

# INQAAHE GUIDELINES OF GOOD PRACTICE (GGP)



## EXTERNAL REVIEW REPORT



**ANEAES**

Agencia Nacional de Evaluación y  
Acreditación de la Educación Superior

**TETĀ REKUĀI**  
**GOBIERNO NACIONAL**

*Paraguay  
de la gente*

<b>Organisation</b>	Agencia Nacional de Evaluación y Acreditación de la Educación Superior – National Agency of Evaluation and Accreditation of Higher Education (ANEAES)
<b>Place</b>	Asunción, Paraguay
<b>Date of the visit</b>	Monday 20-September-2021 to Friday 24-September-2021

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# INTRODUCTION

## INQAAHE GGP External Review Process

As part of its ongoing goal of continuous enhancement and promoting quality culture in the higher education field at a national and international level, the National Agency of Evaluation and Accreditation of Higher Education (ANEAES) requested and submitted its application to the International Network for Quality Assurance Agencies in Higher Education (INQAAHE) to conduct an external review of its procedures, policies, and operations against the INQAAHE Guidelines of Good Practice (GGP) for its re-alignment.

The guidelines are part of INQAAHE's mission and are intended to promote high standards of professional practice by QA agencies (see [Annex 1](#) for reference).

## ANEAES GGP Alignment Process

On 29 June 2021, ANEAES presented its letter of intent to apply for the external evaluation under the INQAAHE good practice guidelines (GGP). After INQAAHE's recognition committee approved ANEAES's eligibility to proceed with the external review, ANEAES presented its Self-Evaluation Report (SER) on 30 July 2021, which includes a portfolio with the main documentation of ANEAES:

1. Self-Assessment Report (SER) - Spanish version.
2. Self-Assessment Report (SER) - English version
3. More than 250 supporting documents and annexes
4. Virtual tour of the ANEAES offices.

The Review and assessment were carried out against the GGP (as revised in 2016) and following the [INQAAHE Procedural Manual 2018](#) by an independent panel of international experts appointed by INQAAHE (see [Annex 2](#)). The GGP Review Panel (the Panel) is composed by:

- **Dr Guy HAUG (Review Panel Chair):** International Expert in European Higher Education and evaluation and accreditation of Higher Education in Europe and Latin America.
- **Dr. Ariana De Vincenzi (Review Panel Secretary):** Member of the Council of Rectors of Private Universities of Argentina and Academic Vice-Rector of the Inter-American Open University
- **Mg. Rafael Gutiérrez Niebla (Review Panel member: Academic and quality assurance expert):** President of the National Council for Quality of Tourism Education A.C. of Mexico (CONAET).

Due to COVID-19 travel constraints in September 2021, it was no longer possible to hold a face-to-face site visit in Asunción, Paraguay. In agreement with INQAAHE and ANEAES, a 5-day virtual site visit was scheduled from Monday 20 September 2021 to Friday 24 September 2021.

The virtual visit took place according to a program agenda (see [Annex 3](#)) that included a total of 15 interviews with different stakeholders and a final session with ANEAES staff where the Review Panel shared their comments and feedback regarding the external review process.

The Panel interviewed and discussed with more than 106 interviewees, including representatives of:

- Ministry of Education and Science of Paraguay (MEC).
- Board of Directors and Leadership of ANEAES.
- Self-assessment team and agency staff.
- Professional Unions and Industry Representatives.
- International partner agencies and national collaborators.
- Representatives of different Institutions of Higher Education
- National and International Peer Reviewers.
- Students.

Once the virtual visit concluded, the Panel drafted the first version of the external review report, which was shared in advance to ANEAES for verification before submitting the final version to INQAAHE's Board for its final decision.

Refer to [Annex 4](#) for the Summary Assessment of Compliance of INQAAHE Guidelines.

## About the National Agency of Evaluation and Accreditation of Higher Education (ANEAES)

The National Agency for the Evaluation and Accreditation of Higher Education (ANEAES) was created by Law No. 2072 on 13 February 2003, to “evaluate and, where appropriate, to accredit the academic quality of higher education institutions that are subjected to its scrutiny and to produce technical reports on the academic requirements of academic degrees and higher education institutions”. Although Law 2072 grants ANEAES the technical and academic autonomy for the fulfilment of its functions, it was only in 2013 with the approval of Law 4995/13, Law of Higher Education, when this technical body obtained administrative and financial autarky.

The Agency states its mission as follows: "We are the institution responsible for evaluating and accrediting the quality of higher education in Paraguay for its continuous enhancement" and its functions are defined in Law 2072/03, Article 4:

1. *Carry out external evaluations of the academic quality of higher education institutions.*
2. *Produce technical reports on academic projects for the qualification of careers and institutions, at the request of the competent instance of Higher Education.*
3. *Serve as an advisory body in matters related to evaluation and accreditation in higher education.*
4. *Serve as a consultative body at the request of institutions or organizations interested in matters related to this law and the terms of its competence.*
5. *Accredit the academic quality of the degrees and postgraduate programs that have been the object of external evaluations by the same Agency.*
6. *Give timely public dissemination on accredited degrees; and,*
7. *Be linked to national or foreign organizations in matters of financial or technical cooperation.*

During the first 10 years, ANEAES focused on the accreditation of undergraduate degrees, which implied the design and approval of a national evaluation and accreditation framework with conceptual foundations, dimensions, components, criteria, and indicators. Under the provisions of Law 2072/03, accreditation is voluntary except for "*undergraduate degrees in law, medicine, dentistry, engineering, architecture, agronomic engineering and for those degrees that enable graduates to engage in professional practice that may result in damage to the integrity of people or their patrimony*".

The first accreditations of postgraduate programs of medical specialties were carried out in 2013, a prerogative that the Agency has with its creation Law (Art. 4, numeral 5). Between 2018 and 2019, the National Evaluation and Accreditation Model was modified to incorporate the accreditation mechanisms of postgraduate programs for masters and doctorates, and of institutions (Universities, Higher Institutes, Teacher Training Institutes and Professional Technical Institutes) and update the mechanisms for the evaluation and accreditation of undergraduate degrees.

According to ANEAES' self-evaluation report, between 2009 and 2019, the agency carried out 793 evaluations of undergraduate degrees and postgraduate programs, of which 44% achieved accreditation while 56% were not accredited or their results were postponed until the identified weaknesses were eliminated. Likewise, 36 of the undergraduate degree accreditations were carried out in the ARCU-SUR System, with regional validity. The accreditation process for postgraduate programs is incipient and institutional accreditations have not yet been carried out. In this regard, between 2016 and 2017, experimental institutional evaluations were carried out at 5 universities and higher institutes (2 public and 3 private), and in 2019 an evaluation process for diagnostic purposes started at higher institutes and public universities and one private institution (private institutions pay a fee for any quality assurance process).

## Higher Education in Paraguay

Higher education in Paraguay represents the third level of formal education in the educational system and, as provided by the National Constitution in article 79, universities and higher institutes have the purpose of professional training, scientific-technological research, and university extension. The current Higher Education Law "Law 4995/2013" defines third-level professional training institutes (teacher training institutes and professional technical institutes) as higher education institutions. Universities cover a multiplicity of areas of knowledge while higher institutes work in a specific area. Both offer undergraduate degrees, and graduate programs (training, specializations, masters, and doctorates). Third-level vocational training institutes provide training in different areas of technical and practical knowledge and enable the exercise of a profession through undergraduate degrees.

According to official statistics, by 2020 in Paraguay, there are 55 universities, 9 from the official sector and 46 from the private sector; 37 higher institutes, 8 from the official sector and 29 from the private sector; 227 professional technical institutes (ITP), 5 from the official sector and 222 from the private sector; 69 teacher training institutes, 40 from the official sector and 29 from the private sector.

Universities and higher institutes are created by Law on the basis of a binding opinion by the National Council of Higher Education (CONES), based on an ANEAES technical report. On the other hand, the National Council of Higher Education (CONES) is responsible for the authorization of new careers or affiliates not foreseen in the original institutional projects. CONES is also the body responsible for intervening or closing a university, a higher institute or a degree. Moreover, the authorization of tertiary-level professional training institutes is the responsibility of the Ministry of Education and Science on the basis of an evaluation process by the National Institute of Educational Quality (INEE).

## EXECUTIVE SUMMARY

As part of its consolidation plan as the Quality Assurance Agency in Paraguay, ANEAES requested INQAAHE for its external review following the provisions of the Guidelines of Good Practices. The external review was carried out considering the ANEAES 2009-2019 self-evaluation report, the information gathered in the interviews held throughout the virtual visit carried out in September 2021 and the complementary information provided by the agency after the virtual visit. Likewise, the results of the ANEAES evaluation produced by RIACES in April 2019, under the manual of good practices proposed by this network, were also taken into consideration.

The self-evaluation report presented by ANEAES in the INQAAHE external review is concise, it does not include updated information for the years 2020 and the first semester of 2021 and the responses to the different categories, criteria and indicators of the guidelines of good practice are not exhaustive. Nevertheless, within the framework of the virtual visit, complementary information was accessed as a result of the high participation and good disposition of the different stakeholders.

