



THE FIRST WAVE OF CLUSTER ACCREDITATION: EXPERIENCES, ACHIEVEMENTS AND CHALLENGES

THEMATIC ANALYSIS



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QUALITY ENHANCEMENT

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Introduction

National Center for Educational Quality Enhancement is a quality assurance agency that is responsible for the external quality assurance (EQA) of higher education (HE) in Georgia and implements two mechanisms of HE quality assurance (QA): authorization of higher education institutions and accreditation of higher education programmes. The center was established as the National Education Accreditation Center in 2006, and in 2010 it was established as the National Center for Educational Quality Enhancement.

The process of accreditation of higher educational programmes has been implemented in Georgia since 2011.¹ From 2011 to 2022, accreditation was mandatory for regulated fields, as well as teacher training and Georgian-language training programmes and for doctoral level programmes. Despite the non-mandatory nature of accreditation, in 2011-2022 accreditation was a necessary requirement for students to receive a state grant. Accordingly, in 2011-22, the majority of educational programmes operating in the country went through the accreditation process, and as of March 1, 2022, out of 1,623 educational programmes operating in Georgian higher education institutions, 1,410 were accredited.²

The process of accreditation of educational programmes, from the initial stage onwards, was characterized by exceptional workload. To illustrate this, Table N1 shows the total number of decisions made by the Accreditation Council in 2011-2022. In addition to the general number, it should also be noted that throughout these years, educational programmes from different fields used to be accredited at the same time, which is why, along with managing the evaluation of a large number of programmes, the NCEQE had to continuously search for experts to evaluate programmes from different fields of study. This led to the use of a large number of resources, both by the NCEQE and by the higher educational institutions themselves, which, taking into account the above situation, needed to take care of the accreditation of specific programmes from different fields in a parallel mode.³ This was one of the main prerequisites for the initiation of the cluster accreditation process.

¹ National Center for Educational Quality Enhancement - 2013 Report and Analytical Review of 2011-2013 (2013) https://eqe.ge/res/eqannualreport_2013.pdf

² Complete list of higher education programmes as of March 01, 2022. Provided by Education Management Information System.

³ Piloting of Cluster Evaluation of Higher Educational Programmes in Georgia - CEENQA Newsletter, 11/1, July 2021 https://www.ceenqa.org/wp-content/uploads/CEENQA-Newsletter_Vol.11_No.1_July_2021.pdf

Table 1: Number of decisions made by the Accreditation Council from 2011 to 2022.⁴

year	Number of programmes reviewed at the council
2022	208
2021	313
2020	235
2019	270
2018	195
2017	76
2016	140
2015	135
2014	267 ⁵
2013	185
2012	671
2011	408

Preparation for cluster accreditation

The active phase of cluster accreditation mechanism development started in 2020, with the support of EU-funded Twinning project “Strengthening capacities for quality assurance and governance of qualifications ” in which the NCEQE cooperated with the partner agencies, AQAS from Germany and HAKA (formerly EKKA) from Estonia. In August 2020, amidst the Covid-19 pandemic, the center introduced the vision of cluster accreditation to HEIs, the main issues of which were: the joint evaluation of programmes from the perspective of three cycles of the higher education and the consolidation and more effective use of resources spent on evaluation for all involved parties.⁶ At the beginning of 2021, with the support of German and Estonian experts, an initial pilot model of the cluster accreditation process and standards was

⁴The data is based on the NCEQE’s annual reports: <https://eqe.ge/ka/page/static/59/tsliuri-angarishebi>

⁵For 2014, only the number of positive decisions is provided

⁶Transition to cluster accreditation, 17/08/2020 - <https://eqe.ge/ka/posts/2685/klasterul-akreditatsiaze-gadasvla>



developed, which was piloted in 3 higher educational institutions of Georgia with the financing of the Twinning project. Among the challenges identified during the pilot was the integration of individual programme and cluster-focused assessments within the evaluation of standards focused on the programme content.⁷

The legal situation in the direction of accreditation of higher educational programmes was changed significantly in 2022. First of all, as a result of the legislative changes implemented in March 2022, accreditation became mandatory for all higher education programmes operating in Georgia.⁸ Taking into account the above, accreditation became mandatory for the programmes that up until then were being implemented in the authorized mode. In addition, the changes implemented in 2022 also affected the nature of the accreditation process. The cluster accreditation procedures were also approved which were reflected in the Accreditation Charter.⁹

The approval of the cluster accreditation process was accompanied by changes in the accreditation standards. As part of the changes, several components were moved between the first and second standards, which ensured a clear separation of the content focus of the requirements of these two standards, within which the first accreditation standard became fully focused on the content of educational programmes, and the second standard - on methodological, administrative and other issues of programme support. In addition, two new components were also added: 1.3. - 'Evaluation Mechanism of the Programme Learning Outcomes' and 4.2. - 'Qualification of supervisor of master's and doctoral student'. These issues were also considered in the previous model of standards, however, both of them were separated as components in the cluster accreditation format.

Characteristics of cluster accreditation

According to the model of cluster accreditation adopted in 2022, the order of the Minister of Education and Science of Georgia determined the stages of re-accreditation for educational programmes in various fields. In accordance with the stages and terms of re-accreditation of accredited programmes approved by the order of the Minister of Education and Science of

⁷Macharashvili, Lasha. Piloting of Cluster Evaluation of Higher Educational Programs in Georgia - CEENQA Newsletter, 11/1, July 2021 [https://www.ceenqa.org/wp-content/uploads/CEENQA-Newsletter_Vol. 11 No. 1 July 2021.pdf](https://www.ceenqa.org/wp-content/uploads/CEENQA-Newsletter_Vol.11_No.1_July_2021.pdf)

⁸Law of Georgia on Higher Education - Consolidated version 20/12/2012. <https://www.matsne.gov.ge/ka/document/view/32830?publication=28> ;
Law of Georgia on Higher Education - Consolidated version 20/12/2012. <https://www.matsne.gov.ge/ka/document/view/32830?publication=93>

⁹On the Approval of the Regulation for the Accreditation of Educational Programmes and the Fee for the Accreditation of Educational Institutions - <https://www.matsne.gov.ge/ka/document/view/1320588?publication=24>



Georgia, the first wave of cluster accreditation affected educational programmes in the field of humanities and personal services.¹⁰ According to the same order, the educational programmes in the fields of art, personal services, defense and security, and sports were evaluated in 2023, and educational programmes in the fields of business and administration are to be evaluated in 2024.

The main feature of the cluster accreditation assessment is that the assessment is carried out at the level of a cluster of programmes, which is a group of programmes that are related to each other in terms of content.¹¹ Along with the legislative changes, the National Center for Educational Quality Enhancement has also developed the rules for grouping programmes into clusters.¹²

It is important to note that, despite the approval of the cluster evaluation rule, the decision-making procedure for granting accreditation to educational programmes by the Accreditation Council has not been changed. In particular, regardless of the evaluation of the group of programmes, the Accreditation Council still makes decisions about individual programmes separately. Taking into account the abovementioned legal conditions, the form of the report of cluster accreditation includes assessments at the cluster and individual levels, and in the case of some components, the assessment of individual programmes is mandatory for the expert panel. Accordingly, the cluster accreditation report template allows the experts to provide analytical conclusions, recommendations and suggestions both individually and at the programmes group level.

In order to promote the continuous development of higher education quality assurance mechanisms, as well as taking into account the importance of accreditation and the scale of changes implemented within the framework of the implementation of cluster accreditation, it is especially important to study and analyze the impact of the cluster accreditation model implemented in Georgia, to find out to what extent the cluster accreditation model is able to achieve its goals.

¹⁰Re-accreditation stages during 2022-2028 of higher education programmes and Georgian Language Preparatory Educational Programmes Accredited as of June the 1st, 2022” <https://www.t.ly/cExN3>

¹¹Law of Georgia On Education Quality Improvement, Article 2¹, Paragraph “g”. - <https://matsne.gov.ge/ka/document/view/93064?publication=26>

¹²Rules and conditions for grouping higher education programmes into a cluster - <https://t.ly/5Qlim>



Goal and Methodology of the Research

Research Goals and Objectives

This thematic analysis aims to critically study the first stage of the implementation of the cluster accreditation model introduced in Georgia and identify the challenges in the process, in order to promote the continuous improvement of the quality assurance mechanisms of higher education. Considering the set goal, the research objectives are:

- To assess the compliance of the cluster accreditation mechanism with the predetermined goals;
- To identify successful practices and key challenges accumulated within the cluster accreditation process and the relevant activities for addressing the challenges and ensuring the further enhancement of the process.

To achieve the goal and objectives of the thematic analysis, the following research questions were formulated:

- What kind of model of cluster accreditation of higher education programmes was introduced in Georgia?
- To what extent does the cluster accreditation model ensure the achievement of the goals defined during its implementation?
- What successful practices exist in the cluster accreditation process?
- What are the main challenges in the cluster accreditation process and thus what are the next activities to consider in order to further develop the process?

