* in Novi Sad, Serbia, formerly Post-secondary vocational school of technical education. A one hour interview with the school's vice-director revealed right from the start that the school's successfully completed accreditation process was largely thanks to the adopted proactive attitude towards all Bologna recommendations for reforms and transformations in higher education, as early as three years prior to the announcement of mandatory accreditation. That sounded like a quite exceptional case for Serbia, almost the epitome of modern, change-oriented, quality conscious and student-focused institution of higher education in this context.

While trying to elicit answers to the posed research questions, the impression that somehow constantly lingered in between spoken lines was that virtually no problems or even obstacles were encountered in the preparatory stage for accreditation. This was quite a smooth and pleasant flow of

a dialogue, unveiling the story of a school that embarked on a self-initiated process of reforms and transformations and was, thus, able to gradually fine-tune itself in accordance with accreditation standards. The whole process of preparation lasted around 8 months (since the announcement), with the last two being the most hard-working and persevering period of filling out forms and administering tons of paperwork. According to the interviewee, about 60 000 pages were written and submitted for the subsequent analysis and reviews of the 13 study programs and the institution.

What makes the whole case even more unique in this environment is the fact that the human factor in it was so strongly positive that it was actually welcoming and facilitating changes. The whole work was organized in teams gravitating around different study programs, with one coordinator per each team, and they all first educated themselves on issues related to Bologna, quality standards and, generally speaking, European tendencies in higher education. Both administrative and teaching staffs were genuinely determined to raise their institution to a higher level, from where they would be able to offer better service to their prospective students and achieve competitive advantage over similar educational institutions.

One of the questions that inevitably arose during the interview was whether the interviewee thinks there is any connection between their staff's background in technical education and their attitude to accreditation procedure and standards. The answer was affirmative. In other words, when your institution employs teachers predominantly with educational background in mechanical and electrical engineering, computer science, metallurgy etc, the majority of them will probably have an inherent sense of precision and highly value mechanisms of quality assurance and control. According to the interviewee, if such characteristics are at the same time coupled with the generally very young community of scholars willing to work on their professional growth and development, then positive result of accreditation is almost guaranteed. Implementation of accreditation standards and procedures- in her words- slightly increased the burden on teaching and administrative staff, in terms of development and management of procedural documents and their utilization in practice, but significantly raised the level of quality and organization. Benefits for students are more than evident, as she said. In months of preparation for accreditation, all employees were working until late and literally sacrificing their own free time to systematize the results of their previous three years of reforms, but teaching was not to suffer because of that.

In her opinion, accreditation standards were somewhat unclear in the very beginning, or at least- some of them. Fortunately, the Accreditation Commission was always there, just a phone call away, to offer guidance and explanations that would emerge in doubtful areas. Cooperation between higher education institutions that were in similar situation was very fruitful as well. All parties involved in the process seemed to have been learning along the way. When you have pioneer or



“zero” accreditation going on in one country, as she said, it is only normal that problems and issues of concern will occur, especially those related to standards and criteria. What matters is the readiness of the Accreditation Commission to assist and help in the process by giving instructions and providing continuous support. The feedback received from the first cycle of accreditation will surely lead to slight changes and modifications of standards, to provide better understanding and smoother i.e. easier enforcement of standards in the future.

According to the interviewee, implications of this first cycle of accreditation can only be regarded as positive; manifold improvements are obvious and numerous. Student evaluations already show a high level of satisfaction with the reforms made 3 years ago and student exam pass rates have gone higher as well. Thanks to the application of standards in concordance with Bologna recommendations, students are now able to gradually master smaller portions of knowledge throughout the academic year and earn final grades by method of continuous assessment. Furthermore, all procedures related to applying for exams, obligatory readings, course requirements etc, are elaborately presented in brochures available for all study programs. According to the school’s vice-director, accreditation standards were primarily conducive to establishing “clear rules of the game” for students and teachers alike.

The interviewee concludes talking about all positive aspects and outcomes of accreditation for their institution. Namely, the need for constant improvement and advancement of teaching equipment, update of library stocks, computer capacities, lab renovation, expansion of office and teaching space etc. The case of *Higher vocational institution of technical education/Higher vocational technical school* in Novi Sad is definitely special in that the institution had started changing long before the announcement of mandatory accreditation and then only had to systematize and formalize the made reforms. The school’s vice-director and leader of self-evaluation process verbalized this fact by the following sentence: *Our school started off its mission three years ago and decided to head for Bologna absolutely independently from the accreditation initiative!*

## Case Study 2

*Interview with S.H., professor and coordinator of self-evaluation process at Higher vocational school of Agricultural and Food Sciences in Prokuplje. Interviewee was chosen as one of the Accreditation Commission’s expert reviewers and also representative of a school that received unconditional accreditation. Main findings related to: greatest obstacles in preparing for accreditation- human factor, time-limit, insufficient capacities to meet requirements and find*

*solutions. Ambivalent reactions to accreditation agenda expressed in the interview. February 19, 2008; Faculty of Agriculture- Institute of Animal Sciences, Zemun, Serbia.*

*Postsecondary school for Agricultural and Food Sciences in Prokuplje, Serbia* has also successfully passed through the process of accreditation and, consequently, had its name changed into *Higher vocational school of Agricultural and Food Sciences*. The interview with the leader of self-evaluation or self-study process at this institution aimed at portraying another case-study and uncovering its (good) practices as well as biggest challenges, obstacles and problems in preparing for accreditation.

It is often said that only final results count (in life), and perhaps this goes for the great majority of things, but I would just add that the “how” is also very important and should not be underrated under whatever circumstances. What made me think like that was the story of my respondent who was pretty honest in providing a first-hand account of the pre- accreditation period at his institution.

The first great obstacle for *Postsecondary school for Agricultural and Food Sciences* was having very little time (two months) to fill out accreditation documentation – the documents and instructions were distributed at a very short notice and so most schools got involved at the last minute. Truth be told, even when the school started doing something about it all, there was heavy resistance among some members of teaching and administrative staff. According to the interviewee, this human factor cast, in a way, a dark shade on all aspects of the school’s involvement and engagement in the process. In his words, the level of collective consciousness still seems to be pretty low. The main problem was that some teachers were not convinced enough about the necessity for quality assurance and control. In the beginning they simply kept commenting how they would hate to see and let their school affairs arranged by someone from the outside. Their personal views and beliefs were coming from ignorance or very scarce and often insufficient knowledge of the European trends in higher education, accreditation standards and reforms in accordance with Bologna recommendations. They never even thought they would need to change. What is more, many of them feared they would lose their position and/or status within the institution should study programs get revised and redefined. In short, the school had quite a slow start with many of its employees being unwilling to change and adapt, and with the deadline for completing accreditation documentation being just around the corner.

It seemed almost impossible for the few enthusiasts and believers in quality assurance and control to convince the rest that they need to change and establish a culture of quality for their own good and not just because they have been forced to. Insufficient knowledge on methods for

curriculum development and design, ECTS methodology, standards and criteria for quality assessment, methods of active learning and student-oriented approach in teaching were only some of the areas in which employees need at least basic instruction. Furthermore, the need for making a glossary of basic terminology was evident and that was also one of the initial steps in the process. Later on, there were great problems of confusing tasks, goals and purpose; learning outcomes were not even considered when conceptualizing courses, and competencies were taken quite loosely, without paying much attention to set standards.

In the description of study programs, of the 12 standards that are relevant, three have been considered to be most important: competencies, curricula, and institutional and technical capacities/facilities. That is precisely what presented one of the biggest challenges for the small public school i.e. poor technical capacities and scarce and outdated equipment. The school tried to solve this problem by seeking donations and other forms of financial help in its immediate environment. It was purchasing books, teaching equipment (laser beam projectors, computers etc.), and renting additional office and teaching space literally overnight, all that to compensate for most obvious deficiencies.

Other challenges included the development of policy and producing policy documents with respect to quality assurance and control mechanisms, as well as strategy and plan documents that had previously been nonexistent. Until then, the school only knew of and had a financial plan, but not even this was adequate enough according to the standards. Huge bureaucracy with piles of paperwork were a must in order to apply for accreditation and yet some teachers/professors, many of whom had other side activities and jobs next to teaching (scientific projects, cooperation with businesses etc.), procrastinated with their tasks and were obviously not efficient and devoted enough in the team work that the whole school depended upon.

In my respondent's view, a great obstacle beside the human factor- but again closely connected with it- was the tendency to shut eyes on obvious problems and hide them under the carpet, rather than face them and deal with them. Critical thinking was almost an unknown concept to most employees, and team work was not really a preferred way of tackling difficulties and collective tasks up until then.

One of the crucial things that expert reviewers of self-study reports concentrated their assessments upon were human capacities. In other words, there was the requirement saying that each educational institution has to have a minimum of 50% of professors with a doctorate. This criterion many institutions found extremely difficult to meet and the alike could be said of *Postsecondary school for Agricultural and Food Sciences in Prokuplje, now- Higher vocational school of Agricultural and Food Sciences*. Lack of human capacities was evident especially in

strictly vocational and applicative disciplines. Because of having insufficient staff, the school previously organized its teaching in such a way that some teachers were overloaded with classes, while some were hired part-time. Problems connected with distribution of classes, course division into general-educational, theoretical-methodological and vocational-applicative, and ECTS introduction required considerable efforts and implied educating teachers and even settling conflicts between them when necessary.

After exposing all these problems and obstacles that emerged during the process of preparing for accreditation, my interviewee- who was in the position of a leader of self-evaluation and who pretty much can take all the credits for the successful completion of accreditation, emphasizes the importance of working on terminology definitions and clarifications as those were one of the key issues of concern and potential factors for non-compliances with standards. Learning outcomes, in his opinion, were not quite comprehensible for the majority and so remained left out of curricula designs. International mobility and comparability dimensions do not seem to be completely applicable at the present-day post-secondary vocational schools in Serbia, but that is certainly an important future objective. Academies of professional career studies are also allowed to organize specialist professional career studies, which are only now undergoing the process of evaluation and accreditation.

It took a lot of effort, determination and perseverance to introduce reforms at *Postsecondary school for Agricultural and Food Sciences in Prokuplje* and earn accreditation, despite numerous disadvantages and handicaps that were present before. In the end, my interviewee concluded by saying that, unfortunately, many schools do not actually implement all the things that exist on paper. To some extent some institutions really do transform the way they operate and also the content they teach, but to some degree we can also talk of mere window-dressing. Sadly enough, some institutions or some teachers within their own institutions will continue doing everything by habit, as it is much easier and does not imply stepping out of their comfort- zone. That is a great danger; perhaps even a threat for Serbian higher education and, undoubtedly, an issue of concern for some future accreditations or other mechanisms of quality control. Even though formal requirements seem to have been satisfied, special attention should be paid to checking the degree to which they truly correspond with the reality.

To sum up, *the Postsecondary school for Agricultural and Food Sciences in Prokuplje* spent 5-6 months in “passive” preparation and then had intensive two months of completing the documentation to apply for accreditation. Despite the many deficiencies and heavy resistance of employees (who wanted to keep the curricula unchanged and then simply tie a certain number of credits to courses), coupled with insufficient knowledge on all matters related to accreditation and

European tendencies in higher education, the school's team coordinators (5 of them, corresponding to 5 study programs) worked day and night just to collect all the requested data and contribute to writing the self-study report. The result was accreditation of 5 study programs and the educational institution itself, with minor remarks and suggestions for remedial action: to expand human capacities i.e. number of teaching staff holding a doctorate and being employed full-time, to improve the existing knowledge of its employees and work on their continuous development, to re-read standards for competencies and re-think which ones are crucial or critical for what study programs and courses. According to my interviewee, who was in charge of the self-study in his institution, around 20% of things were fundamentally changed in order to meet accreditation standards, around 30% of reforms are still pretty much in the inception phase, while as much as 50% of reforms, unfortunately, exist only on paper. However, his overall impression is quite optimistic. We should concentrate on positive sides of this "zero" accreditation and consider it only as the beginning, and as such- incredibly important. If anything, it will bring about an inventory of higher education institutions and will make a rough cleanout of incompetent and inadequate institutions that do not meet the minimum quality requirements. From this point onwards, it will be easier to steer higher education, emphasizing the accountability and quality dimensions, and act in the best interest of the public.

The noticeable focus of the Accreditation Commission, in my respondent's opinion, was on staff competencies and qualifications, space and technical capacities, and the quality of teaching curricula. Strategy and plan documents related to quality assurance and control were developed looking up to European and world-wide standards. Even SWOT analysis (detailed analysis of **S**trengths, **W**eaknesses, **O**pportunities and **T**hreats) was carried out, the result of which was identifying some 15-20 problem areas and showing concrete measures that could be taken to tackle these problems in the future. Truth be told, all these activities that led to accreditation were conducted by a small group of experts and enthusiasts and it was thanks to their hard work and devotion that the school has now adopted a slightly different attitude to the European trends in higher education.

Obviously, institutional leadership or leadership in general is critical for any collective behavior or activity, and particularly in contexts with tensions and complex interpersonal relations resulting from the deeply rooted resistance to changes and unwillingness to learn and develop in accordance with European and world-wide trends in higher education.

### *Case Study 3*

*Interview with M.S., a former vice-dean at the Faculty of Architecture, today professor and coordinator of self-evaluation process, and at the same time one of Accreditation Commission's expert reviewers. Interviewee was chosen to talk about accreditation process from a supra-institutional level. Main findings related to: nature of accreditation process and developed standards, difficulties and challenges in building "zero" accreditation framework in Serbia, implications of the process, description of evaluation process, etc. Generally positive attitude expressed in the interview. February 19, 2008. Faculty of Architecture, Belgrade, Serbia.*

M.S., as one of expert reviewers of the Accreditation Commission, but at the same time a professor at the Faculty of Architecture in Belgrade, was an extremely interesting and eloquent interviewee, and helped me a great deal in my quest to illuminate the phenomenon of accreditation in Serbia from a totally new perspective. M.S. was chosen to be interviewed as one of the people coming from the supra-institutional level and one who was easily approachable, available for comment and extremely helpful in describing the underlying rationales and mechanisms of the accreditation process.

Given his engagement in reviewing and rating accreditation documentation of a small portion of Serbian postsecondary vocational schools- delegated to him concerning his academic background and field of expertise, the observations and opinions M.S. expressed during the interview should be taken as personal and restricted to his experience only.

Speaking of the accreditation agenda in general, the interviewee emphasized the uniqueness of academic discourse in terms of the peculiar dialectical interplay that somehow defines the whole academic community as most liberal and most conservative at the same time. This very special characteristic of academia makes any attempt for transformations and facilitating change quite challenging in itself. The trick for successful initiation and subsequent implementation of HE policy is to sustain this dialectic nature as the determining factor of its existence and have all decisions based on the true conviction and consent of all members of academia. That can be the only way to prevent the resistance to changes and establish a relationship of mutual trust, respect and cooperation in the process of improving the way higher education currently operates.

In line with that position, M.S. continued to talk about the complexity of the project developed and carried out by the Accreditation Commission and stressed the amount of work set to get finished in a very short period of time. According to him, the underlying rationale behind the accreditation agenda was to commence the last phase of reforming higher education in Serbia in

accordance with the whole Bologna framework and the Law on Higher Education from 2005, through introducing order and reviewing uncritical past practices in issuing operating licenses to educational institutions without sufficient quality control mechanisms. He further refers to accreditation as a systemic framework that ascertains the degree to which institutions are committed to offering quality service i.e. education, and to which they have designed and reformed their study programs in line with the Bologna principles and recommendations. The whole idea was to protect public interest and establish rules that would regulate the emergence of new entrants on the market. In that regard, the attitude of students to accreditation should be only positive, as they will now have an official proof of the quality of institution they wish to get enrolled at. The real effects of the process are expected to be seen in the approaching academic year, from the coming generation of students' experience.

M.S. expects the accreditation procedure to evolve and improve with time. At this point, one might say that the Commission has been perhaps a bit too rigid in the sense that it defined a qualification framework pretty narrow in scope, not allowing for much freedom and creativity in conceptualizing new study programs and awarding degrees in respective fields. This led to the fact that some postsecondary vocational schools had to cut out certain existing programs, or at least redefine some of their degree/diploma denominations. The interviewee is absolutely aware of the difficulties this must have caused to some institutions in preparing for accreditation and well understands the necessity for the development of new disciplines and educational profiles, many of which will imply merging and integrating of existing disciplines. In that regard, the interviewee is deeply convinced that such deficiencies of the domain of higher education policy will be remedied in the future to the satisfaction of not just institutions but also prospective students.

When asked about the possible implications of accreditation, my interviewee responded by bringing the problem of staff employment into focus. Namely, up to now it was the case that many teachers, lecturers and professors were circulating between several different schools and/or faculties. This has mainly been the result of insufficient staff capacities or, in other words, the inadequate number of full-time teachers per institution ratio. Accreditation is expected to prove beneficial in that respect as it will require that accredited institutions have at least 70% of teaching staff with full-time employment or otherwise they will not be allowed to operate. To present current employment situation, schools were required to enclose elaborate and updated personnel records to the accreditation documentation. That way, a complete inventory of teaching staff will be made and the Commission, National Council and other important stakeholders in higher education will get a realistic picture of teachers, their capacities, professional qualifications, home institutions, and teaching loads. What is more, we can expect accreditation to lead to the so-called "institution

branding”. In other words, M. S. talks about the likelihood of establishing a system with easily recognizable names, educational profiles and institution images that could play a decisive role in the minds of potential customers i.e. students when selecting from the vast diversity of higher education provision. According to my interviewee, this accreditation initiative represents some sort of zero point for Serbian higher education that will identify quality institutions which award recognized diplomas in our national educational and professional environment/context.

As for some challenges and problems that emerged during the course of accreditation, the interviewee mentioned the problem of office space which somewhat hindered the normal functioning of the Accreditation Commission during the first cycle. This was quite an obstacle in an atmosphere in which communication was essential, not only amongst the members of the Commission, but perhaps even more importantly- between the schools and the Commission. Fortunately, this problem has been resolved and now we can expect a smoother coordination, dissemination of information and support by the Accreditation Commission.

The interview revealed many other interesting facts about the process. After a closer look at standards, it becomes obvious that input dimensions were primarily in focus of accreditation. This is partly due to the on-going debate in Serbian higher education community about the grounds on which the state should base the funding of institutions. There have been certain initiatives that the mode and scope of funding gets tied to the output dimensions, thus signifying a shift from a very pronounced autonomy of institutions, but this far nothing has actually changed. The Accreditation Commission mainly based their observations and remarks on quantifiable dimensions, such as technical and space capacities, library stock, human resources etc. Probably the hardest elements to analyze and rate were the structure and quality of study programs and the extent to which they are reformed and aligned with the Bologna recommendations. In my interviewee’s opinion, it is necessary that output dimensions receive due prominence in the process of accreditation, but when and how it will be possible to integrate them with the existing standards remains to be seen. Perhaps the moment when the private sector in higher education becomes so strong and we start witnessing a highly competitive educational market will at the same time mark the beginning of a new era for Serbian higher education. We currently have a pretty laid-back scene of public institutions which owe this relaxed attitude to the fact that they are fully-funded by the state and do not have to worry much about the measurable results of their work, such as grading criteria, pass and graduation rates, number and quality of graduates etc.

When further describing how the first cycle of accreditation looked, M.S. admits that certain regulations and standards were defined and released quite late, leaving very little time for



institutions to prepare all the documentation. (This was repeatedly criticized as a huge problem by the majority of interviewed institutional leaders as well)

Human factor at some institutions was also a big obstacle in the beginning. My respondent is not convinced that Serbian academic community fully understands the importance of building and developing a quality culture in higher education, but he is absolutely optimistic when talking about the possible implications of it. The interviewee strongly believes that postsecondary vocational schools have already proved to be much more flexible and adaptable than larger entities and that they are becoming increasingly attractive to prospective students with reformed programs centered on practicability and employability aspects.

The biggest advantage of accreditation, according to my interviewee, lies in the fact that it absolutely mobilized the whole academic community. Even if the largest portion of paperwork was delegated to a relatively small number of responsible individuals, at least all teachers had to re-think the positions they hold, courses they teach, teaching methods, as well as competencies and skills their students should acquire along the way. A huge step forward is the mere fact that all members of academia will become familiar with (quality) standards and probably a large majority will continue to work while keeping those standards in the back of their mind. The problem of occasional “window- dressing” cannot be denied, but the expert reviewers from the Accreditation Commission have been thoroughly reading and analyzing accreditation documents, searching for potential inconsistencies and pitfalls as signs of dishonest and deceptive behavior on the level of institutions. The purpose of external review team visits is also to ascertain the authenticity and validity of submitted accreditation documents by means of on-site evaluation.

Aside of the work of responsible bodies and agencies, an informal and yet vital role in quality control and assurance will be played by non-governmental and non- political organizations, such as the Centre for Educational Policy<sup>15</sup>. The only truly professional and detached attitude in quality evaluation can be achieved by absolutely independent bodies that do not take interest in the process. My interviewee holds it that under current circumstances favoritism and partialness are issues that could easily come into the picture and therefore demand serious attention on behalf of policy-makers.

M.S. also talked about the process of reviewing accreditation documentation, as he was one of the Accreditation Commission expert reviewers in the first cycle of accreditation. He describes the procedure as extremely demanding and responsible, requiring a high level of expertise in a particular professional field. It is necessary to carefully analyze all details and see if they match and

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<sup>15</sup> Formerly: Alternative Academic Educational Network

seem convincing. Each school's documentation is reviewed by two expert reviewers, who do not know one another and whose identity remains unknown for the school in question. Once the two reviewers have read through the paperwork and rated the school following a standardized procedure for that, their ratings are compared. If the two reviews differ significantly, arbitration is required by a third party/reviewer. When consensus has been achieved and the decision reached, the Commission then issues an official decision, which will have to include detailed criticism enlisting all remarks should the decision be negative. This is a very important role of the reviewers, as it also implies giving suggestions and specifying concrete measures that a particular institution needs to take for improvement and re-application for accreditation. In other words, the greatest responsibility of the reviewers is to gain the deepest possible insight into the structure, content and quality of study programs, as their expertise could ideally help institutions grasp and get a better grip on potential problem areas and deficiencies from an outside perspective.

Speaking of the biggest and most commonly observed problems and deficiencies, my respondent explains that there is still not sufficient understanding of the following concepts mainly: nature of the new Law on Higher Education in Serbia, the Bologna process, reasons behind cycle-system organization of studies and ECTS methodology. Experienced reviewers can easily pinpoint and identify inconsistencies in submitted documents and so a good advice for institutions could be to allow ample time for preparation for accreditation, including the writing of the self-study report. By doing so, institutions will have to change their mode of thinking, acquire a new perspective on the way they operate, synchronize their inside-activities and even develop new bodies within their organization, aside of mere form-filling and information gathering.

In the course of the interview M.S. also expressed his views on some other aspects of program quality which do not yet exist in Serbian higher education. He mentioned the so-called *benchmark statements* which will need to be defined in the future. The lack of qualification framework is also something that will have to be remedied in the near future. My interviewee emphasizes that we should soon witness the shift of focus from a study program syllabus to learning outcomes. In his opinion, that will signify the fundamental reform of study programs. As for teaching methodology, teacher-oriented approach has to be replaced by student-oriented teaching, the sooner the better. Unfortunately, our country considerably lags behind other European countries in that regard; for the simple reason that many teachers still do not realize the importance of those changes and stubbornly stick to their old-fashioned ways. Teaching methods should correspond with the course content while facilitating critical thinking and active student participation. Learning outcomes should be used as the starting point in conceptualizing study programs and curriculum development.