In 2021, ANEAES elaborated a 2021-2030 strategic plan that, although it formulates goals aligned with its mission, is unambitious and of uncertain impact to address the weaknesses that the Agency identified in its self-assessment. The strategic plan does not contemplate actions or indicators for the monitoring of the achievement of the formulated goals - only quantitative targets are set. Furthermore, ANEAES does not have an internal quality assurance system for its processes and outcomes, nor an information management system (IMS) to systematize the information it has.

ANEAES has adopted a national evaluation and accreditation framework that includes the specific mechanisms to accredit undergraduate degrees, graduate programs, and institutions. Even though ANEAES declares that it implements a systemic evaluation and accreditation model, the disaggregation of differentiated quality criteria and indicators for the accreditation of undergraduate programs in 44 areas regulated by the State promotes fragmentation and hinders interdisciplinarity and institutional integration. Similarly, the reduced integration of quality assurance mechanisms generates duplication of resources and an overload of work for the HEIs and the Agency, a weakness that ANEAES itself identified in its self-evaluation process.

ANEAES has carried out accreditation procedures of undergraduate degrees, mainly those regulated by the government, even though the total number of such degrees that must undergo compulsory accreditation is unknown at the national level. Likewise, the accreditation of graduate programs is incipient and no institutional accreditations have yet been completed. In this regard, the universities and public higher institutes have signed an agreement with the ANEAES to submit themselves to institutional evaluations, but only for

diagnostic purposes rather than for accreditation. Only a few private institutions have undergone institutional evaluation for accreditation purposes.

To carry out the evaluation and accreditation mechanisms, ANEAES has clear guidelines and documents for the processes of self-evaluation, external evaluation, and the production of the final report. There are formal instances to appeal decisions concerning an accreditation process and its outcome before its final resolution. Throughout the virtual visit, it was possible to verify that the evaluation processes are conducted with rigour, transparency, and respect for the academic autonomy of universities and higher institutes.

In this external review report, recommendations have been made to ANEAES to advance in its consolidation process, to address weaknesses (especially those that the agency itself identified in its self-evaluation) and to address the recommendations received by other international evaluation instances. Likewise, ANEAES' achievements are duly acknowledged.

ANEAES is an agency recognized and legitimized by higher education institutions and by the different stakeholders that were interviewed, it has the autonomy to make its decisions and administrative and financial autarky. It was also found that ANEAES has a governance and management structure with qualified professionals with clearly defined functions and has a national database of trained peer reviewers to carry out their role – even though this database should be expanded and should seek to diversify reviewers' profiles.

In summary, the virtual visit confirmed that the creation of ANEAES has had a positive impact on enhancing the quality of higher education in Paraguay and that the Agency has the values, qualities, and capacities to further advance the consolidation process in progress. From the evidence gathered in this external review, the Agency's alignment with the INQAAHE Guidelines of Good Practice is partial but sufficient, in spite of the need for improvements in different aspects of the six dimensions that were evaluated. For this reason, **the Panel recommends to the INQAAHE Board to certify the alignment of the ANEAES to the Guide of Good Practices (GGP).**

# ASSESSMENT OF COMPLIANCE WITH THE INQAAHE GUIDELINES OF GOOD PRACTICE

## I. The structure of the External Quality Assurance Agency (EQAA)

The EQAA is a recognised, credible organisation, trusted by higher education institutions and the public. It has adequate mechanisms to prevent conflicts of interest in the decisions it makes; its staff has the needed skills to carry out the functions associated with external QA. The EQAA has the needed resources to carry out its mission.

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### 1.1 Legitimacy and recognition

ANEAES is a national agency created by law in 2003 under the authority of the Ministry of Education and Culture. The Agency holds autonomy and autarky for its operation and has a regulatory framework that orders the development of the evaluation and accreditation processes.

ANEAES is part of two international networks of quality agencies, the Network of National Accreditation Agencies of MERCOSUR -RANA- and the Ibero-American Network for Quality Assurance in Higher Education-RIACES-. The affiliation to these networks has allowed it to build links with other quality assurance agencies located in Latin America, with which ANEAES develops projects, internships, events, and exchanges peer reviewers.

ANEAES has the policy to prevent conflicts of interest and guarantee the confidentiality of the information. The Agency staff signs a confidentiality agreement and adherence to the principles and values defined in ANEAES code of ethics and good governance. In addition, ANEAES has a regulatory framework where the possible causes of conflicts of interest are defined and appoint a committee of a peer review committee for this purpose. These regulations are available on ANEAES' website.

During interviews held in the virtual visit with representatives of the universities and higher institutes, representatives of the professional associations and staff of the Agency, the recognition of the work carried out by ANEAES and its effective contribution to the progressive incorporation of an enhancement culture of the quality of higher education was highlighted.

### 1.2 Mission and purposes

The mission and objective formulated by ANEAES are linked to the evaluation and accreditation of the academic quality of the higher education institutions, their branch campuses, and undergraduate degrees and postgraduate programs. This mission is contemplated in the establishment decree of ANEAES in 2003 and was ratified by the current Higher Education Law.

In 2021, ANEAES prepared a new 2021-2030 strategic plan that integrates the evaluation of achievements and limitations regarding the goals proposed in the 2017-2020 strategic plan. Both plans enact the same mission, focused on the evaluation and accreditation of the quality of higher education in Paraguay for its continuous improvement. The new plan defines 3 strategic objectives aligned with the agency's mission. The 3 objectives are developed through 11 actions and 20 achievement indicators. These indicators envision annual achievements during 2021-2030.

The Panel considers that, although the objectives of the new strategic plan are aligned to its mission, the actions and indicators of achievement proposed are not sufficient to consolidate the strengths and to address the weaknesses identified concerning the previous period. Even though ANEAES has identified weaknesses in critical aspects of its governance, the proposed improvement strategies are not exhaustive for their resolution. For instance, the development of a second phase of the evaluative model for undergraduate degrees, postgraduate programs and institutions that would be implemented to enhance the integration and quality of the evaluation and accreditation processes. However, neither in the 2021-2030 strategic plan nor in the interviews conducted during the virtual visit, it was not explained what this new evaluation model consists of and what changes will be introduced to the national evaluation and accreditation framework. Likewise, although it is stated in the plan as strategies to be developed between 2021 and 2030 (p. 21-22): *“to implement a computer system (IDEAS) to optimize the administrative, financial and academic processes of the agency”* and *“establish a monitoring and follow-up system for the achievement of institutional goals”*, the proposed achievement indicators are not sufficient to guarantee their effective development. These are limited to the production of statistical publications on accreditations carried out and to project future research on the impact of accreditations in the higher education system.

On the other hand, several of the actions provided in the law are at an initial stage as is the case of the accreditation of programs while other actions present irregularities, for instance, the compulsory accreditation of degrees that are regulated by the State in some universities and higher institutes that have not participated in the calls for accreditation. In the interviews held with the ANEAES management team during the virtual visit, it was mentioned that the Agency does not have statistics about the total number of undergraduate degrees that should be in these mandatory accreditation processes.

Finally, although a mechanism for the evaluation and accreditation of institutions was approved, no full institutional accreditation process has yet been implemented. Only an experimental evaluation of 5 universities and higher institutes was carried out between 2016 and 2017, and in 2019, it was agreed with the universities and public higher institutes to develop an institutional evaluation process for diagnostic purposes and not for accreditation.

### **1.3 Governance and organisational structure**

ANEAES has technical, academic, administrative, and financial autonomy for decision-making in the evaluation and accreditation framework of programs and institutions and the administration of its budget granted by the Ministry of Finance.

However, the efficiency of its management is limited by the current regulatory framework since ANEAES does not have the power to intervene when programs do not attend or present themselves for accreditation calls or when the program does not accredit, being the responsibility of the National Council of Higher Education (CONES) to carry out these interventions. In this regard, it was found that on 20 November 219, ANEAES presented a formal request to the CONES to reinforce the sanctions for non-compliance with the requirements for the evaluation and accreditation of the offer of higher education programs. However, in the interviews held during the virtual visit, it was mentioned that there are universities and higher institutes that continue to enrol students despite not having achieved accreditation of their undergraduate degrees or postgraduate programs.

Similarly, ANEAES does not have systematized information on the universe of undergraduate degrees and postgraduate programs that must be accredited, which prevents prospective planning to expand the coverage of accreditations to be developed.

ANEAES has a trained governance structure with a low turnover rate even though 54% of the staff is commissioned. An issue that can be observed in the governance structure of ANEAES and which was already identified in the RIACES external evaluation report is the one-person departments, highly specialized and with a significant administrative workload, which implies a very high risk if any of them terminate their contract.

### **1.4 Resources**

ANEAES has technical personnel with academic training, who receive training and participate in internships and international events developed within the framework of partnerships with other quality assurance agencies. These personnel intervene in the design of the documents formulated by ANEAES to guide HEIs in the different instances of the evaluation processes while training and offering technical assistance to peer reviewers.

In the interviews held with the ANEAES technical team, a great commitment to their professional work and the improvement of their performance through continuous training was noted. Likewise, the peer reviewers highlighted the professionalism of the agency's technical team in the development of its functions and tasks. However, the high level of specialization of the agency's management structures, evidenced in the organization chart, conditions the efficiency and development potential of its human resources.