Methodology and Selection

This research follows the guidelines for the process and methodology of the thematic analysis created within the framework of the Twinning project of public institutions funded by the European Union.¹³ In order to answer the research questions, the analysis uses a mixed research methodology, in which both qualitative and quantitative methods are utilized. As part of the qualitative research, document analysis was carried out and in-depth interviews were conducted with key stakeholders of the cluster accreditation process. As part of the quantitative analysis, the main statistical trends of the data of the recommendations and suggestions provided in the evaluation were analyzed.

¹³A proposal on the procedure and methodology of the thematic analysis. <https://t.ly/i7-Vo>



Document Analysis

Within the document analysis, the requirements of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015¹⁴) were taken into account and accordingly, the reports of the accreditation expert groups created within the first wave of cluster accreditation were processed. In particular, the recommendations and suggestions given in the cluster accreditation process were analyzed in relation to the objectives and questions of the research. As mentioned above, the first wave of cluster accreditation includes the evaluation of clusters of educational programmes in the narrow fields of *humanities* and *personal services*, which was carried out from the end of 2022 to the summer of 2023.

Taking into account the number of evaluations carried out at the first stage of cluster accreditation, the reports were purposefully selected for qualitative analysis, namely, the sample involved the report within the framework of which the evaluated clusters included all three levels of higher education - bachelor's, master's and doctoral educational programmes - a total of 11 reports. This choice was due to the fact that such clusters allow for a holistic assessment of the institution's resources and capabilities in a specific area, including at the department/faculty/school level.

An in-depth interview

As part of the research, in-depth interviews were conducted with key stakeholders involved in the process. The purpose of the in-depth interviews was to explore the experiences of stakeholders involved in the process. Overall, interviews were conducted:

- with representatives of higher educational institutions (HEIs) (4 interviews);
- with local (4 interviews) and international (2 interviews) accreditation experts;
- with employees of the National Center for Educational Quality Enhancement (2 interviews);
- with members of the 2022-2023 Accreditation Council (2 interviews).

The representatives of higher education institutions were selected taking into account the principle of maximum variations from the institutions that participated in the first wave of the cluster accreditation process. In the case of both local and international experts, those experts were selected who had assessment experience in the framework of both individual programme and cluster accreditation. Additionally, one interview was carried out with an international

¹⁴ Standards and Guidelines for Quality Assurance in the European Higher Education Area: https://www.engq.eu/wp-content/uploads/2015/11/ESG_2015.pdf Georgian version of the document: http://erasmusplus.org.ge/files/files/ESG_2015.pdf



expert who joined the NCEQE’s expert pool within the cluster accreditation process. In the case of the NCEQE’s employees, employees of different hierarchical levels were selected, who had the experience of facilitating both individual and cluster accreditation processes, and were also involved in the development processes of the cluster accreditation mechanism.

The interview was conducted online using the Zoom platform. An audio recording of the meeting was made for further transcription. The respondents confirmed their agreement to the terms of participation in the interview by signing the informed consent form.

Analysis of qualitative data

In the document analysis part, an Excel electronic database was created for research data analysis, which reflected recommendations and suggestions from the selected reports. In order to analyze the information in the database, the data was sorted through the analytical coding. Analytical coding is a coding approach in which, instead of focusing on descriptions, the researcher reflects on and interprets qualitative data¹⁵. Coding was carried out under the conditions of a cognitive framework, which, in addition to identifying the general thematic focus of the recommendations, aimed to determine the qualitative differences between the cluster and individual level recommendations. The codes developed as a result of primary coding are grouped into categories based on thematic grouping. These categories were used to structure the analysis. For example, in the case when various aspects of the development of educational programmes are highlighted in the recommendations and suggestions, they are first coded according to specific instructions (updating the syllabi, updating the literature, etc.), and at the next stage of the analysis, all the mentioned codes are united in the category of development of the content of programmes.

As part of the in-depth interviews, a transcript was made for each interview. Analytical coding approach was also applied to the transcripts. For interviews, coding was done with a focus on critical experiences, challenges, and future initiatives. The structure of the analysis of the results of the interviews was based on the main thematic categories identified in the transcript.

It should be noted that the process of interviews with international experts was carried out in English, within the framework of which an English version of the interview protocol was prepared for them. In order to ensure the reliability and validity of the research, within the framework of the interviews, the interviewers made preliminary qualitative clarification of the main conceptual issues with the respondents. With such a strategy, the group of

¹⁵ Merriam, S. B., & Tisdell, E. J. (2015). *Qualitative Research: A Guide to Design and Implementation*. San Francisco: Wiley.



researchers tried to ensure the formation of a common understanding of the main conceptual issues.

Quantitative Analysis

Within the framework of the research, a quantitative electronic (Excel) data base was created, in which all the recommendations and suggestions issued at the first stage of cluster accreditation were evaluated, indicating the components of the standards and the level of recommendation/suggestion. Using the above-mentioned database, the basic descriptive statistics of the data were analyzed: Frequencies of recommendations and suggestions with respect to different characteristics of institutions, ratios between standards, as well as total and percentile distributions at cluster and individual levels.

Results of the Study

Results of Quantitative Research

Within the framework of the reports included during the reporting period of thematic analysis, a total of 652 recommendations and 583 suggestions were issued by the accreditation experts. It is interesting that in the case of the 3 largest state universities out of 12 higher education institutions, the number of suggestions exceeds the recommendations, and among those institutions that on the contrary received more recommendations than suggestions during the external evaluation, most are regional (see. Figure 1). Of course, the overall volume of written suggestions and recommendations is correlated with the number of clusters of programmes in the relevant field in the evaluated institutions. There is also a strong positive correlation between the number of suggestions and recommendations issued by institutions.

Number of Recommendations and Suggestions in relation to the organizational status and geographical location of the HEIs

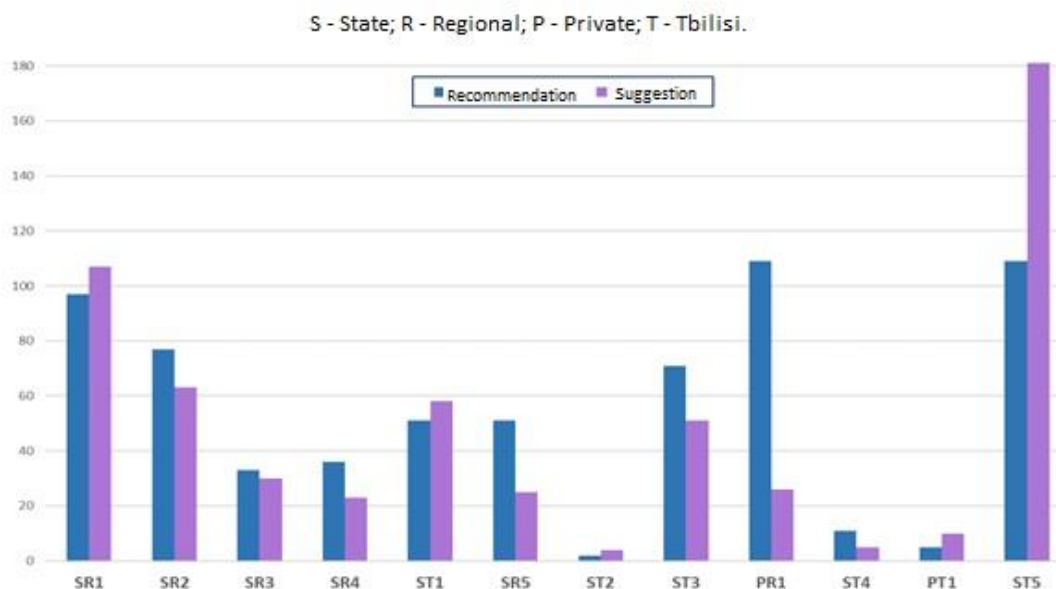


Figure 1

The percentage distribution of suggestions and recommendations according to institutions can be seen in Figure 2:

The Percentile Distribution of Suggestions and Recommendations according to the HEIs

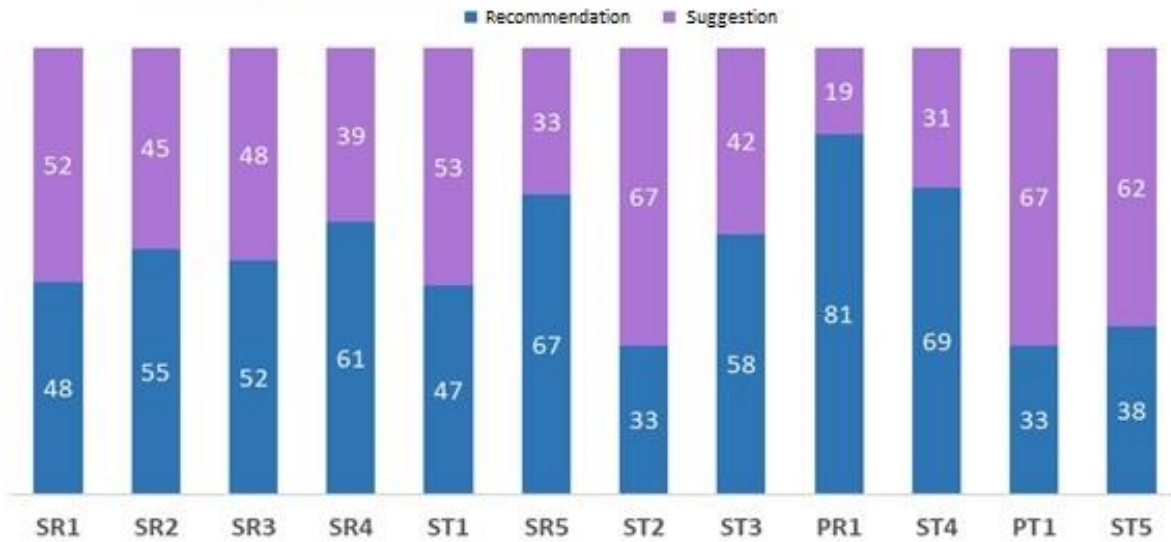


Figure 2

Distribution of Recommendations and Suggestions according to the accreditation standards' components

