





9th European Quality Assurance Forum

13 – 15 November 2014

University of Barcelona, Spain

Changing education – QA and the shift from teaching to learning

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Short bio (150 words max):

Melinda Szabo joined the EQAR Secretariat in March 2013. Amongst others, she is responsible for the <u>Analysis on the recognition of EQAR-registered agencies</u>.

Melinda has done her master studies in Educational Management in Romania and complemented her degree with studies in political science at the Universite Libré de Bruxelles.

She has previously worked in the Bologna Follow-Up Group Secretariat in providing support for the activities of the Working Groups and Networks (mainly the Social Dimension Working Group and Network of Experts on Student Support in Europe). Her professional experience includes work done on quality assurance in the Center for Quality Assurance at the Babes-Bolyai University (2008-2010) and in the Institutional Evaluation Programme of the European University Association as a member of the student experts' pool in quality assurance.

Proposal

Title: "An analysis of the Quality Assurance Agencies activities across borders"

Abstract (150 words max):

Taking into consideration the paucity of information in the area of external quality assurance activity of quality assurance agencies (QAAs) the present paper provides a first attempt to fill in the gaps. The study is based on the responses of 60 surveyed QAAs and considers the activities of respondents who operate within different national contexts (evaluation/audit/accreditation at programme or institutional level), the practices and procedures employed (criteria and processes, publication of reports, follow-up activities, expert team, appeals and complaints procedure etc.) as well as the perceived benefits and challenges by these QAAs that carry out reviews across borders.

The findings also provides a basis for considering measures that could facilitate the EQA activity of agencies within EHEA, while working in compliance with the European Standards and Guidelines.







Text of paper (3000 words max):

1. Introduction

1.1 Background and scope of the survey

Information on the international activity and recognition of quality assurance agencies (OAAs) across borders is limited to the national reporting of the Bologna Process¹ (2012) and the desk research exercise carried out by the European Quality Assurance Register for Higher Education (EQAR) in 2013². The results show that there are eleven EHEA countries where higher education institutions can choose to be evaluated by an EQARregistered agency as part of the national requirements for external quality assurance (EQA). Some additional countries use different requirements for allowing and recognising the reviews carried out by these agencies. At present, there is only limited quantitative data on the number of QAAs operating in these countries, and on the number of institutions or programmes having been reviewed.

To fill the gap on the external quality assurance (EQA) activities of agencies within different national contexts and legal backgrounds as well as of the main challenges and benefits related to their cross-border EQA activity, a survey has been carried out.

The questionnaire addressed the existing practices and procedures employed by agencies in their cross-border QA reviews and the rational for their international activity and other types of international activities (e.g. cooperation with other agencies).

To ensure the clarity of the text two main terms have been explained below. For further clarification a list of abbreviation is provided in Annex 2.

- Cross-border external quality assurance (EQA) reviews (evaluation, audit, accreditation) of a higher education institution or a programme in country A carried out by a QAA from country B.
- International activities of QAAs joint projects, cooperation agreements, • networking, exchanges etc. carried out by QAAs with partner(s) from other countries.

1.2 Methodology

The guestionnaire was launched on an online platform (Qualtrics)³ and distributed to representatives of QAAs active within and beyond the European Higher Education Area (EHEA). The questionnaire was circulated in two rounds.

In the initial round (12 February and 20 March) 41 different OAAs responded. In the second stage (15 May – 25 June) an additional 19 QAAs have submitted their answers (see Annex 1). The second round was set up to increase the coverage of QAAs. The following analysis is based on the responses of 60 QAAs, representing 67% of the total number of QAAs contacted.