ANEAES has its own building and a budget autarky. The budget is not enough to hire their staff, most of which are commissioned, although it shows stability in their positions.

## Commendations

1. The panel **commends** ANEAES for the legitimacy it has been building up among the HEIs, academic corporations and professional associations of Paraguay.

## Recommendations

1. The Panel **recommends** ANEAES to align more clearly the actions and indicators foreseen in its 2021-2030 strategic plan, in line with its determination to overcome the weaknesses identified in its self-evaluation.
2. The Panel **recommends** ANEAES to map out the undergraduate and postgraduate academic programs offered by the entire HE system of Paraguay, in order to gain a more precise understanding of its current coverage and thus get a clear view of what is still needed to reach the full coverage required by the Higher Education Law.
3. The Panel **recommends** ANEAES to define a matrix management structure that fosters the synergy of available resources and makes full use of the talent of its staff.

## Conclusion of the Panel's assessment

The panel concludes that ANEAES is **substantially compliant** with the INQAAHE Guidelines of Good Practices in examination section 1: "The structure of the External Quality Assurance Agency".

## II. Accountability of the EQAA

The EQAA has in place policies and mechanisms for its internal quality assurance, which demonstrate a continuing effort to improve the quality and integrity of its activities, its response to the changes to the context in which it operates and its links to the international community of QA.

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### 2.1 Quality assurance of the EQAA

ANEAES has a code of ethics and good governance that align its operation.

Among the values that guide the behaviours of its staff include transparency, efficiency, responsibility, impartiality, confidentiality, consistency, integrity, equality, fairness, and well-being. During the interviews with the HEIs representatives, the respect that is evidenced in the evaluation and accreditation processes for the diversity of institutional projects was highlighted, as well as the professionalism of the peer review committees.

Although ANEAES implements the Standard Model of Internal Control for Public Entities of Paraguay (MECIP), this standardized mechanism, for all national institutions, has not been sufficient for the agency to develop a specific internal system to ensure the quality of its services, processes, and outcomes. Indeed, the agency itself recognizes in its self-assessment report (page 91) that it does not have an explicit mechanism for systematic evaluation of the organizational unit, nor does it have systematized information about its experiences and knowledge, or about internships or exchanges carried out with other international agencies. In this sense, in the ANEAES 2021-2030 strategic plan (pg. 18) the following are considered as weaknesses: *“the insufficient systematization of the experiences and evaluations carried out by the agency; not enough use of the available information to provide feedback for improvement of institutional processes; and the few spaces for analysis, debate and internal reflection on trends, innovations and ways to follow”*.

On the other hand, ANEAES has been externally evaluated by RIACES and several of the recommendations that emerge from the evaluation report produced in April 2019 persist as weaknesses, even some of these recognized by the agency in its self-evaluation report, which evidence that in the last 3 years no corrective actions were taken to target the limitations that were identified by this evaluative instance.

The ANEAES self-evaluation report that was presented for INQAAHE’s GGP alignment considers the period between 2009-2019, omitting the years 2020 and the first semester of 2021. It is a concise report that offers superficial information concerning the weaknesses identified and about their review strategies and enhancement. The document abounds in references on the theoretical framework to design the evaluation and accreditation framework of the agency and on the regulatory framework that gives legitimacy to its procedures. However, there is little information about the problems, limitations, or

challenges that the agency had to face and that the panel was able to reveal during the interviews.

The report shows internal inconsistencies on the dates on which the evaluation and accreditation mechanisms are approved or implemented, or mismatches regarding the information declared in the report and the information gathered in the interviews or on the website. For example, the self-evaluation report mentions 7 accredited postgraduate courses between 2009 and 2019, while in the interviews, it was referred to 38 accredited postgraduate programs in that period, the latter is close to the information declared on the ANEAES website.

## 2.2 Links to the QA community

ANEAES has built associative alliances mainly with quality assurance agencies in the Latin American region, as a correlate of its integration into RANA and RIACES. As it emerges from its self-evaluation report and from the interviews held with the representatives of the quality assurance agencies with which ANEAES has partnerships, the collaborative activities focus on internships, exchange of peer reviewers, development of joint events and attendance of ANEAES's staff to events organized by agencies in the region. The agency does not have systematized mechanisms to evaluate the impact of the learning achieved in exchanges with other quality assurance agencies, nor has it carried out research or publications on the impact of the evaluation and accreditation processes carried out on the improvement of the system. higher education. Likewise, the spectrum of its links with the quality assurance community is limited to the agencies of the Latin American region, this aspect limits the recognition of the experiences developed in quality assurance agencies in other continents and that could recreate possibilities of further development/

### Commendations

1. The panel **commends** ANEAES for the efforts and progress made in the articulation of its policies, projects, and activities with other Latin-American agencies for quality assurance in higher education.

### Recommendations

1. The panel **recommends** ANEAES to adopt a more coordinated and systematic approach of its cooperation and exchange with foreign quality assurance agencies, in order to better disseminate internally the lessons learned from these exchanges and thus keep abreast of global advances in quality assurance in Latinamerica and other continents.
2. The panel **recommends** ANEAES to develop its own internal system for the evaluation of the impact of its processes and decisions on the quality and relevance of Paraguayan higher education.
3. The panel **recommends** ANEAES to develop a comprehensive, computerized management information system which would allow it to base its decision-making

processes on the entire range of information actually available. This system should include in particular statistics on the outcomes of its evaluation and accreditation procedures and data about the agency's compliance with its Strategic Plan and with the recommendations of external evaluating bodies.

4. The panel **recommends** ANEAES to ensure that the recommendations arising from external evaluation reports by international organizations are fully taken into account in the Agency's planning, activities and organization.

### **Conclusion of the Panel's assessment**

The panel concludes that ANEAES is **partially compliant** with the INQAAHE Guidelines of Good Practices in examination section 2: "Accountability of the EQAA".

### III. The EQAA's framework for the external review of quality in higher education institutions

The main concern of the EQAA is the promotion of quality education and student achievement. In doing this, it recognises that quality is primarily the responsibility of the higher education institutions themselves, and, supports this principle in its criteria and procedures. These promote internal quality assurance (IQA) and provide higher education institutions with clear guidance on the requirements for self-assessment and external review.

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#### 3.1 The relationship between the EQAA and higher education institutions

ANEAES encourages HEIs to assume responsibility for monitoring and evaluating the quality of their educational services and their outcomes. The national evaluation and accreditation framework includes criteria and indicators to evaluate the operation of an internal quality assurance system for careers, programs and the organizational development of HEIs.

Since 2009, HEIs have been progressively incorporated into the accreditation processes for undergraduate programs, mainly those regulated by the State. The accreditation of postgraduate programs is still incipient, although the first accreditations were carried out in 2013. In 2019, the call was opened for public university institutions to present themselves to a voluntary diagnostic evaluation process, to which a private university institution was added for the evaluation process for accreditation purposes, paying a fee to participate in this instance.

In the interviews with the HEIs authorities, students, and representatives of professional associations, it was revealed that there is a clear social awareness about the contribution of ANEAES as an accrediting institution of quality of education, promoting the inclusion of quality assurance as a public policy. The authorities of the interviewed HEIs concur in highlighting that ANEAES has contributed to the structuring of the higher education system of Paraguay and that the evaluation processes are developed within a framework that respects the academic autonomy of the HEIs and the diversity of institutional projects.

Nevertheless, for all HEIs to assume responsibility and autonomy in commitment to quality and accountability to society, ANEAES must systematize the evaluation and accreditation mechanisms provided by law, following a planned extension of coverage of programs and institutions. Therefore, it is essential for ANEAES to access an accurate diagnosis of the academic offer of the HEIs in Paraguay and, accordingly, to plan the extension of its coverage.

#### 3.2 The definition of criteria for external quality review

In 2007, ANEAES approved the national model for the evaluation and accreditation of higher education considering its conceptual foundation and dimensions, components, criteria, and indicators for undergraduate programs that were updated later in 2018. In 2009, the mechanisms to accredit medical programs were defined and in 2019, the evaluation and

accreditation mechanisms for masters and doctorates were approved, while the mechanisms for medical programs were also updated. In addition, in 2019, the HEIs evaluation and accreditation mechanisms were approved: universities and higher institutions, teacher training institutes, and professional technical training institutes. Guidelines have been elaborated for self-evaluation, external evaluation, and monitoring enhancement plans.

There are formal mechanisms for HEIs representatives and professional associations to participate in the validation of the quality criteria of the programs in the different areas of knowledge and professional activity. The HEIs academic representatives convene to workshops, while the representatives of professional associations are integrated into advisory commissions. Students and graduates are not invited to participate in this validation process, although in the interviews held with the evaluation committee, they were proactive and demanded their intervention.

As mentioned in the previous section, current accreditations correspond to undergraduate programs regulated by the State and to programs - medical specialties -, masters and doctorates-. These mechanisms are developed under quality criteria that assess the relevance, efficiency, effectiveness and integrity of management, processes, and resources. There are no criteria or indicators to evaluate the learning outcomes in the training process, in key with a notion of quality that transcends accountability in each area and that deepens the educational transformation driven by evaluation and accreditation.