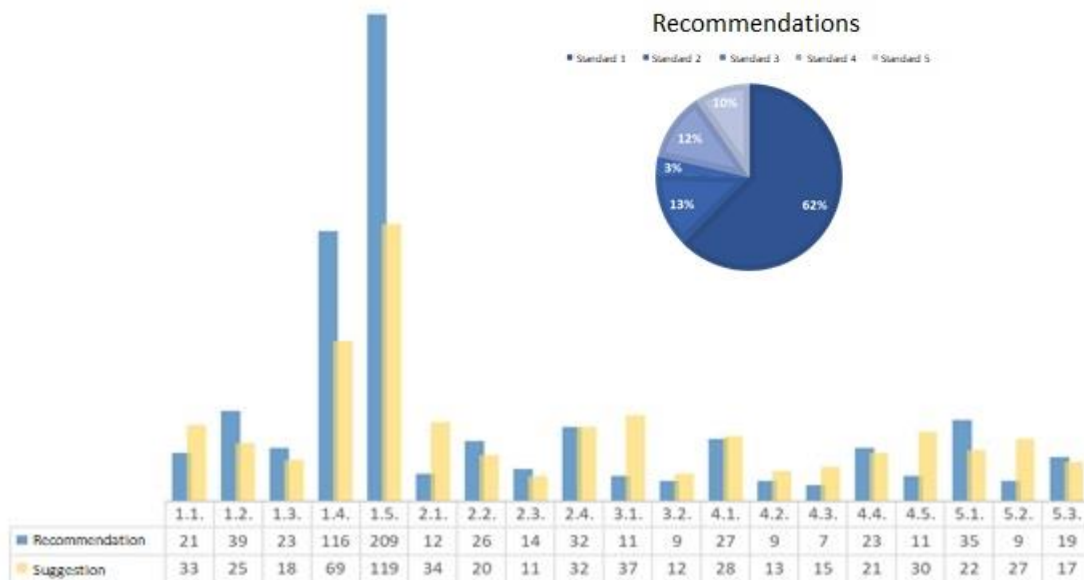


Figure 3

As can be seen in the third figure, the most of the issued suggestions and recommendations are devoted to components 1.4 and 1.5, which respectively include the structure and content of the educational programme. In terms of frequency of recommendations, the following



components come in the next place: 1.2 - learning outcomes, 5.1 - internal quality assurance, 2.4 - evaluation methods and 4.1 - human resources part. The components of the standards, where a lot of suggestions are given, are also distinguished by the fact that the number of suggestions there significantly outnumber the number of recommendations. These components are: 3.1 - Student Services, 2.1 - Programme Admission Requirements, 1.1 - Programme Objectives, and 4.5 - Programme Budget. If we look at only the recommendations issued as a whole, according to the standards, most of them (62%) fall on the first standard, the smallest amount falls on (3%) on the third standard, and the remaining shares are more or less equally distributed on the 2nd, 4th and 5th standards. There is a roughly similar ratio in the case of suggestions, although with a less dramatic contrast between the first and the rest of the standards.

In total, 216 recommendations are addressed to the overall cluster level, and almost twice as many - 436 recommendations - are issued to individual programmes. Out of suggestions - 248 are related to the cluster level and 335 to individual programme/programmes. Thus, in the case of a cluster, the number of suggestions slightly exceeds the number of recommendations, and according to individual programmes, on the contrary, the number of recommendations greatly exceeds the number of suggestions.

Directly according to the standards, it is also interesting to see that in terms of the learning outcome evaluation mechanism (1.3), teaching (2.3) and evaluation (2.4) methods, material resources (4.4), internal quality assurance (5.1) and periodic monitoring of programmes (5.3) much more recommendations are made at the cluster level rather than at the individual programme level. In this regard, the most visible difference is in the component of the 5.1 standard, where there are 33 cluster recommendations and only 2 individual ones. Additionally, there are a number of standards under which only a cluster recommendation is issued, namely: 3.1 - Student Services, 4.3 - Staff Support Services, and 5.2 - External Evaluation of a Programme. It is worth noting that there are no components without a cluster level recommendation.

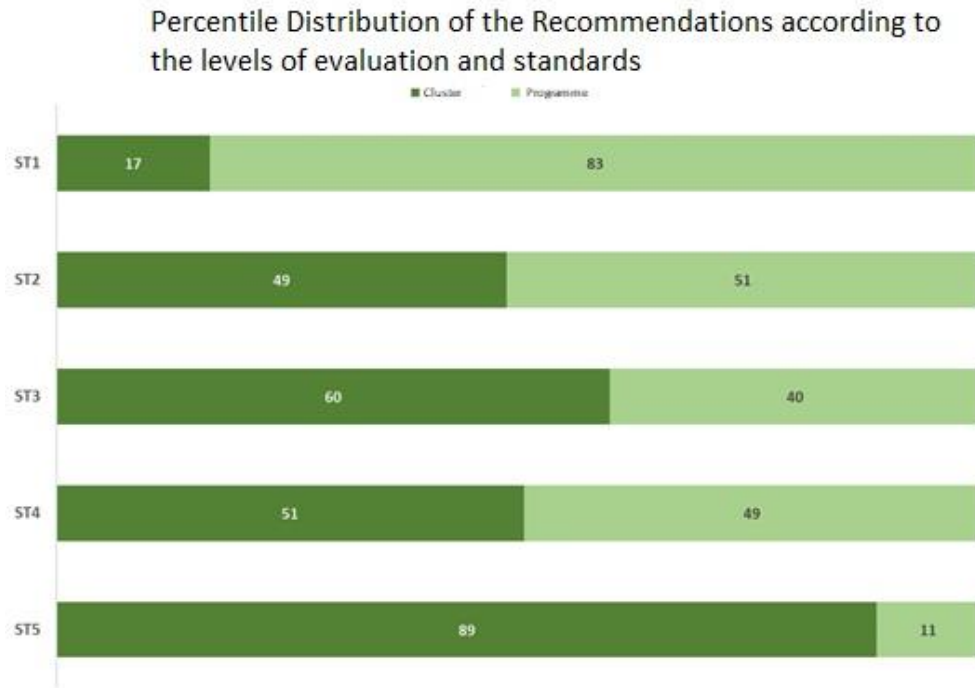


Figure 4

In a broader context, (See figure.4) observing in terms of standards, in the case of the third and fifth standards, the number of cluster recommendations prevails over individual-programme level recommendations. The distribution in the second and fourth standards is more or less equal, while in the first standard the experts were more focused on individual programme evaluation. Instead, in the fifth standard, practically 90% of the recommendations are at the cluster level. However, this is less surprising, considering that the structure of the current draft report of the experts' evaluation in the first standard requires a detailed evaluation of programmes, both at cluster and individual levels, while in other standards, the number of components the assessment of which is mandatory only at the cluster level according to the methodology developed by the center increases proportionally.

Results of Qualitative Research

Analysis of Cluster Accreditation Reports

1. Educational Programme Objectives, Learning Outcomes and their Compliance with the Programme

In the table below, it can be seen that in the case of the first standard of accreditation, the main share of the main recommendations and suggestions comes at the level of individual, programme evaluation.

Component	Recommendation at the cluster level:	Suggestion at the cluster level	Recommendation at the programme level	Suggestion at the programme level
1.1.	0	4	6	4
1.2.	3	2	14	7
1.3.	2	6	2	0
1.4.	1	4	21	7
1.5	10	6	32	22

Table N2: *Number of recommendations and suggestions related the components of the 1st standard of accreditation.*

Component 1.1 Programme Objectives. In the suggestions and recommendations given in relation to the component, the suggestions and recommendations provided in relation to specific programmes predominate, as can be clearly seen from the above statistics; Meanwhile, there are especially large number of recommendations and suggestions related to the content of the goals and technical characteristics of individual programmes. For example, taking into account the content of individual programmes, highlighting different issues in the goals, changing the wording of the goals. The mentioned recommendations and suggestions are qualitatively less different from the recommendations issued within the framework of accreditation of individual programmes.

In addition, it is important to note the narratives related to labor market demands and employer engagement. Notes related to these issues are given both at the programme and cluster level. One of the suggestions given in this regard was to better integrate career development issues into the clustered programmes. Another issue, with regard to which both cluster and programme level comments are presented, concerns the so-called benchmarking,



that is, comparing programmes and their goals with other programmes, although any type of qualitative difference in the remarks issued at different levels is less evident.