1.3Background information about respondents

The responses were provided by a wide-range of QAAs established in 30 of the 47 EHEA member countries and in 7 other non-EHEA territories/countries (i.e. Australia, Kosovo⁴,

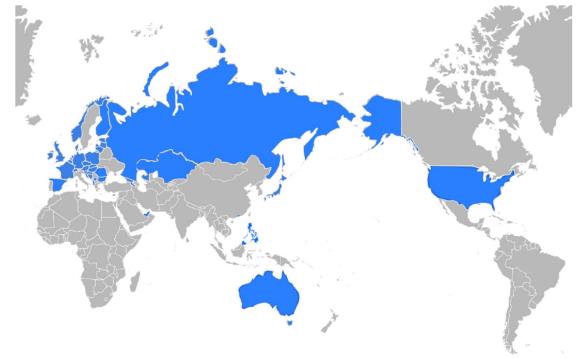
¹ Bologna Process implementation report (2012)

² Further information about the results of the desk research is available in Annex 1 and on the project's website at: <u>http://eqar.eu/projects/map.html</u> ³ The PDF version of the questionnaire can be accessed here:

https://eqar.eu/fileadmin/documents/eqar/information/Preview Questionnaire - Crossborder activity of QAAs.pdf.



Hong Kong, Japan, Philippines, United Arab Emirates and United States of America) (see Map below).



Map of countries where QAAs that have completed the survey are based

- Countries where responding QA agencies are based (registered office)
 Countries with no respondents
- Countries with no respondents

A little over half of the responses (32 out of 60) were provided by QA agencies listed in the European Quality Assurance Register $(EQAR)^5$.

Most of the responding QAAs have been established with the purpose to carry out external quality assurance activities primarily within their country, within a specific group of sovereign states or within a region. In addition, 7 of the responding QAAs have been set up with the primary purpose of operating internationally (e.g. AEC, EAPAA, ECCE, FIBAA, IEP).

The diversity within the responding 60 QAAs is also reflected in terms of the type of the EQA activity and domain (audits, accreditation, or evaluation for specific disciplines or across different fields of study).

2. Overview of international activities

The main findings of the survey are summarised below. The first part covers the general international activities of quality assurance agencies (QAAs), while the following parts focus specifically on the cross-border EQA activities (i.e. audit, accreditation or

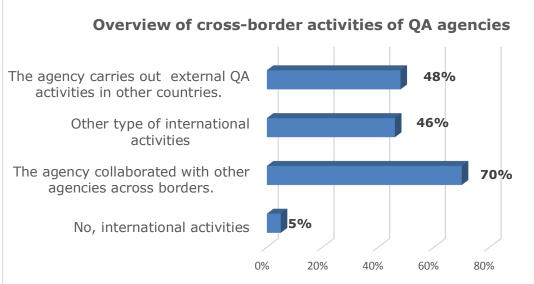
⁴ All references to Kosovo, whether the territory, institutions or population, on this report shall be understood in full compliance with United Nation's Security Council Resolution 1244 and without prejudice to the status of Kosovo.

⁵ EQAR listed agencies as of 25st July 2014.



evaluation) of agencies since 2009. The final part discusses the implication of the findings in regard to the cross-border EQA activity of QAAs.

The responses on the general inquiry on agencies' international activity reveal that only 3 of the 60 quality assurance agencies do not have any type of international activity at all. Out of the remaining 57 responding QAAs, 48% have carried out reviews across borders, 70% collaborated at international level with other QAAs and 46% answered that they have engaged in other types of international activities (see table below).



It is worth noting that some QAAs do not have the legal authority to carry out reviews of HEIs/programmes abroad (e.g. CAA, AI). Their interaction is limited to collaboration within the international quality assurance networks or the bilaterally/multilaterally interactions with other QAAs.

As part of their international activity most agencies have listed international projects (CeQuint, QUEST, Qrossroads, MULTRA, ECAPEDIA, IMPALA, Twinning, NOQA, GICAQ project, QACHE, ESABIH) and involvement in different European (ENQA, CEENQA, ECA, REACU) or other international networks/associations (INQAAHE, ANQAHE).

Within EHEA, 42 of the responding QAAs have reported cooperation across borders with other QAAs. The collaboration seems often to have a more regional concentration that might be related to the similarity of the higher education systems and external QA framework resulted from a shared historical development.