Although ANEAES declares to implement a systemic evaluation and accreditation model, the disaggregation of criteria and differentiated quality indicators for the accreditation of 44 undergraduate programs regulated by the State promotes the fragmentation of the evaluation processes and undermines institutional integration. The reiteration of a set of criteria and indicators for each program that an HEI must accredit, overloads the institutions and the agency itself, removing agility and synergy of efforts and resources between the evaluation processes. In this regard, in the current strategic plan, ANEAES identified as a weakness to be solved: *"the low integration of evaluation and accreditation mechanisms"* while it plans to carry out a review of the evaluative model of programs towards the second phase of criteria and indicators.

### **3.3 The external review process**

The processes of accreditation of undergraduate and postgraduate programs and the evaluation of HEIs include the phases of self-evaluation, external evaluation, and final report, each one of these guided by procedure manuals provided by the agency. The clarity of the documents prepared by ANEAES to guide the evaluation processes as well as the training that is provided in the framework of each call for accreditation of degrees and programs was particularly valued by the HEIs academic representatives that were interviewed during the virtual visit.

The HEIs have an instance for the review of the preliminary report produced by the peer review committee in which they can make a discharge. In case of disagreement with the

outcome, there is also a procedure to request the reconsideration of the resolution and outcome.

The peer reviewers at a national and international level are integrated into a national registry according to the academic profiles of each discipline or program. The requirements to be a peer reviewer, the list of registered peer reviewers and their curriculum vitae are published on the ANEAES website. The selection of a peer reviewer to participate in an external evaluation process is by public lottery. The peer reviewers are trained regularly, being a requirement to participate in training to continue as a registered peer reviewer of the agency. During the interviews with the panel, national and international peers positively valued the training provided by ANEAES.

During the interviews with the technical team of the agency and with peer reviewers, it was highlighted that the national register of peer reviewers is still scarce and that international peers do not always recognize the cultural characteristics of the country, constituting a risk in terms of the relevance of the outcomes of the evaluations. Likewise, it was revealed that, even though it is not required by law, almost all the peer reviewers are academic. The panel recommends that the agency evaluate the risk that this implies in terms of biasing the evaluation to the academic dimension of the degree or program, neglecting the economic and social relevance of its educational project.

### **3.4 The requirements for self-evaluation**

There are documents prepared by ANEAES to conduct the self-evaluation processes and these documents are available on the agency's website. These documents are clear and offer conceptual details, define the quantitative evaluation scale and the qualitative criteria to evaluate the dimensions, criteria components and indicators of each evaluation and accreditation mechanism (undergraduate, postgraduate programs and institutions).

### **Commendations**

1. The panel **commends** ANEAES for developing a participatory process for the definition of the quality criteria and indicators for its different evaluation and accreditation procedures.
2. The panel **commends** ANEAES for promoting the culture of evaluation in HEIs through training sessions aimed at representatives of said institutions.
3. The panel **commends** ANEAES for the elaboration of clear and detailed documents that guide the HEIs and the peer review committees in the evaluation and accreditation processes.

### **Recommendations**

1. The panel **recommends** ANEAES to seek a more generic and cross-disciplinary approach to its currently disciplinary-based quality assurance mechanisms, thus

fostering the synergy between the various evaluation processes and promoting a more optimal use of its human resources.

2. The panel **recommends** ANEAES to increase the number of peer reviewers in its database and to broaden the profile requirements in order to accommodate more non-academic experts who understand the needs and demands of industry and the labour market.

### **Conclusion of the Panel's assessment**

The panel concludes that ANEAES is **substantially compliant** with the INQAAHE Guidelines of Good Practices in section III: "The EQAA's framework for the external review of quality in higher education institutions"

## IV. The EQAA and its relationship to the public

The EQAA makes public its policies and decisions about institutions and programmes, discloses the decisions about its own performance and disseminates reports on outcomes of QA processes.

Not compliant

Partially compliant

Substantially compliant

Fully compliant

### 4.1 Public reports on EQAA policies and decisions

All the regulations issued by ANEAES to develop the evaluation and accreditation processes of higher education degrees, programs and institutions are available on the ANEAES' website. The list of accredited degrees and programs is also published, it indicates the date on which the accreditation took place and the resolution that ANEAES grants it. On the other hand, public information on the list of accredited degrees is not sufficiently transparent and accessible for the general public and students in particular. The website mentions accredited degrees in the "*current national model*" and in "*the historical national model*" and some degrees are repeated in both sections, in some cases, with expired accreditation dates, and without further information on the current validity. Likewise, the diversity of instances of evaluation of HEIs including approval, licensing, evaluation for diagnostic purposes, accreditation, these instances can be confusing for the different higher education stakeholders so that they can clearly distinguish what is the level of quality assurance that each HEIs has in compliance with the quality criteria.

### 4.2 Other public reports

The agency's self-evaluation report and the executive report of the external evaluation carried out by RIACES in 2019 are found on the ANEAES website, without additional information about the follow-up of the recommendations and overcoming the weaknesses identified.

### Recommendations

1. The Panel **recommends** ANEAES to also publish the full evaluation reports – not only the accreditation decisions.
2. The Panel **recommends** ANEAES to review the information provided on its website about accredited degrees, since it may currently be confusing for the general public.
3. The Panel **recommends** ANEAES to prepare recurring reports reviewing the development of the quality and relevance of Paraguayan Higher Education, both at the institutional and national level.

### Conclusion of the Panel's assessment

The panel concludes that ANEAES is **partially compliant** with the INQAAHE Guidelines of Good Practices in section IV: "The EQAA and its relationship to the public".

## V. Decision making

The EQAA has policies and procedures in place that ensure a fair and independent decision-making process in the final review of the institution or the programme. It provides effective procedures to deal with appeals and complaints.

Not compliant

Partially  
compliant

Substantially  
compliant

Fully compliant

### 5.1 The decision-making process

The ANEAES Board of Directors is the body responsible for making decisions concerning the accreditation period of four or six years, the postponement of accreditation or the non-accreditation of a degree or program. Based on the self-evaluation report and the external evaluation report issued by the peer review committee, the ANEAES Board of Directors elaborates an evaluative synthesis on the precision, sufficiency, and relevance of the accreditation process and, before issuing the opinion, receives the authorities of the HEIs to make their appeals and issue their feedback on the process carried out. In this way, the decision is built based on the reports and complementary information as an outcome of this process.

In the interviews held during the virtual visit of the ANEAES, the rectors and representatives of the self-evaluation committees of the HEIs recognized the contribution of the accreditation process in the enhancement of institutional governance, the systematization of information and the greater participation of faculty and students in the evaluation of the quality of education. They consider that the accreditation process is rigorous, transparent and respectful of the diversity of institutional projects.

The external evaluation reports are elaborated according to the dimensions, components, criteria and evaluation indicators defined in the national framework for evaluation and accreditation of degrees and programs. Before the submission of the final evaluation report, the agency sends a preliminary report to the HEIs, an instance in which they can expand information or use their right of reply regarding the points objected by the peer reviewers. During different interviews with the HEIs representatives, the internal consistency was highlighted about the regulations in place to execute the evaluation and accreditation processes and the performance of the peer reviewers during site visits to the institutions.

In compliance with the provisions of Law 2072/13, ANEAES periodically communicates the list of accredited, non-accredited and postponed degrees in their accreditation to the CONES, the Ministry of Education and Science and the Ministry of Foreign Affairs. It should be noted that ANEAES does not have the legal competence to discontinue a degree or postgraduate program in case if the degree or program does not attend the accreditation calls or does not receive the accreditation, in these circumstances, the CONES has the power to intervene in these irregularities under the provisions of CONES Resolution No. 166/15.

In November 2019, ANEAES formally requested the CONES to modify this resolution and to reinforce the application of penalties due to the evidence that some higher education institutions evade the evaluation of the degrees and postgraduate programs that must be accredited. During the virtual visit and interviews with members of the ANEAES governance staff, it was mentioned that even two years after this formal request, there are degrees and postgraduate programs that did not reach their accreditation and continue to enrol students without any type of restrictions or action taken by CONES.

Although the Panel understands that ANEAES is not the body responsible for correcting these irregularities, the panel considers that it is necessary to make evidence that these irregularities condition the development of its mission and put at risk the transparency and effectiveness of the evaluation and accreditation process. For this reason, the panel recommends ANEAES to reinforce the claims already made to CONES to effectively comply with the current regulatory frameworks.

## 5.2 The EQAA's process for appeals and complaints

ANEAES has procedures for processing appeals for the final resolution of the accreditation process. The HEIs may request the appeal by written note and signed by the highest institutional authority within 10 days after the notification of the resolution. ANEAES appoints a review committee composed of three members from the national peer reviewers register, two of which must be from the area of knowledge of the evaluated degree or program and the third from the education field. Within a maximum period of 45 days and after considering all the documents generated during the evaluation process, the review committee issues a new conclusive outcome against which no appeal can be lodged.

### Commendations

1. The Panel **commends** ANEAES for the rigour and consistency of the procedure used to make decisions about the accreditation of degrees or programs – a feature that is also highly appreciated by the HEIs themselves.

