

INQAAHE GUIDELINES OF GOOD PRACTICE
EXTERNAL REVIEW REPORT

Comisión Nacional de Acreditación (CNA)
Chile

Santiago de Chile
May 23-26, 2017

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A. Executive Summary

The National Accreditation Commission of Chile (CNA) was assessed against the Guidelines of Good Practice (GGP) of the International Network for Quality Assurance Agencies in Higher Education (INQAAHE). The review was processed by an independent team of international experts nominated by INQAAHE. Following the pre-defined procedure the CNA conducted a self-assessment along the guidelines of INQAAHE and documented with the corresponding evidence the procedure and results in a report that was then reviewed by the external experts. Evidence was made available to substantiate the evaluation. Based on the thoroughly done self-assessment submitted by the CNA the panel of experts visited the Commission in Santiago de Chile from June 23-25, 2017. The panel met with representatives of every group that is involved in the activities and decision-making of the CNA, including students and representatives of stakeholders from all areas involved in the evaluation processes of the CNA. All the meetings took place on the premises of the CNA in Santiago de Chile. The detailed schedule outlining the interview groups and individuals is attached to this report as Annex A (Agenda).

The panel of experts concludes that the CNA is fully (1) or substantially (3) compliant with four out of the six INQAAHE standards while two aspects were considered to be only partially compliant:

The structure of the CNA

Regarding the CNA's structure, organization and public recognition the peers found that the CNA has achieved a considerable success by restoring its legitimacy and public acceptance in the period since the corruption scandals in 2011.

Its work is based on an adequate legal provision, follows a strict code of conduct and has a mission that is compliant with international standards as well as Chilean law. Its structure and organization is generally able to perform the tasks entrusted to it in an effective and efficient way, although not all academic disciplines feel equally represented by the CNA Commission. The legal changes expected for the near future made it difficult for the peers to assess in how far modifications of the Commission will be initiated and to what degree these changes will introduce an alternative composition of the Commission as well as other CNA committees. Already without any legal changes the resources provided to the CNA are limited and not fully compliant with its tasks. The peers are convinced that some significant increase needs to be made in order to keep up with the mission assigned to the CNA. Moreover, the legislative framework in which operates the CNA seemed to be restrictive while the Chilean landscape of higher education is characterized by an extreme level of liberalization regarding institutions as well as programmes. Thus,

the peers repeatedly were confronted with the expression that the law would not permit what would be required in order to deal effectively with the diverse conditions of Chilean higher education and quality management. Consequently, it appeared to be important to the peers that the CNA understands itself more expressly as a representative of a group of stakeholders that need to be heard during the reform process going on at the moment in Chilean politics.

The CNAs framework for the external review of quality in higher education institutions

The peers generally approved of the accreditation procedure carried out by the CNA which is adequate and based on valid and publicly known criteria. The procedures include on-site-visits and the consultation of all participating stakeholders. However, they also identified room for improvement. The criteria should be updated in regular intervals under participation not only of academic experts but also of students and industry representatives. Then it must be made sure that the criteria for the accreditation procedures are understandable, although with the recent revision improvement may already have been achieved. In order to guarantee an adequate assessment of all programmes equally by peer experts it should be ensured that the agencies' registers are open to interested reviewers of all study fields. Further, the peers understood that the costs for the accreditation procedures are not always transparent to the institutions and might be reduced in cost and time for example by combining related programmes into accreditation clusters.

Decision making

The decision-making process was found by the peers to be well-established and offering possibilities of complaint to all institutions under review. Nonetheless, they criticized that the development from expert review to the objective decision of the CNA Commission needs to be better outlined in order to increase the public understanding and appreciation of the accreditation decisions.

The CNA and its relationship to the public

The peers affirmed that the CNA is doing its best to promote quality assurance through publications on the matter as well as public co-operations and presentations in schools. Although the informative value of the accreditation procedures must still be promoted with the Chilean public it was appreciated by all stakeholders that the quality assurance system has already much improved Chilean higher education.

Accountability of the CNA

It was understood by the peers that the CNA has a general desire for external review and internal quality assurance. However, it was emphasized that the processes initiated for the current evaluation need to be transferred into permanent self-review yet non-existent which should be revised frequently through external review in the future.

The QA of cross border higher education

Although the peers accepted that the CNA is interested in and open to cross border quality assurance measures this is still limited and difficult, mostly due to the peculiarities of the Chilean higher education system to which the CNA criteria are adapted. Nevertheless, the peers affirmed the importance to adjust the Chilean accreditation standards to the global procedure in order not to lose contact while education is becoming more and more internationalized.