The activities are sometime initiated by regional or international organisations (Nuffic project in Yemen, GIQAC project funded by World Bank and supported by Unesco, USAID in Ethiopia), they may be a result of strategic alliances set up by an agency (QAA-UK's agreement with Singapore, South Africa, Malaysia, Japan, Hong Kong) or as part of a multilateral agreement to recognise the accreditation of joint programmes (MULTRA project with CNA from Colombia).

Among the reasons for engaging in international and EQA activities, QAAs describe the benefit drawn from the exchange of experiences and practices in QA reviews, the possibility of increasing their visibility at international level, the increased trust, recognition and comparability of diplomas resulting from the collaboration with other QAAs as well as the stimulation of mobility of students and staff.

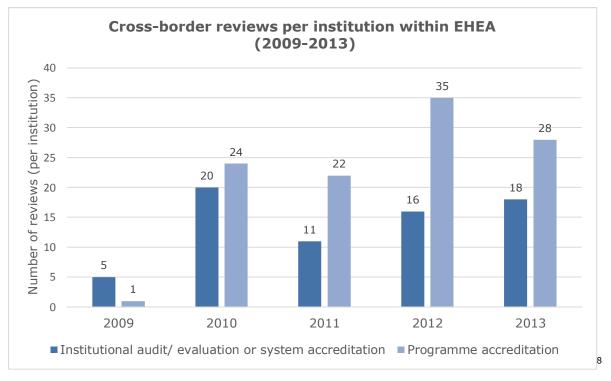
3. Overview of cross-border External QA activities



In the following analysis replies received from 29 $QAAs^6$ that carry out external QA reviews across borders are being examined.

21 of these QAAs are listed in EQAR⁷, attesting their substantial compliance with the European Standards and Guidelines (ESG). They represents two thirds of all EQAR-registered agencies (21 of 32). It is noteworthy to consider a possible relationship between QAAs seeking a registration in EQAR and their EQA activities across borders.

The external QA activities of these agencies spanned across 39 EHEA and 46 non-EHEA member countries and territories. In the last five years these agencies have reported to carry out 240 cross-border reviews, 71% of which within the EHEA. These results point to an increasingly dense web of external reviews across borders that seems to be increasing since 2009 (see chart below).



The reviews carried out vary depending on the level (institution, programme level), purpose of the quality assessment (accreditation/audit/evaluation) and external QA framework (open or not open to cross border QA reviews⁹).

The reviews tend to have a European concentration (see charts below) as most respondents come from EHEA. The highest number of reviews are carried out by QAAs who have an international orientation (e.g. ETN, ASIIN, EAPAA, IEP).

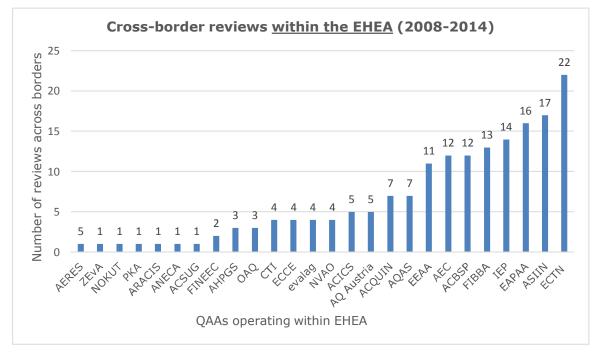
⁶ Non-EHEA respondents carrying out reviews across-borders: ACBSP, ACICS, PAASCU, TEQSA.