My interviewee only briefly touched upon a potential (and logical to expect) problem that will arise as one of the consequences of not accrediting institutions that failed to comply with the set standards. Namely, the penalty for not meeting the minimum quality requirements will be deferred enrolment for the institution in question. As for the students that already study at the non-accredited educational institution in question, they will be allowed to continue their studies if they wish to, but are otherwise welcome to transfer to a similar school or faculty which offers a comparable study program in the respective field. However, this is expected to open up series of problems related to institutional capacities, compensatory exams due to differences in study programs, treatment of exams and earned credits from a non-accredited institution etc. My interviewee emphasizes that all necessary steps and precautions should be taken in such cases to prevent overloading and quality depreciation. Obviously, that will bring forward a new challenge for policy makers to seriously consider and find the optimal way to deal with it.

At this point, it would be illusive to think that accreditation standards are perfect and immovable. Naturally, they will be slightly modified and perhaps continuously fine-tuned in the process of building and developing a quality culture in Serbian higher education. However, there cannot be any drastic changes of standards, as that would automatically imply partiality and unfair treatment of those institutions that went through the accreditation process under the old/initial standards. Therefore, almost all modifications will be directed at the current method and system of reviewing and evaluating, and not so much at the standards.

The interviewee concludes by commenting briefly on the nature of current accreditation standards. In setting up standards, the Accreditation Commission mostly relied on the wider European higher education area. The primary intention was to bring good European practice into the higher education of Serbia and so nation-specific and contextual factors were not taken too much into consideration. The noted deficiencies or problem areas after the first cycle of accreditation (according to the feedback provided by institutions and mistakes repeatedly observed throughout vast accreditation documentation and self-study reports) have mainly to do with the wording of some standards. Clearer and more detailed definitions of standards related to purpose, goals, and competences are required, but the interviewee justifies these pitfalls by stressing that this was only the very first accreditation initiative in Serbian higher education and that *learning- by- doing* and *problem-solving* along the way is just normal for all beginnings. To end on a positive note, M.S. says he is deeply convinced that Serbian higher education will see even more devoted work of the Accreditation Commission in providing constant support and helping institutions successfully pass through accreditation process and then continuously strive to improve their quality- once the minimum standards have been reached.

Obviously, this interview was extremely revealing in terms of some practical issues related to the mechanism of accreditation from an “insider’s” perspective. Given that M.S. made it known in the interview that he was engaged by the Accreditation Commission for the position of an expert reviewer, the findings of the interview are, quite understandably, limited to his personal and professional experience and expose a pretty affirmative view on the whole accreditation agenda in Serbia. During the conversation, my respondent also highly commended the work of the Accreditation Commission for their constant support and guidance in the process of accreditation. He even mentioned several instructional seminars and meetings intended to help institutions in the second cycle pass through accreditation more easily, with the fewest possible hindrances or difficulties.

#### *Case Study 4*

*Interview with Đ.Č., a full professor and coordinator of preparation for accreditation at the College of Hotel Management in Belgrade. Interviewee was primarily chosen because College of Hotel Management initially received a warning notification and got accredited after corrective measures have been taken, but, interestingly enough, interviewee is also a member of the National Council for HE. Main findings are related to: remarks and criticisms of the Accreditation Commission, adjustments and changes to get accreditation, attitude of the National Council etc. Generally positive attitude expressed in the interview. March 4, 2008. College of Hotel Management, Belgrade, Serbia.*

Another certainly interesting and revealing interview was conducted at the College of Hotel Management, a public vocational higher education institution.

The school’s case seemed particularly interesting to me due to the eventual twist of the Accreditation Commission’s decision to grant accreditation to this institution after the initial warning notification. In line with the main aim of this study, the just mentioned official notification of a warning status was precisely the reason for choosing to portray the case of College of Hotel Management; the primary motive was to look into the main remarks of the Accreditation Commission and explanations behind such a decision.

The suggested responsible person at the College of Hotel Management for discussing issues related to accreditation on the institutional level was Đ.Č., a full professor in the field of tourism and head of the research and development centre at the College of Hotel Management in Belgrade. The course of interview, however, revealed yet another valuable piece of information; namely, the

fact that my interviewee is also a member of the National Council for Higher Education and as such was able to provide worthy insight into the accreditation process from a different angle.

To start from the most general information, the College of Hotel Management has been the only school in this field since its opening in 1974. When founded, it was known under a different name- College of Hospitality Management, which was then changed in 1993. Being state funded from the first until the present day, it has not seen significant investments into its development. Taken from the interview with Đ.Č., the school has always had to rent hotel and restaurant space for regular practice hours which has been not just a heavy burden but also one of the noted obstacles for getting accredited. Other main criticisms by the Accreditation Commission referred to the existing study programs and this is still a pretty unclear remark, according to the interviewee. Namely, the initial decision of the Commission to issue a warning notice to the College enlisted four main problems in connection with: the number of study programs, number of students/enrolment figures, number of associate teachers, and space capacities. Aside from the fact that all employees had been quite convinced they would easily pass through accreditation and that this unfavorable decision came as more than a shock, Đ.Č. and his closest collaborators felt somewhat confused upon receiving the notification from the Accreditation Commission. Although he had previously been absolutely realistic about all possible outcomes and even trying to reason his colleagues that the situation at the College of Hotel Management is by no means perfect, my respondent was pretty surprised himself that no specific reasons or explanations were accompanying the decision with its main criticisms. In his opinion, the remarks were very indefinite and vague. They did not even contain the concrete figures or rationales behind the decision.

Having no other choice but to comply with the decision and make the necessary changes if wishing to get accredited, the College faced the difficult task of having to cut on one of its study programs (as it was not specified which particular one). Building upon the initial heavy resistance of many employees to the whole accreditation agenda, an even greater commotion was caused by the necessity to eradicate one of the programs and so deprive many teachers of their primary and sometimes only positions. A difficult decision was made to leave *confectionery artistry* out of the then program offerings, due to the relatively smaller interest of prospective students into this program. Responsible teachers were given other 'compensatory' courses to teach within the scope of their professional fields and areas of expertise.

Other deficiencies and imperfections also had to be ironed out, and all that was conducted through close cooperation and guidance of the Accreditation Commission. Additional space was rented and contracts signed, enrolment figures decreased, and additional teaching staff hired.

Despite inconveniencies, all those were pretty benign requests for changes, according to my interviewee.

One of the commonplace obstacles and challenges in preparing accreditation documentation and carrying out a self-study was lack of teaching facilities and technical capacities- primarily due to scarce budget allocations and state allowances for institutional improvement and development. Other difficulties were related to insufficient teaching staff and teacher-per-student ratio. Furthermore, the general impression of the staff at the College of Hotel Management was that some of the standards were not clear enough, or at least they found them very difficult to understand. Problems related to interpreting accreditation standards have, thus, been repeatedly mentioned by higher education institutions that passed through the accreditation process. Questions were obviously arising along the way and calling for continuous refinement and clarification of standards by the Commission.

Another observation and opinion of my interviewee referred to the very nature of accreditation standards in general. He expressed his personal belief that they do not truly measure quality of educational institutions and programs, as it is impossible to encompass and assess all relevant parameters for quality and compare them against some set criteria. In his opinion, it is mainly the quantifiable ones that are in the focus of attention. They are, at the same time, the only ones that are possible to measure.

Serving also an important role in the National Council for Higher Education, my respondent was quite informed of some little known deficiencies of the Accreditation Commission which he wished to draw attention to. Namely, it is the lack of experts in some professional fields which are perhaps underrepresented in Serbia. My interviewee's assumption, relying on his private sources, was that the appointed reviewers for the College of Hotel Management were not quite from the domain of hotel and restaurant management, gastronomy, or confectionery artistry, but from a much wider field. He raised the question of adequacy and depth of analysis if reviewers are not strictly from the respective field of expertise. Trying to stay away from too harsh criticism, he also emphasized how little time the Commission had to launch the whole accreditation agenda compared to the vast amount of documents and self-study reports they were literally snowed under with.

In conclusion, Đ.Č. wished to stress the positive aspects of reforms in line with Bologna recommendations and "zero" accreditation framework. After making the necessary changes and having received the affirmative decision of accreditation, The College of Hotel Management has continued to adjust and fine-tune its processes against the Bologna related dimensions, trying to find the best fit for its students and study fields. The ECTS methodology has been implemented as part of accreditation requirements and is going well for now. The three-year study programs were

introduced even before accreditation, but the interviewee believes that the extent to which all accreditation standards will be truly respected and implemented largely depends on the particular national system in question and mentality of people involved in the process.

Sitting at the same time on the National Council for Higher education, my respondent expressed his personal views on the whole accreditation agenda of postsecondary vocational schools in Serbia. The National Council has been dealing with complaints of institutions that did not get accredited by the Commission and giving them directions on what to do in order to eventually get accredited. In that regard, the Accreditation Commission was perceived by schools as a very strict and rigid decision-making body, while the National Council has been typically viewed as slightly more lenient, focusing more on necessary quality improvements to pass the threshold requirements. However, this claim should be taken very cautiously, as it is, after all, just a personal opinion and observation of my interviewee. According to him, the evident focus of accreditation was on the number and qualifications of teaching staff, teaching curricula, and space and technical capacities. Inadequate qualifications of some teachers and/or professors are frequently observable in self-study reports and that is something that needs to be seriously dealt with. When asked to compare public and private institutions with respect to quality dimensions and accreditation standards, Đ.Č. said that private schools have the advantage of much better space and technical capacities and teaching equipment. In his opinion, the quality of teaching staff is usually pretty much equal to that of public schools', since before the introduction of accreditation standards many times same teachers would circulate between public and private institutions. For this reason, my interviewee holds that the main rationale behind the whole accreditation scheme was the wish to get integrated into the wider European academic context and finally start building a quality culture in Serbian higher education, rather than an all-encompassing clean-out time for private schools, as believed by many. Accreditation standards will prove beneficial in that respect as they will introduce a sort of detailed inventory of all institutions of higher education together with their teachers and professors, enlisting their professional backgrounds, complete lists of qualifications, place and type of employment, and affiliations.

My respondent wished to end on a positive note, stressing the amount of work on an enormous project of establishing the whole accreditation framework in Serbian higher education. When all circumstances are considered, and especially given the fact that this has been really only a pioneer attempt- certain imperfections and shortcomings are quite normal and expected.

## Case Study 5

*Interview with V.V. from the Accreditation Commission. Interviewee was chosen as a representative of the responsible accrediting body to talk about accreditation agenda/process from a supra-institutional level. Main findings are related to: rationale behind accreditation initiative, summary of results and outcomes, nature of standards, biggest challenges and problems encountered in the first cycle of accreditation. Generally positive attitude expressed in the interview. March 4, 2008. Palace of Federation, Belgrade, Serbia.*

Interview with V.V. was especially informative and invaluable in providing a better insight into the way the Accreditation Commission operates and coordinates the whole process. V.V. readily accepted to talk about all issues connected with standards, review procedure, experiences with institutions, as well as outcomes and possible implications of accreditation.

In the course of almost two hours, my interviewee explains that there are currently around 400 experts engaged by the Commission in the process of reviewing accreditation documents and self-study reports, but admits that some disciplinary fields are still, unfortunately, underrepresented. By and large, these 400 experts are the main support and assistants to 15 members of the Commission who rely mainly on the reviewers' assessments of documentation and self-study reports. To facilitate efficient and effective work of reviewers, special attention is paid to continuous coaching and training into the appropriate assessment methodology based on standards set by the National Council for Higher Education and proposed by the Commission. Three large groups of standards are used in practice: Standards for accreditation of higher education institutions, Standards for accreditation of study programs of the first and second tier, and Standards for accreditation of doctoral studies<sup>16</sup>. The so-called "zero accreditation" is mandatory for all higher education institutions by Law on Higher Education as of August/September 2005. Postsecondary vocational schools represent a smaller portion of higher education and were chosen to be first to go through the whole process, hence the reason why so many complained to have been "the guinea pigs of an inquisition-like process" (author's remark based on quite a few respondents' comments)

Postsecondary vocational schools were scheduled to get examined and accredited by September 2007, while the next row of accreditation, comprising all faculties and universities, is currently in process and can be subdivided into five cycles. Accreditation in the sense of continuous quality control mechanism is supposed to repeat every three years and rely more on self-evaluation in the future. V.V. also mentioned the close cooperation of the Commission with other European

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<sup>16</sup> See translated versions of official documents in Appendix



accreditation agencies and commissions, the purpose of which is the exchange of experiences and implementation of good practices in Serbia. While other European countries now put a much higher emphasis on self-evaluation as method of continuous quality assessment and control, in Serbian context this is still not applicable. Since objectivity and accountability are at stake, some mechanisms need yet to be established and the quality culture adequately developed for European trends to be implemented in Serbia. My interviewee summarizes this point by reflecting upon the concept of knowledge as a commodity on the knowledge market. Though very popular and much exploited, this concept should be taken very cautiously and with certain constraints. Since knowledge is a matter of public interest and there are many stakeholders in higher education, institutions responsible for producing and disseminating knowledge can by no means be freely regulated by the market.

Getting down to the main research question, my respondent continued to speak about the quantifiable results of accreditation in the form of concrete assessment figures or grades given upon reviewing documentation submitted by institutions. These grades, in her opinion, could be used as good starting points for some potential attempt of ranking higher education institutions in the future. And although that does not fall under the mandate of the current assembly of Commission, that is definitely a possibility and perhaps interesting idea for future actions and developments (food for thought).

When asked about the extent to which current accreditation standards truly ascertain the quality of institutions and study programs, V.V. sounded quite confident that the concept of quality has been pretty successfully decomposed into a number of standards, in particular those related to teaching staff, space and technical capacities, students, and study programs. According to her, all these input parameters are typically easily observable, either from accreditation documentation and self-study reports or external visits to institutions. The interviewee admits that Serbian higher education still needs to work on developing benchmark statements and that learning outcomes, although defined, are very difficult to measure. The amount and quality of knowledge i.e. skills and competencies that students gain at particular institutions are output dimensions that are for the moment impossible to assess. In my interviewee's opinion, that is something that labor market will have to assess the true value of. In time, with steady economic development and progress, we can expect the market to balance out the supply- demand ratio and thus ascertain the quality of study programs and schools from which the best graduates are coming.

The Accreditation Commission was not even trying to perform a statistical analysis of public and private postsecondary vocational schools, although such comparison could be interesting in terms of conclusions. My respondent emphasized that the Commission treated all institutions

absolutely equally, wishing to prevent any bias judgments, and so the adjectives “public” or “private” have received no prominence in their so-far analysis of outcomes.

Continuing to talk about various challenges and problems that have been encountered in the course of this initial accreditation, the interviewee underscored the problem of financing that occasionally obstructs or at least impedes the Commission’s work. She realizes that budgeting issues are quite expected and, unfortunately, common in the present-day Serbia, but it is extremely difficult to organize staff trainings, run copies of materials, or arrange travels for external review teams without sufficient monetary funds. When asked about the reasons why there is no official web-site of the Accreditation Commission, she replied by again invoking financial difficulties. The Commission is very welcome to share the same web space with the Ministry of Education<sup>17</sup>, but the procedure for putting up notifications and updating information is often quite tedious and lengthy. The Accreditation Commission does have the intention of having its own official presentation on the world- wide web, but such a project will have to wait a while. The transparency issue seems to be slightly problematic with these technicalities, so to say, but that was the explanation given why some of the information has not been made available to the public.

The problem of office space has only recently been solved but was otherwise quite a hindering factor during the first cycle when it was necessary to provide constant support-lines to institutions.

Time lines that were set prior to the beginning of accreditation were quite difficult to stick to. The number of higher education institutions and study programs is extremely big and the reviewers needed to carefully examine all the documentation and reports. Even the standards were developed and established in a very short amount of time, not to mention that they were announced to postsecondary vocational schools on a very short notice, when the institutions only had a couple of months to collect all that was required to apply for accreditation. Speaking of paperwork, the Commission experienced difficulties with keeping it stored in one place as it did not even have its offices during the first cycle. The whole procedure is now simplified with introducing the possibility of submitting the documentation in electronic format, but certain difficulties will always arise. Those are all beginners’ problems, according to V.V., but pragmatic solutions to them will be found along the way.

The interviewee rates the existing standards as extremely good and backs that statement saying that they were defined after cross-comparison and detailed analysis of European, American, and standards of neighboring countries. Naturally, some modifications and fine-tuning will have to

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<sup>17</sup> Official web- site of the Ministry of Education, available at: <http://www.mps.sr.gov.yu/>

happen, but that is a normal life-path (development path) for a process that has only recently come into existence. Once this first accreditation or “zero accreditation” has been completed, renewals will be required every 3 years and self-evaluation will increasingly become a primary method of quality assessment and control. In the future, operating licenses for higher education institutions will also be contingent upon satisfactory fulfillment of quality requirements and will be issued exclusively to those institutions that got unconditional accreditation. That will also be one of the positive changes and implications of accreditation.

*Quite contrary to what was heard from M.S., V.V. and Đ.Č., interviews with institutional leaders and/or staff members from those postsecondary vocational schools that did not get accredited in the first-cycle of accreditation unveil totally different perspectives and generally negative experiences.*

*People from several non-accredited institutions, who agreed to share their stories, have all voiced their frustration, dissatisfaction and anger towards the work of the Accreditation Commission and/or the National Council and quite openly presented all the remarks and critiques they received in the form of official correspondence with the Accreditation Commission and the National Council to support their standpoints.*

#### *Case Study 6*

*Interview with D.J., School Secretary at the Academy for Aesthetics and Cosmetics, Belgrade. Interviewee was chosen as a school secretary and coordinator in preparation for accreditation at school that did not get accredited. Main findings are related to: procedure for issuing operating licenses as opposed to accreditation standards, biggest challenges and obstacles while preparing for accreditation, shortcomings in the work of accrediting bodies, etc. Generally negative attitude expressed in the interview. March 7, 2008. Academy for Aesthetics and Cosmetics, Novi Beograd, Serbia.*

After a very warm welcome at the Academy for Aesthetics and Cosmetics where D.J. is employed in the position of a school secretary, an hour long conversation with her was only a prelude to a number of strikingly unexpected and interesting facts that shed a completely new light on the nature and manner in which the process of accreditation was conducted, thus taking my research into a totally different and yet unknown direction.

The Academy for Aesthetics and Cosmetics in Belgrade is a privately owned postsecondary vocational school that did not get accredited. The school filed an official complaint to the National Council for Higher Education but thus far has not received any notification of a positive decision.

The main argument of my respondent, and the one she opened the interview with, was related to the process of issuing operating licenses (and legalization) of higher education institutions and how it was completely nullified (overpowered) by the subsequent accreditation process. Namely, the Academy for Aesthetics and Cosmetics was granted an operating license in late May of 2006 and the announcement of mandatory accreditation was made in September the same year. That was only the first year of existence for the Academy and the first generation of students was enrolled. The interviewee emphasizes the fact that in order to get an operating license all schools were required to submit complete documentation stating and explaining their mission, vision, goals, justifying the need for opening, enclosing full reports on study programs, curricula, teaching, space and technical capacities. In other words, D.J. was trying to make her point by saying that some sort of quality control had already been exercised prior to accreditation as a necessary precondition for getting an operating license, but then the results of accreditation in the form of deferring decisions brought into question the entire system and the way it functions. Without question, process of issuing operating licenses and process of accreditation as attempt to introduce the system of quality control and assurance into Serbian higher education stand in opposition. The big question now, in the interviewee's opinion, is what- if anything- has changed so dramatically in the quality of institutions since the time of applying for license, which was not so long before the process of accreditation (for some institutions these two processes occurred within a single year).

The biggest challenges and obstacles in preparing for accreditation, according to D.J., were standards referring to the number of full-time employed teachers/professors. The greatest illogicality was that the schools were required to present signed contracts for engagement of teaching staff for all years and study programs, regardless of the fact that some schools (like the Academy for Aesthetics and Cosmetics) had only just come into existence and did not even have students in the second and third year at the time. This standard was not seriously considered and treated as worthy of redefining by the Accreditation Commission, as if the intention was to altogether eradicate the emerging private sector at its very beginnings. My interviewee underscores it that the smaller and developing schools were not even given a decent chance to grow and catch up with the old, state-funded schools and faculties. In her opinion, the standards should acknowledge different ranges of institutions based on certain parameters and should be applied accordingly. A similar example was the standard referring to the number of computers that the school must have. The requirement is same for all schools, regardless of the size of the institution in terms of student

numbers, and equals a minimum of twenty computers. D.J. believes that a computer lab with twenty computers cannot be a necessary and sufficient requirement for a school of twenty and, say, five hundred students. The ratio of computers per student should have been set as a standard instead. The alike could be said of the standard referring to the number of titles in the library stock, which is again defined irrespectively of the size of institution.

A big obstacle for the Academy as a new private school which did not even have its first generation of graduates was the standard which required established cooperation and collaboration with another school with a comparable study program(s) from abroad, so that students who wish to continue their studies at a different institution could easily transfer and get recognition of their student records. Despite the fact that meeting this standard again implies at least some years of existence, tradition and reputation- on the basis of which a school could seek partner schools across borders, the Academy eventually managed to overcome this obstacle. The interviewee talks about the lengthy and arduous procedure of exchanging emails, letters and telephone calls, as well as paying official visits to several institutions from France and England, but focuses on the positive side of it all saying that now they have the possibility to refer their students for practice and work at partner institutions abroad.

When asked about the reasons for negative decision upon accreditation request by the Accreditation Commission, D.J. answered that the main remarks were related to the size of teaching staff, but that the feedback they got from the Ministry of Education in the form of an unofficial statement said that the Academy for Aesthetics and Cosmetics will never really be seriously considered for a postsecondary vocational school. The interviewee was quite bitter at that bias remark and added that the communication lines with the Commission while preparing for accreditation did not function so smoothly. As a matter of fact, they had a hard time getting someone answer the telephone and help by giving information or clarifying some standards. The difficulties were numerous, from filling in the forms to the calculations of credits, number of required teachers, classes etc. She further supports her argument by saying that she constantly kept in touch with many other schools and they also had the same doubts and different understandings of standards. D.J. even went to the Ministry in person to talk to someone and get the instructions and explanations of some troublesome (unclear) parts of standards, but without any luck. She did not find anyone to help her. Even after having received the official notification of the deferring decision, my interviewee could not get a timely explanation and assistance on what to do next.

D.J. wished to comment on some irregularities in the work of the Accreditation Commission as well. Despite the fact that the external review team was supposed to appoint the date and time for their visit by calling the institution at least fifteen days prior to their visit, stating the names of

people on the review team, this formal procedure was not fully respected and obeyed. The external review team came on Saturday (which is not a regular working day of the Academy for Aesthetics and Cosmetics), having made an appointment the previous day and staying at the Academy for mere fifteen minutes. The review team consisted of two people only, which was yet another example of non-compliance with procedural regulations. They did not even have time to inspect the Academy's premises on other locations where students' practice is organized. The impression was that the final decision of the Accreditation Commission was made long before the external visit, although by standards of accreditation the external visit with on-site evaluation is an integral part of the process and necessary for reaching the final decision.