In addition to what has already been mentioned above, from the point of view of cluster evaluation, separate suggestion is provided regarding the deepening of the structural links between the programmes grouped in the cluster as well as in-depth connection of the programmes. Although the suggestion which such content is only one, it qualitatively represents a rather rare example of a holistic evaluation of a component.

Component 1.2 Programme Learning Outcomes In relation to the given component, taking into account its requirements, an important part of the suggestions and recommendations at the programme and cluster levels refer to the formulation and development of learning outcomes. In many cases, emphasis is placed on clearly delineating the elements determining the difficulty of the level of qualification, according to the national qualification framework, where special attention is paid to the enrichment of the element of responsibility and autonomy. In other cases, particularly when the remarks relate to a particular programme, as in the case of objectives, certain field-specific issues are called for to be more prominent in the learning outcomes. Along with this, in some cases, comments are given regarding better alignment of the programmes with the respective sector benchmarks.

Another issue to which a significant share of recommendations and suggestions is devoted, similarly to the component 1.1, is the need for greater involvement of employers in the development of learning outcomes and better integration of labor market research results. Recommendations and suggestions on these topics were mainly given at the programme level, and there was only one case where cluster level suggestion was provided.

In addition, the analysis highlighted recommendations and suggestions focused on the issues of internationalization and research skills development, however, of the latter, all were issued at the individual programme level. In addition, a number of programme-level remarks were related to the growth and improvement of foreign language components, which in some cases were related to the prospects of increased internationalization.

Component 1.3 Evaluation Mechanism of the Programme Learning Outcomes

In this case, cluster-level comments exceed the programme-level comments. Given its requirements, this component is closely related to 1.2. component and, accordingly, structural similarities can be observed in the recommendations and suggestions given in relation to the two components, for example, the issue of greater cooperation with employers, informing them and taking into account labor market requirements, as well as compliance with the sector



benchmarks – all are highly relevant. However, it should also be noted that in some cases, the wording of the provided suggestions and recommendations is less suitable for the requirements of the component itself and mainly refer to 1.2. component.

In relation to the comments made at the cluster level, the component presents several recommendations and suggestions of a distinctly holistic nature, which allow reflection on the cluster level assessment of the component. Examples of this are the recommendation to develop a mechanism for evaluating learning outcomes at the cluster level and to use the data obtained through this mechanism for the strategic development of the programmes grouped in the cluster. Also, one of the suggestions specifies the use of a database for monitoring the changes implemented in the programmes, which, despite the fact that it is less related to the given component, is an example of working with the programmes with a holistic approach. A similar noteworthy comment, albeit different from the component's requirements, is the suggestion regarding the use of inclusive assessment methods within the clustered programmes for the students with special educational needs.

Component 1.4 Structure and Content of Educational Programme For this component, the focus is largely on the content of individual programmes. Accordingly, in relation to component 1.4, recommendations prevail on the following issues: thematic enrichment of the programmes and integration of additional academic courses, updating the literature used in the courses of the programmes and replacement with more modern editions and greater connection with modern scientific achievements in a specific discipline. Comments related to the structure of the programme are also provided, as well as "technical" issues such as the use of the terminology of the National Qualifications Framework, changes in the status of courses (elective and compulsory) and the formal determination of the number of credit hours.

In individual, exceptional cases, such type of recommendations and suggestions are provided that correspond to the cluster level in terms of content, although they are issued at the programme level. This basically refers to the overlaps between the content of programmes at different levels.

Component 1.5 Academic Course/Subject In general, this component contained the largest number of recommendations and suggestions. The number of recommendations and suggestions given in this component exceeded not only the number of recommendations and suggestions given to all components, but also to all other individual standards, except for the first one.



In relation to this component, the dominant issue in the recommendations and suggestions is the literature used in the academic courses, which in some cases, mainly in the case of comments issued at the cluster level, is also related to the language prerequisites for admission to the courses. In total, literature-related comments represent almost half of the recommendations and suggestions given within the component. As can be seen from the very beginning, the remarks regarding this issue are given at both the cluster and programme levels and the pathos delivered in these two categories, is does not differ much. Similar to the trends identified in component 1.4., specific recommendations and suggestions are addressed to: updating the literature within the programme(s), changing the nature of the literature (e.g. using monographs instead of scientific articles in the educational process), adding additional literature and technically correcting the used literature. However, the wording of these recommendations and suggestions are qualitatively less different at the programme and cluster levels.

In addition to the above issue, the component 1.5, similarly to the other components of the first standard, provides recommendations and suggestions regarding sector benchmark statements and greater compliance with the requirements of the National Qualifications Framework. There are many notes directed to the content and structural development of individual courses, which refer to, for example, the addition of individual topics to the courses, as well as the movement of modules within the programme, the changes in their status, etc. In addition, it is important that some cases notes are provided on the development of the level of internationalization as well as on the emphasis and development of research skills. Another, rather large group of recommendations and suggestions is related to "technical" issues, which belong to various short-term rectifiable problems, and they are not related to the content or structural parts of the courses.

Overall, the component 1.5, considering its content, contains a holistic assessment at a minimal level, and the recommendations and suggestions are almost entirely focused on the programmes.

Summary of the First Standard

Overall, within the framework of the evaluation of the first accreditation standard, the reviewed reports contain 16 recommendations and 22 suggestions at the cluster level, and 75 recommendations and 40 suggestions at the programme level. This highlights a dominant emphasis on the evaluation of individual programmes within the evaluation of the components of the standard, however, it is worth noting that holistic, cluster - oriented evaluation efforts are present in the reports for nearly all components, except for the largest and most

voluminous component, 1.5. Such remarks are mostly given within suggestions and their frequency does not establish a dominant narrative of evaluation against these standards. However, such remarks illustrate the potential of the cluster evaluation model in achieving holistic evaluation. Furthermore, an important prerequisite for the trend of focusing on programmes should be that, according to the current QA legislation, it is mandatory to conduct a review at the programme level in these components (except for the component 1.3.), both in self - evaluation and the expert reports.

2. Methodology and Organization of Teaching, Adequacy of Evaluation of Programme Mastering

Compared to the first standard, the share of cluster evaluations is much higher in the second accreditation standard. Overall, 58 recommendations and suggestions have been issued, among them 29 at the cluster level and 29 at the programme level. Table N3 demonstrates the exact quantitative distribution of recommendations and suggestions in relation to the components of the standard:

Component	Recommendation at the cluster level	Suggestion at the cluster level	Recommendation at the programme level	Suggestion at the programme level
2.1.	1	4	3	7
2.2	1	6	11	1
2.3	4	1	1	1
2.4	1	11	0	5

Table N3: *Number of recommendations and suggestions regarding the components of the 2nd accreditation standard.*

Component 2.1 Programme admission preconditions. Based on the component requirements, the evaluations were mainly focused on the language and content requirements considered/to be considered in the preconditions for admission to the programmes. Among them, in some cases, on the issue of Georgian language competence, when it comes to the admission of non - Georgian speaking students to the programme. In terms of content requirements, there were remarks on the need for more rigorous verification of the applicants' competencies during the admission process to the programme and in some cases, only on admission of the individuals with specific qualifications. The suggestions and recommendations provided at the cluster and programme levels were qualitatively less different from each other and only in one case a



suggestion was provided that highlighted specific needs for public access to information about master's and doctoral programmes.

Component 2.2. The Development of Practical, Scientific/Research/Creative/Performing and Transferable Skills This component provides recommendations and suggestions of a holistic nature that are uniquely oriented on cluster. Firstly, some cluster level suggestions in regards to the development of research skills should be noted, suggesting the ways to enhance the research skills of the students at various levels through strengthening the foreign language component and introducing research - seminar type activities. The remarks regarding the copyright protection related to the literature used within the programmes grouped in the cluster are particularly noteworthy. Additionally, the narratives for developing programmes are provided, focusing on improving research ethics and optimizing the use of graduate resources.

Additionally, both at the cluster and programme level, recommendations have been issued in the direction of actively involving students in various academic activities. At the programme level, remarks are largely concentrated on developing practical skills and improving the quality of the academic product (theses).

It can be said that despite the limited number of remarks at the cluster level, component 2.2. provides an important example of holistic evaluation for programme clusters.

Component 2.3. Teaching and Learning Methods In relation to the mentioned component, both quantitatively and qualitatively, cluster-specific remarks predominated in the reviewed reports. Recommendations at the cluster level are provided on both regarding the improvements of the teaching/learning methods used in the programmes and the professional development of the staff. Furthermore, in a separate recommendation, methodological development is linked to internationalization as an opportunity for students to learn and share modern methods of teaching and learning. At the programme level, the focus of the remarks was on the compliance of T/L methods to the sectoral benchmarks and the development of field - specific methodologies. Overall, similar to component 2.2., component 2.3. serves as an excellent example of cluster-level evaluation, where instead of focusing on an individual programmes, the emphasis is on eliminating problems at the cluster level.