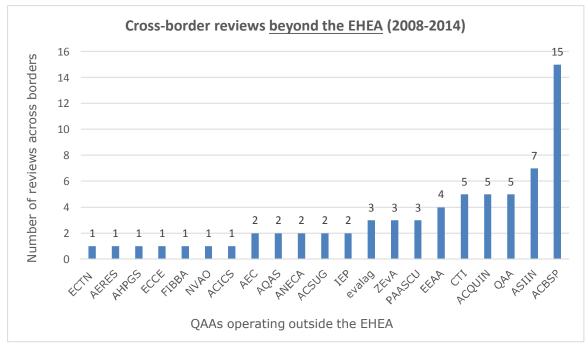
⁷ EQAR listed agencies as of 25st July 2014.

⁸ Chart is constructed on the responses provided by 24 (EHEA established) QAAs between 2009 and 2013. Responses for 2008 and 2014 were excluded to increase comparability, as agencies where asked to report on the last 5 years in two rounds within 2014.

⁹ We refer here to the obligatory external evaluation or accreditation, i.e fulfilling the requirements set out within the national legal framework for higher education institutions and/or at programme level.







a. Status and recognition of EQA

The status and recognition of these cross-border QA reviews depend on the national legislation of the country of the reviewed institution or HEI's programme and the purpose of the review (e.g. voluntary, not part of the periodic EQA review).

In some cases cross-border EQA are recognised as a substitute to the legally required EQA procedures (e.g. Austria, Kazakhstan, Lithuania, Lichtenstein etc.), while in other instances the review was undertaken on a voluntary basis in order to gain an additional external feedback (IEP reviews, evalag review of an institution in Hungary) or a quality label (EUR-ACE label awarded by ASIIN, Premium label offered by FIBAA etc). Some







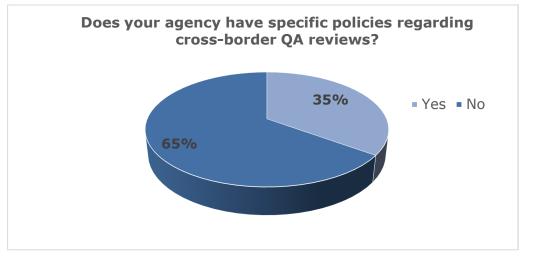
countries recognise the review carried out by a foreign QAA for joint degrees (in Denmark and Germany), for transnational HE provisions (e.g. PKA review of a transnational programme in Lithuania) or specific circumstances (bilateral agreements).¹⁰

The EQA reviews can also take the form of a cooperation with the nationally recognised QA body (AEC collaboration with ANQA, ZEVa, SKVC etc.).

In three fourths of cases the cross-border review was initiated by the higher education institution, while reviews initiated at the request of the ministry or another QA agency where less common. Examples of Ministry initiatives is the request launched by the German Community of Belgium to AEQES for the evaluation of some of its HE programmes, or the Ministry of Education from Moldova contracting ARACIS for the review of its Law study programmes. In several instances the initiative came as a result of a collaboration or agreement established by the QAA and the national QA agency (e.g. AEC agreement with AEQES and OAQ), or its ministry (e.g. national IEP reviews in Romania and Portugal).

b. Criteria and processes in cross-border QA

Regarding the existing policies or procedures developed by QAAs to carry out reviews across border, 9 out of 26 agencies have established and published specific policies for cross border EQA (see pie chart below).



QAAs where further asked about details regarding the **criteria and processes** used during their reviews abroad.

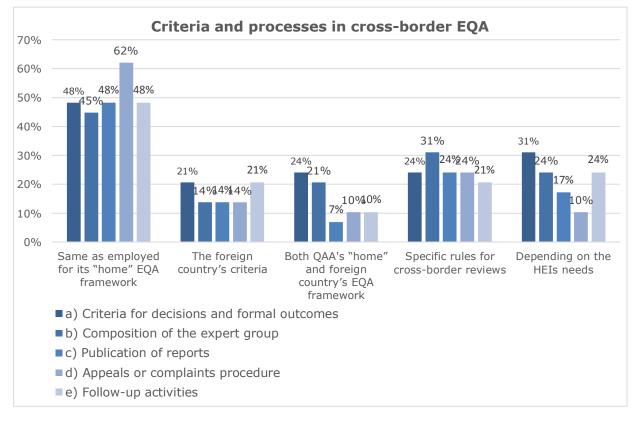
The results point to a change in practice for over half of the agencies carrying out reviews across borders (see table below). A forth up to a third of these agencies adapt their criteria if needed, according to the requirements within the foreign country.