My respondent clearly criticizes the ambiguousness of some standards and the procedure which analyzes and rates quality of institutions solely on the basis of what institutions wrote in their self-study reports and enclosed as accreditation documentation. Even if some institutions have behaved dishonestly and clearly gave misleading representations of their programs and capacities, the Commission seems to have been evaluating primarily the quality of written text.

D.J. concludes by criticizing the system in which one minister of education gets replaced by another, and then all of a sudden policy decisions brought during the old minister become questioned and even overruled under the new one. Clearly, the victims are educational institutions which do not have a choice but to be highly flexible and adaptable, fully respecting the legislative and accreditation framework. On the other hand, we have witnessed inconsistencies with regulations on behalf of those who are considered to be the epitomes of standards and who aspire to introduce the culture of quality to Serbian higher education. The highest priority for improvement perhaps lies within the responsible bodies for accreditation, which should first question the quality of their own work and finally start practicing what they preach.

#### *Case Study 7*

*Interview with D.B., Professor at the Higher Vocational School of Fine and Applied Arts in Belgrade and coordinator in preparation process for accreditation. Interviewee was chosen as a representative of a school that initially did not get accredited, but after having lodged an appeal eventually received accreditation. Main findings are related to: biggest challenges and obstacles in the process, shortcomings in the work of accrediting bodies, harmful effects of accreditation for some schools, implementation of Bologna recommendations etc. Generally negative attitude expressed in the interview. March 7, 2008, Higher Vocational School of Fine and Applied Arts, Belgrade, Serbia.*

The choice of this particular school was primarily triggered by the fact that it was the only postsecondary vocational school from the field of fine and applied arts that entered the first-cycle of the accreditation process. Interestingly enough, it is a state-funded school that first received a negative decision, but eventually got accredited after having lodged an official complaint to the National Council for Higher Education. Driven by the main idea of the study, to depict the same process but from several different angles and standpoints, I was determined to find a school which succeeded in reversing the decision of accreditation to its advantage. Hoping to identify and analyze the main remarks by the Accreditation Commission and remedial measures that were taken to achieve accreditation, I managed to arrange an interview with one of the professors and coordinators in the process of preparing for accreditation- D.B., who readily agreed to share his first-hand experiences with me and help me find answers to the posed research questions.

This is one of the two state-funded schools in my research that had received serious criticism by the Commission, but the irony was that all remarks were related to some aspects of school's functioning that basically depended on state funding. According to my interviewee, D.B., it was impossible for school to switch to the system proposed by the Bologna declaration overnight. The school has always been dependent on the state, both financially and in essence- regarding practically all aspects of its existence. If the school ever wanted to announce new openings, it needed to get approval from the state. If the teachers ever wished to design and introduce new and innovative courses, responding to new professional developments and matching diversified student interests, it again needed budgetary allowance and consent from the state i.e. the Ministry of Education. The situation for the School of Fine and Applied Arts has always been quite complex and thus much resembled a vicious circle in the process of accreditation. Namely, on the one hand the school was obviously not meeting some of the standards, while- on the other hand- its hands had been tied and staff members were unable to act in line with quality requirements.

A huge obstacle that is being repeatedly mentioned in interviews is insufficient time for preparation. Another big challenge was to delegate tasks to staff members when a larger part of employees were close to retirement and the rest were extremely young members of teaching staff who have not had much experience, if any at all, in the sort of activities and tasks required for preparation. Even some standards related to space capacities were different for the school (min. 5 square meters were required per each student, as opposed to 4 sq m. for other fields), given that it belongs to a specific field. My interviewee wishes to underline that no transitional period or period of adjustment to the Bologna model was considered at all. The Accreditation Commission (and the National Council for Higher Education) obviously had set a goal to transform the higher education

system in line with Bologna recommendations as soon as possible, but had not realized all the potential problems beforehand. D.B. goes on to support his view by saying that the standards were not clear and explicit enough. It was not obvious from them whether the Commission required that educational institutions align themselves immediately with standards (especially referring to the ratio of existing students and capacities) or perhaps if they apply only to the coming generations that will be following the reformed study programs and teaching methodology. The differences are huge in terms of expectations and feasibility of transformations in such a short period of time, particularly if you depend on someone else when it comes to crucial strategic decisions and actions.

The main remarks and reasons why the schools did not get accredited in the beginning were related to insufficient teaching staff, lack of librarian, insufficient teaching space per student and inadequate name of one study program (i.e. not in accordance with the prescribed educational profiles and qualification framework for this kind of school). The whole illogicality of this criticism, as seen through the eyes of my interviewee and his colleagues, lies in the fact that all these remarks were closely connected with funding and absolutely not in the power of the school director or teaching and administrative staff. Many times before the accreditation process the school applied for additional funding, proposing new courses and clearly stating the need for a certain profile of employees, but did not receive any positive feedback from the Ministry. The Ministry was even trying to convince them that they should only realistically describe the school, its capacities and programs, and that the Commission will surely have sufficient understanding for the situation as such, given that it is a state-funded school and the conditions are very well known.

However, the Postsecondary Vocational School of Fine and Applied Arts was analyzed irrespective of its mode of funding and it seems that the Accreditation Commission expected the school to have fully implemented the standards, taking no consideration for the means and methods to achieve this.

Some remarks were easily curable, but others required drastic changes at the expense of financial standing of the school. To be more explicit, the school appointed a librarian by means of inner staff allocation (as it was not granted additional money by the Ministry), changed the name of one of its study programs, and had to seriously cut on the number of students to be enrolled in order to meet the standard related to space capacities. Since there was no other way that the school could possibly expand its premises, the suggested corrective measure by the Accreditation Commission was to significantly reduce enrolment figures for all three study programs. The final outcome in the form of positive decision was seemingly pleasing, but on the other side totally disastrous for the future of school and its employees. The main reason for this was that the positive decision came only after the school got an initial deferment of accreditation and the penalty was to stop enrolment



for the coming academic year. Since the formal procedure of filing a complaint to the National Council of Higher Education was extremely long, the school entered the 2007/2008 academic year without any new students. When positive decision was ultimately received in November 2007, it was already too late for enrolment and the school had already suffered immensely in terms of financial losses and negative marketing i.e. bad reputation resulting from the initial unfavorable decision. Ever since the deferment of accreditation, the school has been struggling to survive, or as the interviewee put it- “in the state of hibernation”.

When trying to compare the nature and effects of “warning status” and “rejection of accreditation” as two different kinds of unfavorable decision by the Commission, D.B. says that they are totally different, particularly with respect to their consequences. However similar they may seem at first, in the sense that both decisions imply some sort of negative decision or negative result, to receive a *warning notification* is pretty benign as opposed to the *deferment of accreditation* which is absolutely harmful for the institution. Even more specifically, when an institution receives a warning notification, it is suggested certain remedial measures that should be taken in order to get accredited, but the institution is allowed to enroll students and begin the approaching academic year. On the other hand, if the Accreditation Commission has rejected accreditation to an institution of higher education, that is followed by a very strict penalty of not being allowed to enroll new students but simply continuing to operate under unchanged conditions. In other words, we can only speak of huge disappointment, sudden drop of enthusiasm and morale in regular everyday activities, and unavoidable material consequences. That is exactly why the interviewee and his colleagues argue so fiercely against the inflexibility and rigidity of the Accreditation Commission in setting up standards which are not sensitive enough and do not differentiate between different kinds of institutions in terms of age, size, funding difficulties, peculiarities of professional field etc.

“*The trouble is that schools cannot survive with three students only*”, as D.B. said. According to him, rejection of accreditation is an implicit way of saying that an institution is left to slowly die out. Nobody is closing down schools, but if you are not allowed to enroll students, you simply do not have enough material funds to cover all expenses, including teacher salaries. The School of Fine and Applied Arts has had a serious problem with heating its classrooms this past winter. Even after lodging an official complaint, making the necessary changes, and eventually receiving the positive decision of accreditation, administration and staff members are still very disappointed with the outcomes of it all. They have been forced to drastically cut on the number of students and so now they will be allowed to enroll only 15 students per study program, which means either 30 new students (as they currently have two accredited study programs) or at best 45

new students (which is possible only with the accreditation of the third program, the name and concept of which they had to change), so they have to comply with the final decision of the Commission and National Council and act accordingly.

My interviewee's main criticisms and remarks on the whole procedure and work of the responsible bodies refer to the lack of time, inadequate preparation of schools and staff for the process of accreditation, and insufficient instructions and support along the way. He particularly highlights the fact that teachers of their school are all artists, painters, and all of them are masters in their own professional fields and areas, but they do not possess the sufficient degree of skill and knowledge for writing extensive reports and completing tons of paperwork. From the perspective of D.B., the Bologna model is nothing but crude and cruel administration in this regard. The whole idea of introducing a culture of quality and a system that will be continuously evaluated and monitored for quality assurance is undoubtedly a fantastic thing, but at this moment it is all very confusing and problematic. He holds it that postsecondary vocational schools were not sufficiently prepared and instructed for the process. There were some meetings and conferences for school representatives, but hardly any serious training, workshops and instructional seminars. The respondent also recalls how they were told that standards are nothing to be afraid of- as they are not something that is carved in stone. The schools entered the whole process believing that all they have to do is realistically present their educational institutions and then they will be guided through the process of quality improvement as the main purpose of the whole accreditation agenda. But it all turned out to be quite different from expectations, in my respondent's opinion.

My interviewee wrapped up on a positive note, though. He wished to comment a little on the reformed study programs, introduction of credit system and continuous assessment, and utilization of modern teaching methodology to facilitate better learning outcomes. Namely, he sees all these innovations as extremely beneficial in the sense that they will result in a more systematic and carefully planned succession of classes that benefits both teachers and students. We finally know precisely the "who", "what", "where", "how", and "why" for all teaching and non-teaching activities in our school with this new way of keeping records and documentation. Even before the announcement of mandatory accreditation we were practicing in our school some aspects of the Bologna model. Given the nature of our educational profile, we have long ago chosen to continuously evaluate the success of our students. The only difference is that now, after the implementation of accreditation standards, all processes have become clearly defined and much more synchronized. In short, we expect our future students to be the best judges of the true quality of reforms in accordance with accreditation standards.

This was how D.B. commented on his experience and impressions of the accreditation process at the Postsecondary Vocational School of Fine and Applied Arts, the name of which has now been changed into the Higher Vocational School of Fine and Applied Arts. Despite the name, which is a clear indicator that the school has proven to have harmonized its structure and activities with the set standards, there are no enrolled students in the current academic year. Hopefully, the School of Fine and Applied Arts will manage to survive economically against all odds, and grow and develop in the coming period to compensate for incurred losses.

#### *Case Study 8*

*Interview with S.I., General Manager at the Football Academy in Belgrade. Interviewee was chosen as a case of a school that did not get accredited, and is currently still in the appeals process. Main findings are related to: reasons for not getting accredited, summary of formal correspondence with accrediting bodies, problem of impartiality of accrediting bodies, harmful effects of accreditation for private schools etc. Generally negative attitude expressed in the interview. March 7, 2008. Football Academy, Belgrade, Serbia.*

Of all contacted potential interviewees, S.I. was among the few ones who most willingly agreed to discuss matters related to accreditation. He even surpassed my expectations in terms of his readiness to cooperate by providing as much information as possible, exemplified by written correspondence between him, on behalf of the Football Academy, and the Accreditation Commission and National Council. S.I. was genuinely surprised and pleased with the idea that research has been carried out with accreditation process in the focus of attention and that finally the various different stakeholders in higher education will have a chance to voice their opinions and provide invaluable feedback for future improvements and developments in the HE domain.

The Football Academy has not changed its name after the accreditation and has remained a postsecondary vocational school since. The interviewee disappointedly explains how the whole process of preparing for accreditation went, how they were notified of the rejection of accreditation, how the external review looked, and how the Academy entered the long and ongoing process of complaining to the National Council against the negative decision.

At the mere mentioning of the word process, my respondent expressed his view on the whole concept of accreditation and the way it was realized in practice. Above all else, accreditation process should imply duration and continuous efforts on improving the HE quality. It is also very important to bear in mind that the coin always has two sides; or, in other words, that there are two

parties that should be given equal weight and opportunity to contribute in shaping and modeling the ever-growing and changing higher education arena.

S.I. particularly wished to underscore the differences between young and old educational institutions, the clear and visible distinction that in the case of Serbia for the most part coincides with the “private-public” distinction and to which the decision-makers in higher education seem not to be giving due attention. The interviewee believes that this difference is only considered (and in that case even unjustly used as the basis of prejudice) when making wrong generalizations about the alleged poor quality of private providers. He strongly argues that the quality of private institutions in terms of technical capacities (equipment and other teaching facilities) is in most cases only better at private institutions, and as for teaching staff- those are usually all people who were educated and often even worked at state schools and universities, so the quality of teaching cannot and should not be disputed. In the opinion of my respondent, state schools, faculties and universities have a secure, protected status and therefore feel that they do not need to fight to attract students. He further adds that exactly the results of this accreditation process have proven his claim. My interviewee urged me to take a closer look at statistical data, although the representative of the Accreditation Commission, whom I had previously interviewed, refused to comment on accreditation results with reference to public-private distinction. S.I. strongly argues that it is no coincidence that 99% of private schools did not get accredited after the results of the first cycle have been announced, and that those public schools that did not exhibit absolute compliance with the standards were at best given a *warning notification*, as opposed to the *rejection of accreditation* which was a sanction for private institutions. With such discriminating treatment, policy makers have clearly shown their intention to significantly diminish the private sector and re-assume control or monopoly over the higher education market in Serbia. That way, with the private sector being almost decapitated, large numbers of students will simply flee from private to public schools, which will then be rubbing their hands in self-satisfaction and counting additional enrolment influx. That was my interviewee’s opinion and comments on the outcomes of the first accreditation in Serbian higher education, but at the same time a quite sharp criticism and accusation of the rationales behind the accreditation agenda.

The interviewee also readily answered my questions regarding the problems and obstacles that occurred during the process, but they mostly referred to the deficiencies and incorrectness in the work of the Accreditation Commission. He complains about the fact that the external review team did not call to inform them of their visit at all, and when they came, external evaluation took only a very short time. The procedure was not carried out in accordance with regulations. One of the critiques refers to the lack of transparency in the whole process of accreditation: “If the expert

reviewers had been given clear written instructions and guidelines on how to review and rate schools' documentation and self-study reports, then why were they not made public, so that the schools could also get acquainted with the exact procedure and expectations?" As for the results and decisions of the Accreditation Commission and National Council for Higher Education, the question is why they were not publicized on the web page of the Ministry (as the Commission does not have its own site) so that everyone can access such information, instead of hearing the news through the grapevine. The interviewee also mentioned the problem of accreditation fee, which public schools were exempted from paying, while private schools had to pay incredibly large sums contingent upon the number of study programs they submit accreditation requests for.

The main remarks of the Accreditation Commission enlisted in their official decision of the rejection of accreditation were related to the insufficient teaching staff, inadequate name of study program, student group sizes and insufficient library stock.

My interviewee also quite strongly criticized the non-transparency and secretive nature of the whole process of accreditation e.g. anonymity of expert reviewers, unknown instructions and guidelines for reviewing and rating accreditation documents, inside information sharing etc.

#### *Case Study 9*

*Interview with L.L., Professor at the Sports Academy in Belgrade. Interviewee was chosen as a representative of a school that did not get accredited, and is currently still in the appeals process. Main findings are related to: attitude of policy makers towards private sector, unfair treatment of postsecondary vocational schools when compared to faculties and universities, harmful effects of accreditation for private schools, transparency issues etc. Generally negative attitude expressed in the interview. March 7, 2008. Sports Academy. Belgrade, Serbia.*

A very similar account of the accreditation process was documented in an interview with L.L., the founder of the Sports Academy in Belgrade. This is yet another example of a private postsecondary vocational school that did not get accredited. They have lodged an official complaint against the decision of the Accreditation Commission and the National Council has declared the former decision void, returning the subject again to the Commission and requesting repetition of the procedure. Since then, they have not received any information on the status of their request. They were not allowed to enroll any new students and are currently trying to survive with the bear minimum of their expenses.

The interviewee was extremely bitter when expressing his views and impressions of the accreditation process. He points out that faculties and universities have been given the period of almost three years to prepare for accreditation, whereas postsecondary vocational schools had only two months for that, without much prior knowledge and with no experience in the area of self-evaluation, quality assessment and quality control whatsoever.

In my respondent's view, the state should help the private sector and by doing so facilitate competition between public and private institutions, and all that for the purpose of raising the general quality bar in higher education. He sees accreditation as a legalized and formalized way to completely eradicate the private sector. Masked under the policy-makers' agenda to finalize the reforms of Serbian higher education in accordance with the signed Bologna declaration, the accreditation process has been corrupted with the actual intention to destroy competition of educational institutions and re-establish monopoly of the state over higher education. What is more, as L.L. sees it, the whole process of accreditation has turned and completely twisted the question of quality into quantity, i.e. pure counting and checking how many of particular items you have.

The interviewee concludes by handing me a copy of his official letter of complaint to the President of Serbia, Mr. Boris Tadić, the one which contains all of his remarks and critiques of the accreditation procedure. A summary of that will be integrated into the presentation and analysis of most frequently mentioned problems, reasons for not getting accredited, and responses by individual institutions used as bases for complaints.

His final comments were related to the supposed non-transparency and non-legitimacy of the process. Thus, my respondent supports this allegation by drawing attention to the fact that teachers and professors employed at state universities make up vast majorities in both the National Council and the Accreditation Commission, while European and world-wide practice teach us that accreditation agencies should be non-governmental and non-political bodies/entities.

His experience with the recently finished first cycle of accreditation, and the one that is very similar to what was heard in interviews with other institutions- public and private alike, is that accreditation has proven to be nothing but a very cruel, bureaucratic procedure.

*Clearly, these have all been English translations of original transcripts in Serbian and that should be taken into consideration when analyzing and recapitulating what the main findings are. It is also important to emphasize that the author of this paper/scientific study remains substantially detached from the object(s) of study and does not sympathize with any of the beliefs and viewpoints expressed in the research part. In an attempt to provide an impersonal account of the accreditation process observed from several different angles/perspectives, individual viewpoints have been*

*rendered as authentically as possible. Therefore, all statements in the form of direct and reported speech should be considered as pure research findings and nothing but mere interpretations of comments made in interviews.*

#### **4.2.2 Analysis of Documents Related to Accreditation Outcomes**

##### *Accreditation as seen from the Perspective of Private Postsecondary Vocational Schools in Letter of Complaint*

Based on the conducted interviews and a copy of an official letter of complaint to the National Council for Higher Education (provided by D.J., personal communication, March 7, 2008), co-signed by those postsecondary vocational schools that did not get accredited, what follows is a summary of problems and main areas of disagreement and conflict between the schools and the Accreditation Commission as the responsible body.

It has been said in the opening part of the letter that all schools are uniform in their generally affirmative and supportive attitude to the accreditation agenda, that they have accepted it as a necessary continuous method of quality improvement and one of the prerequisites for the desired integration into the wider European educational context.

Despite the disorganized and chaotic context, which is how they have perceived cooperation and support provided by the Accreditation Commission, the schools have clearly shown interest and goodwill to overcome technical difficulties in preparing materials and adjusting to the changing deadlines. All private schools have also accepted and paid the incredibly high fees for accreditation of study programs and educational institutions.

Quite shockingly, of 27 schools that did not get accredited after the first announcement of decisions, the majority are those that had been given operating license relatively a short while before the accreditation process was started. This is, at the same time, one of the very important arguments of the postsecondary vocational schools; wishing to raise the question of evident discrepancy and incompatibility of standards and requirements for issuing and granting operating licenses in line with the new Law on Higher Education and standards and requirements for getting accredited- in cases of some schools these two processes with their final decisions happened within just a single year. The official procedure for getting an operating license required that an institution applying for a license submit an elaborate report on the basis of which quality of the respective institution was rated and granted permission to operate, provided that it met certain standards, of course. Some of the dimensions that were analyzed included: the justification for opening a

particular institution of higher education, quality of (three-year) study programs, technical, space, staff/teaching capacities etc. A logical question that the schools that did not get accredited now raise is: *What could have changed so dramatically/drastically in such a short period of time i.e. after institutions had been granted operating licenses to negatively affect accreditation outcomes?*

The schools even enclosed statistical data on the first announced outcomes of the first cycle of accreditation and they were quite alarming. Interestingly enough, of 33 schools that got accredited immediately, only two schools were private (around 0.6% of the total). However, of the 27 schools that received the deferment decision, only one school was public, or 0.3%. Warning notification was issued to eighteen (18) schools, of which only two are private (1.1%). Obviously, the schools who composed this letter of complaint were trying to imply that the mentioned statistical figures indicate some pretty obvious disparity with respect to accreditation results for public and private schools, which may not be purely coincidental.

One of the main observations and arguments in the letter was that the accreditation process in Serbia has thus far proven to be detrimental rather than favorable for the quality improvement of higher education and faster convergence with the European system of higher education. What the co-signed schools particularly emphasized is the Law on Higher Education, which has been clearly violated in several places. First of all, accreditation outcomes seem to be in serious opposition with the prevailing spirit of the Law, which is striving to channel all HE reforms towards the European context, instead of imposing rigorous sanctions and closing down schools.

Other violations of the Law mentioned in the letter refer to the structure and work of the Accreditation Commission. The regulations are such that the accreditation body should be a totally independent entity appointing experts from different professional and academic fields who are not employed in any of the state organs, political parties, or non-governmental institutions that is in any way connected with higher education. By appointing some members of the Accreditation Commission against the mentioned regulations, not only that the Law on Higher Education has been violated but also the impartiality and objectivity of the process have been severely endangered. Problems resulting from conflicting interests and misuse of position have thus come into the foreground.

In the continuation of the text, the schools fiercely protested against the first public announcement of accreditation outcomes, as of May 3, 2007, at a press conference, without any prior notification of the results given to schools, not waiting for the legitimate period for official complaints to be over, and for the final decisions to be brought by the National Council for Higher Education.



What is more, the lawfully binding framework for accreditation was disobeyed even with respect to the set calendar. Deadlines for the Commission and National Council were broken and extended on several occasions which consequently affected schools in leaving them with insufficient time for adaptations and implementation of standards. It has also been extremely challenging to act in line with some last minute documents, but the Commission did not really take this into consideration. Some highly relevant decisions and information, absolutely necessary for the process of preparation (such as the *qualification framework*), did not find their way to institutions in a timely fashion, and thus seriously impaired the content of accreditation documentation and reports. Many remarks of the Commission and reasons why some institutions did not get accredited rested largely on incompatibility with the documents issued and publicized long after the specified date for submission of accreditation materials.

Given such hasty manner in which the whole process was started, postsecondary vocational schools have been unfairly given only 53 days to prepare and compile accreditation documentation, which is truly a too short period for such extensive and comprehensive work. Just for reference, faculties and universities have been given a period of three years for preparation, which is- despite their much bigger size and scope- still quite a disproportion and biased treatment of postsecondary schools.

The problem with a number of inadequately defined i.e. unclear standards which was repeatedly mentioned in interviews with public and private schools alike, has been here described in detail and exemplified by concrete obstacles and challenges that schools had to deal with while preparing accreditation materials. Judging by the findings from interviews and the content of this letter of complaint, it seems to be a commonplace that schools had difficulties in understanding the quantifiable dimension of standards referring to staff capacities. The requirements expressed as percentages and the basis for calculation was perceived quite differently by different schools. Even staff competencies, as defined in accreditation standards, left room for ambiguities and were interpreted by schools to their own advantage.