Component 2.4 Student Evaluation Cluster level recommendations and suggestions are also provided in relation to the given component. In relation to this component, cluster remarks were largely focused on communication issues between Higher Education Institutions and students regarding assessment methods. Apart from that, several remarks were concentrated



on developing the assessment process and integrating it more closely with the learning process. Some remarks were related to methodological changes in evaluation to facilitate programme development. Additionally, separate remarks were made in relation to staff training and internal quality assurance system. As for the programme level, the suggestions provided here, entirely aimed to enhance assessment methods within programme study courses and to reconsider the role of individual assessment methods in the final assessment. Overall, similar to component 2.3. component 2.4. is more cluster - oriented and contains a significant amount of holistic assessment guidance to develop programmes grouped in cluster.

Summary of Standard 2

Unlike the first standard, which was almost entirely focused on programme level evaluations based on content and technical/legal requirements, the second standard places greater emphasis on cluster level evaluations. The given standard, despite some cases where issues of individual programmes remain relevant, creates a unique case of holistic evaluation, where problematic issues, mostly methodological or related to the development of transferable skills, are discussed and analyzed at the cluster level, with opportunities for improvement identified accordingly.

3. Student Achievements, Individual Work with them

Component	Recommendation at the cluster level	Suggestion at the cluster level	Recommendation at the programme level	Suggestion at the programme level
3.1.	3	2	0	2
3.2.	0	4	1	2

Table N4: Number of recommendations and suggestions concerning the components of the 3rd accreditation standard.

Component 3.1 Student Consulting and Support Services When it comes to the 3rd standard, the emphasis in the reports was focused on internationalization issues, including students participation in various international projects and exchange programmes, as well as increasing awareness and information about international perspectives on career development and obtaining international grants. In this regard, recommendations and suggestions are primarily provided at the cluster level, but also at the programme level. Moreover, some remarks were related to ensuring student employability, proactive provision of different types of opportunities by the head of the programme and informing students. The suggestions and recommendations provided at the cluster level clearly reflect the holistic nature of the critical

challenges facing the given component, for which the experts also suggest holistic steps to the Higher Education Institutions.

Component 3.2. Master's and Doctoral Student Supervision The issues analyzed in component 3.1 are also relevant for component 3.2., when it comes to the topic of internationalization and increasing the involvement of students, in this case, master's and doctoral students, in various international activities. Remarks on these topics are given both at the cluster and programme levels. Apart from that, special attention is given to the workload of doctoral thesis supervisors, focusing on the maximum number of potential doctoral students and the formal inclusion of various informal activities carried out during the supervision period into their workload. Similar to component 3.1. in the case of component 3.2. holistic solutions are provided for the highlighted problems at the cluster level.

Summary of Standard 3. Because of the small number of recommendations and suggestions in the reviewed reports regarding the 3rd accreditation standard, there is a limited space for discussion. However, even considering the remarks present in the reports, cluster assessment as a holistic approach to addressing challenges is seen as a potential with respect to the 3rd standard.

4. Providing Teaching Resources

Component	Recommendation at the cluster level	Suggestion at the cluster level	Recommendation at the programme level	Suggestion at the cluster level
4.1.	2	4	8	2
4.2.	1	1	9	1
4.3	1	4	0	0
4.4	2	6	5	1
4.5	3	1	5	0

Table N5: *Number of recommendations and suggestions regarding the components of the 4th accreditation standard.*

Component 4.1 Human Resources In relation to the mentioned component, the emphasis on cluster level was placed on improving both internationalization and research activities, as well as on issues directly related to the educational process, such as ensuring that courses are supervised by individuals whose scientific and academic experience corresponds with the content of the courses and the topics of the scientific papers they supervise (the above - mentioned was highlighted in relation to one Institution). In addition, the reports provided



suggestions regarding the formal diversification of staff workload (which is also reflected in the remarks of component 3.1) and the improvement of the status and employment conditions of invited staff.

At the programme level, recommendations were also issued for better qualitative matching between the courses and scientific - research qualifications of the teachers. In addition, in individual cases, recommendations were given in regards to the rejuvenation of the staff. In several cases, recommendations and suggestions were provided to increase the number of academic staff and in some cases, to increase the number of administrative and support staff. At the programme level, the same recommendations in several cases were repeated in regards to several programmes, which should indicate that the expert group considered a specific remark relevant only for a certain number of programmes grouped within a cluster. However, this also indicates that several challenges highlighted at the programme level are extensive and voluminous in nature, requiring a holistic approach to address them.

Component 4.2 Qualification of Supervisors of Master's and Doctoral Students At the cluster level, emphasis was placed on support of doctoral students by the supervisors in terms of integration into the scientific community, as well as issues of academic integrity - particularly, ensuring a more qualitative approach to plagiarism detection, instead of determining a specific threshold of similarity. At the programme level, emphasis was placed on increasing the employability of doctoral students and bringing them closer to the industry. The remarks directly addressed to supervisors were focused on promoting the scientific activity of academic staff and increasing the visibility of their scientific work through more active participation in conferences and various internationalization - facilitating activities. Additionally, in this component (similarly to component 4.1), there were remarks indicating the thematic alignment of the supervisor's qualifications and experience with the theses that are supervised by them.

Component 4.3 Professional Development of Academic, Scientific and Invited Staff This component represents one of the rarest cases within the studied reports where recommendations and suggestions are provided exclusively at the cluster level. Thematically, both the suggestions and recommendations focus on the professional development of staff and the deeper institutionalization of development mechanisms, as well as promoting the scientific activities of the staff within the institution and in the direction of development perspectives towards internationalization. Considering the content, this component clearly illustrates staff professional development as a challenge of broader nature.



Component 4.4 Material Resources In the remarks related to this component, special emphasis was placed on issues related to access to international scientific databases and the use of these databases. Recommendations addressed both the expansion of access and connectivity to new databases, as well as facilitating the use of databases by students and staff, including providing remote access to the databases. This topic was equally prominent in both cluster and programme level recommendations and suggestions and clear qualitative differences between them were less noticeable. Besides access and use of scientific databases, only one significant issue was identified regarding this component, particularly, the need to support doctoral students financially and in terms of developing academic skills, through offering additional initiatives, was emphasized. Overall, the case of component 4.4 does not reveal any noteworthy methodological directions. However, the thematic analysis clearly indicates that the access and the use of scientific databases pose a serious challenge for the HEIs.

Component 4.5 Programme/Faculty/School Budget and Programme Financial Sustainability It should be noted that all 8 recommendations in this component were issued in relation to one Institution, which, to some extent, reduces the credibility of the topics presented in the recommendations as general trends. In relation to the component, both at the cluster and programme levels, the recommendations and suggestions revealed two main thematic directions: 1. Diversification of financial resources (the same issue was addressed in the suggestions given in this component to another Institution) and 2. Ensuring sustainability of the programme budget. In addition to these two primary issues, in specific cases, remarks were made to allocate more funds towards student activities and to provide increased financial support for doctoral students' publications. In conclusion, the discussion on component 4.5 is significantly constrained because of the scarcity and uneven distribution of suggestions and recommendations in the reports. However, it is generally feasible to take a holistic approach at the cluster level, which more clearly expresses the nature of a problem such as the diversity of funding sources, which by its nature should be considered as an institutional-level issue.

Summary of Standard 4

In relation to accreditation standard 4, mixed image is reflected in the reports. On the one hand, considering the content of the standard, a significant number of remarks are presented at the cluster level, emphasizing holistic approaches to various challenges and areas of development. However, significant number of recommendations and suggestions are provided at the programme level, which, in contrast to holistic evaluation, highlights the tendency to assess programmes individually within the specified standard. Similar to the 1st standard, it



should be considered that in the case of the 4th standard, all of the components, except for 4.3. are obligatorily evaluated at the programme level.

Teaching Quality Enhancement Opportunities

Component	Recommendation at the cluster level	Suggestion at the cluster level	Recommendation at the programme level	Suggestion at the programme level
5.1.	12	7	1	0
5.2.	1	1	0	0
5.3	5	2	1	0

Table N6: *Number of recommendations and suggestions regarding the components of the 5th accreditation standard.*

Component 5.1 Internal Quality Evaluation Among the recommendations and suggestions, the issues of ensuring greater stakeholder involvement in quality assurance mechanisms and participation of quality assurance services at the faculty level (the latter was particularly emphasized in two different reports concerning one Institution) were prominent. Additionally, there are specific recommendations to improve communication with programme staff and to ensure the comprehensive dissemination of the results from quality assurance studies. In individual instances, there was present the issue identified across multiple components of the 4th standard, on alignment between the course content and the qualification of the staff implementing them (Addressed to the same Institution), and additionally, the recommendation was developed to fully utilize sectoral benchmarks. Overall, this component clearly demonstrates the advantage of a holistic approach to internal quality assurance and the recommendations and suggestions outlined at the cluster level are clear example of this.

Component 5.2 External Quality Evaluation There were very few remarks given within this component. The scarcity of data limits the scope of analysis of the component. However, in general, it can be noted that two main issues were highlighted in the remarks: 1. ensuring an evaluation cycle independent of the external evaluation carried out by the NCEQE and 2. the necessity for further work regarding the utilization of external evaluation results. The fact that both suggestions and recommendations are provided at the cluster level, as it is given in the component 5.1 highlights the importance of external evaluation as an event extending beyond individual programmes, emphasizing the benefits of a holistic approach.