B. Foreword

Procedural Remarks

The National Accreditation Commission of Chile (CNA) requested the International Network for Quality Assurance Agencies in Higher Education (INQAAHE) to conduct an external review of its work, policies and procedures. Open for all members and interested agencies, INQAAHE offers such review based on agreed and published criteria, the Guidelines of Good Practice (GGP). The secretariat of INQAAHE processed all necessary preparatory steps in collaboration with the CNA and also agreed on the Spanish language for the review. A team of international experts was suggested by INQAAHE. The CV's and fields of expertise of the panel members were made available to the CNA and no opposition was raised against the team composition.

The review team consisted of:

- Diana María Ramírez Carvajal: Doctor in Law. Head of postgraduate programs at the University of Medellín, Colombia. She was a counselor at CNA Colombia (Chair)
- Rafael Guitérrez Niebla: Master in Management for Development, President of the National Council for the Quality of Tourism Education A.C. of Mexico (CONAET) (Academic Peer)
- Martin Foerster: Project Manager ASIIN e.V., Germany (Secretary)

The CNA delivered a Self-Evaluation Report and also made available a number of additional supporting documents in an online platform that is used as part of regular CNA tools. After comprehensive consultation of the documentation, the review panel visited the office of the CNA in Santiago de Chile and held meetings from 23-26 May 2017.

The interviews on site were held in Spanish. The panel met with all relevant stakeholders and actors to collect different perspectives on the work of the CNA. Interviews were held with the Collegiate Body and the Executive Secretariat of the CNA as well as with representatives of Chilean Institute of Higher Education, accreditation agencies licensed by the CNA, peers reviewers and students.

After the site visit was completed, the Secretary of the panel drafted a report considering the presented evidence, the discussions during the on-site visit and the conclusions of the panel.

All members of the panel then contributed to the draft and agreed on a final version that was then delivered to the CNA for comments. The report reviews the CNA's compliance with the GGP of INQAAHE in the 2016 version. It therefore is based on the descriptions provided in the Self-Evaluation Report of the CNA, the additional information gathered in the discussions on site and by consulting the comprehensive additional evidence that was made available online. Every guideline of the GGP is assessed individually to allow a detailed assessment of compliance.

The review panel wishes to express thanks for the excellent support provided by the CNA. The site visit was carried out in a good working environment for the team and the CNA offices were more than suitable for holding conversations with groups of various sizes. The coordination of the entire schedule was effective and the review panel had an excellent staff support with quick responses to team queries.

C. The CNA in the Chilean Educational System

In 2006 law 20.129 that created the National Quality Assurance System in Higher Education entrusted the National Accreditation Commission as public and autonomous agency, with the aim of verifying and promoting the quality of autonomous Universities, Professional Institutes, and Technical Training Centres.

Among the functions assigned to it under the law were the establishment of a system for the oversight of accreditation agencies, and maintaining a public information system with the accreditation outcomes. Since then the CNA appears as exclusively responsible for accrediting higher education institutions and doctoral programs, additionally conducting the process for disciplines not covered by authorized agencies. Nevertheless, masters and health area programs could also decide to be accredited by the CNA. The voluntary nature of the process was established for all levels, with the exception of compulsory accreditation for pedagogy and medical disciplines.

The structure of the accreditation process was comprehensively defined in the law at all three levels. Namely the process comprises a self-assessment process, an external review, a decision, a remedy filed against the initial decision before the accrediting agency, and lastly an instance for appeal before an independent body.

With regard to institutional accreditation, the law sets forth this will be done considering undergraduate teaching and institutional management as compulsory functions, and areas of research, postgraduate teaching, and community outreach as elective functions, for a maximum period of seven years.

With regard to the accreditation of postgraduate programs and health area specialties, the law endows the CNA with the power to define a specific regulation, and for this type of process the maximum accreditation term is 10 years. Lastly, with regard to undergraduate disciplines and programs, the law sets forth parameters for assessment of the graduation profile of the respective discipline and the set of minimum resources and processes to ensure the profile is met, considering among these the curricular structure, human resources, elements to support teaching and learning, the teaching modality, pedagogical aspects, facilities and physical resources. At this level, accreditation may be awarded for a term of up to seven years.

In broad terms, the Chilean model is given a specific character by the regulatory framework that defines the CNA functions, as well as the regulations that affect it. In this sense, albeit the voluntary nature is maintained as a general rule, the appearance of disciplines for which accreditation is compulsory and the link between financing and institutional accreditation, pedagogies, medicines, masters, and doctoral programs, brings the model each time closer to being compulsory.