Another complete subchapter in the letter was devoted to the violation of procedural regulations by the Accreditation Commission and the Ministry of (Higher) Education. The complaints in this domain are mostly connected with the obligation of the Commission to announce the external team review at least fifteen days prior to the visit, which was not always respected. As a matter of fact, in the majority of cases, private schools vigorously complained about not having been informed of the external evaluation in a timely manner or not at all. In some cases, even when the visit was announced, there were notable inconsistencies with the regulations regarding the composition of the external review team. It often happened that members of the team would change

on the day of visit, or that one of the members- typically a representative of the Ministry, would be missing.

The co-signatories of the letter also expressed their general dissatisfaction with the work of the Accreditation Commission in terms of the apparent disregard of the code of conduct. Namely, the unanimous viewpoint of the above mentioned postsecondary vocational schools is that the accreditation process clearly lacks objectivity, professionalism, expertise in some fields, and transparency. The schools generally have a pretty bad impression when it comes to the readiness and willingness of responsible parties to provide information and support throughout the process. They have expressed huge disappointment with the degree and quality of cooperation with the Commission and the Ministry of Education, in terms of availability, approachability, responsiveness and helpfulness.

Knowing that the final decisions have to be officially announced by the National Council for Higher Education, the injured parties fiercely protest against the publicly announced outcomes of accreditation by the Accreditation Commission, which totally ignored the right of non-accredited institutions to appeal and thus resort to a higher authority i.e. the National Council. Only after the completed appeal procedure can the final decision be reached and the accreditation results made public by the National Council. By violating this regulation, the Commission has created serious detriment to a number of schools, both in terms of financial losses and negative advertising in the public eye. Losses incurred in this way are extremely difficult to remedy, especially when speaking of how it all affected the enrolled students and their parents. Atmosphere of discomfort, anxiety and uncertainty had started to spread long before institutions even got a chance to repeat the evaluation process and get second examination of accreditation materials.

As for the official decisions of the Accreditation Commission that were sent in the form of evaluation summary reports, the schools have expressed criticism with respect to the wording and mistakes that they occasionally contained, but above all else- quite confusing observations and remarks, sometimes not even remotely connected with the school in question.

Impartiality and bias attitude of the responsible parties was further exemplified by the alleged permission given to faculties for starting to offer vocational studies and announcing enrolment for academic year 2007/08, prior to the completion of mandatory accreditation. The Ministry for Higher Education has allowed them to submit the respective documentation by the end of year 2007. This has seriously enraged postsecondary vocational schools for they were not permitted to enroll new students under any circumstances had they not got accredited. Besides, such an initiative of expanding the existing capacities of faculties and universities beyond their current program offerings, will inevitably bring about shifts and relocations of students between

institutions, the result of which may be a gradual dying out of postsecondary vocational schools, or today's higher educational institutions of vocational studies.

In the concluding paragraphs of the petition to the Ministry of Higher Education as a superior authority, the co-signatories request the abolishment of initial negative decisions and granting of conditional accreditation and student enrolment for academic year 2007/08. The schools in question also requested the time period for the completion of remedial work and implementation of corrective measures, wishing to thus allude to the quality improvement dimension which should be at the heart of any accreditation agenda.

#### *Accreditation as seen through the Perspective of the National Council for Higher Education*

In the course of research, through one of my interviewees (D.B., personal communication, March 7, 2008), I got hold of a very interesting document providing a summary of activities that the National Council for Higher Education has undertaken by December 2007 in regard with the appeals process of postsecondary vocational schools against the decisions of the Accreditation Commission. The document has been signed by Dr. Srđan Stanković, President of the National Council for Higher Education.

To better understand the procedure, it is important to know that the National Council for Higher Education is a superior authority to the Accreditation Commission, dealing exclusively with official complaints against the final decisions of accreditation and having the power to nullify the results and return subjects to the Commission for repeated evaluation. The Council started its active involvement in the process of accreditation by adopting the sets of standards and procedural rules and regulations proposed by the Accreditation Commission as of October 20, 2006. The Accreditation Commission has been constituted as the working body of the Council and is responsible for accreditation at the first level of decision-making.

After the first announcement of accreditation results, 35 non-accredited postsecondary vocational schools lodged official complaints within the lawfully designated time and the National Council assumed its main role and responsibility. At its 16<sup>th</sup> meeting, in June 2007, the Council adopted its Internal Procedures and Code of Conduct for matters of processing and resolving appeals concerning unfavorable accreditation outcomes for institutions and study programs. A detailed plan of activities was also developed at that meeting, concentrating on efforts to resolve all appeals in the shortest possible time, so as to enable student enrolment in the 2007/08 academic year- for those schools that eventually get positive decisions. In late June 2007, all members of the Accreditation Commission were invited to the 18<sup>th</sup> meeting of the National Council to jointly

discuss the general accreditation principles and reach consensus on further policy measures, necessary for finalizing the first accreditation cycle.

However, communication between the National Council for Higher Education and the Accreditation Commission regarding some crucial questions and problems did not really run smoothly. The Council's standpoint was to admit the noted deficiencies and shortcomings in the process of accreditation and find the best possible solutions to compensate for them. Their concrete suggestions to the Commission were basically to slightly reduce the level of requirements for certain standards by modifying them a little and making them more reasonable and feasible for institutions in the transitional period. They requested that the Accreditation Commission repeats evaluation of some problematic parts of accreditation materials and thus contribute to achieving the primary aim of quality improvement in Serbian higher education. Rather than imposing rigorous sanctions against the schools that did not show absolute compliance with the standards, the Commission (and the National Council) should be providing all the necessary assistance and support to educational institutions and all their constituent entities in processes of quality assurance and improvement. The main areas that required minor adjustments or fine-tuning were related to defining maximum enrolment figures in cases when institutions do not have sufficient space capacities and ascertaining staff competencies on the basis of educational and professional background. Additional clarification of what should present the basis for calculation of the number of full-time teachers was also suggested as one of the necessary improvement areas.

In the process of resolving appeals, each school's official representative was invited to present oral arguments on appeal, lasting not more than 10 minutes per individual case. The final outcome of this hearing was that 5 schools got accredited and 9 schools did not. The remaining 20 appeals were accepted and cases resolved by referring them once again to the Accreditation Commission for additional or re-evaluation. The suggestion given to the Commission was to reconsider the possibility for changing their decisions and turning them into warning notifications where it seems appropriate and justifiable.

Unfortunately, this request was not accepted benevolently by the Accreditation Commission and it did not respond positively to the returned subjects, supporting its firm standpoint by referring to the Law on Higher Education, and even more specifically to the part which defines and explains the procedure for initiating accreditation. However, the National Council replied by underscoring that only parts of materials need to be re-read and re-evaluated, instead of whole materials, and so it would have nothing to do with initiating the process from the beginning. The Commission has already accepted to do the same thing for schools that received a warning notification with specific

aspects of their structure of programs to change and improve and re-submit accreditation materials for further reading and evaluation.

Despite the efforts of the National Council to find a compromising solution for schools in the appeals process, consensus has not been reached. The Accreditation Commission's official statement was to deny the right of the National Council to return the materials for repeated evaluation procedure and firmly stick to its original decisions regarding the deferment of accreditation for schools in question.

Driven primarily by the public interest policy, but also striving to efficiently and effectively finalize the appeals process, the National Council has eventually assumed the power to bring decisions independently and irrespective of the opinion of the Accreditation Commission. Acting upon its lawfully assigned role, the Council has positively resolved appeals of 12 institutions and 26 study programs. Fourteen schools and 76 study programs have still remained without accreditation, either because of the necessary reduction in the number of study programs, their poor quality, or simply because some institutions never even filed an official complaint.

These outcomes of the appeals process clearly represent what the cornerstone of the National Council's strategy is. Since the inception phase and the very onset of accreditation agenda in Serbia, all their efforts have been aimed at essential quality improvement in higher education, through continuous communication and cooperation with schools, rather than repressive measures and sanctions leading to the gradual closing down of schools. In that sense, the Accreditation Commission was only impeding the whole procedure and causing delays in the decision-making process. There are ample reasons to cause suspicion that what we have witnessed thus far is some sort of a hidden agenda and a tendency to monopolize the process of accreditation, which is unacceptable from the perspective of the National Council. It is also important to draw attention to the fact that throughout accreditation process, the Commission has not even once consulted the National Council on issues related to standards interpretation and implementation. What is more, despite sending requests on several occasions, the Council has never received a full report or summary of decisions from the Commission, enlisting accredited, non-accredited schools, and those that got a warning notification. It has been extremely difficult for the National Council to get proper insight into the work of the Accreditation Commission, which has become even more complicated over time with the significantly deteriorated interpersonal relationships.

Nevertheless, it is well worth mentioning that the appeals process went smoothly, with no attempts to exert pressure and influence the decisions of the National Council, neither on the side of schools that had appealed, nor coming from the Ministry of Education. As a matter of fact, the National Council wishes to emphasize excellent cooperation and constant assistance of the

Ministry, both in terms of technical and professional support. The Council is also satisfied with the overall demeanor of schools that had appealed and the Conference of School Directors, and grateful to the Conference of (Serbian) Universities (KONUS) for support and help along the way.

### 4.3 Research Findings: Illustrations and Interpretations of Quantitative Accreditation Outcomes

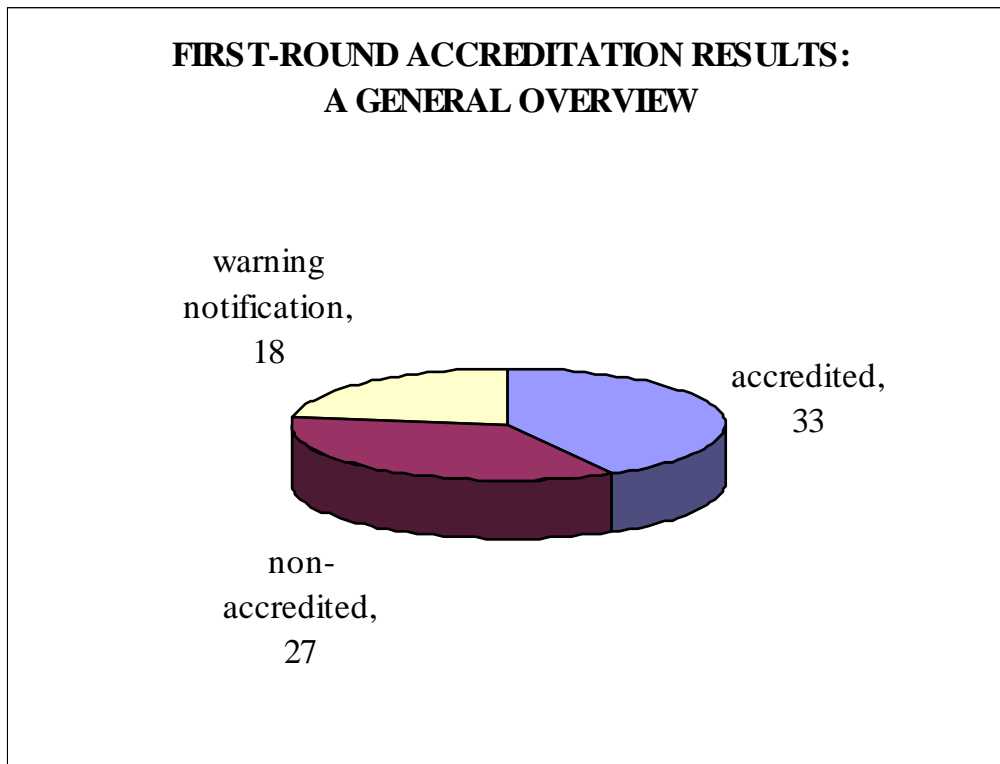


Figure 3

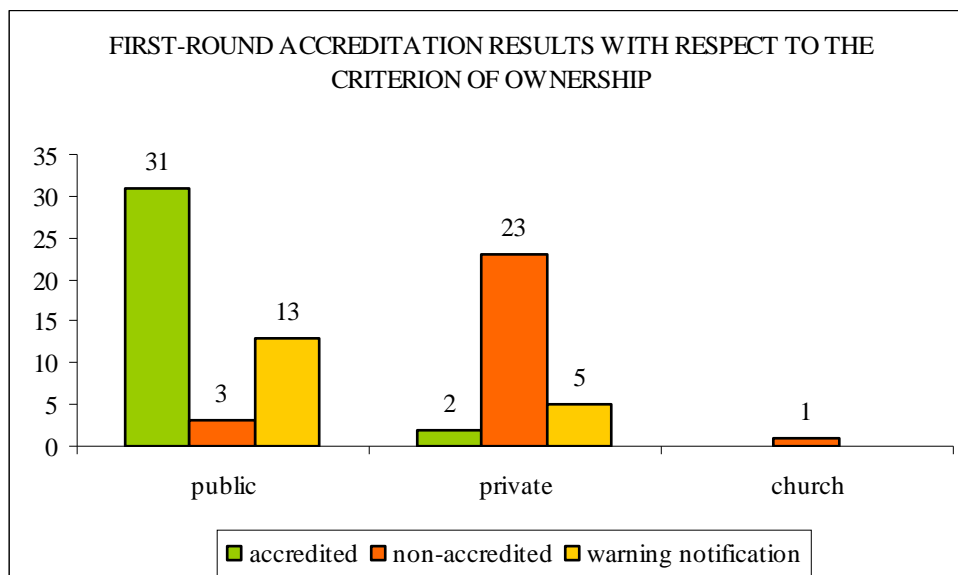
As we can see from the above pie-chart, the total number of postsecondary vocational schools that applied for accreditation was **78**. According to the findings from some Serbian daily papers that have been regularly reporting on the progress of accreditation<sup>18</sup>, there were three schools that had not even entered the process by submitting an application request.

It is important to explain here that accreditation results were announced in stages. Given the fact that the concept of accreditation implies a continuous or ongoing process of quality assurance and quality improvement, it is a logical necessity that periodically we witness a change in the statistical data regarding those schools that had previously been in the process of accreditation and have just received either a positive or a negative decision. To recapitulate, there are three possible outcomes, or three kinds of decisions that institutions get informed of in the form of written notifications. For schools to attain official approval of their existence they need to receive a positive

<sup>18</sup> Online edition of the Serbian daily paper, news posting as of May 3, 2007 by B. Borisavljević

decision on accreditation and then apply again for renewals to receive reaffirmation of accreditation in 3-5 years' time. *Accreditation without conditions* is a clear sign of compliance with the set standards and achieved academic recognition. A *warning notification* or 'warning' status is given to those institutions that do not show full compliance with the set standards and need to make improvements in some aspects of its structure and/or activities. Such institutions are required to undertake remedial measures suggested by the Accreditation Commission and submit a follow-up report on specific issues, which had previously been labeled as problematic, within a period of three months. If proven to have addressed all the formerly observed inconsistencies with quality requirements and made the necessary corrections, schools will eventually get accredited. The third and least desirable outcome is the *deferral of a decision on accreditation*. In other words, if an institution fails to demonstrate compliance with the standards and opinion of the accrediting agency (in this case the Accreditation Commission) is that there is substantive inconsistency and noncompliance with quality criteria and standards, which are beyond minor changes and easy improvements, then the rejection of accreditation is a due sanction.

Looking at *Figure 3*, which represents the outcomes of the very first round of accreditation, announced by the Accreditation Commission, we can see that there were initially **33 schools that got accredited**, while as many as **27 schools that were rejected** and **18 received a warning status**. These results have absolutely shocked the public and caused quite a tumult in higher education.



**Figure 4**

Statistical representations become even more interesting and perhaps controversial when analyzed from the perspective of ownership. Looking at the bar chart in *Figure 4*, we can see that of



the 33 accredited schools, 31 were public or state schools, whereas only 2 private schools got accredited. On the other hand, of the 27 non-accredited or rejected schools, 23 are from the private sector in higher education and only one institution is owned by the Serbian Orthodox Church. The relatively high yellow bar represents the 13 public schools that initially received a warning notification, as opposed to a significantly smaller number of private schools to have been evaluated in such a way.

Several questions could be raised here to provoke discussion: Why were there so many private schools that did not get accredited? Were they really of such poor quality when compared to their public counterparts? How come so many public schools received a warning notification while so many private ones got the deferment decision? Where is the dividing line between issuing a warning notification and rejecting accreditation for an institution? These questions were repeatedly posed in some interviews (e.g. with D.J., S.I., L.L., personal communication, March 2008) in the course of this research, as well as press releases and TV shows ever since the onset of accreditation. However, the answers were found to be pretty different depending on the role in the process and individual perspective.

When all postsecondary schools have been classified based on five broad categories of study fields, this is how their participation looked:

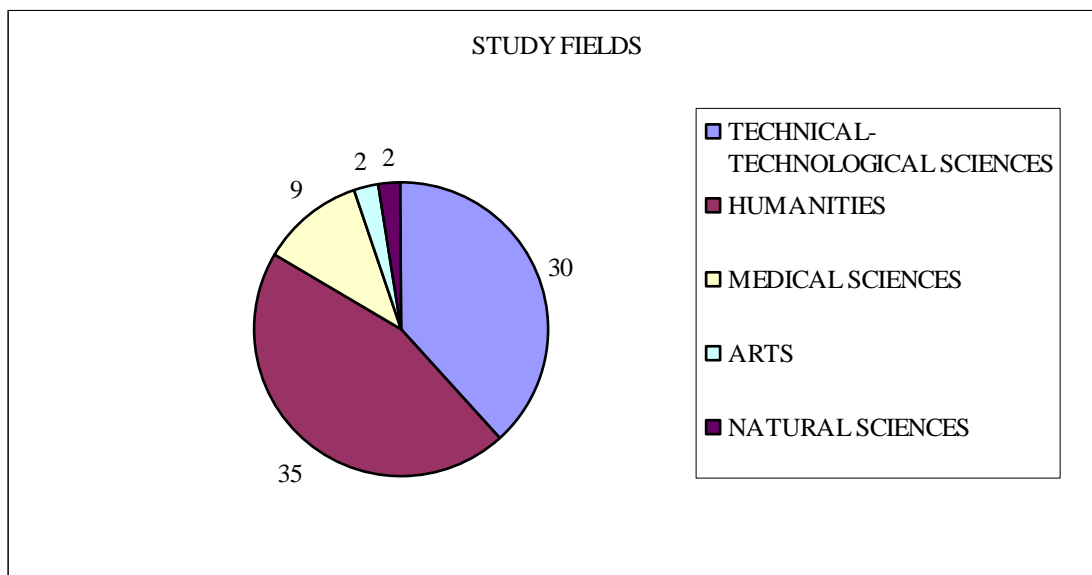


Figure 5

Obviously, the largest number of postsecondary vocational schools is in the field of humanities and technical-technological sciences, with 35 and 30 schools respectively. Nine schools were from the field of medical sciences and only four schools from the field of arts and natural

sciences (two in each group). When wishing to analyze accreditation outcomes with a special focus on study fields, we get the following results:

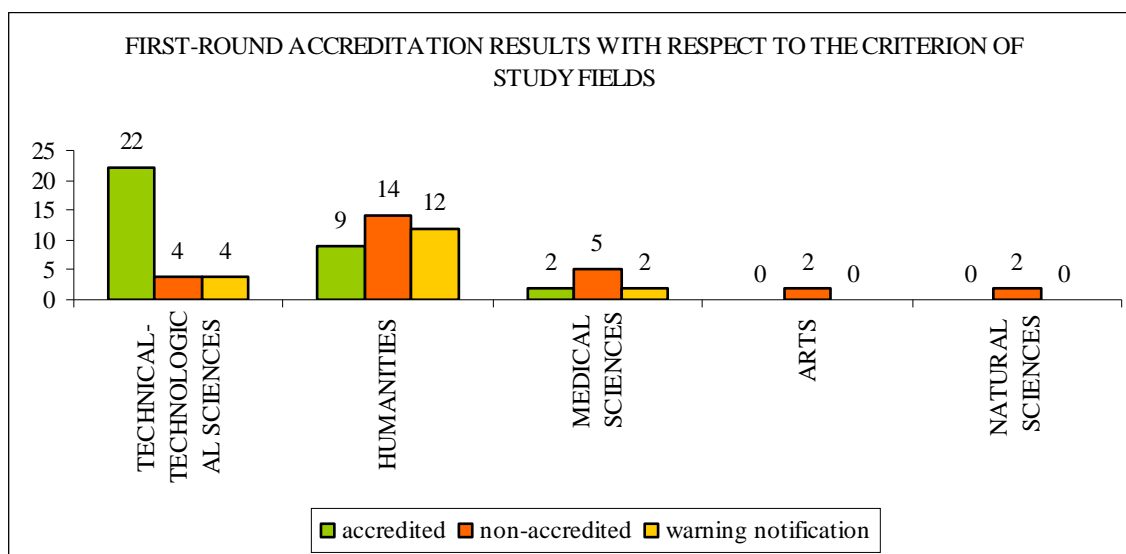
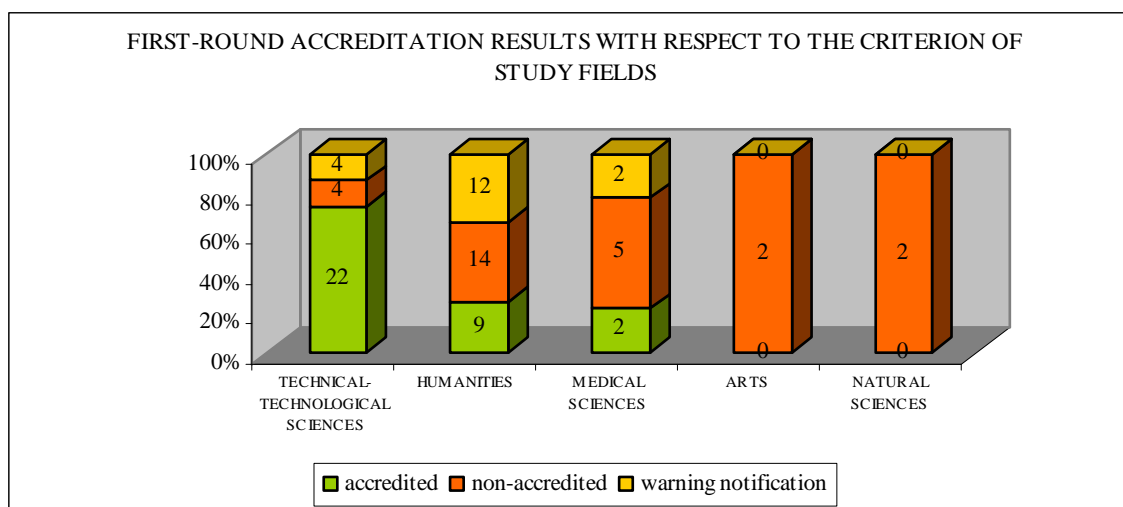


Figure 6

From *Figure 6* it becomes obvious that most successful in terms of accreditation results were schools from the technical-technological field. As many as 22 of those schools got unconditional accreditation, while only 4 earned a warning status and another 4 got rejected. The largest number of non-accredited schools, 14 of them, was from the field of humanities and, according to what President of the Accreditation Commission said in one of his newspaper interviews<sup>19</sup>, the majority of those are from one of the following disciplines: management, entrepreneurship and banking. Besides, the largest number of schools with a warning status was also initially in the field of humanities. Based on such statistics, quite a legitimate question to be raised is whether perhaps some reasons for non-compliance with standards could be traced in the mere nature of study fields and disciplines or if there is no justifiable connection at all. On the other hand, one can witness pretty staggering statistics for arts and humanities, where all schools received the deferment of accreditation. When expressed in percentages, results seem absolutely formidable, but exact numbers show that there were actually only two schools in each group and none of them got accredited. Perhaps the following illustration provides a much better representation of results, in