Component 5.3. Programme Monitoring and Periodic Review There was a thematic diversity of the remarks regarding the component. In particular, the recommendations and suggestions aim to include external evaluation in the evaluation cycle of programmes more rigorously, to compare programmes against other programs (so - called benchmarking), increase the involvement of stakeholders in the evaluation cycle, to integrate research component in quality assurance mechanisms, as well as to address student workload issues in specific programmes from the quality assurance department side and more effective dissemination of the research conducted by the QA department within the university. In the component 5.3. the thematic diversity and the concentration of remarks at the cluster level clearly emphasize the advantage of holistic approaches within the component, where the cluster approach may prove more effective than the programme approach.

Summary of Standard 5

In the 5th accreditation standard, approach on cluster evaluation is clearly delineated, which should be influenced by both the specificity of the topic and the flexibility provided by normative conditions to fully concentrate on cluster evaluations." The main issue with this standard is that considering quality assurance mechanisms in a holistic perspective, in relation to the entire group of programmes, is considered by experts to be the optimal approach to work with this standard.



Interviews with Stakeholders

Representatives of Higher Education Institutions

Goals of cluster accreditation and compliance of the process with them

Regarding the goals of the cluster accreditation, the opinions of the representatives of the institutions were largely corresponding with each other and the emphasis was placed on two directions, content and resource-orientation. In terms of content, the respondents emphasized the holistic evaluation of the programmes, encompassing programmes of different levels, where the greater emphasis should be placed on the interconnection of programme content and on field development in general at the institutional level. When it came to resource orientation, respondents discussed requirements of less human, financial, and time-related resources from the HEIs, NCEQE and experts, as an idea behind the approach, designed to further improve the existing form of accreditation.

Regarding whether the model of cluster accreditation, adopted in Georgia has successfully achieved the mentioned goals, from the point of view of content, respondents found it challenging to provide a definitive answer. Although the respondents emphasized the overall positive nature of cluster accreditation, in their opinion, considering that cluster accreditation is a fairly new phenomenon, observation of its real results will be possible after several years, when the results of the evaluations of various clusters will be available.

In terms of resources, the HEI representatives discussed the implications of cluster accreditation more freely and some respondents emphasized the counterproductive impact of cluster accreditation on various issues. They believed that from the financial point of view, cluster approach did not reduce costs, while from the point of view of human and time resources, even the increase of the workload was reported in separate cases. They connected aforementioned with the need to gather documentation on programmes of different levels and the cluster approach itself was seen as a novelty that required a significant amount of time to adapt to. One positive impact that was agreed upon by all HEI representatives was that the cluster assessment significantly reduced assessment time, as in cases where multiple accreditation site-visits would be required for different programmes, the given format covers all programmes in a single site-visit.

Specificity of cluster evaluation and impact on quality culture

When discussing the main distinguishing characteristics of cluster accreditation compared to individual evaluation, HEI representatives primarily highlighted cognitive differences in the



evaluation approach. In particular, the emphasis was placed on the holistic evaluation of individual programmes, which, according to them, together with the comprehensive external evaluation of the programme allows to see the "big picture", which in some cases was completely contradictory to the fragmented approach to the evaluation of individual programmes. While discussing this issue, the respondents analyzed the impact of the changed evaluation perspective on the internal quality assurance systems of the Institutions.

Some respondents mentioned that they had already adapted this approach as part of their internal quality assurance processes for programmes before cluster accreditation was introduced. Therefore, aside from the new formal obligation to prepare documentation at the cluster level, they have not experienced any other significant changes. A representative from one such Institution mentioned that, in general, staff members are more engaged in evaluation processes in recent years. However, according to her, it would be challenging to connect this event directly with cluster accreditation. She outscored, that the cluster model did not have any impact on the quality culture within the Institution because quality culture cannot be developed solely "top-down" and it is the matter of the Institution's internal culture from beginning to end. At the same time, while formulating the similar opinion, one of the respondents also mentioned that in the past, there were often cases where a significant number of programmes from a particular field were jointly submitted for accreditation. In those instances, holistic evaluations still occurred to some extent, albeit in a more fragmented manner. The main difference brought by the cluster model was the reduction in the amount of time needed for the evaluation process, particularly during accreditation site-visits, as mentioned earlier.

Some respondents highlighted how the cluster accreditation model affected the internal quality assurance process and the adjustments that Institutions made to comply with updated normative environment. These respondents pointed out some institutional - level changes that were made to shift to the new assessment model. In such instances, Institution representatives emphasized the adaptation to the cluster model, especially during the self - evaluation process, when it became necessary for the Institution to develop updated approaches to ensure optimal engagement of the stakeholders. In similar cases, Institution representatives highlighted the positive impact of the cluster accreditation model on Institutional development and the establishment of a quality culture within the Institutions.

Involvement of International Experts

Regarding the involvement of international experts, Institution representatives generally expressed a positive attitude and emphasized their constructive role in programme



development and in increasing the level of objectivity in the evaluations. This, in turn, enhances reliability in the accreditation process. However, they also noted significant personal and professional differences among the international experts involved in the process. While most experts supported conducting holistic assessments, in some cases some found it challenging thing to do. In addition, respondents highlighted the language barrier as one of the challenges during the process. They also noted perceived passive involvement of international experts in the entire evaluation cycle, particularly concerning the Accreditation Council hearing. They emphasized the necessity of improving cooperation with international experts.

Benefits of Cluster Accreditation

Speaking about the benefits of cluster evaluation, beyond the issues already mentioned earlier, HEI representatives mostly highlighted the greater opportunities for the development of academic field within the HEIs through holistic evaluation. In this context, one of the respondents outlined the potential of adapting a holistic approach to labor market research in the framework of cluster evaluation. At the same time, representatives from the Institutions that did not consider the cluster accreditation as critically important influence over the HEIs' internal systems, nevertheless emphasized that this approach encouraged deeper, integrated approaches to programmes within the HEIs. This was exemplified by internal discussions within the Institutions on how to group individual educational programmes in the cluster. Additionally, a representative from one of the Institutions emphasized the necessity of strengthening the Accreditation Council by increasing the number of specialists in specific fields. This was prompted by distribution of the accreditation period of the programmes in particular fields during certain years. One respondent also observed that cluster accreditation simplified the Council's activities, although this perspective was not shared by the Council members themselves. Detailed information on this will be provided in the following sub-chapters.

Main challenges and directions for future development

One of the main challenges highlighted by the HEI representatives during the interviews was not directly related to cluster accreditation but it pertained to the abundance of external quality assessment tools, which continue to require significant administrative and financial resources from Institutions and in some cases, these tools pose a challenge in the process of working on cluster accreditation.



Respondents also emphasized the obligation to prepare extensive formal documentation, which Institutions still have to comply under cluster accreditation and which in some cases was further complicated by the need to submit information both at the cluster and individual levels when preparing for the process. One of the respondents mentioned that it would be desirable to use more digital tools in this process, which would minimize the bureaucratic burden.

At the same time, one respondent pointed out that, as the expert recommendations were formulated at both cluster and programme levels, this sometimes tended to become a point of confusion for the HEIs, as there was increased likelihood of making technical errors in such detailed reports, prompting the suggestion to clearly separate cluster - level and individual programme - level recommendations.

In addition, one of the respondents highlighted the challenges, that the HEIs face in the process of grouping programmes in the cluster. According to her, it was sometimes challenging to take into account the existing regulations in this regard, because sometimes the programmes were closely related in content, even though their grouping was difficult due to the restrictions provided by the regulations. She believed it would have been beneficial to revise the mentioned regulation after accumulating evaluation experience and tailor it more closely to the needs of the Institutions.

Accreditation Experts

The goals of cluster accreditation

Regarding the goals of introducing cluster accreditation, the opinions of the experts fully correspond with the opinions of the representatives of the Institutions and also in their case, they emphasized the opportunity to save the resources in the single comprehensive evaluation of the programmes of various levels. In addition, in some instances, experts added the issue of studying the development of the field and analyzing the existing status quo from an international perspective, as part of the goals of the cluster accreditation.

However, unlike the Institution representatives, the experts provided a more precise assessment of the achievement of the existing goals. According to the experts, cluster accreditation largely succeeds in achieving its goals from the perspective of the evaluation process. One of the experts compared the process of evaluating programmes within a single spectrum of cluster accreditation to the individual accreditation format and highlighted that the experts often needed to request additional documents or search for documents on the website of the Institution to present a holistic picture. In the existing model, experts indicated



that it was easy to identify overlaps between programmes and define relevant remarks, which from the experts' perspective enabled achievement of one of the main goals within the process.

Experts, like Institutions, emphasized the possibility of conducting holistic evaluation at the Institutional level in the process of preparing for the cluster accreditation and noted that this could bring some positive change to the Higher Education Institutions. However, similar to some Institution representatives, they also emphasized that the cluster accreditation alone could not foster the quality culture, because the quality culture was primarily dependent on the internal systems of the Institutions.

Regarding the issue of the resources, similar to Institution representatives who highlighted increased workload within the framework of cluster accreditation, experts unitedly pointed out that the process also required additional work for the experts. According to one of the experts, this was because of the technical nature of the evaluation process, which required the experts to conduct a double assessment of the programmes grouped within the cluster: First as a complete cluster and then as individual programmes. In the this process, when the experts have to work on two different levels of evaluation and compile a report, they would notice that due to the format of the evaluation, it was possible to miss some important issues, especially at the level of individual programmes and in general it became more possible to make technical errors on the part of the experts.