### Recommendations

1. The Panel **recommends** ANEAES to upgrade its efforts for the disclosure of non-accreditation, in two different ways: on the one hand, by publicly - and if needed insistently - requesting CONES, as the competent authority, to take action against HEIs that illegally offer non-accredited programs; on the other hand, by itself disclosing irregularities on its website and otherwise, in order to ensure the transparency of the information available to students and society about the actual quality of higher education in Paraguay.

### Conclusion of the Panel's assessment

The panel concludes that ANEAES is **substantially Compliant** with the INQAAHE Guidelines of Good Practices in section 5 "Decision making".

## VI. The QA of cross border higher education

The EQAA has policies relating to both imported and exported higher education. These policies take into account the characteristics of the providers and the receivers, and, refer to all types of transnational higher education.

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<input type="checkbox"/> Not compliant	<input checked="" type="checkbox"/> Partially compliant	<input type="checkbox"/> Substantially compliant	<input type="checkbox"/> Fully compliant
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### 6.1 Criteria for cross border higher education

ANEAES does not include criteria and indicators to promote and evaluate cross-border education in the evaluation and accreditation framework of degrees, programs, and institutions. The self-evaluation report argues that the current regulations in the country prevent ANEAES from developing evaluation processes to accredit the quality of cross-border education. In the interviews with representatives of the HEIs, it was mentioned that this type of higher education is almost non-existent in Paraguay and that the efforts to incorporate professors and researchers in their graduate programs are conditioned by the budget or regulatory limitations imposed by the State.

### 6.2 Collaboration between agencies

ANEAES is a member of the RANA network of MERCOSUR and the RIACES network of Ibero-America. It is within the framework of these networks that ANEAES has built links and partnerships with other agencies and developed internship activities, peer reviewers exchange and participated in events. Likewise, since 2009, ANEAES implements the accreditation system of university degrees for regional recognition of the quality of their degrees in the MERCOSUR-ARCU-SUR system. This experience has had a positive impact on the development of the evaluation and accreditation procedures by ANEAES at the national level.

#### Commendations

1. The Panel **commends** ANEAES for the accreditation of Paraguayan higher education degrees through the ARCU-SUR system of MERCOSUR countries, and for its substantial contribution to the collaboration between quality assurance agencies in Latin America, especially within the framework of RIACES.

#### Recommendations

1. Even though cross-border higher education is not currently seen as an issue in Paraguay, the Panel recommends ANEAES to further investigate the theme to get a full understanding of its implications, and to formally request CONES and the Ministry of Education & Science to develop a comprehensive policy for the internationalization of higher education and the promotion of its quality assurance, thereby also contributing to promoting the quality of the Paraguayan higher education system.

### Conclusion of the Panel's assessment

The panel concludes that ANEAES is **partially compliant** with the INQAAHE Guidelines of Good Practices in section 6 “The QA of Cross border higher education”.

## CONCLUSIONS FROM THE REVIEW PANEL

Since its establishment in 2003, ANEAES has contributed to disseminating a culture of evaluation in HEIs and has been able to gain legitimacy and recognition among the academic community and professional associations. The Agency enjoys autonomy and autarky for its operation and has highly skilled staff trained to carry out their functions - even though the internal structure is highly specialized, with a low level of collaboration between the various departments. ANEAES has developed a national evaluation and accreditation framework with the participation of HEIs representatives and professional bodies. Program accreditations have been carried out in 44 areas including medical specialties, masters and doctorates. There are still no completed institutional accreditation procedures, even though an evaluation process for diagnostic purposes has been initiated for a few public HEIs and one private HEI. In the virtual visit, the panel got evidence that the current evaluation processes are implemented with rigour and transparency and are accepted by HEIs.

The segmentation of quality assurance criteria and indicators by areas/disciplines leads to the fragmentation of the accreditation work, may impede HEI's further development and overburdens both HEIs and ANEAES. The Agency acknowledges the need for a closer integration of its evaluation and accreditation procedures in its strategic plan; the Agency foresees a second revision of its evaluation model in order to overcome these difficulties.

The membership of ANEAES in two international networks of quality assurance agencies - RANA and RIACES - has fostered the development of cooperation and alliances with other agencies, mainly in the Latin American region. During the virtual visit the panel was satisfied that ANEAES has an active agenda of collaboration with these agencies, including internships, the exchange of peer reviewers, the organization of joint events and the participation in various activities for the development of quality assurance policies. The Agency still needs to better take advantage of the learning gained from these inter-institutional relations and partnerships, and to push for a comprehensive internationalization policy for Paraguayan higher education – including cross-border education - that would also have a positive impact on the quality of HE in the country.

In 2021, ANEAES adopted a new strategic plan for 2021-2030 with objectives that are aligned with its mission. However, the proposed actions and goals are not sufficient to overcome the weaknesses identified by the Agency itself. ANEAES does not have a formalized internal quality assurance system, nor a comprehensive management information system that would allow it to better analyse and improve its processes and its impact.

During the virtual visit, it became clear that HEIs appreciate the positive impact of accreditation procedures on the improvement of quality in higher education and on organizational governance, as well as on the systematization of information and on faculty and student engagement in quality assessment. The majority of interviewees and

stakeholders that participated in the virtual visit coincided and highlighted the positive impact of ANEAES' evaluation and accreditation activities on the consolidation of a quality culture. In Paraguayan higher education, this impact is seen as the entrance into a new age: there is a "before" and an "after" ANEAES.

However, the ANEAES management team expressed its concern about HEIs offering degrees and programs that are not accredited or do not even seek accreditation but continue to enrol students - without any action being taken against them by the responsible body - CONES. This situation negatively affects the transparency of ANEAES's work and violates the right of students and the community to have access to full information about the outcomes of ANEAES' evaluation procedures.

In summary, the Panel was able to confirm - throughout the virtual visit and despite a somewhat deficient self-evaluation report - that ANEAES is adequate in its activities and is consolidating its role as the agency responsible for evaluating and accrediting the quality of higher education, thus effectively contributing to its continuous improvement. ANEAES has succeeded in positioning itself as a quality "brand" recognized by the academic community and its stakeholders. The Agency still needs to further strengthen this consolidation process by means of a strategic plan addressing the identified weaknesses, the recommendations arising from the present report and the challenges of its future development.

From the evidence gathered in this external review, the alignment of ANEAES with the INQAAHE good practice guide is partial, but sufficient, provided the Agency sticks to its commitments and further enhances its achievements – more or less, depending on each of the six dimensions that were evaluated.

Based on its conviction that ANEAES has had a positive, important and acknowledged impact on the improvement of the quality of higher education in Paraguay and that the Agency has the values, characteristics and capacities to further advance in the consolidation process in progress, **the Panel recommends the INQAAHE Board to certify the alignment of the ANEAES to the Guide of Good Practices (GGP).**

# SUMMARY OF COMMENDATIONS, AND RECOMMENDATIONS

## I. Commendations

### Section 1: The structure of the External Quality Assurance Agency (EQAA)

1. The panel **commends** ANEAES for the legitimacy it has been building up among the HEIs, academic corporations and professional associations of Paraguay.

### Section 2: Accountability of the EQAA

2. The panel **commends** ANEAES for the efforts and progress made in the articulation of its policies, projects, and activities with other Latin-American agencies for quality assurance in higher education.

### Section 3: The EQAA's framework for the external review of quality in higher education institutions

3. The panel **commends** ANEAES for developing a participatory process for the definition of the quality criteria and indicators for its different evaluation and accreditation procedures.
4. The panel **commends** ANEAES for promoting the culture of evaluation in HEIs through training sessions aimed at representatives of said institutions.
5. The panel **commends** ANEAES for the elaboration of clear and detailed documents that guide the HEIs and the peer review committees in the evaluation and accreditation processes.

### Section 4: The EQAA and its relationship to the public

### Section 5: Decision making

6. The Panel **commends** ANEAES for the rigour and consistency of the procedure used to make decisions about the accreditation of degrees or programs – a feature that is also highly appreciated by the HEIs themselves.

### Section 6: The QA of cross border higher education

7. The Panel **commends** ANEAES for the accreditation of Paraguayan higher education degrees through the ARCU-SUR system of MERCOSUR countries, and for its substantial contribution to the collaboration between quality assurance agencies in Latin America, especially within the framework of RIACES.

## II. Recommendations

### Section 1: The structure of the External Quality Assurance Agency (EQAA)

1. The Panel **recommends** ANEAES to align more clearly the actions and indicators foreseen in its 2021-2030 strategic plan, in line with its determination to overcome the weaknesses identified in its self-evaluation.
2. The Panel **recommends** ANEAES to map out the undergraduate and postgraduate academic programs offered by the entire HE system of Paraguay, in order to gain a more precise understanding of its current coverage and thus get a clear view of what is still needed to reach the full coverage required by the Higher Education Law.
3. The Panel **recommends** ANEAES to define a matrix management structure that fosters the synergy of available resources and makes full use of the talent of its staff.