<sup>19</sup> Taken from an online edition of “Večernje novosti” from May 3, 2007

terms of comparison between exact numbers and percentages of the total number of schools that applied in the respective categories:

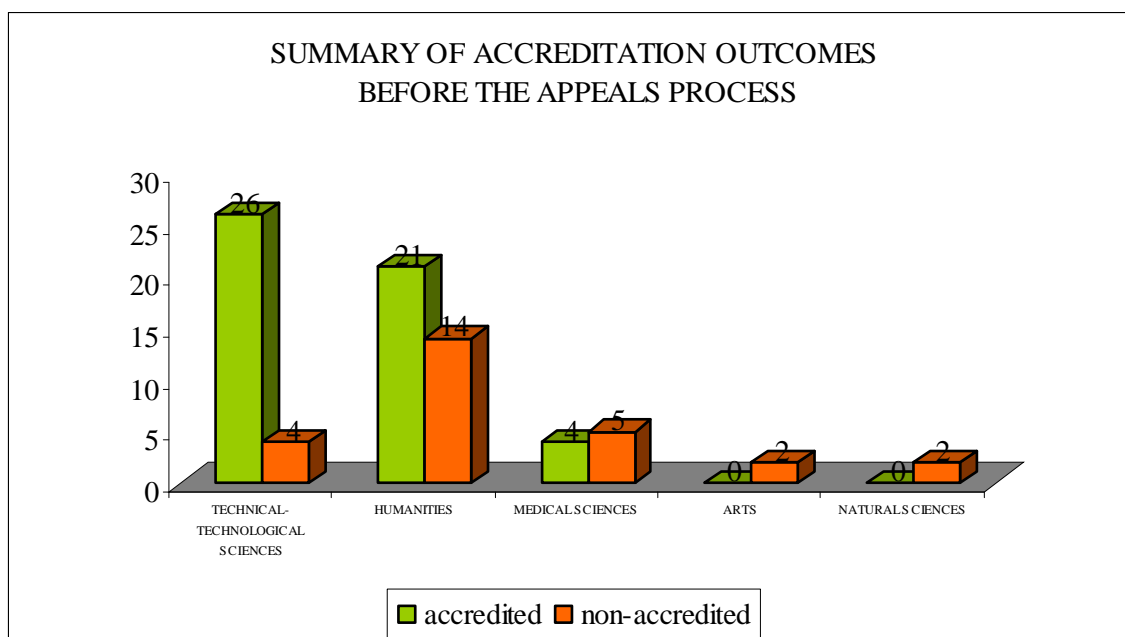


**Figure 7**

As is in the nature of scientific research, it is necessary to explain how the process of collecting valuable numerical data advanced. The primary source of information regarding quantitative outcomes of accreditation was the official web-site of the Ministry of Education. Given the fact that neither the Accreditation Commission nor the National Council for Higher Education has their own web site, the search for valuable data was limited to only a couple of pages, which do not even seem informative enough. The space reserved for postings of decisions and notifications is clearly not being updated regularly, and so this study's research findings rest mainly upon the information provided by August 23-24, 2007.<sup>20</sup> Within that time frame the Accreditation Commission has decided positively in the cases of several postsecondary vocational schools, which had previously had a 'warning status', but there still remained a large number of schools who were not satisfied with the final judgment of the Commission and started the appeals process.

What follows is the summary of results from the last phase of the process in which the Accreditation Commission was still actively involved.

<sup>20</sup> According to the available reports on accreditation outcomes on the official web-site of the Republic of Serbia's Ministry of Education



**Figure 8**

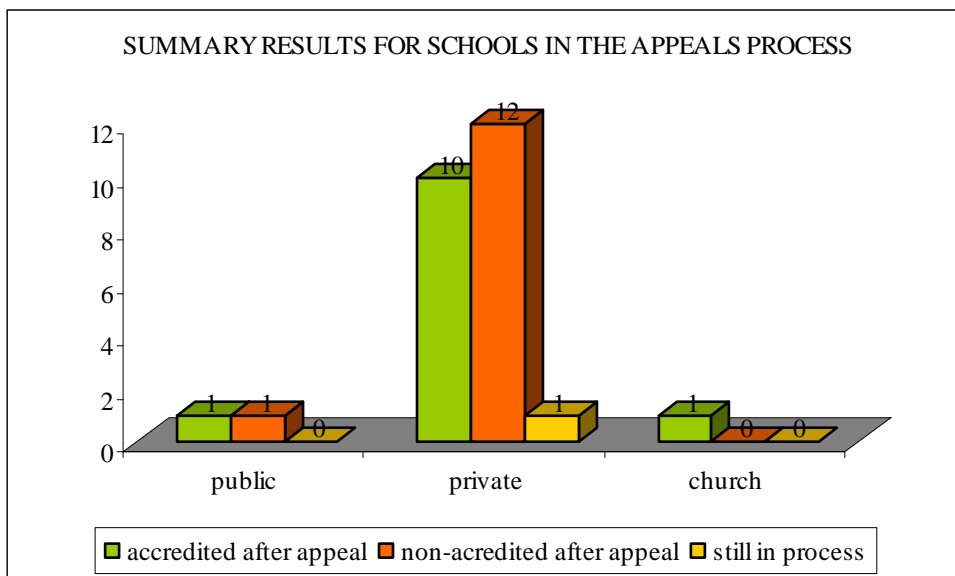
Interestingly enough, the cooperation between the Accreditation Commission and the National Council for Higher Education seems to end in October 21, 2007, when the Commission officially declares unwillingness to proceed with repeated evaluation procedures (only partial re-evaluation of accreditation materials) upon request of the National Council, and remains firm in its previous decision not to give accreditation to any more schools or reconsider additional amendatory documentation submitted by schools<sup>21</sup>. From that point onwards, the National Council assumes total responsibility for resolving appeals matters and helping institutions in their constant efforts to comply with the quality standards. When the Commission discontinued its engagement in further re-evaluations of contested accreditation materials, the total number of schools that got accredited was 51, while there still remained 27 schools utterly disappointed by the rigidity and inflexibility of the accrediting body.

Trying to act in the best interest of all stakeholders in higher education and also in line with the quality improvement dimension as one of the main rationales behind the accreditation agenda, The National Council continued resolving appeals and assisting schools in their strenuous task of finally achieving accreditation. President of the National Council also stated that the utmost priority of accrediting bodies or agencies should be to jointly work with educational institutions on building a quality culture and that should imply on-going cooperation and support which was, for some

<sup>21</sup> Findings from a document issued and signed by Dr. Srđan Stanković, President of the National Council for Higher Education, December 12, 2007

reason, missing in the work of the Accreditation Commission<sup>22</sup>. Therefore, the Council proceeded with its work and eventually granted accreditation to another 12 schools and 26 study programs. Of the 27 non-accredited schools after the Accreditation Commission has ceased to further consider complaints and requests for re-evaluation, the number of non-accredited schools and study programs was reduced to 14 and 76 respectively.

The following chart illustrates the quantitative outcomes of the appeals process:

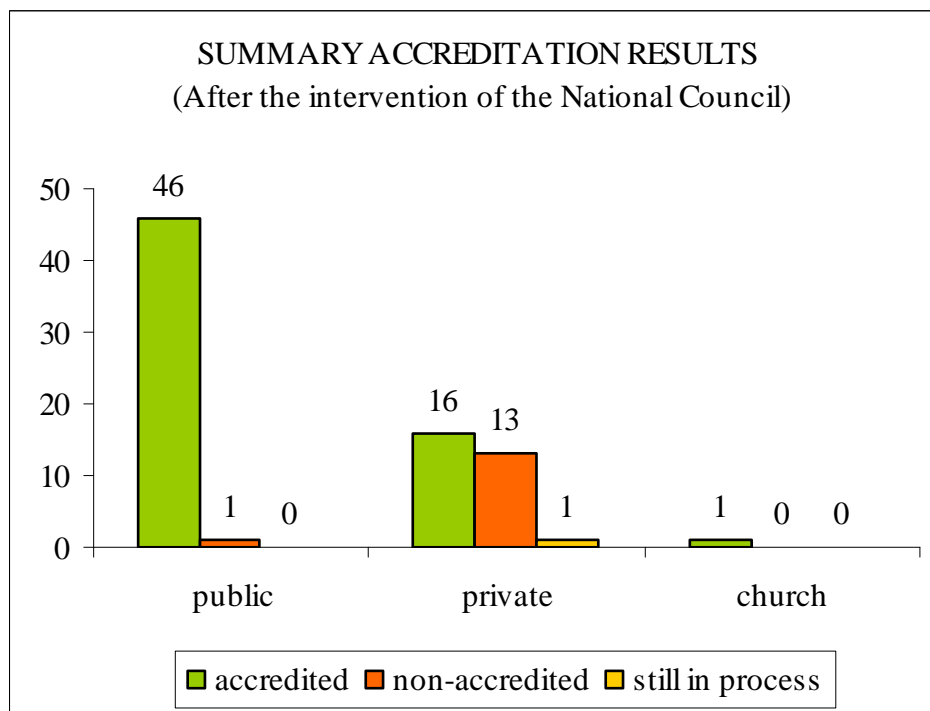
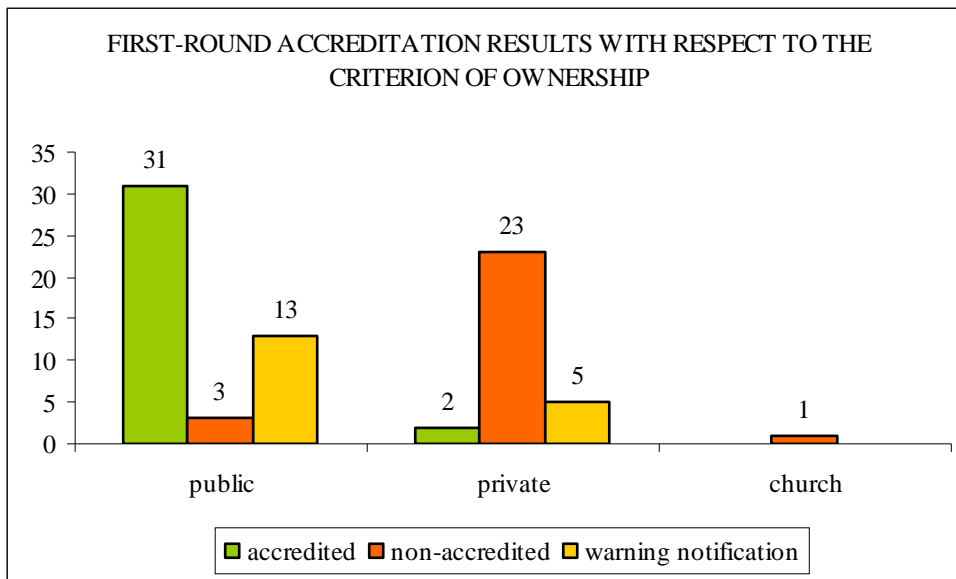


**Figure 9**

It is evident from the above bar chart that of the two public schools that filed an official complaint against the unfavorable decision of the Accreditation Commission, one got accredited eventually, while one got rejected again. Of the 23 non-accredited private schools in the process, 10 schools' appeal matters were positively resolved by the National Council, while 12 got turned down again and one still remained in the process. The only school whose founder and owner is the Serbian Orthodox Church finally got accredited as well.

Now, if wishing to compare the early stage of evaluation when the Accreditation Commission announced the first-round results to the public (without even informing schools of their decisions) with the summary results after the intervention of the National Council, this is how the two events would correlate:

<sup>22</sup> Previously cited source (paraphrasing the content of official document in Serbian, p. 4)



**Figure 10**

At this point, it seems necessary for the purpose of scientific research to reflect upon the evident transition in numbers of accredited and non-accredited postsecondary vocational schools. Progress, in terms of quantitative results, is truly remarkable. Private institutions benefited the most from the intervention of the National Council, which showed considerable understanding for financial and other losses that sanctioned schools suffered after the announcement of first negative decisions by the Accreditation Commission. The numbers in *Figure 10* represent a huge leap from

31 to 46 accredited public schools, and from only 2 to 16 private schools that in the end achieved the so much wanted academic recognition. The one and only church school got accredited, whereas 14 schools (13 private and 1 public) have once again been deferred accreditation, and one appeal is still being considered.

Statistical representation of the outcomes with a focus on study programs has not been provided here, for reasons of inadequate and incomplete sources of information that were accessible during scientific research. In attempt to make a classification of all schools and study programs under general titles: *accredited*, *non-accredited* and *warning status*, I had to follow the official decisions, paying particular attention to the posting dates, and track down changes in status for individual schools and programs, while counting them over and over again each time a new decision would be passed. Another problem that occurred during classification is related to the five broad study fields to which all schools were assigned. Program offerings, on the other hand, did not necessarily correspond with the study field to which the institution in question belonged, and there simply was not enough visibility regarding the classification of study programs. Wishing to avoid approximate and yet questionable categorization, the detailed statistical analysis of accreditation results considering study programs has intentionally been left out.

Needless to say, a great obstacle during scientific research and data collection was insufficient transparency. Decisions on accreditation appeals have not been made available on-line and should we put aside individual institutions that had to be informed of the final decision, news has only been distributed in an unofficial way, or ‘through the grapevine’, which has significantly added to the already existing frustration and anxiety among schools. What is more, there are no accessible official notifications i.e. decisions on accreditation that could be seen and analyzed, as if all remarks, suggestions, and reasons for (not) getting accredited should be kept confidential. Only some of the interviewed schools, complaining about the received negative decisions, wished to share all the related documents in order to make the case and prove their point. When recapitulating the findings, I cannot but emphasize the amount of work that was needed to arrive at the presented statistics and illustrations of accreditation outcomes. Being fully aware of the imperfect sources of information, the summary of research results, though lacking more precise and updated figures, is the best possible at this moment under stated circumstances.

## 5 CONCLUDING THOUGHTS

### 5.1 General Observations and Conclusions

Since the main research question was phrased in such way as to primarily seek answers related to the description of accreditation outcomes in order to be able to give some qualifications in terms of the degree of successful implementation, I will mainly reflect upon such dimensions of the process that can lead to some sound argumentation on policy issues.

Perhaps it would be appropriate here to invoke the exact research question and then attempt at drawing some possible conclusions on all the different levels of meaning behind the problem:

*What were the outcomes of the recently finished first cycle of accreditation in Serbian higher education and to what extent can we see them as truly affecting and/or improving the quality of programs and institutions, and raising standards and accountability level?*

In other words, the central research problem falls under the broad domain of policy implementation and investigating the accreditation process with respect to factors which have obviously affected it, either positively or negatively. This main concern of the study becomes perhaps more visible in its 'operationalized' version, i.e. when asking about the main obstacles, challenges, reasons why some institutions did not get accredited, quality dimensions that were most emphasized, etc.

Given that the study was conceptualized as a peculiar medley of often diametrically opposed standpoints, it would be very hard to strike any firm position and take any side in particular. Nevertheless, there are some commonplace findings from the multiple case study analysis which allow for some observations and perhaps justifiable conclusions.

Ø What were the biggest challenges and obstacles?

When talking about the biggest obstacles and challenges in preparing for accreditation, all interviewees who represented the institutional level in the process unanimously brought up issues related to insufficient time for preparation before the application deadline and somewhat clouded content and meaning of some standards. One of the interviewees also complained about the extremely high application fee charged by the state. With respect to that, perhaps had the state given institutions some sort of discretionary financial incentive accompanying the introduced quality initiative, perhaps it would stimulate better responses on the institutional level followed by much better accreditation outcomes (Brunetto & Farr-Wharton, 2005, p.12). Moreover, almost all interviewed representatives of postsecondary vocational schools complained about insufficient and



inadequate support and guidance throughout preparation period, which can be attributed to poor logistics in the pioneer accreditation initiative in Serbia. Problems connected with lack of office space, official web-site, and open direct telephone lines for questions are evident deficiencies of the initial stage of accreditation, but most of them were solved just before the commencement of the second cycle- accreditation of faculties and universities. Hence, all these repeatedly mentioned factors that to a great extent hindered the process of successful implementation of accreditation policy are definitely worth some serious consideration. According to the interviewees, these resources seem to have been underprovided in the process, which surely negatively affected the morale and atmosphere on the institutional level, probably also leading to poorer outcomes of accreditation. According to Van Meter and Van Horn (1975) the critical variables for successful policy implementation are *policy standards and objectives* and *policy resources*, but there can be others as well, such as: inter-organizational communication, characteristics of the implementing agencies, economic, social and political environment, and the disposition of implementers (as cited in Gornitzka, 1999).

Ø *How did HE institutions change in response to or in interaction with accreditation policy implementation?*

Some institutions had no problem whatsoever in developing an even proactive and facilitating approach to accreditation, while others struggled immensely with the mere idea of changing anything at all.

A huge obstacle for institutions in the process of preparing for accreditation was *human factor* as well. Namely, the accreditation agenda had caused a lot of disorder on the institutional level and in some schools the evident problem was low level of collective consciousness and insufficient knowledge and understanding of the reasons and methods for curriculum development, ECTS methodology, importance of introducing quality assurance mechanisms etc. It seems that an even greater obstacle than lack of knowledge was the *lack of faith into the proposed values and practices which were significantly different from the existing ones*. According to one of the main perspectives explaining organizational change, all organizations interact with their environments for achieving their main objectives and while doing so they cherish a combined approach of conformity to environmental change and pertaining to organizational stability (Gornitzka, 1999, p. 9). Thereby, it does not surprise that accreditation initiative was “welcomed” with heavy resistance by many on the institutional level. Such responses are quite expected unless the proposed changes/reforms are in line with the deeply rooted values, interests, perceptions and even resources of the typically well-developed academic discourse. From the so-called ‘neo-institutional’ perspective, one of the important factors leading to successful policy implementation is a *normative match* between the

values and beliefs underlying the proposed policy and the identity and traditions of the organization in question (Gornitzka, 1999, p.10).

Other possible observations are related to the importance of institutional leadership and team work in the accomplishment of tasks, which was also frequently mentioned in interviews, either affirmatively as a great impetus for change, or again as something that was missing on an institutional level. Impact of leadership and organizational culture have also been mentioned as crucial internal factors (on the level of institutions) affecting policy implementation. Senior management has been said to immensely influence the responses of employed academics to proposed policy initiatives (Brunetto & Farr-Wharton, 2005, p. 15). Therefore, perhaps more attention should be paid on behalf of policy makers to negotiating policies and formulating missions, visions and objectives with institutional leaders, as unavoidable stakeholders in higher education.

Ø *Reasons for not getting accredited and some controversial and debatable questions related to accreditation outcomes*

The most commonly cited reasons for not getting accredited were related to insufficient number of teaching staff, inadequate names for study programs, i.e. not in accordance with the approved qualification framework, insufficient library stock and IT capacities and quality of study programs.

When reflecting upon quantifiable outcomes, previously statistically represented in the summary of research results, an interesting and yet quite controversial issue has been opened with the so many public institutions given a warning status and, on the other hand, rejected accreditation for the majority of private schools. Such outcomes perhaps leave plenty of room for serious debates referring to the questionable criteria and- according to some interviewees- somewhat shady decisions and ratings, said to have been targeted at the private sector. Proof of this can be found by analyzing accreditation decisions for schools and programs and comparing ratios of non-accredited programs in public and private schools. What has not been made clear is how some public institutions can get accredited if having more than half of programs non-accredited. Nevertheless, whatever side we take, these statistics are perhaps worth analyzing and pondering over.

Ø *What is the impression of the accreditation standards?*

The general impression is that postsecondary vocational schools were treated too rigidly and served almost as guinea pigs in introducing and testing accreditation standards.

Nevertheless, when speaking of the standards, one thing is certain: they can never be completely perfect or absolutely accurately measuring quality. There is always room for further refinement and

modifications in some future accreditations and renewals. According to an interview with one of the Accreditation Commission's expert reviewers, output dimensions should be integrated with the existing standards, as quality cannot fully and correctly be ascertained on the basis of input dimensions only. Due attention has to be paid, in his opinion, to learning outcomes, competencies and qualification that students acquire upon graduation from particular institutions, numbers of graduates and their employability on the labor market.

Given the fact that the predominant higher education policy in Serbia, just as many other countries in the region (Schwartz & Westerheijden, 2007, *Preface ix-xii*), is the one of converging towards the European higher education framework, building a base for a strong and stable quality assurance mechanism is probably a central part of the transformations process. However, some findings from the multiple case study analysis point to the quite apparent emphasis on quantifiable criteria in granting approvals for educational institutions and study programs. The impression after interviewing different stakeholders in higher education and comparing and summarizing their experiences with accreditation, is that the existent standards are shaped mainly around input dimensions in higher education, as if the extremely complex and comprehensive nature of quality can be reduced down to only countable parameters. According to Reichert and Tauch (2003), *one of the greatest dangers of any accreditation agenda is to perceive accountability and quality in a too narrow perspective, using a rigid and overly standardized evaluation procedure* (as cited in Schwartz & Westerheijden, 2007, p.5). The best strategy in shaping up standards would perhaps be to determine them through negotiation of all HE stakeholders, by identifying and singling out those values and characteristics that correspond with the societal needs and demands in the first place, while simultaneously decomposing or breaking down the concept of quality in higher education and translating its constituent parts into accreditation standards. Provided that there is no hidden agenda behind the accreditation initiative, it may be a good suggestion for policymakers to work more on educating and instructing all relevant parties in higher education required to follow certain formal procedures and prepare accreditation materials of sufficient quality to satisfy the evaluators' criteria and get accepted as passing the threshold level for accreditation.

Ø *To what extent can we speak of the accreditation process truly affecting the quality of HE and introducing the culture of quality in Serbian higher education?*

It seems that all the various stakeholders in higher education, interviewed in the course of research, agree that it is impossible to check the extent to which the content of accreditation documentation and self-evaluation reports truly and accurately correspond with reality. Interview findings reveal that external reviews often seemed as pure formalities, followed merely for the sake of procedure rather than having any factual meaning and influence on the final evaluation decision.

What can be concluded from many findings is that quality and content of accreditation documentation was a decisive factor in evaluation, and perhaps in some cases of occasional *window-dressing* quite misleading for expert reviewers who seem to have ignored this possibility. A suggestion for future accreditations might be to pay more attention to external review or on-site evaluation, as it rightfully represents the integral part of evaluation and accreditation process.

Ø Does the accreditation implementation process follow more a top-down or bottom-up approach?

Judging from the *modus operandi* of institution(s) responsible for evaluation and accreditation, it seems that the ultimate responsibility and management of the whole accreditation agenda is largely in the hands of the state. Despite the fact that the Accreditation Commission was primarily conceptualized and established as a non-governmental body which would ideally handle and monitor the implementation and development of a quality culture in higher education by itself, there are relatively well grounded reasons to conclude that the state through the Ministry of Education and the National Council for Higher Education still largely maintains control over the way higher education in Serbia operates and evolves<sup>23</sup>. The intervention of the National Council in the last stage of the first-cycle of accreditation perhaps best proves this point and opens even more questions for further discussion and analysis. When analyzed through the prism of theoretical framework, resting mainly upon policy implementation theory, we could perhaps conclude that the predominant approach in Serbia is the top-down one, while the preferred model is still the one of 'rational planning and control'.