The two - level evaluation dilemma and other challenges in the process

When analyzing the different stages of the cluster accreditation process, experts first of all noted that because of the need to study extensive amount of material, preparation for cluster assessment was more challenging for experts than working with the individual programmes. In addition, the experts noted that the cluster approach methodologically changed experts approaches to evaluation. Particularly, one of the experts noted that if in the past the distribution of functions was usually done by assigning standards to experts, now it is common to assign individual programmes to individual experts. In addition, due to the existence of two levels of evaluation, experts emphasized the need to formulate questions to be asked during the site visit, both at the cluster and program levels.

Regarding the accreditation site-visit, the experts emphasized the reduction of the assessment time. However, it was also noted that in some cases, there is not enough time left to ask questions specifically about individual programmes, which subsequently affects the assessment process. Speaking about the period after the site visit, in addition to the issues that were discussed in the previous subchapter, the experts also noted a problem related to the report



template for cluster accreditation. In particular, according to some experts, the cluster report template was large and complex to handle and scrupulous work was necessary when finalizing the report so as not to conflate cluster and programme level recommendations. However, regarding the report template, one of the experts also emphasized that it was impossible to avoid the mentioned complexity at the present stage and noted the importance of the quality of the self - evaluation report developed by the Institution, which, in her opinion, had a significant impact on the finalization of the report by experts.

During the interview one of the experts highlighted the necessity for improved training of Accreditation Councils. According to her, in certain instances, accreditation experts had an impression that the Council members lacked direct familiarity with various technical aspects of external evaluation process.

Besides that, a separate issue was highlighted concerning the translation of reports, particularly when the original was in English and according to the experts, there were instances where the intended content was completely lost in translation.

Experts on experts

One of the experts noted that when the programs with the different contents were grouped within a cluster based on formal intersections, such as philology of various languages, there were instances where the expert groups lacked specialists in the specific fields. This absence of field-specific experts significantly complicated the evaluation process for the group.

Additionally, several experts critically addressed the issue of training for those involved in the cluster accreditation process. In particular, they noted that there were instances where certain experts were involved in the assessment process without possessing the specific knowledge and competencies directly required for the external quality assessment. This lack of expertise made it difficult for the more experienced experts, who had to spend additional time working individually with the less knowledgeable experts. The experts also highlighted the lack of time in the work process, which they generally attributed to the relatively short period allocated for the implementation of the first wave of cluster accreditation. Although they did not generalize this aspect, considering the specific context of the first wave, they indicated that the overall time constraint affected the preparation of experts for the assessment. They emphasized that strict adherence to deadlines was crucial for the smooth conduct of the process, for all sides including the NCEQE, experts, and institutions. During the first wave, challenges in this area impacted the entire process.



In some cases, the experts remarked on the time allocated for the evaluation and pointed out that it was important to give them more time to work on the reports. According to one expert, the current timeframe was not significantly different from the one, determined for drafting conclusions on individual programs, despite the workload being much greater in the case of the cluster evaluations.

Participation of international experts;

The local experts were quite critical of the involvement of international experts. In particular, both the representatives of the HEIs and the experts noted that the international experts varied significantly in terms of personal and professional characteristics. Their approaches and levels of involvement at different stages of the evaluation also differed. The experts also emphasized the international experts' lack of awareness of the local context, which became a significant challenge in the evaluation process. It should be noted that this position is shared by the international experts themselves. They emphasized the need to provide basic information on the context of higher education during the evaluation process, particularly regarding the issues such as the funding for education and research, about which the individuals from other contexts may be completely unaware. Without this information, experts might develop incorrect expectations, ultimately affecting the evaluation process. Accordingly, both local and international experts highlighted the need for the NCEQE to engage in more intensive collaboration with international experts.

Members of the Higher Education Programmes' Accreditation Council

Objectives and achievements of cluster accreditation

Regarding the objectives of cluster accreditation, the opinions of the council members were aligned with those of university representatives and experts. In discussing the potential for holistic evaluation and comparison of programs at different levels, one council member raised an additional issue. They emphasized that cluster accreditation could enable the institution to examine student attrition, thereby potentially increasing the number of graduates from the first level of higher education who continue their studies at the second level within the same institution.

Regarding the achievement of the goals, one council member noted that it is too early to assess the results at the current stage. Several years will be needed to accumulate sufficient data and conduct a thorough analysis. Nevertheless, the council members, considering the current situation, emphasized the clearer picture that the evaluation process of programs in unity has provided. In their view, this clarity was already inherently achieved through the process itself.



Additionally, one member noted that the cluster evaluation was particularly valuable for Council Members in assessing resource-related components. The cluster evaluation provided a clearer picture of the level of integration among the programs, which had not been possible in the past.

Participation of international experts;

The opinions of the Accreditation Council members regarding the involvement of international experts in the cluster accreditation process aligned with those of other stakeholders. They highlighted challenges such as the lack of competence of international experts in regards to the local context and the significant differences among the experts themselves, as well as between their evaluations. Aside from the aforementioned issues, one council member noted difficulties in communication with some international experts during the Council session. In particular, they noted that there were instances when the Council was unable to obtain optimal information from international experts. Local experts were less active in such situations due to the power dynamics within the expert groups, which often placed the international experts in the primary responsible roles. The council member suggested a potential model for involving international experts, where they would serve as members of the group rather than as chairpersons, in order to reduce the aforementioned challenges. According to one of the council members, such a combination would distribute responsibilities more evenly within the group and encourage the stable and active involvement of local experts.

Challenges and areas for improvement

Like all other stakeholders, the members of the Council noted that their workload within the framework of cluster accreditation was further complicated as well as increased. The number of documents to be reviewed by the Council significantly is increased significantly within the clusters, making it challenging for the Council to study the documents in a timely and comprehensive manner. According to them, this issue had a direct impact on the decision-making process by the Council. Regarding the documentation, one council member suggested increasing digitization in this area. For example, if certain fundamental institutional documents were pre-uploaded for Council members, there would not have been a need for re-uploading the similar documents during every single accreditation process. According to the council member, this approach could address technical gaps and reduce the time required for the Council's work.



Additionally, the members of the Council noted that the size, complexity, and inflexibility of the cluster accreditation report template made it difficult to fully perceive the assessment. This complexity sometimes caused confusion, particularly in cases where a large number of recommendations were provided at different levels. In addition, one council member noted that there were cases where the findings contained long narratives that, while intended to be give more information, actually became less informative for the council. According to him, it would have been preferable if the conclusions contained very short and concise narratives.

Additionally, the council members suggested establishing a time limit for the institutions during the council hearings. They noted that, despite the council's willingness to listen extensively to institutions, there were instances of lengthy speeches from institutions that could have been better managed with such limitations.

Representatives of the National Center for Educational Quality Enhancement

Objectives of Cluster Accreditation

Regarding the objectives of cluster accreditation, representatives of the NCEQE identified the same issues as other stakeholders. Additionally, one representative of the NCEQE emphasized that, beyond the many reasons and purposes for introducing cluster assessment, it was also important to acknowledge that periodic updates to assessment systems are beneficial. These updates help ensure that mechanisms remain relevant to current challenges.

In discussing the achievement of goals, the representatives of the NCEQE emphasized that longer time is needed to properly evaluate the results of the cluster accreditation. However, they also noted that several issues were already within reach and could be addressed sooner. In particular, they noted that it was clear that more individuals from the institutions were collaboratively involved in preparing accreditation applications and participating in the accreditation process. They regarded this increased involvement as a positive trend.

Cluster Accreditation Process and Accumulated Experience

Representatives of the NCEQE, along with all the other stakeholders, noted that the establishment of the cluster accreditation model had increased the workload for the Center's employees involved in the process, making it more challenging. However, one representative also noted that the increase in workload was characterized more by qualitative growth than by sheer quantity. In particular, they noted that with the implementation of the new model process, where the involvement of international experts became mandatory from 2023, the work of the NCEQE's employees became more complex. This new requirement necessitated



that the employees learn new skills and establish effective methodologies for cooperating with experts. The NCEQE representatives noted that, although the quantitative administrative tasks had decreased due to their consolidation, the management responsibilities they had to organize increased. This shift not only expanded their workload but also required qualitatively more meticulous management.

In general, the NCEQE staff emphasized that the agency itself had to learn a lot of new things during the implementation of the new process, which in the future should be a guarantee that the NCEQE would be better prepared for the next waves of cluster accreditation, primarily from a methodological point of view, which would improve the quality of work with experts and would contribute to a better management of the process.

The representatives of the NCEQE also discussed the templates of the cluster accreditation report, noting that, from their perspective as well, the form was complex and often inflexible.

Involvement of Experts and International Experts

The NCEQE representatives mentioned that successfully conducting the cluster accreditation process required a highly strategic approach to resource management. This included timely identification and assignment of the experts for the evaluations. They noted that this process is complicated by the need to operate within a limited timeframe.