The Chilean model also follows the concept of a system of agencies that compete among themselves and can be for profit. In this sense, the establishment of supervision mechanisms has entailed strong tensions between the respect for autonomy and the need for regulation and supervision of the system. The law provided the institution linked to quality assurance with an organic articulation that sought to not only integrate the assessment functions within a national agency and private entities, but also connected to the Higher Education Information Service (SHEI), the National Council of Education, and the MINEDUC Division of Higher Education, thereby safeguarding the autonomy which the current agency would have by law. Albeit during an earlier phase its operation was autonomous, the law enshrined CNA autonomy before the Ministry. The formation of the present Commission also changed from being a Commission with members appointed by the Ministry of Education into an agency mainly comprising academics appointed by the HEIs and which considers student representation, although it also includes the MINEDUC Head of Higher Education and the President who is appointed by the President of the Republic. After the acts of corruption in 2011 -sanctioned by criminal justice - public opinion has questioned the composition of the Commission, referring to its corporate character.

In terms of the outcomes, the CNA and the private agencies have extended the coverage of accreditation, reaching relevant levels: after 338 disciplines with an accreditation decision by January 2007, at present there are 1,302 with a decision; after 55 HEIs accredited by January 2007, at present there are 91 accredited; and after 101 doctoral programs and 153 masters programs subject to the accreditation process by mid-2006, at present there are 184 doctoral programs and 296 masters programs with a decision.

The CNA is currently immersed in a process of deep change, awaiting a possible reform of the higher education system, particularly of the relevant legislation. Likewise, the new Teacher Professional Development law transfers competence in accreditation processes exclusively to the CNA. This implies a significant rise in the number of its processes, with an impact on the work of the Executive Secretariat and the Commission Plenary. Lastly, conditioning the free university education policy to 4-year accreditation could also create greater pressure on the assessment process, with an impact on the various stages of the process and detracting from the validity of a process in constant legitimization.

The accreditation system in Chile includes three levels:

Accreditation of institutions: Autonomous universities, institutions of the armed forces, professional institutes, and technical training centres can voluntarily submit to an institutional accreditation process, the purpose of which is to assess

the compliance of its corporate project and verify the existence of effective mechanisms for self-regulation and quality assurance, as well as tending toward strengthening their capacity for self-regulation and continuous improvement.

Accreditation of undergraduate disciplines: The accreditation of professional and technical disciplines and undergraduate programs is performed by authorized private accrediting agencies or by the Commission. This procedure is also voluntary, except for study disciplines and programs leading to professional degrees for Medical Surgeon, Primary Education Teacher, Secondary Education Teacher, Special Needs Teacher, and Pre-School Teacher, which - in accordance with the law currently in force - must compulsorily undergo the accreditation process. These degrees, in accordance with the law on teaching disciplines, can only be granted by the CNA.

Accreditation of postgraduate programs: Accreditation of postgraduate programs for masters, doctoral, and health area specialties is performed by the Commission or authorized private agencies, the power to accredit doctoral programs being privative to the CNA.

Private accrediting agencies conduct processes that are equivalent to those conducted by the CNA, including the three fundamental stages: Self-Assessment, External Review, and Decision. Additionally, the CNA and the private accrediting agencies do compete at certain levels directly on an open market concerning theoretically all Master level programmes for which any private agency or the CNA may be chosen by the institutions. However, the CNA affirms that apart from its supervising role it does not actively compete with any agencies but only act in a subsidiary way in cases where activities cannot be carried out by any private agency. In these cases the CNA must implement substantially similar criteria and procedures to the ones applied by the private agencies.

D GGP compliance

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

The EQAA is a recognized, credible organization, trusted by the 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 to external QA. The EQAA has the needed resources to carry out their mission.

Not compliant Partially compliant Substantially compliant Fully compliant

During their on-site visit the peers critically assessed the CNA's structure along the following aspects.

They positively approved of the CNA's full recovery of legitimacy after the corruption cases in 2011 punished by law. They understood that in the aftermath legal provision for the composition of the CNA Collegiate body has been revised to the effect, that apart from the agency's president who is chosen by the president of the Republic all other members of the Collegiate body are elected by its stakeholder organizations thus reducing the danger of institutionalized corruption.

Further, for all those active in the CNA as well as the agencies licensed by the CNA a strict ethical Code of Conduct has been introduced.

By these measures the CNA has largely regained the public's trust and acceptance. However, the peers also understood from discussion with various parties that the laudable intention of maximum transparency and strict observance of the code of conduct has led to a bureaucratization and therefore to a slowdown in the CNA's processes. By regaining its public recognition the agency runs the risk of losing a great degree of flexibility necessary for dealing with the very heterogeneous Chilean Higher Education landscape.