General observations and some perceived problems during the process

In other words, the pronounced disparity between the policy and standpoints of the Accreditation Commission and the National Council, followed by the discontinuation of cooperation between the two entities, seems like a quite alarming sign that the process of accreditation might be endangered. Looking at the first results of accreditation, announced by the Commission, and comparing them to the final decisions brought by the National Council, one possible assumption might be that the Accreditation Commission was too rigid and inflexible in terms of operating an overly standardized evaluation procedure and steering it towards piecemeal eradication chiefly directed at the private sector in higher education. Another possible way to look at the results would be to give the Commission the benefit of the doubt and suspect that maybe the National Council was too lenient and generous in granting accreditation to some non-deserving institutions (and programs) as well. In line with that, there might be some plausible assumptions

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<sup>23</sup> According to the article by V. Čekić, posted on April 03, 2006, online press release of a Serbian daily paper *Dnevnik*

that perhaps some political influences and lobbying came into the equation when resolving appeals of initially non-accredited institutions in a positive way and thus compromising the judgment and competency of the principal accreditation body. All these equally likely speculations have been derived from quite subtle hints underlying some comments made in interviews. In more concrete terms, the interviewee from the College of Hotel Management, who is at the same time sitting on the board of the National Council, implied between the lines that there was some lobbying in favor of specific schools having religious and political significance. Even when all this is put aside, there is a general impression of the extremely bad communication and collaboration between the two responsible bodies for evaluation and accreditation, which throws a very dark undertone to the whole process.

#### *Problem of insufficient transparency*

Other unfavorable comments and observations made on account of the supra-institutional level in accreditation process are related to insufficient transparency in disseminating valuable information, publicizing complete official decisions with remarks and suggestions for improvement, and the overall perceived secrecy of evaluation procedures and criteria. Perhaps the decision to keep evaluators' identities anonymous is understandable and maybe even justifiable as an answer to the widespread corruption and dishonesty in many segments of society, but possibly in the future policymakers could gradually start introducing a more trust-based and more transparent system. Ideally, in such system institutions would by their own free will choose to get accredited by most renowned experts whose evaluation would then be regarded as the most desirable reference and best advertising on the higher education market.

#### *Conflict of Interests*

One extremely important reason for making a summary of accreditation outcomes is also to build on recent experiences, whether positive or negative, and learn from observed deficiencies and mistakes. Even if many critiques and complaints of non-accredited institutions are largely debatable, perhaps some points they made are well worth considering and rethinking. A serious problem repeatedly mentioned in interviews with private postsecondary vocational schools is conflict of interests. Namely, the main questions these institutions have raised are related to structure or composition of the National Council and Accreditation Commission. While European practice teaches us that accrediting agencies should be absolutely independent, non-governmental and non-political bodies, what we have in Serbia is a situation in which the Parliament chooses members of the National Council (from lists of proposed members by the Serbian Parliament, Conference of Academies of Professional Career Studies and Conference of Universities-KONUS) and the Council then selects and appoints members of the Accreditation Commission through an

open competition for expert reviewers. Again, findings from interviews and newspaper articles reveal identities and affiliations of all members of the National Council for Higher Education, which imply unequal representation in numbers of scholars from the public and private sector. In other words, private sector is absolutely underrepresented with only one member, as opposed to 15 other members delegated from public institutions of higher education<sup>24</sup>. Given such disproportion, perhaps there is a potential danger that some decisions may be biased and inclined to favor the public sector.

Conflicting interests could also come into the picture when analyzing the work of expert reviewers from the Accreditation Commission. The fact is that they are chosen on the basis of academic and scientific fields in which they possess expertise, and so the accreditation documentation they evaluate is typically from competing educational institutions. Needless to say, this can affect objectivity and obstruct the detachment of reviewers in rating the quality of applying institution. On another note, these same expert reviewers can at the same time be engaged at their home-institutions to coordinate the process of preparation for accreditation, which may give considerable advantage to respective educational institutions, as opposed to the less lucky ones who cannot hire experts to help them in achieving the so desired academic recognition and approval.

#### Issues related to policy and steering of HE

Financing issues are often quite sensitive, in the sense that entities that stand behind the process (Ministry of Education i.e. the State) money-wise could also theoretically, to some extent, exert influence on accrediting agencies in bringing final decisions. This is not saying that it necessarily has to be the case with this first accreditation initiative in Serbia, but is probably worth thinking and, thus, trying to prevent any hypothetical problems connected with this in the future. Financing is also an important factor in sustaining competition and quality levels in higher education. Since there is a sharp dividing line between the public and private sector in Serbia, in the sense that the state only financially supports public institutions, perhaps the future might bring a new incentive for private institutions as well. If public institutions would not be the sole beneficiaries of state funds and if the private ones could also apply for and use parts of governmental budgets for education, maybe we could witness some considerable quality improvements while fighting for students and monetary resources, and then the market would ideally become the true judge of quality.

On account of policymakers in Serbian higher education, there have been some perceived deficiencies of the Law on Higher Education, which were pointed at in some interviews. As it

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<sup>24</sup> Online press release of a Serbian daily paper *Dnevnik*, as of 03.04.2006

appears, the Law probably unintentionally left a loophole thus enabling faculties to commence with vocational studies before having them first accredited in the first cycle of accreditation when all vocational schools were required to. This seemingly minor weakness of the Law has caused lots of bitter feelings and fierce protest of vocational schools, since they believe injustice has been done to them in terms of reduced enrolment figures due to the inevitable and quite logical outflow of students to faculties.

#### Problems on the supra-institutional level

When summarizing results and outcomes, it is important to comment on the repeatedly mentioned shortcomings, primarily in the work of the Accreditation Commission. It is often blamed for not conforming to procedural standards, in the sense that external review teams would occasionally fail to inform institutions of the visit in a timely fashion, or that composition of review teams would often change before the visit without any notification. Many times, external reviews would last from half an hour to one hour, during which time it seems impossible to ascertain the actual quality of institutions, as well as truthfulness and validity of submitted accreditation documentation.

#### Ø What are the implications of the completed accreditation?

The question is also how accreditation will affect institutions, i.e. whether it will actually contribute to building a quality culture in Serbian higher education or whether institutions will again resort to their old and routine practices. A possible observation could be that this uncertain and dubious outcome should perhaps be seriously addressed by means of on-going accreditation and renewal initiative that would ideally serve as a vehicle for maintaining certain standards and quality levels. According to some interviewees, this could be one of the most significant implications of the initial stage of accreditation.

Another possibly good outcome of the accreditation agenda, according to the interviewed parties from the supra-institutional level (V. V., Đ. Č. & M.S., personal communication, February-March 2008) is that accreditation of program(s) and institutions will now become the standard requirement for issuing operating licenses. According to my interviewees, as this was not the case in the past, we have now ended up having dozens of educational institutions of dubious quality. Accreditation agenda will, hopefully, introduce some order in the way Serbian higher education will continue to operate and develop, while approaching the European space of higher education. One of the important accreditation outcomes will also be the advantage of having a comprehensive inventory of (higher) educational institutions as well as teaching staff, as an indispensable tool to enable (better) strategic thinking and planning that Serbian higher education has been seriously lacking. Another benefit of such an inventory will be a gained insight into the whereabouts of

teaching staff, which used to fluctuate between several different institutions at a time, looking for a higher paycheck. Accreditation standards have put considerable emphasis on active and passive teaching hours, and teaching loads, as areas which were also not regulated before but certainly playing a crucial role in maintaining high quality levels.

Despite a lot of tumult and controversy surrounding this very first accreditation process in Serbian higher education, it seems undeniable that it is a huge step forward from total deregulation of quality to the attempt to introduce a system of quality control and assurance in higher education. Worth crediting is surely hard work and determination on behalf of the Accreditation Commission and National Council for Higher Education, but it should not end at this. Any good system of quality assurance requires continuous self-evaluation and assessment procedures, and if Serbian policymakers wish to lead our higher education towards European borderless education area, that will have to imply some additional fine-tuning of standards to facilitate quality improvement rather than just meeting minimal requirements, with a special focus on integrating standards related to comparability of study programs and output dimensions in higher education.

Concentrating on implications for domestic environment, some very valuable lessons for faculties and universities could be drawn from the recent experiences in the first cycle of accreditation. Obviously, institutions need to allocate sufficient time in the preparatory stage, to be able to conduct detailed and comprehensive self-evaluation and produce all the required policy documents. Meticulous attention should be paid to the content of accreditation materials as this has thus far proved to be (one of) the decisive factor(s) in reaching the final decision in evaluation part. Trying to secure additional funding would serve as a great incentive for implementing policies in higher education. The phase of policy formation and formulation should perhaps be understood more as a process of constant fine-tuning which, thus, calls for continuous reviewing and reconsidering, involving all parties that take interest in HE. Country and nation-specific contextual factors should also be given due attention and, if possible, transformed into the advantage of social actors, rather than deficiency and hindering dimension in policy implementation. Speaking of governmental policies, it seems extremely important to watch out for the sequence of contradicting policies which can seriously affect public response. As for accreditation standards, perhaps they could see some refinement in the future, mainly in terms of paying due consideration for institutional differences and maybe organizing criteria more in relative terms, e.g. that some quantitative requirements be expressed as ratios which could come as a more reasonable solution for varying HE institutions, and especially those that have just been opened. Finally, one of the priorities seems to be that some irregularities noted in the work of accrediting bodies be remedied immediately, as current situation could only lead to further deepening of dissatisfaction and distrust



on both sides. Increased transparency could also raise accountability levels and resolve numerous conflicts between HE institutions and accrediting bodies.

Generally speaking, all stakeholders in higher education can and should learn from the outcomes of the first accreditation cycle, to avoid the commonly reported problems and mistakes, and through working on individual development and improvement contribute to raising the overall quality level for Serbian higher education.

## **5.2 Limitations of the Study and Suggestions for Future Research**

Needless to say, the conducted multiple case study analysis is, by definition, not conducive to any justified generalization. Therefore, plenty of room is left for further research and analysis of other individual cases if wishing to arrive at even more detailed results. Given the already mentioned reasons of insufficient transparency, it was not possible at this moment to get access to all relevant reports and documents that might have helped to give better portrayal of the process and its outcomes. It would be very interesting, though, to see and analyze the accreditation results for faculties and universities and compare them to the findings of this study. Perhaps only then could we make some firm arguments with respect to the accreditation agenda and attitude of the state to its higher education sector. Now it is too early to make any predictions about the initiative to build and develop a quality culture in Serbian higher education in terms of the way it will further progress, but what matters is that an initial step has been taken in the direction of discussing and evaluating the sole evaluation procedure, thus providing opportunity for various participants in higher education to voice their opinions and, hopefully, influence the shaping of the HE discourse in Serbia.

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## APPENDIXES

### Appendix 1: Standards for Self-Assessment and Quality Assurance of Higher Education Institutions<sup>25</sup>

**Standard 1: Strategy of quality assurance**

Higher education institution shall determine the strategy for quality assurance, which shall be publicly accessible.

The Strategy for quality assurance shall contain:

- The commitment of the higher education institution to permanently and systematically enhance quality of its program;
- The measures conducive to quality assurance;
- The entities in charge of quality assurance (expert bodies, students, non-faculty staff) and their rights and obligations in the process;
- The fields of quality assurance (study programs, teaching, research, grading of students, text books and literature, resources, non-teaching support, management process);
- The commitment to build corporate quality culture;
- The cohesion of educational, science research, artistic and professional activities.

The Strategy of quality assurance shall be approved by the Board of the higher education institution at the proposal of the Management authority.

The higher education institution shall publish its strategy for quality assurance and promote it, both within the institution and in the public.

The higher education institution shall periodically review and upgrade the Strategy for quality assurance.

**Standard 2: Standards and procedures for quality assurance**

The higher educational institution shall establish ways and means (standards) and procedures for quality assurance in its work, which shall be available to the public.

The Standards for quality assurance shall contain the minimal level of performance quality in the higher education institution.

The procedures for quality assurance shall be set for each area of quality assurance separately, which shall stipulate in detail the conduct of the entities within the quality assurance system of the subject institution.

The standards and procedures for quality insurance shall be promulgated by the professional body of the higher education institution at the proposal of the Quality assurance commission.

The higher education institution shall be bound to make the standards and procedure for quality assurance available to teachers, students and the public.

The higher education institution shall periodically review and upgrade the standards and procedure for quality assurance.

<sup>25</sup> The provided appendixes have been received through one of the interviewees (V.V., personal communication, March 4, 2008) and the original form was retained and enclosed- no changes or corrections have been made regarding their style and content

**Standard 3: System of quality assurance**

The higher education institution shall set the organizational structure for quality assurance.

The higher education institution shall set in its Statutes the jobs and tasks of teachers, associates, students, expert bodies, departments and the Quality Assurance Commission within the process of approval and implementation of the strategy, standards and procedures of quality assurance.

The higher education institution shall take specific measures conducive to students' participation in the strategy formulation and implementation, standards, procedure and culture fostering quality assurance.

The higher education institution shall form a Quality Assurance Commission from the ranks of teachers, associates, non-faculty staff and students.

**Standard 4: Quality of the curriculum**

Quality of the curriculum shall be assured via monitoring and verifying its objectives, structure, workload of the students and through modernization of the content and permanent collection of information about the quality of the program from among appropriate organizations in the neighboring countries.

The higher education institution shall regularly and systematically review and if appropriate, redefine:

- The goals of the curricula and their harmonization with the basic tasks and objectives of the higher education institution;
- The structure and content of the curriculum as to the ratio of general-academic, scientific-professional and professionally applicable disciplines;
- The workload for the students measured by ESPB;
- The outcomes and competences achievable by the graduates and their employability and advanced education.

The higher education institution shall have the procedures in place for approval, monitoring and control of the curriculum.

The higher education institution shall regularly obtain feedback from employers, representatives of the National Employment Service and other appropriate organizations about the quality of studies and its own curriculum.

The higher education institution shall provide the possibility to the students to participate in the assessment and assurance of quality of the curricula.

The higher education institution shall ensure permanent updating of the substance of curricula and their comparability with those of the appropriate foreign higher education institutions.

The curriculum of the study program encourages the students to creative thinking, deductive research and application of the knowledge and skill to practical purposes.

The conditions and procedures necessary to finalize the study and get the diploma of a given education level are defined and accessible to the public, particularly in the digital form, and are harmonized with the objectives, contents and volume of accredited study programs.



**Standard 5: Quality of teaching process**

Quality of the teaching program is assured through interactivity of teaching, case studies, professional performance by the teachers and associates, adoption of and adherence to the action plans by courses and monitoring of teaching quality and introduction of measures needed in the case that the quality of teaching is found inadequate.

The teachers and associates shall act in a professional manner while teaching and holding exercises and shall maintain correct relationship with the students.

The teaching plan and timetable (lectures and practice) shall be adjusted to the requirements and possibilities of students, shall be known before the beginning of the corresponding semester and consequently carried out.

The teaching at the higher education institutions shall be interactive, with obligatory case studies, prompting the students to think and be creative, independent in their work and application of the acquired knowledge.

The higher education institution shall ensure the adoption of the action plan of each subject, before the start of a semester and make it available to the students, which shall include:

- The basic data about the course: title, year, number of ESPB credits, conditions;
- The objectives of the course;
- Contents and structure of the course;
- The plan and timetable (teaching and practice);
- The manner of evaluation of acquired knowledge about the course subject;
- Textbooks, namely obligatory and optional literature;
- Data about teachers and associates at the course.

The higher education institution shall systematically follow up the implementation of teaching plan and action plans by individual courses and take corrective measures in the case of discrepancy.

The higher education institution shall systematically follow, assess the quality of teaching of individual subjects and take corrective measures for improvement. The institution shall alert the teachers who fail to abide by the action plan of the course or to reach proper quality of teaching and practice, to the need for improvement and secure the needed advance training.

**Standard 6: Quality of science research, artistic and professional performances**

The higher education institution shall permanently promote and ensure conditions, monitoring and assessment of the results of science research, artistic and professional performance and their integration into the teaching process.

The higher education institution shall achieve unity of educational, scientific research and professional work.

The higher education institution shall permanently devise, prepare and carry out science research, artistic and other professional and other types of programs, and both the national and international scientific projects.

The higher education institution shall systematically monitor and assess the scope and quality of research of teachers and associates.

The content and the results of scientific, research, artistic and professional

activities are harmonized with the strategic goals of the institution itself, as well as with the national and European goals and standards of higher education.

Knowledge gained by the higher education institution by means of implementation of certain scientific, artistic and professional activities, shall be actively involved in the then current teaching process.

The higher education institution shall encourage its employees to get actively involved in scientific, research, artistic and professional work and to publish their results as frequently as possible.

The higher education institution shall engage in publishing activities within its possibilities.

#### **Standard 7: Quality of teachers and associates**

Quality of teachers and associates shall be ensured by means of careful planning and selection, under public procedure, provision of conditions for permanent education and development of teachers and associates and assessment of quality of their teaching.

The procedure and conditions for the selection of teachers and associates shall be set in advance, shall be public and accessible for evaluation by the professional and larger public. The procedure and conditions shall be subject to periodic review and upgrading.

The higher education institution, in selecting the teachers and associates for promotion to the positions, shall abide by the prescribed procedures and conditions for assessment of scientific, research and educational activities of the teachers and associates.

The higher education institution shall systematically monitor, assess and prompt the scientific research and educational activities of teachers and associates.

The higher education institution shall implement long term policy of qualitative selection of young personnel and their advancement as well as various types of advanced studies.

The higher education institution shall provide for the teachers and associates permanent education and advancement, via study visits, specializations, participation in scientific, artistic and professional conferences.

The higher education institution, in selecting and promoting the teaching, scientific and artistic staff shall evaluate in particular the connectivity of work in education with the work on the projects in other areas of economic and social life.

The higher education institution shall particularly take into account educational capacities of teachers and associates in their selection and promotion.

#### **Standard 8: Quality of students**

Quality of students shall be assured by selecting the students according to prescribed criteria, via grading of students during the training, permanent follow up and review of the evaluation results and mobility of students and taking adequate measures in the case of failure.

The higher education institution shall provide to the potential and enrolled students all relevant information and data in connection with their studies.

While selecting the students for enrollment, the higher education institution shall evaluate the results they achieved in the prior education process and the results reached at the entrance test, namely aptitude test in compliance with the Law.

Equality and equitability of the students on all the grounds is guaranteed (race, color, gender, sexual orientation, ethnic, national or social background, language, religion, political or other opinion, status at birth, sensory or motorical handicap and social status), as well as the possibility for students in special need. The higher education institution shall develop and inform the students in advance of the obligation of attending the courses.

The students shall be graded according to the criteria, rules and procedure made public in advance.

The higher education institution shall systematically analyze, grade and promote methods and criteria for grading the students by courses and specifically: whether the method of grading the students is adjusted to the course, whether the performance of the student is monitored during the teaching process and at the final exam within the grade average and whether the ability of the student to apply the knowledge gained is graded.

The methods of assessment of students and the knowledge they acquired during the teaching-science process shall be adjusted to the targets, content and scope of accredited study programs.

The higher education institution shall provide for correct and professional conduct of teachers in the course of assessment of students (objectiveness, ethics and correct relationship with students).

The higher education institution shall systematically follow and control the grades of students by courses and take adequate measures in the case of irregularities in the grade distribution (too many high grades or low grades, unequal distribution of grades) over a longer period of time.

The higher education institution shall systematically follow and check the mobility of students by courses programs and take corrective measures in the case of too low mobility or other irregularities in grading.

The higher education institution shall facilitate an adequate form of students' organization, action and participation in decision making in compliance with the Law.

**Standard 9: The quality of textbooks, literature, library and IT resources**

The quality of textbooks, literature, library and IT resources shall be ensured by enactment and implementation of the corresponding lateral bylaw.

The higher education institution shall provide the students with textbooks and other literature needed for mastering the courses in the adequate quantity and on time.

The teaching in each course shall be covered with respective text books and other teaching media known and published in advance.

The higher education institution shall enact a general bylaw on textbooks. In line with the general bylaw the institution shall systematically follow up, assess the quality of textbooks and other media in terms of their content (contemporariness, accuracy) the structure (examples, questions, summaries), style and volume (adjustment to the number of ESPB credits); textbooks and other educational media which fail to meet the standards shall be either improved or withdrawn from use and substituted.

The higher education institution shall provide students' library equipped with necessary library units and reading facilities.

The higher education institution shall systematically monitor, assess and enhance the structure and scope of library stock.

The higher education institution shall provide the students with necessary IT resources: adequate number of PCs of good quality, other IT equipment, Internet access and other communications equipment.

The number of librarians and service staff and their education background shall be adjusted to the national and European standards of the trade.

Competence and motivation of the supporting staff in the libraries, reading rooms and IT centers shall be permanently monitored, assessed and enhanced.

The students shall systematically get familiarized with the library and the rules of IT Center.

The premises for library stock, archive and other digital material, and particularly for the students' reading rooms shall be situated in an adequate part of the building to facilitate the work of students, teaching and non-teaching staff and other users. Access to the library and its complete stock shall be 12 hours a day, at least.

**Standard 10: Managerial quality of the higher education institution and the quality of teaching support**

Managerial quality of the higher education institution and the quality of teaching support shall be ensured by means of delineation of competences and responsibilities of management bodies and units for non-teaching support and monitoring and assessment of their performance.

The management and operating bodies, their competences and responsibilities for the set up and management of the higher education institution shall be determined under the general bylaw of the institution in compliance with the law..

The structure, organizational units and their scope of activity as well as coordination and control shall be set forth in the general enactment of a higher education institution, in keeping with the law.

The higher education institution shall systematically monitor and appraise the organization and management of higher education institution and take measures conducive to the improvement.

The higher education institution shall systematically follow and assess the performance of the managerial and non-teaching staff and take the measures to enhance the quality of their work; it shall particularly monitor and assess their attitude towards the students and motivation.

The conditions and procedure for the employment and promotion shall be set forth in the general bylaw of a higher education institution and made available to the public.

The proceedings and activities of the managerial and non-teaching staff shall be open to the assessment of teaching, non-teaching staff, the students and the public opinion.

A higher education institution shall ensure the number and quality of non-teaching staff in compliance with the accreditation standards.

The institution shall facilitate life long learning to the managerial and non-teaching staff in their trade.

**Standard 11: Quality of premises and equipment**

The quality of premises and equipment shall be ensured by means of their adequate volume and structure.

The higher education institution shall have premises of appropriate capacity: class rooms, cabinets, libraries, reading room and the similar, for pursuit of their respective activities in a decent way.

The higher education institution shall have an adequate and modern technical laboratory and other specific equipment which enables good quality teaching at all types and degrees of studies.

The higher education institution shall permanently monitor and adjust its office capacities and equipment to the demands of the teaching process and number of students.

The higher education institution shall enable smooth access to all employees and students to different types of information in digital form and to IT, for scientific-educational purposes.

The higher education institution shall have at least one room equipped with modern technical and other devices where the students and the staff can use PCs and services of copying, printing, scanning and CD burning and DVD material).

**Standard 12: Funding**

The quality of funding of the higher education institution shall be ensured through the quality sources of funds, financial planning and transparency in spending with the view to financial stability in the long term.