At the request of the higher education institution one in three QAAs have changed their criteria for decisions and formal outcomes, one in four the composition of the external review panel and their follow-up activities, while 17% have reconsidered their practice on the publication of reports.

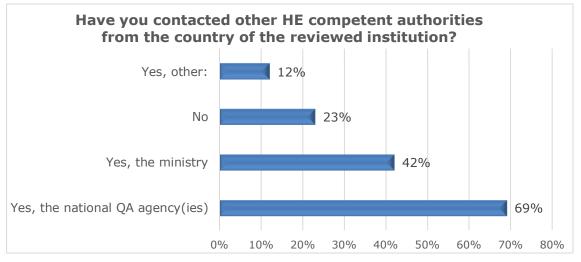
Most agencies have chosen more than one answer in all given criteria indicating the diversity of approaches to external QA across-borders. These results point also to a specialisation of EQA practices, with agencies combining the foreign country's criteria with the "home" country's criteria or by using specific rules for their cross-border review.

¹⁰ For additional information see : <u>http://eqar.eu/projects/map.html</u>.





Within the country of the reviewed HEI, 42% of the responding QAAs have contacted the responsible Ministry and 69% the national QA agency with the purpose of discussing the need to incorporate additional criteria (required by the national authorities), to clarify the specific requirements for the official recognition of the review or to be updated regarding the accreditation developments within that country (see chart below). In other instances the meeting was set up with the Ministry to discuss the terms of reference and the programme details for the review process.



c. Benefits and challenges of cross-border QA reviews in the EHEA

Quality assurance agencies have described as main the **benefit** of their activity within other countries the opportunity to improve their own processes and methodologies, by reflecting on how well they can be deployed in a different system. Their observations





from their cross-border work also allowed them to expand their own network and increase their national and international profile. Some QAAs mentioned they value the opportunity of promoting continuous improvement, while ensuring transparency and comparability within their field.

The key challenges QAAs have experienced when operating in a different country is to familiarize themselves with the regulatory framework, context and customs of the "target" country. This requires considerable effort before operating in a country for the first time. Agencies have described this as particularly difficult for cases where regulations on the work of foreign agencies were unclear or not transparent. Further challenges observed by quality assurance agencies in their cross-border activities include language barriers; the availability of regulatory documents and standards in English or their own language; difficulties as to what set of standards to apply; and different expectations in terms of content and style of reports, especially where another agency needs to make a decision on their basis.

To overcome these barriers, QAAs have approached national authorities and/or local QAAs (see above) to clarify the requirements of the national EQA framework and ensuring mutual trust. In order to address language barriers, some QAAs have included a native speaker within the external review team or arranged for simultaneous translation for their panel meetings.

4. Measures to facilitate the EQA activities of agencies across borders (60 respondents)

The survey also invited QAAs¹¹ to provide a number of suggestions that could facilitate the EQA activity of agencies abroad (at international, national or institutional level). The main suggestions are presented below.

At international level:

- Promoting the European Standards and Guidelines (ESG) as the core element of trust and recognition within the EHEA.
- Development of procedures/policies for the recognition of accreditation decisions of joint programmes.
- Direct financial resources to QA agencies to support international quality assurance activities and reviews.
- Establishing and agreeing on trans-national quality seals and common policies for the publication of evaluation reports.
- Organisation of international benchmarking seminars.
- Developing a data base of international experts.
- EQAR-registration as a reference for cross-border external QA reviews.
- Promoting the use of standardised information on each countries requirements on cross-border reviews to facilitate QAAs first contact with that country and dissemination of results from cross-border reviews.
- Regulation to prevent the negative effects of a possible "marketisation" of QAAs activities across borders.