The NCEQE representatives, along with many other stakeholders involved in the process, also emphasized the need for more extensive work with the experts. One representative mentioned that the level of training provided to experts for the evaluations was one of the reasons, why the holistic evaluation component was not significantly achieved in the first wave of evaluations. Additionally, it was noted that the overall number of experts with relevant qualifications in certain fields in the country is relatively small. This often results in a high workload for certain experts during the cluster year and creates a situation where experts frequently end up evaluating each other. In relation to this issue, discussed as part of the "small country syndrome" by the representatives of the NCEQE, the role of the international expert was particularly emphasized. It was noted that international experts contributed to increasing the objectivity to the assessment process, thereby enhancing the credibility of the evaluations. The representative of the NCEQE also mentioned the discussions regarding the extent to which international experts should necessarily be involved in the process in the role of chairperson. According to her, the main justification for the NCEQE's current approach was the possibility to reduce the conflicts of interest.



Regarding the international experts, the representatives of the NCEQE additionally noted that their involvement significantly increased the NCEQE's workload, both from the organizational and qualitative perspectives. In addition, they noted that in many cases, there was a lack of synergy between the local and international experts in the assessment process. They attributed this to both the international experts' limited knowledge of the local context and frequent language barriers, which were caused by the lower English language proficiency among some local experts.



Conclusion and Recommendations

Conclusion

Based on the experts' reports developed within the framework of cluster accreditation and the interviews conducted with stakeholders, the process, which is still in the development stage, is outlined as complex. The first wave of implementation demonstrated a high potential for development and improvement. However, several challenges have been clearly identified that need to be addressed to enhance the process further.

The reports clearly highlight the potential for a holistic assessment of various issues at the cluster level, while the program-level assessments still remain relevant. This is related to the approaches within the assessment, which mandate program-level evaluations for individual components, while other components can be analyzed and assessed exclusively at the cluster level. Given the above, it is not surprising to see the abundance of program-level recommendations and suggestions concerning the first accreditation standard. This standard necessitates both cluster and individual level analyses for all components, except for component 1.3. Additionally, the accumulated experience in accreditation indicates that, during the accreditation process of individual programs as well, more recommendations and suggestions were provided in the components, concentrated on the content of the programmes.

A similar picture arises with the 4th standard, where, with the exception of component 4.3, a cluster-level analysis is mandatory for all other components. However, the recommendations issued at the program level within the framework of the 4th standard differ in content from those of the 1st standard. In most cases, the focus of the 4th standard's recommendations encompasses broader issues than those pertaining to individual programs. Issues such as the scientific activity of academic staff, rejuvenation of academic staff, increasing staff numbers, and strengthening scientific supervision potential—key topics in the recommendations of standard 4—are generally more appropriate and desirable to apply to the cluster level. Additionally, it should be noted that a holistic analysis of resources and the creation of a clear picture to support the development of the field was a primary goal behind the introduction of cluster accreditation, as stated in official statements from the NCEQE and perceived by key stakeholders. The representatives of the Accreditation Council also highlighted the importance of analyzing resources within a joint context. Therefore, it is possible that, in the future, there may be a shift in the focus of the assessment regarding Standard 4 towards a cluster perspective.



Regarding the accreditation standards 2, 3 and 5, where the evaluation of individual programs is mandated only for component 2.1 – programme admission preconditions, the analysis of the studied reports presents a more or less optimal picture of the cluster assessment. This is particularly evident in relation to Standard 5, where the benefits of cluster-level assessment of quality assurance mechanisms are clearly apparent.

Regarding the stakeholders' reflections on the first wave of cluster accreditation, different parties agree on the objectives of implementing cluster accreditation, although their evaluations of the achievement of these objectives are not unified. In relation to this issue, the main tendency is to refrain from evaluation due to the short time that has passed since the implementation of the process began. However, a number of achievements are highlighted, which are more or less obvious within the evaluation process, for example: Holistic evaluation of the programmes, holistic overview of the resources, and, in general, the involvement of more individuals in the preparation and evaluation of accreditation applications. These benefits arise from the actual requirements related to cluster accreditation and may indirectly indicate a tendency to improve the quality culture. However, it was clearly emphasized in the interviews that the development of a quality culture is the prerogative of the institutions themselves, and external evaluation is less likely to be a leading factor in this regard. Another positive development is the increased involvement of field experts in the Accreditation Councils according to the cluster years.

Regarding international experts, stakeholders agree on the generally positive impact of their involvement, which is particularly aimed at enhancing the objectivity and reliability of assessments and reducing conflicts of interest. In some cases, the lack of synergy and mixed experiences concerning the quality of involvement of international experts at all stages of the evaluation process, along with a lack of understanding of the local context, remain the main challenges. However, considering the nature of these challenges, more work toward their improvement will be beneficial. The primary responsibility in this area rests with the NCEQE, which should aim to plan and implement more effective models for working with both local and international experts in the subsequent stages of cluster accreditation. Comments from the NCEQE representatives about the initial cluster accreditation process as a learning experience suggest that, after each stage of assessment, the center will be better prepared to address the challenges identified in previous stages. However, it is crucial that efforts to address these challenges are carried out in a timely manner.

Although economizing the resources, including the decrease of the workload for all stakeholders, was a key issue in the initiation of cluster accreditation, so far all stakeholders



involved in the process, believe that their workload has increased. At the current stage, it is possible to address these issues in several ways, such as by providing more time for Council members to review program documents and extending the deadlines for experts to present draft reports and the final reports. In general, this situation may be caused by both - the novelty of the process, which requires the parties to learn and adapt, and the cluster accreditation format itself. It will be important to further investigate this issue in the subsequent stages of the evaluation.

From the HEIs' perspective, it was also noted that, alongside the workload associated with cluster accreditation, the simultaneous implementation of multiple external evaluation mechanisms posed a challenge, contributing to a sense of Evaluation Fatigue. Given that the representatives of the HEIs in this study were employees of the Quality Assurance departments, and considering their specific roles in external evaluations, it is challenging to generalize this sentiment across the institutions as a whole. However, it is possible that the NCEQE will take into account various factors, including planned and case based monitoring or other follow-up evaluations, as well as the overall burden of external evaluation mechanisms on higher education institutions.

One of the issues that almost all stakeholders singled out as a challenge was the format of the cluster accreditation report, due to its size and complexity. The position among the parties was that the given template is inflexible, confusing, and has a complex structure, which increases the likelihood of technical errors. In addition to the risk of conflating cluster-level and program-level recommendations, the parties also highlighted that the reports were sometimes overloaded, thus they suggested that relatively brief narratives would be more effective.

In some cases, the parties addressed the possibilities of digitizing the accreditation process, which was seen as one of the ways to reduce the large amount of documentation used in the accreditation process. The increased use of digital resources is a well-recognized goal for the NCEQE's processes, as evidenced by its frequent mention in the NCEQE's previous thematic analyses.

One of the main challenges in the implementation of the first stage of cluster accreditation was the relatively limited timeframe, which subsequently impacted the overall quality of the process. In particular, during the first stage of cluster accreditation, the strategic mechanisms intended to enhance the effectiveness and efficiency of the assessment could not be utilized to their full potential. From the NCEQE's perspective, it was not possible to fully optimize and retrain the pool of experts in the format devised before the commencement of the process. Additionally, there were instances of delays in the submission of documentation by the



institutions. These factors can be considered partly natural and inevitable during the implementation of a new mechanism, when all the stakeholders have to adapt to new legal conditions and embrace the innovations. However, in order to fully utilize the potential of cluster accreditation, particularly in regards to the effectiveness and efficiency of the assessments, it is crucial that the lessons learned from the initial experiences are integrated into subsequent stages. This will ensure that cluster accreditation becomes a genuine mechanism for supporting higher education institutions and achieves the objectives on which it was based on.



Recommendations:

- It is recommended to reassess the necessity of conducting individual level analysis within the components of accreditation standard 4.
- It is recommended that, for the subsequent stages of cluster accreditation, the NCEQE effectively manages the strategic planning of its resources, and ensures the timely mobilization and training of its expert pool, including international experts, to mitigate risks and challenges associated with the implementation of the evaluation processes within constrained timeframes.
- It is recommended for the NCEQE to avoid the inclusion of the individuals in the expert panels who may struggle to establish productive communication with other members, particularly international experts, due to language barrier.
- It is recommended that members of the Accreditation Council be allocated more time to review the documentation, and the expert panels to be given extended periods to prepare and present draft and final reports, and that the NCEQE translators have sufficient time for translation and editing of the reports.
- It is recommended to review the self-assessment and report templates for cluster accreditation, particularly in regards to the variation of cluster-program evaluation levels and the assignment of recommendations and suggestions. This review should aim to make these tools more convenient for stakeholders involved in the accreditation process.
- It is recommended to continue working with the HEIs and experts on the technique of writing reports, ensuring that information is optimally reflected in the self-evaluation report and the expert report, and to avoid unnecessary overloading of these documents within feasible limits.
- It is recommended to enhance the possibilities for grouping programs to ensure that clusters are not fragmented, thereby minimizing the impact on the budget allocated by the HEI for external evaluations.
- It is recommended to establish time-limits for presenting positions during the Accreditation Council hearings.