In any case the CNA disposes of a sufficiently established legal basis and is recognized in its competences by bodies of higher education institutions, students and politics.

Further, the peers learned that the CNA bases its policies and practices on the UNESCO guidelines on higher education quality assurance and through its participation in the INQAAHE network demonstrates its interest in international quality assurance networks. As mentioned before, the prevention of conflicts of interests and compliance with the ethical standards are of surmount importance to the CNA. All these regulations are published and externally accessible.

The CNA's mission is clearly defined and established by the Law No. 20.129 which created the National Quality Assurance System in Higher Education (SINAC-ES - Sistema Nacional de Aseguramiento de la Calidad de la Educación Superior) in Chile. Consequently, four basic functions have been determined: information, licensing of new higher education institutions, institutional accreditation, and accreditation of

disciplines or programs. The CNA was created in order to take care of these functions. Hence, the peers agreed that the mission of the CNA is properly established.

The governance structure of the CNA appeared to the peers to be absolutely consistent with this mission and the resulting objectives, the structure also being defined by the law 20.129. It consists of a Collegiate body comprising of a president who is appointed by the president of the Republic, three university academics being appointed by the state universities (CRUCH), two university academics as representatives of the private universities, one representative of the professional institutes and one of the technical training centres. Further, it includes two academics who are being appointed by the National Scientific and Technical Research Council (CONICYT), the head of the Ministry of Education Division of Higher Education, two outstanding professionals appointed by the Commission itself and two student representatives.

The executive Secretary has only the right to speak in the Commission, not to vote. In its decision-making process and the development of criteria the Commission is being supported by 18 Area Committees representing the variety of disciplines and four Advisory Committees (Supervision of Agencies, Pre-graduate, Post-graduate and Institutional). Supported in the practical implementation of its mission is the CNA by an Executive Secretariat.

In conclusion and as outlined above the composition of the Collegiate body ensures in the view of the peers its independence and impartiality with most of its members being elected or appointed by its stakeholders, the only political link of the Commission being its president.

The peers gained the impression of an effectively-working administration and structure that carries out external review processes in great efficiency. Nevertheless, as will be discussed below in more detail, they also realized that the increasing number of tasks assigned to the CNA has brought it to the edge of an overload. Although the peers learned that during the past years the duration of accreditation processes could be reduced to six months, the quantity of processes makes it questionable if this processing time can be maintained in the future. In addition, it became clear, that the limited number of Commission members signifies that decisions have to be taken by its members without any experts of particular study programmes being present.

Consequently, the peers would approve of any solution that either includes a greater variety of academic subjects into the Commission or guarantees at least the participation of experts of the respective disciplines in the decision making process. In any case, it became clear that such thought are at the moment quite in vain since law 20.129 is in a state of revision with serious modifications being expected. While some months ago a full replacement of the Commission was negotiated it is now expected, that parliamentary legislation will at least change its current composition. All these changes being still speculative it is understood by the peers that any

strategic plans of the CNA at the moment are limited and depend on the law to be passed sometime in the near future.

The legislative changes of the past years as well as those to come are also the most important issue facing the CNA's resources. While the peers were impressed by the highly-qualified and motivated staff of the agency they met during the on-site-visit they soon learned that the financial and human resources of the CNA are seriously at its limits. The 73 staff members have been able to fulfil the agency's mission efficiently during the past years. As has been mentioned above, the time for accreditation processes could be significantly reduced compared to the initial years since 2006. Nevertheless, in the meantime more and more tasks have been entrusted to the CNA without significantly increasing its resources. In 2016 alone the modification that all pedagogic programmes, pre-graduate and postgraduate have been accredited with the CNA and not any longer with the private agencies has increased the number of accreditation processes by 100%. It is easy to imagine that this increase by a constant number of staff will seriously decelerate the agency's processes. Moreover, it is expected that the legislative changes described above will eventually lead to the abolition of the remaining private agencies entrusting all accreditation processes to the CNA. Such a modification – although at the moment still speculative – will necessarily gravely impair the quality assurance system in higher education in Chile.