At national level:

- Ensuring a more flexible and transparent national regulation for the work of foreign QAAs.
- Making available national rules and criteria in a widely spoken language.
- Encouraging national agencies to cooperate with field specific international QAAs.

¹¹ The question was made available to all internationally active QAAs





Raising awareness on the benefits of recognising the diversification of QA practices and removing the strains for HEIs who are duplicating these reviews.

5. Discussions on findings:

The international dimension seem to be part of the daily life of QAAs. This extends from the participation in international quality assurance networks or bilateral cooperation to an increasing involvement in cross-border quality reviews for at least half of the surveyed agencies. The last five years have seen an ascending trend of these reviews with 84% of the 47 EHEA member states experiencing an external quality assurance review with a non-national agency. In this context it becomes increasingly important, to cover up the paucity of information and provide a basis for discussion on QAAs activity across border, on their rational, perceived benefits and challenges when operating in different legal frameworks as well as the implications of these findings considering the EHEA ministers commitment to allow EQAR-registered agencies to perform their activities within their borders while complying with national requirements.

External quality assurance fulfils many purposes¹² (e.g. safeguard academic standards for higher education, accredit programmes and/or institutions; ensuring user protection; public provision of independently-verified information about programmes or institutions; improvement and enhancement of quality). QAAs bear the responsibility in fulfilling these purposes, within familiar (i.e. national) or less familiar QA frameworks (i.e. crossborders). At institutional level QAAs are expected of balancing between autonomy and accountability, while ensuring the responsibility of the institution in the evaluation process and the implementation of recommendations¹³. At programme level, QAAs are expected to provide expertise and improve the (international) recognition of the delivered study programme. When they carry out reviews across borders, QAAs have to also consider on adapting their procedures and methodologies to different national requirements, to mitigate possible tensions of different EQA approaches (e.g. enhancement vs accreditation focused national frameworks) and other possible strains (i.e. HEI's preference for a cross-border QAA and on open conflict with the national QAA). Responding agencies have also acknowledged the risk of HEIs selecting a review due to its less strict requirements. QAAs thus, bear the responsibility of delivering high quality reviews in less familiar QA frameworks but also the responsibility in refusing a review.

Cross-border reviews provide an added value to agencies in terms of prestige, income or learning opportunities. It allows them, notwithstanding the resources needed for preparing such reviews (especially for nationally subsidised public QAAs), to improve their understanding on quality and reflect their experience back "home", thus transferring their knowledge on the national framework. Agencies that have specialised in carrying out reviews across borders, have developed their image and offerings to meet their target group's needs. This is regarded positively by most agencies, since it encouraged them to improve their processes so as to be most beneficial for the higher education institution or program under review, and to develop a clear presentation of their approach and its benefits for institutions.

It has to be considered whether it is possible to move from an ad-hoc to a standardised EQA for each QAAs operating cross-borders. The distinctive feature of standardized reviews is that QAAs make use of policies and procedure for cross-border external QA, which are developed within only 9 of the surveyed QAAs. While all QAAs involved in cross-border EQA activities could establish such procedures, it is worth considering that

¹² ESG, p. 15

¹³ Trends 2010, p. 88.





for some agencies their first priority is to carry out their EQA activities within their country, therefore cross-border reviews are secondary in focus.

Another dimension is the publication of reports and decisions, which as the findings show is not a generalised practice. When asked for further details about the quality assessments carried out (i.e. to provide web link to the report of the external review carried out), QAAs offered such an information for only little 41% of cases. The publication of reports is common among QAAs registered in EQAR who have committed themselves to work in line with the European Standards and Guidelines and less common to those who do not intend to be part of the Register.

Making available background information on national HE systems and legislative requirements for the recognition of decisions and outcomes of QA reviews by nonnational agency was one of the key recommendations expressed by QAAs to facilitate the activities of agencies across borders. Cross-border QAAs could avoid unintentional consequences, due to lack of contextual information or awareness if this information where readily available.