### Section 2: Accountability of the EQAA

4. The panel **recommends** ANEAES to adopt a more coordinated and systematic approach of its cooperation and exchange with foreign quality assurance agencies, in order to better disseminate internally the lessons learned from these exchanges and thus keep abreast of global advances in quality assurance in Latinamerica and other continents.
5. The panel **recommends** ANEAES to develop its own internal system for the evaluation of the impact of its processes and decisions on the quality and relevance of Paraguayan higher education.
6. The panel **recommends** ANEAES to develop a comprehensive, computerized management information system which would allow it to base its decision-making processes on the entire range of information actually available. This system should include in particular statistics on the outcomes of its evaluation and accreditation procedures and data about the agency's compliance with its Strategic Plan and with the recommendations of external evaluating bodies.
7. The panel **recommends** ANEAES to ensure that the recommendations arising from external evaluation reports by international organizations are fully taken into account in the Agency's planning, activities and organization.

### Section 3: The EQAA's framework for the external review of quality in higher education institutions

8. The panel **recommends** ANEAES to seek a more generic and cross-disciplinary approach to its currently disciplinary-based quality assurance mechanisms, thus fostering the synergy between the various evaluation processes and promoting a more optimal use of its human resources.

9. The panel **recommends** ANEAES to increase the number of peer reviewers in its database and to broaden the profile requirements in order to accommodate more non-academic experts who understand the needs and demands of industry and the labour market.

#### **Section 4: The EQAA and its relationship to the public**

10. The Panel recommends ANEAES to also publish the full evaluation reports – not only the accreditation decisions.
11. The Panel recommends ANEAES to review the information provided on its website about accredited degrees, since it may currently be confusing for the general public.
12. The Panel recommends ANEAES to prepare recurring reports reviewing the development of the quality and relevance of Paraguayan Higher Education, both at the institutional and national level.

#### **Section 5: Decision making**

13. The Panel recommends ANEAES to upgrade its efforts for the disclosure of non-accreditation, in two different ways: on the one hand, by publicly - and if needed insistently - requesting CONES, as the competent authority, to take action against HEIs that illegally offer non-accredited programs; on the other hand, by itself disclosing irregularities on its website and otherwise, in order to ensure the transparency of the information available to students and society about the actual quality of higher education in Paraguay.

#### **Section 6: The QA of cross border higher education**

14. Even though cross-border higher education is not currently seen as an issue in Paraguay, the Panel recommends ANEAES to further investigate the theme to get a full understanding of its implications, and to formally request CONES and the Ministry of Education & Science to develop a comprehensive policy for the internationalization of higher education and the promotion of its quality assurance, thereby also contributing to promoting the quality of the Paraguayan higher education system.

## ACKNOWLEDGMENT

The Review Panel extends its gratitude to the National Agency for the Evaluation and Accreditation of Higher Education (ANEAES) for its application and interest in the external review under the Guidelines of Good Practices (GGP) of INQAAHE, its commitment during the evaluation process and hard work in the interview process.

The Review Panel extends its gratitude to the president of ANEAES, Dr Dina Matiauda Sarubbi for her continued interest and commitment in promoting a culture of quality in higher education in Paraguay and to the ANEAES staff that facilitated and supported the planning and coordination for the external review and the virtual visit.

Finally, the Review Panel also wishes to thank all the participants and stakeholders internally and externally from ANEAES, the Ministry of Education and Science of Paraguay, ANEAES staff, as well as the HEIs Representatives from the different universities, national and international evaluating peer reviewers, student representatives and international agencies and national partners who participated in the virtual visit. Your comments and feedback during the interview sessions contributed significantly to the external review of ANEAES.

# ANNEX 1. INQAAHE GUIDELINES OF GOOD PRACTICE

## I. The structure of the External Quality Assurance Agency (EQAA)

The EQAA is a recognised, credible organisation, trusted by higher education institutions and the public. It has adequate mechanisms to prevent conflicts of interest in the decisions it makes; its staff has the needed skills to carry out the functions associated with external QA. The EQAA has the needed resources to carry out its mission.

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### 1.1. Legitimacy and recognition

- 1.1.1 The EQAA has an established legal basis and is recognized by a competent external body.
- 1.1.2 The EQAA takes into consideration relevant guidelines issued by international networks and other associations, in formulating its policies and practices.
- 1.1.3 The EQAA has a clear and published policy for the prevention of conflicts of interest that applies to its staff, its decision-making body, and the external Reviewers.

### 1.2 Mission and purposes

- 1.2.1 The EQAA has a written mission statement and a set of objectives that explicitly provide that external quality assurance of higher education is its major concern, describe the purpose and scope of its activities and can be translated into verifiable policies and measurable objectives.

### 1.3 Governance and organisational structure

- 1.3.1 The EQAA has a governance structure consistent with its mission and objectives, and, adequate mechanisms to involve relevant stakeholders in the definition of its standards and criteria.
- 1.3.2 The composition of the decision-making body and/or its regulatory framework ensure its independence and impartiality.
- 1.3.3 The EQAA's organisational structure makes it possible to carry out its external review processes effectively and efficiently
- 1.3.4 The EQAA has a strategic plan that helps assess its progress and plan for future developments

### 1.4 Resources

- 1.4.1 The EQAA has a well-trained, appropriately-qualified staff, able to conduct external evaluation effectively and efficiently in accordance with its mission statement and its methodological approach.

- 1.4.2** The EQAA has the physical and financial resources needed to fulfil its goals and carry out the activities that emerge from its mission statement and objectives.
- 1.4.3** The EQAA provides systematic opportunities for the professional development of its staff.

## II. Accountability of the EQAA

The EQAA has in place policies and mechanisms for its internal quality assurance, which demonstrate a continuing effort to improve the quality and integrity of its activities, its response to the changes to the context in which it operates and its links to the international community of QA.

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### 2.1 Quality assurance of the EQAA

- 2.1.1 The EQAA operates with transparency, integrity and professionalism and adheres to ethical and professional standards.
- 2.1.2 The EQAA has in place mechanisms that enable it to review its own activities in order to respond to the changing nature of higher education, the effectiveness of its operations, and its contribution towards the achievement of its objectives.
- 2.1.3 The EQAA periodically conducts a self-review of its own activities, including consideration of its own effects and value. The review includes data collection and analysis, to inform decision-making and trigger improvements.
- 2.1.4 The EQAA is subject to external reviews at regular intervals, ideally not exceeding five years. There is evidence that any required actions are implemented and disclosed.

### 2.2 Links to the QA community

- 2.2.1 The EQAA is open to international developments in quality assurance and has mechanisms that enable it to learn about and analyse the main trends in the field.
- 2.2.2 The EQAA collaborates with other QA agencies where possible, in areas such as exchange of good practices, capacity building, and review of decisions, joint projects, or staff exchanges.

## III. The EQAA's framework for the external review of quality in higher education institutions

The main concern of the EQAA is the promotion of quality education and student achievement. In doing this, it recognises that quality is primarily the responsibility of the higher education institutions themselves, and, supports this principle in its criteria and procedures. These promote internal quality assurance (IQA) and provide higher education institutions with clear guidance on the requirements for self-assessment and external review.

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### 3.1 The relationship between the EQAA and higher education institutions

- 3.1.1 The EQAA recognises that institutional and programmatic quality and quality assurance are primarily the responsibility of the higher education institutions (HEIs) themselves, and respects the academic autonomy, identity and integrity of the institutions and programmes.
- 3.1.2 The EQAA promotes the development and appropriate implementation of IQA processes in accordance with the understanding that the primary responsibility for assuring quality resides with the institutions and its programmes.
- 3.1.3 The EQAA bears in mind the level of workload and cost that its procedures will place on institutions, and, strives to make them as time and cost effective as possible.

### 3.2 The definition of criteria for external quality review

- 3.2.1 The EQAA recognises and values institutional diversity and translates this valuation into criteria and procedures that take into account the identity and goals of higher education institutions.
- 3.2.2 The standards or criteria developed by the EQAA have been subject to reasonable consultation with stakeholders and are revised at regular intervals to ensure relevance to the needs of the system.
- 3.2.3 Standards or criteria take into consideration the specific aspects related to different modes of provision, such as transnational education, distance or online programmes or other non-traditional approaches to HE as relevant to the context in which they operate.
- 3.2.4 Standards or criteria explicitly address the areas of institutional activity that fall within the EQAA's scope, (e.g., institutional governance and management, programme design and approval, teaching and learning, student admission, progression and certification, research, community engagement) and on the availability of necessary resources (e.g., finances, staff and learning resources).
- 3.2.5 Criteria or standards and procedures take into account internal follow up mechanisms, and, provide for effective follow up of the outcomes of the external reviews.
- 3.2.6 The EQAA procedures specify the way in which criteria will be applied and the types of evidence needed to demonstrate that they are met.