The higher education institution shall have long-term finance necessary for the implementation of teaching and research process, science-research projects, artistic and professional activities.

Source of funding the higher education institution may be as follows:

- Finance by the Founder;
- Scholarships;
- Donations, grants and endowments;
- Funds financing science research, artistic and expert studies;
- Projects and contracts for teaching, research and consulting services;

- Commissions for commercial and other services;
- Founding rights under the contracts with third parties;
- Other sources in compliance with the law.

The higher education institution shall autonomously allocate and earmark financial assets in such a way to ensure stability and liquidity in a longer period of time.

The higher education institution shall provide for transparency of its sources of funds and the allocation of the same in the operating report and annual accounts to be approved by the Council.

**Standard 13: The role of standards in self-assessment and quality assurance**

The higher education institutions shall ensure a significant role of the students in the process of quality assurance through the activities of the students' organizations and students' representatives in the bodies of higher education institution and via polls about the quality of the higher education institution..

The students' representatives' are members of the Quality assurance commission of the higher education institution.

The students shall express their opinion in an adequate way on the strategy, standards, procedures and documents concerning quality assurance of the higher education institution, including the results of self-assessment and quality assurance of the higher education institution

An obligatory element of self-assessment of the higher education institution is a poll of opinion and attitude of the students in all the areas which are examined in the process of self-assessment. The higher education institution shall be obliged to organize and carry out the polls and make its results available to the public, and include them in the total grade and quality grade.

The students are actively involved in the processes of permanent shaping, realization and evaluation of study programs within the curriculum and development of the assessment methods.

**Standard 14 : Systematic monitoring and periodic quality assessment**

The higher education institution shall permanently and systematically collect necessary information on the quality assurance and periodic reviews in all the fields of quality assurance.

The higher education institution shall ensure the implementation of given standards and procedures for quality and performance of all the tasks of entities in the process of quality assurance in that institution.

The higher education institution shall provide the infrastructure and the conditions for regular systematic collection and data processing needed for quality assessment in all the areas subject to self-assessment.

The higher education institution shall ensure regular feedback from employers, representatives of the National Employment Service, its former students and other corresponding organizations about the competence of the graduates.

The higher education institution shall ensure the data needed for comparison with foreign higher education institutions in terms of quality.

The higher education institution shall periodically carry out self-assessment and review the quality level for observance of the determined strategy and procedures for quality assurance as well as the achievement of the desired standards of quality. In the periodic self-assessments the results of students' polls shall be included. Self-assessment shall be carried at least once in three years.

The higher education institution shall pass the results of self-assessment to teachers and associates via departments and professional bodies and students' organizations, the Accreditation commission and the public.

## Appendix 2: Standards for Accreditation of Higher Education Institutions

### **Standard I: Basic goals and objective of a higher education institution**

A higher education institution shall have the basic goals and objectives that are in line with the objectives of higher education set forth in the Law.

The main goals shall reflect social justifiability of higher-education institution, set the general directions of its activities and constitute the basis for recognition of priorities of higher education institution in the future work.

The main goals of higher education institution, in brief, shall be defined by the administrator of the higher-education institution and published in the appropriate institutions' newsletter.

The objectives of higher education institution shall emanate from the basic goals, determine the concrete results desirable to be achieved by the higher education institution and constitute the basis for examination of its work.

The objectives shall be concrete, achievable and measurable, in line with the possibilities and characterize more closely the activity of higher education institution.

The higher education institution shall periodically review its basic goals and objectives, with the view to their justifiability in terms of planning and allocation of resources.

### **Standard 2: Planning and control**

To achieve the basic goals and objectives the higher education institution shall plan and control the results of all the forms of education, scientific, artistic, research and professional activities, within its scope.

Higher education institution shall put in place the prescribed procedures for short term and long term planning. The planning is done based on the analysis of internal and external factors. Planning is based on systematic and permanent compilation of data and their professional analysis. The results of planning are the planning documents, available to the public and applicable in practice.

Higher education institution shall regularly and systematically control the fulfillment of the basic goals, giving priority to the achievement of educational objectives. The control is carried out by means of comparison of planned and achieved results and comparison of higher education institution with its results in the past and with the results of the similar higher education institutions in the country and abroad. A report shall be drawn on the results of the control in higher education institution that shall be accessible to the public.

The higher education institution shall regularly review the effectiveness of the implemented planning and control with the view to their enhancement.

### **Standard 3: Organization and administration**

The higher education institution shall have in place the organization structure and administration system for the achievement of goals and objective of higher education institution.

Powers and responsibilities of the administrator, expert bodies of the higher education institution and students parliament shall be set forth in the Statutes of the institution.

The work of the manager, expert bodies and students' parliament shall be periodically assessed.

#### **Standard 4: Studies**

The content of the qualification and diploma of individual types and study levels correspond to the character and objectives of the study programs. The study program of higher education institution shall comply with the basic tasks and objectives and shall serve their achievement. The higher education institution shall systematically and effectively plan, carry out, supervise, evaluate and upgrade the quality of study programs.

The qualifications which mark the completion of the basic professional studies shall be acquired by the student who:

- demonstrated their knowledge in their study area, based on the previous education and able to use professional literature;
- capable of applying knowledge and understanding the profession;
- capable of transmitting knowledge to others;
- capable of continuing studies;
- capable for team work.

The qualifications which mark the completion of the basic academic studies shall be acquired by the students who:

- demonstrated knowledge in the study area based on the previous education and which enables them to use professional literature, but also covered some aspects relying on key knowledge of their study area;
- capable of applying knowledge and understanding in the manner which reveals professional approach to the job or knowledge and have the abilities most frequently expressed in thoughtful arguments and solving problems within the study areas;;
- capable of collecting and interpreting necessary data;
- capable of thinking of relevant social, scientific and ethical issues;
- develop abilities for continuation of studies.

The qualifications which mark the completion of diploma academic studies shall be acquired by the students who:

- demonstrated their knowledge and understanding in the study area, which supplements the knowledge acquired at the basic academic studies and represents a basis for the development of critical thinking and application of knowledge;
- capable of applying knowledge in solving problems in a new or unknown environment in wider or multidisciplinary areas within the science educational and/or artistic educational study field;
- capable of integrating knowledge, solve difficult problems and reason on the basis of available information which contains compliance with social and ethical responsibilities connected to the application of their knowledge and judgment;
- capable of clear and unequivocal transmission of knowledge and way of deriving conclusions to the professional and wider public;
- capable of continuing studies in a way they shall freely choose.

The qualifications which mark the completion of specialist academic studies shall be acquired by the students who:

- demonstrated deep knowledge , understanding and capabilities and ability in



selected scientific and artistic areas of specialization, based on the knowledge of skills acquired during the diploma academic studies and which corresponds to research in the given narrower scientific and artistic study areas;

- able to apply the acquired deep knowledge, understanding and capabilities acquired during specialized studies for successful solution of complex problems in a new or unknown environment, in narrower scientific and artistic study areas;
- have a superior ability to connect the acquired knowledge in solving complex problems, to judge on the basis of available information and draw conclusions which are at the same time compliant with social and ethical responsibilities related to the application of their knowledge and judgment;
- capable to efficiently following and imparting novelties and the research results in the area of specialization and clearly and unequivocally transmit their conclusions, knowledge and procedure of coming to conclusions to the professional and wider public.

The qualifications which mark the completion of specialist professional studies shall be acquired by the students who:

- demonstrated deep knowledge, understanding and professional skill in the selected narrower areas of specialization, based on the knowledge and skills acquired during the basic professional or basic academic studies, as a form of special preparation and suitable for successful work in the area of specialization;

- able to apply the deep knowledge, understanding and skills for successful resolution of complex problems in partially new or unknown environment narrower study areas;

acquired knowledge and skills necessary for a team work in solving complex problems of the profession;

- have superior ability of integrating professional knowledge and skills, to judge and give, based on the available information possible conclusions, which at the same time contain thinking of social and ethical compliance in connection with the application of their knowledge and judgment; capable of efficiently following and adopting novelties in their area of specialization and unequivocally transmit their conclusions, knowledge and process of conclusions to the professional circles and public at large.

The qualifications which mark the completion of doctoral studies shall be acquired by the students who:

- demonstrated system understanding of certain studies; who mastered the skills and methods of research in their field;
- demonstrated the ability to conceive, design and apply; who demonstrated the ability of adaptation of the research process with the necessary degree of academic integrity;
- by their own original research and work achieved the creation which pushed the frontiers of knowledge published and which is of national and international reference;
- capable of critical analysis, appraisal and synthesis of new and complex ideas;
- capable of transmitting professional knowledge and ideas to their colleagues, wider academic community and society at large;
- capable of imparting, in the academic and professional setting, the technological, social or cultural progress.

Each study program is connected to a harmonized whole which includes the objectives, structure and contents, policies and procedures of admission of students, learning methods

and way of testing knowledge, learning outcomes and students' competences.

Higher education institution offering more than one study programs shall ensure that all the program meet the basic quality standards and are compatible with a necessary degree of harmonization.

Higher education institution shall publish the objectives of each of the study programs it offers. The objectives include the achievement of certain knowledge and professionalism and methods for their acquisition. The objectives may involve the development of creative abilities and mastering of specific practical skills, needed in career development.

The study programs have a harmonized structure of an adequate scope and depth and appropriate learning methods.

The higher education institution shall regularly plan and assess the results of their study programs. Those activities are based on fixed objective and available means.

The higher education institution shall permanently develop, promote and review the content of its study programs where the faculty has a key role to play.

Each course within the study program shall be expressed in ECTS credits. The scope of study is expressed with the sum of ECTS credits. The number of ECTS credits needed for acquisition of a diploma shall be regulated by the law. It will be possible to transfer ECTS credits among different study programs.

#### **Standard 5: Science research and artistic work**

The higher education institution which carries academic studies shall have an organized science research and artistic work.

The higher education institution shall permanently conceive, prepare and implement science research and artistic, professional and other types of programs as well as national and international projects.

The higher education institution shall establish the procedure and criteria for systematic follow up and appraisal of the volume and quality of scientific research, namely artistic work of the teaching staff.

The content and the results of science research, artistic and professional work of the institution shall be compatible with the objectives of the higher education institution and with the national and European objectives and standards in higher education.

The knowledge acquired by higher education institution by implementing science research and artistic work shall be included in the teaching process.

The higher education institution shall encourage and ensure the conditions to the teaching staff to actively take part in the science research, artistic and professional activities and to publish the results of their work.

The higher education institution shall carry out and prompt the publishing activity in keeping with their possibilities.

For the sake of commercialization of the results of science research and artistic work the university, namely another higher education institution may become a founder of the technology transfer center, innovation center, business-technology park and other organizational units.

#### **Standard 6. Teaching staff**

The higher education institution shall employ the teachers, researchers and associates in their scientific, artistic and teaching activities able to achieve the basic goals and objectives of the institution. The members of the Faculty shall competently realize the study programs and perform other mandated goals.

The number of teachers shall correspond to the requirements of study programs which the institution implements. The total number of teachers shall have to be sufficient to cover

the total number of lessons within the study program which the institution carries out, so that the teacher will have 180 lessons of active teaching (lectures, consultations, practice, and field work) annually, namely 6 lessons a week.

The workload by teacher cannot exceed 12 lessons of active teaching a week. Thereby, out of the total number of necessary teachers minimum 70% must hold the permanent full time employment contract out of the total number of study program which is the subject of the request for a license. For the study programs in artistic field that number cannot be lower than 50%.

Of the total number of teachers needed by years of study for a study program which is to be licensed, the academies of professional studies and higher education professional studies, except in the artistic area, must have minimum 50% of teachers with doctoral degree.

The number of associates shall correspond to the requirements of the study programs. The total number of associates shall be sufficient to carry the total number of teaching lessons in study programs which the institution delivers and thereby each associate shall have 300 lessons of lectures annually, namely on average 10 lessons of active teaching a week, except in the field of art.

Scientific, artistic and professional qualifications of the teaching staff shall correspond to the science educational that is artistic educational field and the level of their credits. The qualifications are evidenced by diplomas, published works, art works and records of educational qualities and corresponding professional experience.

If a higher education institution employs the students to do the job of teaching associates, who attend diploma academic or specialized studies, they must have grade average minimum eight (8) at their basic studies.

The higher education institution shall elect to the rank of assistant a student at the doctoral studies who completed the prior levels with the overall grade average at least eight(8) and who demonstrated aptitude for teaching. The higher education institution shall provide for a sufficient number of assistants for realization of good quality study program and involvement of the faculty members.

The institution shall provide the teachers and associates with the conditions for scientific, artistic and professional advancement and development. The institution shall provide the teachers and associates with the conditions for scientific and research work, participation in the local and international scientific conferences, collection of necessary literature, planning and realization of research

### **Standard 7. Non-teaching staff**

The higher education institution shall have a faculty which by its professional and vocational activities shall ensure successful realization of study programs, basic goals and objectives of the study program of the higher education institution.

The higher education institution shall have at least one librarian. The higher education institution with over 500 students shall have at least two librarians with high educations and one junior librarian.

The higher education institution with up to 500 students shall organize student's service with at least two employees plus one additional for 1000 students and another one per each additional 2000 students.

The higher education institution shall have at least one employee with high education to attend to IT system.

The higher education institution shall have at least one employee -graduated lawyer - on

the job of a secretary.

**Standard. 8 Students**

In compliance with the basic goals the higher education institution shall determine the terms of admission of students and select the candidates further to them. The higher education institution shall provide necessary facilities for successful mastering of the study programs.

The higher education institution shall announce the competition for admission to studies. The competition shall contain: number of students per study programs offered, terms of admission, criteria of enrolment, and criteria for ranking the candidates, the procedure for the competition implementation, the manner and time frame for complaints to the ranking and the level of school fees to be paid by the student whose studies are not budgeted.

Number of students enrolled to higher education institution shall be adjusted to the human resources, space and technical and technological possibilities.

The candidate for admission to the studies of the first degree shall take entrance examination or aptitude test, depending on the Statutes of high education institution. The ranking of the candidates shall be made based on the general achievement in the secondary education and the results at the entrance examination, namely aptitude test.

The higher education institution shall permanently and systematically follow the achievements of the students and their advancement in each study program carried out and take measures of support in the case of unsatisfactory outcome.

The success of students in mastering individual courses shall be monitored regularly and assessed during the teaching. The overall grade of a student in one course consists of the grade obtained on pre-examination obligations and knowledge proven at the test. The minimum share of credits of the student attending the teaching in the overall credits shall be 30%, and maximum 70%.

A person who shall complete the studies shall acquire corresponding professional, academic namely scientific title in line with the law.

The status of a student shall be terminated in the cases set forth in the law.

**Standard 9. Premises and equipment**

The higher education institution shall provide for premises and equipment needed for good performance of all forms of teaching. The standards for premises and equipment shall be designated by education-scientific, namely education-artistic fields.

The higher education institution shall provide premises for teaching as follows:

- buildings with minimum 4sqm of gross area per student, namely 2sqm for teaching in shifts, except for the field of arts;
- amphitheatres, classrooms, laboratories namely other premises for teaching, and a library and reading room, as needed in the education process of a given scientific education and/or education artistic area;
- adequate working area for teachers and associates;
- a place in amphitheatre, classroom and laboratory for each student.

The higher education institution shall ensure the premises for administrative affairs, minimum two offices for students' service and the Secretariat.

The premises ensured by higher education institution for teaching requirements and management shall have to meet corresponding town planning, technical and hygienic conditions. The premises shall be in the buildings holding necessary construction and operating licenses. If the premises for teaching and management are not owned by higher education institution or granted for use, it shall contract leasing for the period of minimum five years,

The higher education institution shall ensure necessary technical equipment for modern teaching further to the needs of the study program.

The higher education institution shall ensure equipment and teaching in compliance with health and safety standards and inform the students.

The higher education institution shall provide premises for students' parliament.

**Standard 10. Library, textbooks and IT support**

The higher education institution shall have an appropriate library equipped with all necessary textbooks for the study and IT resources and a service utilized for the achievement of the basic goals.

The higher education institution shall have the library with literature, which shall provide an adequate support to the teaching process in the science educational and artistic activities. The library shall have at least 1000 library units in the area covered by the teaching.

The higher education institution shall ensure the coverage for all the courses with corresponding textbooks, educational media and devices, The media and devices shall have to be available timely and in the number sufficient to ensure smooth teaching process.

The higher education institution shall have IT equipment necessary for studies and science research and artistic work. The higher education institution shall provide for at least one IT room with minimum 20 PCs and Internet access.

The higher education institution shall ensure needed training for the teachers, associated and student with the view to efficient use of the library and other IT resources.

**Standard 11. Sources of finance**

The sources of finance of higher education institution shall be sufficient to ensure quality teaching for at least the duration of the study program.

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The higher education institution shall achieve positive financial results in the period of at least three years.

The higher education institution shall have the financial plan accessible to the public for the period prescribed by law, which is an integral part of the business plan of the higher education institution. The financial plan shall clearly present future income and expenditure by types and periods.

If appropriate, the higher education institution shall take bank credits and guarantees.

**Standard 12. Internal mechanism for quality assurance**

The higher education institution shall approve and carry out the quality insurance strategy in its work.

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The higher education institution shall approve clear and comprehensively formulated strategy of quality assurance of the teaching process, management of the higher education institutions, teaching activities and conditions for work and study, accessible to the public.

The higher education institution shall form a special commission for quality assurance from among the teachers, associates and non-teaching staff and students.

The higher education institution shall implement in practice the established strategy for quality assurance and to that end shall take necessary measures to realize the strategy for quality assurance and eliminate the irregularities observed. The higher education institution shall particularly follow up the quality of teaching, examinations, success of students and studies on the whole by individual courses, quality of text books and take special measures for elimination of deficiencies observed.

The students shall have an active role in the process of approval and realization of the strategy for quality assurance. Of special significance will be assessment of quality of the teaching process, which shall be carried out by students' polls.

Self-assessment shall be an integral part of the strategy for quality assurance and shall be carried out in the intervals of maximum three years. The students' assessment of the quality of the teaching process shall be taken into account in the self-assessment.

The higher education institution shall have a general bylaw on the textbooks.

**Standard 13. Transparency**

The Higher education institution shall publish complete, precise, clear and accessible information of its work intended for students, potential students and other stakeholders.

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The information published by the higher education institutions shall help the students and potential students take decision on their education.

The higher education institution shall publish its goals, objectives, expected educational outcomes, description of study programs and description of courses offered and programs delivered, conditions of enrolment and transfer of ECTS credits, the amount of school fee, the

Statutes of the institution and its accreditation, strategy for quality assurance, financial results and other relevant data.

The higher education institution shall publish the list of teachers and associates on their qualifications and engagement in a higher education institution.

## **II SUPPLEMENTAL ACCREDITATION STANDARDS OF HIGHER EDUCATION INSTITUTIONS WITHIN THE GIVEN SCIENCE EDUCATION NAMELY SCIENCE ARTISTIC FIELD**

### **Mathematics**

#### **Standard 6. Teaching staff**

The teaching shall be organized in such a way that up to 80 students shall attend the teaching at the basic studies and up to 25 students the practice and up to 15 students the laboratory practice.

The teaching shall be organized in such a way that the lectures at the diploma academic studies shall include up to 25 students, the practice up to 15 students the group of laboratory practice up to 10 students.

#### **Standard 7. Non-teaching staff**

The higher education institution shall ensure, at all the levels and types of studies, the associates who partake in the realization of laboratory trials and field practice of the students.

#### **Standard 9. Premises and equipment**

The higher education institution shall ensure an additional laboratory space for experiments, conditions for field teaching and other conditions in keeping with the needs of the study program relative to the number of students in the courses which require the experimental teaching.

### **Humanistic sciences**

#### **Standard 6. Teaching staff**

The groups for the teaching by types of courses in the basic studies shall be:

- at the academic general education and theoretical methodological courses up to 300 students;
- at the scientific professional and professional applied up to 200 students.

The scope of the practice group by type of courses at the basic studies shall be:

- at the academic general education and theoretical methodological courses up to 50 students;
- at the scientific professional and professional applied up to 30 students.

The scope of the group for teaching and the diploma studies shall be up to 50 students.

The scope of the group for practice at the diploma studies shall be up to 25 students.

## Medical sciences

### **Standard 1: The basic goals and objectives of the institution**

The goals shall be concrete, achievable relative to the available resources and describe the details of the institutional activity, including the professional scientific research and medical work.

### **Standard 6. Teaching staff**

The total number of teachers must suffice to cover the total number of teaching lessons at the study programs carried out by the higher education institution so that a teacher will deliver 120 lessons on average per year, namely 6 lessons per week. The maximum engagement per teacher cannot exceed 12 contact lessons a week. The number of lessons will include the engagement of the teachers in all the accredited study programs and engagement of teachers within medical specialized studies and the studies of narrower specializations which were established under the health care regulations.

The maximum number of students in a group for practical teaching at the pre-clinical courses will be 10, at the clinical 5 and in the group of theoretical teaching 80.

### **Standard 9. Premises and equipment**

Laboratories, namely teaching units for practice in pre-clinical courses shall correspond in terms of capacities to the number of students enrolled and specific study features and teaching courses, but cannot be less than 20% of the total number of enrolled students. For the purpose of clinical training of the students and universities and medical schools within it shall cooperate with respective clinic as partners in medical education, which shall be subject the relevant contract.

The clinical units and clinical teaching capacities shall fully cover the clinical sources of the given study program.

## Technical and technological sciences

### **Standard 6. Teaching staff**

At the basic studies the teaching group shall have up to 180 students, practice group up to 60 students and the group of laboratory practice 20 students.

At the diploma studies the teaching group shall have 32 students, practice group up to 16 student and the group for laboratory practice up to 8 students.

### **Standard 7. Non-teaching staff**

The higher education institution shall ensure the needed professional associates who shall take part in the laboratory, experimental and field exercises at all the levels and types of study.

### **Standard 9. Premises and equipment**

To be able to carry out its study program the higher education institution shall ensure adequate science educational units, in house or outsourced.

In house teaching units shall be: teaching laboratories, scientific and research development laboratories, experimental plots, technical center and other scientific, research development and innovation units within the higher education institutions.



The outsourced teaching scientific units shall be: the institutes, centers of excellence, innovation centers, organizations providing infrastructural support to innovation activities and food producing companies, intermediaries, equipment and services.

The outsourced teaching scientific units shall be equipped with necessary measurement, demo, computer and ITC devices for experimental, demo and simulation character for all the courses within a given group of scientific professional and applied courses.

In the area of bio-technical sciences a higher education institution shall ensure minimum one adequate experimental plot. The experimental plots in agriculture shall be owned by higher education institution or shall be lease-held and of at least 100 Hectares of arable land under different crops and breeds, nurseries and seed plantations, according to the modern technologies supported by good farm appliances, depending on the study program requirements. The experimental crops in the area of forestry shall be owned by higher education institutions or lease held and minimum 1000 hectares under different forest stands, producing seed and nursery material with the application of modern technology, supported by good quality mechanization. The experimental estates business shall correspond to the requirements of study programs carried out by higher education institutions.

## **Arts**

### **Standard 6. Teaching staff**

Depending on the type and character of the course, the teaching at the higher education institutions in the area of arts shall be:

- individual,
- group,
- collective.

The size of the group may range from two to 20 twenty students depending on the type and nature of the course.