The light of these findings, it is worth exploring further areas of development. For instance ministries could learn from the existing practices and can step up their effort to ensure a fair competition between QAAs working across-borders within the EHEA, while entrusting the higher education institutions to make the right choice.

Acknowledgements

The research on which this paper is based was undertaken in the context of the RIQAA project (Recognising International Quality Assurance Activity in the European Higher Education Area carried out in 2013/2014-539939-LLP, Work-Package 3). This project has been funded with support from the European Commission. This paper reflects the views only of the authors, and the Commission cannot be held responsible for any use which may be made of the information contained therein.

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- <u>http://eqar.eu/projects/map.html</u>.

ANNEXES

Annex 1. Quality assurance agencies that have filled in the questionnaire

Home country(ies)	Name of the QA agency	Acronym
Albania	Public Accreditation Agency for Higher Education	PAAHE
Armenia	National Center for Professional Education Quality Assurance Foundation (ANQA)	ANQA
Australia	Tertiary Education Quality and Standards Agency	TEQSA
Austria	Agency for Quality Assurance and Accreditation Austria	AQA









Belgium	Association Européenne des Conservatoires, Académies de Musique et Musikhochschulen	AEC
Belgium	European Chemistry Thematic Network Association	ECTN
Belgium (Flemish	Quality Assurance Unit of the Flemish Council of	VLUHR
speaking)	Universities and University Colleges	QAU
Belgium (French speaking)	Agence pour l'Evaluation de la Qualité de l'Enseignement Supérieur	AEQES
Bosnia and Herzegovina	Agency for development of higher educations and quality assurance	HEA
Bosnia and Herzegovina (Republika Srpska)	Higher Education Accreditation Agency of Republika Srpska	HEAARS
Bulgaria	The National Evaluation and Accreditation Agency	NEAA
Croatia	Agency for Science and Higher Education	ASHE
Cyprus	Council of Educational Evaluation and Accreditation	CEEA
Czech Republic	Accreditation Commission Czech Republic	ACCR
Denmark	Danish Evaluation Institute	EVA
Denmark	The Danish Accreditation Institution	AI
Estonia	Estonian Higher Education Quality Agency	EKKA
Finland	Finnish Higher Education Evaluation Council	FINHEEC
France	Evaluation Agency for Research and Higher Education	AERES
France	Commission des Titres d'Ingénieur	CTI
Georgia	National Center for Educational Quality Enhancement	NCEQE
Germany	Accreditation, Certification and Quality Assurance Agency	ACQUIN
Germany	Accreditation Agency in Health and Social Sciences	AHPGS
Germany	Evaluation Agency Baden-Württemberg Commission	evalag
Germany	Agency for Quality Assurance through Accreditation of Study Programmes	AQAS
Germany	Akkreditierungsagentur für Studiengänge der Ingenieurwissenschaften, der Informatik, der Naturwissenschaften und der Mathematik	ASIIN
Germany	Foundation for International Business Administration Accreditation	FIBBA
Germany	Zentrale Evaluations- und Akkreditierungsagentur Hannover	ZEvA
Germany	European Evangelical Accrediting Association	EEAA
Germany	European Council on Chiropractic Education	ECCE
Hungary	Hungarian Accreditation Committee	HAC
Hong Kong SAR	The Hong Kong Council for Accreditation of Academic and Vocational Qualification	HKCAAVQ
Ireland	Quality and Qualifications Ireland	QQI
Japan	National Institution for Academic Degrees and University Evaluation	NIAD-UE
Kazakhstan	Independent Agency for Accreditation and Rating	IAAR
Kosovo	Kosovo Accreditation Agency	KAA
Latvia	Higher Education Quality Evaluation Centre	AIKNC
Lithuania	Centre for Quality Assessment in Higher Education	SKVC
Netherlands	Accreditation Organisation of the Netherlands and Flanders	NVAO
Netherlands	European Association for Public Administration	EAPAA