### **3.3 The external review process**

- 3.3.1** The EQAA carries out an external review process that is reliable and based on published criteria and procedures. It follows a self-assessment or equivalent, and, includes an external review (normally including a site visit or visits), and a consistent follow up of the recommendations resulting from the external review.
- 3.3.2** The EQAA has published documents, which clearly state what it expects from higher education institutions, in the form of quality criteria, or standards and procedures, for self-assessment and external review.
- 3.3.3** The external review process is carried out by teams of experts consistent with the characteristics of the institution/programme being reviewed. Experts can provide input from various perspectives, including those of institutions, academics, students, employers or professional practitioners.
- 3.3.4** The EQAA has clear specifications on the characteristics and selection of external Reviewers, who must be supported by appropriate training and good supporting materials such as handbooks or manuals.
- 3.3.5** External review procedures include effective and comprehensive mechanisms for the prevention of conflicts of interest, and, ensure that any judgments resulting from external reviews are based on explicit and published criteria.
- 3.3.6** The EQAA's system ensures that each institution or programme will be evaluated in a consistent way, even if the external Panels, teams, or committees are different.
- 3.3.7** The EQAA carries out the external review within a reasonable timeframe after the completion of a self-assessment report, to ensure that information is current and updated.
- 3.3.8** The EQAA provides the higher education institutions with an opportunity to correct any factual errors that may appear in the external review report

### **3.4 The requirements for self-evaluation**

- 3.4.1** The EQAA provides clear guidance to the institution or programme in the application of the procedures for self-evaluation, the solicitation of assessment/feedback from the public, students, and other constituents, or the preparation for external review as necessary and appropriate.

## IV. The EQAA and its relationship to the public

The EQAA makes public its policies and decisions about institutions and programmes, discloses the decisions about its own performance and disseminates reports on outcomes of QA processes.

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### 4.1 Public reports on EQAA policies and decisions

- 4.1.1 The EQAA provides full and clear disclosure of its relevant documentation such as policies, procedures and criteria.
- 4.1.2 The EQAA reports its decisions about higher education institutions and programmes. The content and extent of reporting may vary with cultural context and applicable legal and other requirements.
- 4.1.3 The EQAA has mechanisms to facilitate the public a fair understanding of the reasons supporting decisions taken.

### 4.2 Other public reports

- 4.2.1 The EQAA discloses to the public the decisions about the EQAA resulting from any external review of its own performance.
- 4.2.2 The EQAA prepares and disseminates periodically integrated reports on the overall outcomes of QA processes and of any other relevant activities.

## V. Decision making

The EQAA has policies and procedures in place that ensure a fair and independent decision-making process in the final review of the institution or the programme. It provides effective procedures to deal with appeals and complaints.

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### 5.1 The decision-making process

- 5.1.1 The EQAA decisions take into consideration the outcomes of both the institution's self-assessment process and the external review; they may also consider any other relevant information, provided this has been communicated to the HEIs.
- 5.1.2 The EQAA decisions are impartial, rigorous, and consistent even when they are based on the reports of other quality assurance bodies.
- 5.1.3 The EQAA decisions are based on published criteria and procedures, and, can be justified only with reference to those criteria and procedures.
- 5.1.4 Consistency in decision-making includes consistency and transparency in processes and actions for imposing recommendations for follow-up action.
- 5.1.5 The EQAA's reported decisions are clear and precise.

### 5.2 The EQAA's process for appeals and complaints

- 5.2.1 The EQAA has procedures in place to deal in a consistent way with complaints about its procedures or operation.
- 5.2.2 The EQAA has clear, published procedures for handling appeals related to its external review and decision-making processes.
- 5.2.3 Appeals are conducted by a Panel that was not responsible for the original decision and has no conflict of interest; appeals need not necessarily be conducted outside the EQAA.

## VI. The QA of cross border higher education

The EQAA has policies relating to both imported and exported higher education. These policies take into account the characteristics of the providers and the receivers, and, refer to all types of transnational higher education.

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### 6.1 Criteria for cross border higher education

- 6.1.1** The EQAA in a sending country makes clear that the awarding institution is responsible for ensuring the equivalent quality of the education offered, that the institution understands the regulatory frameworks of the receiving countries, and that the institution provides clear information on the programmes offered and their characteristics.
- 6.1.2** Students and other stakeholders receive clear and complete information about the awards delivered.
- 6.1.3** The rights and obligations of the parties involved in transnational education are clearly established and well known by the parties.

### 6.2 Collaboration between agencies

- 6.2.1** The EQAA cooperates with appropriate local agencies in the exporting and importing countries and with international networks. This cooperation is oriented to improve mutual understanding, to have a clear and comprehensive account of the regulatory framework and to share good practices.
- 6.2.2** The EQAA seeks ways to cooperate in the external quality assurance in transnational education provision, for example through mutual recognition.

## ANNEX 2. APPOINTMENT AND COMPOSITION OF THE GGP REVIEW PANEL

### INQAAHE GGP Review Panel

		
<p><b>Guy HAUG</b> Review Panel President</p> <p>Expert on the European Higher Education Area and the evaluation and accreditation of Higher Education in Europe and Latin America</p> <p>Spain – France</p>	<p><b>Ariana De Vicenzi</b> Panel Secretary</p> <p>Vice-Chancellor of the Universidad Abierta Interamericana</p> <p>Delegate for the Council of Rectors of Private Universities -CRUP for INQAAHE, since 2010.</p> <p>Argentina</p>	<p><b>Rafael Gutiérrez Niebla</b> Review Panel Member</p> <p>President of the National Council for the Quality of Tourism Education A.C. from Mexico (CONAET)</p> <p>Mexico</p>

### Report signed off by INQAAHE GGP Review Panel

Date: 03 December 2021

### INQAAHE GGP Project Coordinator

	<p><b>Mr Dewin Justiniano</b> INQAAHE GGP Project Coordinator</p> <p>Quality Assurance Senior Specialist at ADEK – 42 Abu Dhabi, UAE</p> <p>Honduras</p>
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## ANNEX 3. VIRTUAL VISIT AGENDA

Day 1: Monday 20 September 2021		
Time (Paraguay)	Interviews	No. of participants
8:00 AM – 8:30 AM	Internal Meeting: GGP Review Panel	3
8:30 am - 9:20 pm	Session 1: ANEAES Board of Directors	6
9:40 am - 10:30 am	Session 2: Evaluation Directors of the ANEAES	5
10:50 am - 11:40 am	Session 3: Ministry of Education and Science	2
1:00 pm - 1:50 pm	Session 4: Counselors (National Council of Higher Education - CONES, CONACYT, FEEL, CAFEEI.	5
Day 2: Tuesday 21 September 2021		
Time (Paraguay)	Interviews	No. of participants
8:00 AM – 8:30 AM	Internal Meeting: GGP Review Panel	3
8:30 am - 9:20 pm	Session 5: ANEAES Former presidents and former counselors	7
9:40 am - 10:30 am	Session 6: ANEAES Self-evaluation team	7
10:50 am - 11:40 am	Session 7: ANEAES Staff	6
Day 3: Wednesday 22 September 2021		
Time (Paraguay)	Interviews	No. of participants
8:00 AM – 8:30 AM	Internal Meeting: GGP Review Panel	3
8:30 am - 9:20 pm	Session 8: Professional Unions and Industry Representatives.	7
9:40 am - 10:30 am	Session 9: Peer Reviewers (national and international)	9

10:50 am - 11:40 am	Session 10: ANEAES International / National Partners	9
1:00 pm - 1:50 pm	Session 11: Students/Alumni	11
<b>Day 4: Thursday 23 September 2021</b>		
<b>Time (Paraguay)</b>	<b>Interviews</b>	<b>No. of participants</b>
8:00 AM – 8:30 AM	Internal Meeting: GGP Review Panel	3
8:30 am - 9:20 pm	Session 12: Higher Education Authorities	10
9:40 am - 10:30 am	Session 13: HEIs Representatives - Institutional accreditations (Self-Assessment Committees)	8
10:50 am - 11:40 am	Session 14: HEIs Representatives – postgraduate program accreditations (Self-Assessment Committees)	7
1:00 pm - 1:50 pm	Session 15: HEIs Representatives –undergraduate/ degree accreditations (Self-Assessment Committees)	8
<b>Day 5: Friday 24 September 2021</b>		
<b>Time (Paraguay)</b>	<b>Interviews</b>	<b>No. of participants</b>
8:30 AM – 8:10 AM	Internal meeting of the GGP Review Panel and preparation for exit report.	3
10:30 AM – 11:30 AM	Exit Report – Closure of the Virtual Visit	20

## ANNEX 4. SUMMARY ASSESSMENT OF COMPLIANCE OF INQAAHE GUIDELINES.

#	INQAAHE GGP	REVIEW PANEL ASSESSMENT
<b>1</b>	<b>THE STRUCTURE OF THE EQAA</b>	<b>Substantially</b>
<b>1.1</b>	<b>Legitimacy and recognition</b>	
<b>1.1.1</b>	The EQAA has an established legal basis and is recognized by a competent external body.	
<b>1.1.2</b>	The EQAA takes into consideration relevant guidelines issued by international networks and other associations, in formulating its policies and practices.	
<b>1.1.3</b>	The EQAA has a clear and published policy for the prevention of conflicts of interest that applies to its staff, its decision-making body, and the external Reviewers.	
<b>1.2</b>	<b>Mission and purposes</b>	
<b>1.2.1</b>	The EQAA has a written mission statement and a set of objectives that explicitly provide that external quality assurance of higher education is its major concern, describe the purpose and scope of its activities and can be translated into verifiable policies and measurable objectives.	
<b>1.3</b>	<b>Governance and organisational structure</b>	
<b>1.3.1</b>	The EQAA has a governance structure consistent with its mission and objectives, and, adequate mechanisms to involve relevant stakeholders in the definition of its standards and criteria.	
<b>1.3.2</b>	The composition of the decision-making body and/or its regulatory framework ensure its independence and impartiality.	
<b>1.3.3</b>	The EQAA's organisational structure makes it possible to carry out its external review processes effectively and efficiently	
<b>1.3.4</b>	The EQAA has a strategic plan that helps assess its progress and plan for future developments	

<b>1.4</b>	<b>Resources</b>	
<b>1.4.1</b>	The EQAA has a well-trained, appropriately qualified staff, able to conduct external evaluation effectively and efficiently in accordance with its mission statement and its methodological approach.	
<b>1.4.2</b>	The EQAA has the physical and financial resources needed to fulfil its goals and carry out the activities that emerge from its mission statement and objectives.	
<b>1.4.3</b>	The EQAA provides systematic opportunities for the professional development of its staff.	