The collective teaching can be organized for a group of up to 300 students.

Weekly and annual workload of the associates shall depend on the specific features of the study programs, duties of the associates and occupations fixed under the general bylaw of the higher education institution.

### **Standard 9.Premises and equipment**

The higher education institution shall ensure the premises for teaching and provide for minimum 5 sq meters net per student.

The higher education institution shall ensure additional premises in keeping with the specific features of artistic areas: workshops, laboratories, exhibition gallery, concert hall, audio and opera study, theatre, cinema, TV studio and necessary equipment for modern teaching according to specific features of artistic fields.

## **Appendix 3: Standards for Accreditation of Higher Education Programs of the First and Second Level**

### **Standard 1. Structure of the study program**

The study program contains the elements specified in the Law

Each study program shall have the following elements

- name and objectives of study programs;
- type of studies and outcomes of the learning process;
- professional, academic, namely scientific title;
- conditions of admission to the study program;
- list of obligatory and optional study areas, namely courses with framework contents;
- the method of the study and the time needed for individual types of studies;
- credits of each course expressed in terms of the European credit transfer system (ECTS);
- credit values of the final thesis in the basic, specialized and diploma academic studies, namely doctor dissertation, expressed in ECTS credits;
- preconditions for admission to individual courses or groups of courses;
- manner of choice of courses and other study programs;
- conditions for transfer to other study programs within the same or related study areas;
- other issues of significance for the realization of study programs.

The volume of studies is expressed in the number of ECTS credits.

The basic professional studies shall have 180 ECTS credits.

The specialized professional studies shall have at least 60 ECTS credits.

The diploma academic studies shall have between 180 and 240 ECTS credits.

The diploma academic studies shall carry at least 60 ECTS credits provided the basic academic studies reach the volume of 240 ECTS credits but at least 120 ECTS credits.

The specialist academic studies will have at least 60 ECTS credits provided the academic studies had been completed.

The doctor studies have at least 180 ECTS credits if the basic academic and diploma academic studies had been completed and the results is at least 300 ECTS credits.

The academic study programs in medical sciences can be organized within the basic academic and diploma studies with the total volume of maximum 360 ECTS.

### **Standard 2. Purpose of study programs**

The study program shall have clearly defined purpose and the roles in the education system, accessible to the public.

The purpose of the study program is to educate the students for recognizable and clear professions and occupations. The study program shall ensure acquisition of competences, which are socially justified and useful.

The purpose of realization of the study program must be clearly and unequivocally formulated.

### **Standard 3. Objectives of study program**

The study program shall have clearly defined objectives.

The objectives of study program include the achievement of competences and academic skills and methods of their acquisition, The objectives may also include the development of creative capacities and mastering of specific practical skills necessary in practicing the trade.

The objectives of study program shall be in compliance with the basic goals and objectives of higher education institution where the program is carried out.

The objectives of the study program implementation must be clearly and unequivocally formulated.

#### **Standard 4. Competences of graduated students**

By completing the study program a student acquires general and course-specific capabilities serving the function of good quality professional, scientific and artistic activity.

Having completed the master program the student shall acquire the following general abilities:

- to analyze and synthesize the solutions and consequences;
- to master the methods, procedures and research processes;
- to develop critical and self-critical capabilities and agility and the cooperation with closer social and international stakeholders;
- observe the professional code of conduct.

Having completed the master program the student shall acquire the following course-specific abilities:

- fundamental understanding and comprehension of the discipline of the corresponding profession;
- resolution of concrete problems in different areas and their application;
- linking the basic knowledge in different areas and their application;
- follow-up and application of novelties in the profession;
- development of skills and abilities to use the knowledge in the given field;
- use ICT in getting the knowledge in the given area.

#### **Standard 5: Curriculum**

The curriculum of study program contains the list and structure of obligatory and optional courses and modules and their description.

The structure of the curriculum shall cover the distribution of courses and modules by semesters, trimesters, namely blocks, the stock of lessons of active teaching within ECTS.

The description of courses shall contain the name, type of the course, the year and semester of studies, the number of ECTS credits, name of the teacher, objective of the course with expected outcomes, knowledge and competences, preconditions for attendance at the course, content of the course, recommended literature, methods of implementation, the way of assessment of knowledge and grading system and other data.

The structure of the study program at the basic academic studies, except in the field of art, shall contain the following groups of courses with a relative share in the total number of ECTS credits, as follows:

- academic-general education-around 15%
- theoretical and methodological - around 20%
- scientific namely artistic professions around 35% and
- professional applied-around 30%.

The structure of study program at the basic professional studies, except for the field of arts, shall contain the following groups of courses relative to the total number of ECTS, as follows:

- academic- general educational-around 15%
- professional, namely art professional - around 40% and
- professional applicative-around 45%.

In the structure of the study programs, except in the field of art, the optional courses are represented with at least 20% relative to the total number of ECTS credits at the basic studies and minimum 30% relative to the total number of ECTS credits at the diploma studies.

### **Standard 6. Quality, modernity and international compatibility of the study program**

The study program is harmonized to the contemporary trends in the world and status of the profession, science and art in respective education-scientific, namely education-artistic field and is comparable to the similar programs of the higher education institutions abroad, and specifically within the European education area.

The study program offers the students the latest scientific, artistic namely professional knowledge in the corresponding fields.

The study program is comprehensive and compliant with other programs of higher education institutions.

The study program is harmonized to at least three accredited programs of a foreign higher education institution of which at least two of the higher education institutions located in the European educational area.

The study program shall be formally and professionally adjusted to the European norms in terms of admission, duration, requirements for transfer to the next year, acquisition of diplomas and the manner of study.

### **Standards 7: Admission**

The higher education institution, in compliance with the social needs and its own resources, shall enroll the student to corresponding study program based on the success in their previous schooling and entrance tests, aptitude and capacities.

The number of students enrolled to corresponding study program shall be fixed in terms of available space and human resources available to the higher education institution.

The type of knowledge, aptitudes and capacities tested on entrance shall be suitable to the nature of the study program and the method of testing correspond to the character of the study program and shall be publicly available in the admission advertisement.

### **Standard 8: Grading and promotion of students**

The grading of the students shall be based on the permanent monitoring of the work of students and on the credits gained in fulfillment of pre-examination duties and the exam itself.

The student completes the study program by taking exams and gaining certain number of ECTS credits in line with the study program.

Each individual course in the program shall have a certain number of ECTS credits, which the students can get if they pass the exam.

The number of ECTS credits shall be determined on the basis of the work load of

students in mastering certain course and by application of uniform methodology of a higher education institution for all under the given study program.

The success of the student in mastering certain course shall be permanently monitored during the teaching and expressed in credits. The maximum number of credits achievable in the course will be 100.

The student earns the credits in the course by attending the teaching and fulfilling the pre examination obligations and by passing the exam. The minimum number of credits achievable by fulfilling the obligations during the teaching will be 30 and the maximum 70.

Each course in the study program shall have clear and transparent way of earning the credits. How the credits can be earned during the teaching shall depend on the number of credits the student earns during the teaching or performing the pre exam obligation and at the exam.

The overall success of the student at a course shall be expressed in grades from 5 (failed) to 10 (excellent). The grade of the student is based on the total credits earned by meeting the pre exam obligations and passing the exam according to the quality of acquired knowledge and skills.

### **Standards 9: Teaching staff**

The teaching staff is recruited for the implementation of the study program with necessary scientific, artistic and professional qualifications.

The number of teachers corresponds to the requirements of the study program and depends on the number of courses and number of lessons. The total number of teachers must suffice to cover the total number of lessons in the study program, so that a teacher has 180 lesson of active teaching (teaching, consultation, practice, practical work and field work) on average p.a., namely 6 lessons a week. Of the total number of needed teachers at least 70% must have a permanent employment contracts, full time, and for the study program in the field of art minimum 50%. The realization of study programs of professional studies except in the field of art, requires at least 50% of teachers with Ph.D.

The number of associates corresponds to the needs of the study program and depends of the number of courses and lessons. The total number of associates at the study program must be sufficient to cover the total number of lessons on that program so that the associates have on average 300 lessons of active teaching p.a., namely 10 lessons a week, except in the field of art.

The science and professional qualifications of the teaching staff shall correspond to the education and scientific field and the level of their responsibilities. A teacher must have at least five references in the narrow science, art namely professional area concerned.

The data about the teachers and associates (CV, election to functions, references) must be available to the public.

### **Standard 10: Organizational and material resources**

For the realization of a study program adequate human, spatial, technical, library and other resources shall be provided, adequate to the character of the study program and the anticipated number of students.

The higher education institution shall ensure adequate premises for the performance of study program, namely the building with at least 4 sq meters gross per student, namely 2 sq m for teaching in shifts, except in the field of arts.

The higher-education institution shall have amphitheatres, classrooms, laboratories or similar teaching premises, a library or similar premises for teaching, library and reading rooms as appropriate for study program, adequate to the given education scientific namely artistic fields. The higher-education institution ensures a place in the amphitheatre, classroom and laboratory for every student attending the study program.

The higher-education institution ensures all needed technical equipment for modern teaching activities.

The library shall have minimum 100 library units relevant to the study program of the higher education institution.

The higher-education institution shall ensure the coverage of all the courses by adequate textbooks, teaching media and aids, available timely and in sufficient numbers for normal development of teaching process of that study program.

For the implementation of study program the necessary IT shall be provided.

### **Standard 11: Quality control**

The quality control of the study program shall be regularly carried out by means of self-assessment and external quality tests.

Quality control of the study program means regular and systematic follow up of its implementation and measures for quality enhancement in terms of curricula, teaching, teaching staff, grading of students, textbooks and literature.

Quality control of the study program is carried out in the period set in advance which is three years in the case of self-assessment, and maximum five years for quality control.

Quality assessment of the study program involves an active role of students and their appraisal of quality of the program.

### **Standard 12: Distance learning**

The study program based on the methods and technologies of distance learning is supported with resources which ensure good quality of study program.

The higher education institution may organize the study program in distance learning for every area and each education scientific and artistic field, if the substance of teaching, supported by available resources can be acquired via distance learning of good quality and if the same level of knowledge of graduated students, the same efficiency of studies and the same rank (quality) of the diploma can be provided as in the case of the usual implementation of study program.

### ***Program***

The substance of the course of the study program shall be conceived in a modern way and adapted to distance learning with the stated time needed for consultation.

The teaching material shall fully comply with the education objectives in terms of quality, contents and volume, to the curriculum and programs for the courses and adjusted to independent and successful learning.

The learning instructions provided by the higher-education institution shall contain more concrete proposals and suggestions concerning strategy of learning by the students and autonomous test of knowledge.

### ***Grading and promotion of students***

The sub system for testing the students' knowledge shall be integrated into the management system of the distance learning process and support different forms of learning and tests (consultations, self-assessment, pre examination tests, reports, examination).

The examinations shall be taken at the headquarters of the higher education institution, namely in the facilities listed in the operating license of a higher education institution.

### ***The teaching staff***

The higher-education institution shall have a qualified and competent faculty to carry out the study program of distance learning.

The teachers shall be responsible for drafting the teaching material, tests prior to the exams and for final exams, as well as for adjustment of all the activities conducive to mastering the necessary scope of knowledge.

One teacher may cover maximum three courses in a semester.

Consultations with the students shall be carried out by teachers or associates. One teacher, namely associate may do the consultations with no more than 80 students in a term.

The required number of teachers and associates under permanent contract shall is 70% of the minimum number of teachers and associates necessary for study program implementation. In the case that the study program goes in parallel in the usual way and at a distance, the total requirement for teachers and associates shall be determined as in the usual way of studies, where one teacher may do the consultations with no more than 80 students from both groups of students, on average, per term.

### ***Resources (equipment, library, premises)***

The higher-education institution shall provide equipment and ICT for the establishment and maintenance of two-way communication between teacher-student to implement education activities in distance learning (parts of teaching, consultations, self-assessments, tests of knowledge within pre examination obligations, projects, seminars, essays and the similar).

Within the system of distance learning process the administration of the higher education institution must ensure:

- one integrated distance learning system (DLS) platform, either proprietary or leased, with specialized software for accommodation and distribution of multimedia teaching curricula intended for independent learning (text, audio and video information) and for the complete learning process management;
- different teaching forms: public broadcasting of the planned teaching event at the appropriate time (broadcasting of teaching or discussions among teachers /experts video taped live or pre recorded), delivery of lectures and multimedia teaching material from a server and consultations for guided and informal panel forums;
- a single user interface supporting more than one user category, including the students, teachers and administrative staff;

- quality and two-way communication of teachers and associates with the students enabling the services of electronic mail, discussion forums and discussions in real time;
- the possibility of recording the time the student spent over the teaching material and assessment and grading of the students by means of tests and with the support and under the control of specialized software package;
- high reliability of the system through an adequate system of surveillance of excess and protection of the contents.

The higher education institution shall ensure access to its own and other suitable libraries, and particularly to the organizations specialized for delivery of electronic text books and other teaching and scientific publications.

The higher education institution shall provide access to own or other suitable higher education institutions having premises adequate as to space and conditions for normal procedure of the final examination, work of administrative staff and maintenance of the integrated computer platform supporting distance learning.

With the view to improving the quality of consultations the higher-education institution may establish consultation centers geographically distant from the seat of the institution, with information communication platform integrated in the distance learning system, professional literature and facilitating practical exercise.

#### **IV ADDITIONAL STANDARDS FOR ACCREDITATION OF STUDY PROGRAMS WITHIN A GIVEN EDUCATION SCIENTIFIC NAMELY ARTISTIC FIELD**

##### **Science-mathematics**

##### **Standard 5. Curriculum**

The education field of mathematics shall require special abilities defined for the study program accreditation, taking into account the internationally accepted competences for the given profession.

##### **Standard 9. Teaching staff**

Teaching shall be organized in such a way that the group attending teaching at the basics studies shall have 80 students and practice up to 25, while in the group of laboratory exercises up to 15 students.

The teaching shall be organized in such a way that the teaching group at diploma studies shall have up to 25 students in a group, practice up to 15 students and laboratory practice up to 10 students.

The teacher must have at least five representative references in the science education area at the study program including: monographs, books, articles, scientific and professional contributions, textbook, practice book or summary of questions, patents and software solutions.



### **Standard 10. Organization and material resources**

The field of mathematics requires additional laboratory space to carry experimental teaching, conditions for teaching in the field and other conditions in keeping with the needs of the study program and number of students in the courses which have experimental teaching.

## **Humanities**

### **Standard 9. Teaching staff**

For quality study programs in the field of humanities it is necessary to meet the norms concerning the number of students by teaching groups, namely:

- the size of the group for teaching at the basic studies for academic- general education and theoretical methodological courses, up to 300 students, for science-professional and science-applied up to 200 students;
- the size of the group for exercise at the basic studies for academic-general educational and theoretical-methodological courses, up to 50 students, and for the science professional and applied up to 30 students;
- the size of the group for teaching at the diploma studies up to 50 students;
- the size of the group for exercise at the diploma studies is up to 25 students.

## **Medical sciences**

### **Standard 5. Curriculum**

The curriculum of the study program of the diploma academic studies in corresponding scientific areas within the education scientific field of medical science must contain the obligatory core and the possibility for special study modules. The special study modules should be in the courses directly connected to medicine, either laboratory or clinical, biological or behavioral, research oriented or descriptive. The curriculum of the study program should contain optional courses.

### **Standard 6: Quality, modernity and international convergence of study programs**

The integrated academic studies of the first and second degree (medical studies), for acquisition of academic and professional title of «medical doctor», last 6 years or 5,500 lessons of theoretical and practical teaching, independent students' activities and practice in medical institutions further to Directive 2005/36/EC of the European Parliament and Council of Europe dated 7 September 2005, on the recognition of professional qualifications in the part concerning medical doctors.

The purpose of Directive 93/16 of the Council of Europe is to facilitate free movement of medical doctors via mutual recognition of the primary and specialized qualifications of the residents of EEA (The European education area).

### **Standard 9. Teaching staff**

The total number of teachers must be sufficient to cover the number of lessons of teaching at the study programs which are realized by the study programs of the higher education institution so that the teacher shall have 120 lessons on average per year, namely 4 lessons a week. The maximum work load of the teacher cannot be more than 12 contact hours a week. The number of lessons includes the involvement of teachers in all the accredited study programs, as well as the engagement of teachers within medical specialist studies (specialist studies in conformity with the medical care regulations) and studies of narrow specializations, which are governed by health care regulations.

The maximum number of students in the group for practical teaching in pre clinical courses is 10, and in the clinical five. The maximum number of students in the group of theoretical teaching is 80.

Scientific capacities of the teachers and associates are evaluated according to the regulations applicable to education and scientific activities.

### **Standard 10. Organization and material resources**

Laboratories, namely teaching units for performance of practice at pre clinical courses, shall correspond in terms of the number of enrolled students and specificities of studies and courses so as to reach at least 20% of the total capacity.

The clinical training of the students requires partnership between the universities that is medical schools and clinics in the medical education.

The clinical practice units and clinical teaching capacities must cover corresponding clinical courses in the study program. The higher-education institution within the education science field of medical sciences shall contract the cooperation defining the parties' responsibilities.

### **Technical sciences**

### **Standard 4. Competences of graduated students**

The completion of the study program enables the student to acquire the following course-specific capabilities:

- designing, organizing and supervising the production;
- independent trials, statistical plotting of results, formulation and presentation of results;
- drafting, in an adequate manner, and presentation of the results.

The student shall acquire the knowledge and skill in:

- environment protection;
- cost effective utilization of natural resources of the Republic of Serbia in keeping with the principles of sustainable development.

In the area of Biotechnical sciences, the student shall acquire knowledge and skills:

- for production of safe food;
- in the areas of agriculture and forestry for the production of plant and animal species and livestock breeding.

### **Standard 5. Curriculum**

The integral part of the curriculum of the study programs for the basic and diploma studies in the area of technical and technological sciences is professional practice of at least 45 lessons, carried out in the appropriate science research institutions, in the innovation centers, in the organizations offering infrastructure support to innovative activities, in the companies and public institutions.

In the field of bio technical sciences, in the area of agriculture and forestry, the students during the basic studies have practice within at least 45 lessons, production practice in the duration of at least 45 lessons and technological and organization practice in the duration of at least 45 lessons.

### **Standard 9. Teaching staff**

For a good quality study program performance at the basic and diploma studies in the field of technical and technological sciences it is necessary that the higher education institution meet the norms of the number of students by teaching groups. The scope of the group for teaching is up to 180 students, practice group up to 60 students and the group for laboratory exercise up to 20 students. For good quality performance of study programs of diploma studies the size of the theory group is up to 32 students, practice group up to 16 students and the group for laboratory work up to 8 students.

Representative references of the teaching staff in the technical and technological sciences are: science and professional works published in the international and local reviews, contributions printed in the proceeds of the science and professional conferences, monographs, textbooks, survey articles, collection of questions, practice books, patents, new products or essentially improved existing products, new plant species, new livestock and new technologies.

### **Standard 10. Organization and material resources**

For the performance of study programs the requisite scientific teaching units need to be provided, in house or outsourced.

In-house scientific teaching units are: teaching laboratories, scientific, research and development laboratories, technical centers and other R&D and innovation units within the higher education institution.

The science teaching units that are outsourced are: the institutes, centers of excellence, organizations for innovation activities, organizations for infrastructural support to innovative activities and food producing companies, intermediaries, equipment and services.

The teaching units are equipped with measurements, demo, computer, ICT equipment for experimental, demo and simulation trials in these study programs within the group of science teaching and applied courses.

In the area of biotechnology adequate experimental plots have to be provided, owned by the higher education institution or leased, of the total area of minimum 100 Ha of arable land with different crops and livestock breeds, with the application of modern technology, supported by high quality farm appliances that are needed in the study programs. In the area of forestry there must be suitable experimental estates owned by the higher education institution or leased, of the total area of minimum 1000 Ha of land consisting of various forest stands, producing seeds and nurseries with the application of modern technology, helped by modern technology and good farm machines.

The facilities at the experimental farms shall correspond to the study program requirements that are carried out in higher education institution.

## Arts

### Standard 5. Curriculum

The basic selection of arts studies is built in the major course.

The structure of the study program at the basic academic studies in the field of arts contains the following groups of courses expressed in ECTS credits in such a way that :

- arts groups of courses are represented by 50% to 60 %;
- theoretic arts groups of courses are represented by 30% to 40%;
- social and humanistic groups of subjects are represented by about 10%.

The structure of the study program at the basic professionals studies in the field of arts shall consist of the following groups of subjects expressed in ECTS credits:

- artistic groups of subject account for about 40% ;
- theoretical-art groups of subjects are represented by about 20%;
- professional applied groups of subjects are represented by about 30%;
- social-humanistic groups of subjects account for about 10%.

The number of ECTS credits which corresponds to the optional subjects in one study program shall be:

- at the basic studies at least 5%;
- at the diploma studies about 10%;
- at the doctoral studies about 20%.

### Standard 9. Teaching staff

The teaching at higher education institutions in the field of arts is carried out as:

- individual;
- group;
- collective.

The organization of teaching is based on all the three ways of teaching activity, depending on the type and nature of the subject.

The size of the group in group teaching depends on the type and nature of the subject and ranges from 2 to 20 students.

Collective teaching is organized for the group of 300 students.

Maximum engagement per teacher cannot exceed 12 contact lessons a week.

Weekly and annual work load of the associates depends on the specificities of the study program, responsibilities of the associates and the title held according to the general bylaw of higher education institution.

Representative references for education-artistic area of music arts are:

- works of art of music (composition works) performed in the country and abroad;
- works of art in the area of music performed at the festivals in the country and abroad;
- concerts and opera performances in the country and abroad (performance activities);
- concerts and opera performance at the festivals in the country and abroad;
- master course and seminars in the country and abroad;
- participation in the musical competitions in the country and abroad;
- participation in juries at the musical competitions in the country and abroad;
- awards and recognitions for artistic activity;
- published theoretical or textbook works in the country and abroad (books and professional works and professional magazines).

Representative references for education artistic area of drama and performance work are:

- public performance of artistic work on the regular repertoire;
- public performance of artistic work at the manifestations and festivals;
- commercial realization of artistic work;
- participation or guidance of special art courses, seminars or master workshops in the country and abroad;
- participation in the work of juries at the national or international festivals;
- awards and recognitions for art work in the country and abroad;
- published theoretical or textbook works in the country and abroad (books and professional magazines).

Representative references for education artistic area of visual and applied art and design are:

- public exhibition of a work of art at the individual exhibitions;
- public exhibition of a work of art at the collective jury exhibitions and manifestations;
- commercialization of a work of art;
- participation or guidance of special art courses, seminars or master workshops in the country and abroad;
- participation in the national and international competitions of artistic works;
- participation in the work of juries in the local and foreign exhibitions. competitions and manifestations;
- awards and recognitions for artistic work in the country and abroad;
- published theoretical or textbook works in the country and abroad (books and professional magazines).

References in the area of science of art shall be determined in keeping with the standards applicable to the area of science.

### **Standard 10. Organizational and material resources**

For the performance of study program an adequate space shall be provided with at least 5 m<sup>2</sup> net per student.

For the performance of study program necessary special premises depending on the specificity of the artistic area are provided: workshops, laboratories, area for exhibitions, concert halls, audio and opera studios, theatre hall, cinema, TV studio and the similar.

Necessary equipment for modern teaching is provided for the performance of the study program, depending on the specificities of artistic areas.