	Accreditation	
Netherlands	Quality Assurance Netherlands Universities	QANU
Philippines	Philippine Accrediting Association of Schools, Colleges and Universities	PAASCU
Norway	Norwegian Agency for Quality in Education	NOKUT
Poland	Polish Accreditation Committee	PKA
Romania	Romanian Agency for Quality Assurance in Higher Education	ARACIS
Russia	The Agency for Higher Education Quality Assurance and Career Development	AKKORK
Russia	National Centre for Public Accreditation	NCPA
Slovak Republic	The Accreditation Commission, advisory body of the government of the Slovak Republic	ACSR
Slovenia	Slovenian Quality Assurance Agency	SQAA
Spain	Agencia Nacional de Evaluación de la Calidad y Acreditación	ANECA
Spain (Basque country)	Basque University System Quality Agency	Unibasq
Spain (Catalonia)	Agency for Quality Assurance in the University System of Catalunya	AQU
Spain (Castile and Leon)	Quality Assurance Agency for the University System of Castilla y León	ACSUCYL
Spain (Galicia)	Agency for Quality Assurance in the Galician University System	ACSUG
Switzerland	Institutional Evaluation Programme, IEP	IEP
Switzerland	Swiss Center of Accreditation and Quality Assurance in Higher Education	OAQ
United Arab Emirates	Commission for Academic Accreditation	CAA
United Kingdom	The Quality Assurance Agency	QAA
United States of America	Association of Collegiate Business Schools and Programs	ACBSP
United States of America	The Accrediting Council for Independent Colleges and Schools	ACICS

Annex 2. Abbreviations

Abbreviation	Full name/ description
CeQuint	Assessment of Quality in Internationalisation
QUEST	Quest for Quality for Students
Qrossroads	Information regarding quality assured and accredited higher education in Europe
MULTRA	Mutual Recognition of Accreditation Results regarding Joint Programmes
ECAPEDIA	A portal dedicated for higher education issues in quality assurance
IMPALA	Impact Analysis of External Quality Assurance Processes of Higher Education Institutions
NOQA	Nordic Quality Assurance Network in Higher Education
GICAQ	Global Initiative on Quality Assurance Capacity
QACHE	Quality Assurance of Cross-border Higher Education
ESABIH	European Union Standards for Accreditation of Study Programmes at BiH Universities









ENQA	European Association for Quality Assurance in Higher Education
CEENQA	Central and Eastern European Network of Quality Assurance Agencies
ECA	The European Consortium for Accreditation in higher education
REACU	Spanish Network for Quality Assurance Agencies in Higher Education
INQAAHE	The International Network for Quality Assurance Agencies in Higher Education
ANQAHE	The Arab Network for Quality Assurance in Higher Education

Questions for discussion:

- A. Policies, practices and procedures to enhance cross-border EQA
- 1. How are the European Standards and Guidelines underpinning cross- border reviews?
- 2. What would be the requirements under which EQAR-registered agencies may operate, the criteria to be used and the responsibilities vis-à-vis national bodies?
- 3. What would a reference point such as EQAR need to provide in order to be attractive to the QAAs wishing to be active in EQA?
- 4. What are implications for the recognition of qualifications and quality assurance decisions?
- **B.** Benefits and the challenges for QAAs and HEIs to pursue cross-border reviews
- 1. What are the main reasons for QAAs and HEIs to carry out an external QA review?
- 2. What are the benefits and challenges related to agencies' cross-border reviews? How can the challenges be addressed?
- 3. What are the benefits and challenges related to HEIs engaging in review with a cross-border QAA? How can the challenges be addressed?
- 4. What is the recognition status of EQA activities for a non-national QAA? What are the challenges for the recognition of joint programmes and degrees? How can they be addressed?
- 5. What are the main actions that can facilitate external QA reviews (evaluation, audit, and accreditation) across borders? At what level should these changes be made (international, national, institutional)?