<b>2</b>	<b>ACCOUNTABILITY OF THE EQAA</b>	<b>Partially</b>
<b>2.1</b>	<b>Quality Assurance of the EQAA</b>	
<b>2.1.1</b>	The EQAA operates with transparency, integrity and professionalism and adheres to ethical and professional standards.	
<b>2.1.2</b>	The EQAA has in place mechanisms that enable it to review its own activities in order to respond to the changing nature of higher education, the effectiveness of its operations, and its contribution towards the achievement of its objectives.	
<b>2.1.3</b>	The EQAA periodically conducts a self-review of its own activities, including consideration of its own effects and value. The review includes data collection and analysis, to inform decision-making and trigger improvements.	
<b>2.1.4</b>	The EQAA is subject to external reviews at regular intervals, ideally not exceeding five years. There is evidence that any required actions are implemented and disclosed.	
<b>2.2</b>	<b>Links to the community</b>	
<b>2.2.1</b>	The EQAA is open to international developments in quality assurance and has mechanisms that enable it to learn about and analyse the main trends in the field.	
<b>2.2.2</b>	The EQAA collaborates with other QA agencies where possible, in areas such as exchange of good practices, capacity building, and review of decisions, joint projects, or staff exchanges.	

<b>3</b>	<b>THE EQAA'S FRAMEWORK FOR THE EXTERNAL REVIEW OF QUALITY IN HIGHER EDUCATION INSTITUTIONS</b>	<b>Substantially</b>
<b>3.1</b>	<b>The relationship between the EQAA and higher education institutions</b>	
<b>3.1.1</b>	The EQAA recognises that institutional and programmatic quality and quality assurance are primarily the responsibility of the higher education institutions (HEIs) themselves, and respects the academic autonomy, identity and integrity of the institutions and programs.	
<b>3.1.2</b>	The EQAA promotes the development and appropriate implementation of IQA processes in accordance with the understanding that the primary responsibility for assuring quality resides with the institutions and its programs.	
<b>3.1.3</b>	The EQAA bears in mind the level of workload and cost that its procedures will place on institutions, and, strives to make them as time and cost effective as possible.	
<b>3.2</b>	<b>The definition of criteria for external quality review</b>	
<b>3.2.1</b>	The EQAA recognises and values institutional diversity and translates this valuation into criteria and procedures that take into account the identity and goals of higher education institutions.	

<b>3.2.2</b>	The standards or criteria developed by the EQAA have been subject to reasonable consultation with stakeholders and are revised at regular intervals to ensure relevance to the needs of the system.	
<b>3.2.3</b>	Standards or criteria take into consideration the specific aspects related to different modes of provision, such as transnational education, distance or online programs or other non-traditional approaches to HE as relevant to the context in which they operate.	
<b>3.2.4</b>	Standards or criteria explicitly address the areas of institutional activity that fall within the EQAA's scope, (e.g., institutional governance and management, program design and approval, teaching and learning, student admission, progression and certification, research, community engagement) and on the availability of necessary resources (e.g., finances, staff and learning resources).	

3.2.5	Criteria or standards and procedures take into account internal follow up mechanisms, and, provide for effective follow up of the outcomes of the external reviews.	
3.2.6	The EQAA procedures specify the way in which criteria will be applied and the types of evidence needed to demonstrate that they are met.	
<b>3.3</b>	<b>The external review process</b>	
3.3.1	The EQAA carries out an external review process that is reliable and based on published criteria and procedures. It follows a self-assessment or equivalent, and, includes an external review (normally including a site visit or visits), and a consistent follow up of the recommendations resulting from the external review.	
3.3.2	The EQAA has published documents, which clearly state what it expects from higher education institutions, in the form of quality criteria, or standards and procedures, for self-assessment and external review.	
3.3.3	The external review process is carried out by teams of experts consistent with the characteristics of the institution/program being reviewed. Experts can provide input from various perspectives, including those of institutions, academics, students, employers or professional practitioners.	
3.3.4	The EQAA has clear specifications on the characteristics and selection of external Reviewers, who must be supported by appropriate training and good supporting materials such as handbooks or manuals.	
3.3.5	External review procedures include effective and comprehensive mechanisms for the prevention of conflicts of interest, and, ensure that any judgments resulting from external reviews are based on explicit and published criteria.	
3.3.6	The EQAA's system ensures that each institution or program will be evaluated in a consistent way, even if the external Panels, teams, or committees are different.	
3.3.7	The EQAA carries out the external review within a reasonable timeframe after the completion of a self-assessment report, to ensure that information is current and updated.	

<b>3.3.8</b>	The EQAA provides the higher education institutions with an opportunity to correct any factual errors that may appear in the external review report	
<b>3.4</b>	<b>The requirements for self-evaluation</b>	
<b>3.4.1</b>	The EQAA provides clear guidance to the institution or program in the application of the procedures for self-evaluation, the solicitation of assessment/feedback from the public, students, and other constituents, or the preparation for external review as necessary and appropriate.	
<b>4</b>	<b>THE EQA AND ITS RELATIONSHIP TO THE PUBLIC</b>	<b>Partially</b>
<b>4.1</b>	<b>Public reports on EQAA policies and decisions</b>	
<b>4.1.1</b>	The EQAA provides full and clear disclosure of its relevant documentation such as policies, procedures and criteria.	
<b>4.1.2</b>	The EQAA reports its decisions about higher education institutions and programs. The content and extent of reporting may vary with cultural context and applicable legal and other requirements.	
<b>4.1.3</b>	The EQAA has mechanisms to facilitate the public a fair understanding of the reasons supporting decisions taken.	
<b>4.2</b>	<b>Other public reports</b>	
<b>4.2.1</b>	The EQAA discloses to the public the decisions about the EQAA resulting from any external review of its own performance.	
<b>4.2.2</b>	The EQAA prepares and disseminates periodically integrated reports on the overall outcomes of QA processes and of any other relevant activities.	
<b>5</b>	<b>DECISION MAKING</b>	<b>Substantially</b>
<b>5.1</b>	<b>The decision-making process</b>	
<b>5.1.1</b>	The EQAA decisions take into consideration the outcomes of both the institution's self-assessment process and the external review; they may also consider any other relevant information, provided this has been communicated to the HEIs.	

5.1.2	The EQAA decisions are impartial, rigorous, and consistent even when they are based on the reports of other quality assurance bodies.	
5.1.3	The EQAA decisions are based on published criteria and procedures, and, can be justified only with reference to those criteria and procedures.	
5.1.4	Consistency in decision-making includes consistency and transparency in processes and actions for imposing recommendations for follow-up action.	
5.1.5	The EQAA's reported decisions are clear and precise.	
5.2	<b>The EQAA's process for appeals and complaints</b>	
5.2.1	The EQAA has procedures in place to deal in a consistent way with complaints about its procedures or operation.	
5.2.2	The EQAA has clear, published procedures for handling appeals related to its external review and decision-making processes.	
5.2.3	Appeals are conducted by a Panel that was not responsible for the original decision and has no conflict of interest; appeals need not necessarily be conducted outside the EQAA.	
6	<b>THE QAA OF CROSS-BORDER HIGHER EDUCATION</b>	<b>Partially</b>
6.1	Criteria for cross-border higher education	
6.1.1	The EQAA in a sending country makes clear that the awarding institution is responsible for ensuring the equivalent quality of the education offered, that the institution understands the regulatory frameworks of the receiving countries, and that the institution provides clear information on the programs offered and their characteristics.	
6.1.2	Students and other stakeholders receive clear and complete information about the awards delivered.	
6.1.3	The rights and obligations of the parties involved in transnational education are clearly established and well known by the parties.	
6.2	Collaboration between agencies	

<p><b>6.2.1</b></p>	<p>The EQAA cooperates with appropriate local agencies in the exporting and importing countries and with international networks. This cooperation is oriented to improve mutual understanding, to have a clear and comprehensive account of the regulatory framework and to share good practices.</p>	
<p><b>6.2.2</b></p>	<p>The EQAA seeks ways to cooperate in the external quality assurance in transnational education provision, for example through mutual recognition.</p>	