In conclusion, the peers are of the opinion, that the CNA has achieved a lot by restoring its legitimacy and public acceptance in the period since 2011. It is based on adequate legal provision, follows a strict code of conduct and has a mission that is compliant with international standards as well as Chilean law. Its structure and organization is generally able to perform the tasks entrusted to it in an effective and efficient way, although not all academic disciplines feel equally represented by the Collegiate body. The expected legal changes make it difficult for the peers to assess in how far modifications of the Commission will be initiated in the near future and in how far these changes will comply with the issue mentioned or if they will affect its efficiency. Already without any legal changes the resources provided to the CNA are limited and not fully compliant with its tasks. The peers are convinced that some significant increase needs to be made in order to keep up with the mission assigned to the CNA.

Strengths:

1. The CNA has recovered quickly its credibility and the trust from stakeholders in higher education as well as the Chilean public.
2. It is greatly estimated for its contributions to the quality assurance system and the development of an advanced deregulated education system.

3. It has been achieved to preserve autonomy in the development of criteria compared to the great diversity of institutions in the country. Furthermore, given the deregulated education system it is outstanding that the autonomy of the HEIs is not reduced but respected. However, this positive achievement is also critical since it alienates the Chilean Quality Assurance system from global trends.
4. The governance structure of the CNA is well-respected and its leading Commission members represent the academia in the legislation reform process in Chile.
5. The CNA adequately documents and constantly updates its processes and criteria. Some parts such as undergraduate education are already updated while in others further research is being undertaken.
6. It has contributed immensely to the furtherance of an education as deregulated as the Chilean system of higher education.
7. It has an integral structure complying with the necessities of the task of Quality Assurance.
8. Although the workload has seriously increased the CNA has been able to perform its responsibilities in an effective way. However, a critical point has been reached given the expected and already implemented legal changes.
9. Its decisions are transparent and widely recognized. Further, they are made easily accessible to the public in order to ensure a maximum of transparency.

Weaknesses:

1. The difficulties of 2011 that have been overcome in the meantime has hampered its operations which have been slowed down and bureaucratized according to the objective public perception.
2. The way in which the number of years of accreditation awarded is determined is neither always clear nor understandable to the public, an impression shared by students, peers and HEI representatives.
3. The CNA is excessively dependent on legal provisions that seem to be largely obsolete. The legal vacuum in which the agency is acting at the moment leaves too much space for uncertainty and individual interpretation.
4. The increasing number of responsibilities while the financial support is not being increased at the same time leads to a critical state where it has to be expected that the CNA will no longer be able to perform its duties in the way required.
5. Some systemic problems have been detected in the decision-making process where up to four unconnected instances are being involved. If the final decision is being taken by only one instance it should be made clear in how far this decision agrees with or deviates from the previous instances.
6. Due to the lack of a centralized glossary or working guideline methodological weaknesses have been detected. Through the introduction of such documents it

should be made certain that all participants in the process (peers, students, institutions, etc.) are aware of their respective part.

7. The evaluation criteria (in the old versions, at least) appear to be unclear using ambiguous vocabulary. According to the HEIs as well as the private agencies they leave too much room for misunderstandings that could be avoided by a clear determination.

2. 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 recognizes 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 and provide higher education institutions with clear guidance on the requirements for self-assessment and external review.

Not compliant Partially compliant Substantially compliant Fully compliant

From the assessment of the CNA's self-assessment report and the discussions during the on-site visit, the peers got an intense impression from the agency's framework for the external review of quality in Chilean higher education institutions.

The most striking aspect in this context is the extreme diversity of the Chilean higher education landscape comprising public and private universities, technical training centres, professional institutes and institutions of the armed forces in a broad variety of size and distribution throughout the country. Despite the difficulties that this heterogeneity implies it struck the peers as remarkable that the CNA has managed not only to preserve its own autonomy but also not to reduce the HEI's autonomy through the process of quality assurance.

It is clearly understood that due to the historical deregulation of the Chilean higher education criteria and standards need to be developed and applied that comprise all HEIs, leaving no one behind but also accepting the variant educational levels the institutions represent. Nevertheless, it should also be mentioned that this consideration is at the same time a weakness that will need to be discussed later on. In any case, the peers learned that the CNA is very much interested in promoting the quality assurance processes at the respective institutions. The discussion with the quality assurance responsables at various institutions accredited by the CNA revealed that a mutual communication about the processes is continually going on and all stakeholders expressed their conviction that the internal quality assurance of the institutions has led to a significant improvement in Chilean higher education during the past decade.

However, most critically seen was the relation between cost and benefit of the accreditation processes. It was explained to the peers that each program has to be accredited in a separate process at a cost of roughly 15.000 Dollar, causing an annual cost of about 500.000 Dollar for an average-sized institution. What caused irritation among the representatives of higher education institutes was the fact that the cost including all travel expenses for the peers is always the same, no matter how many locations need to be visited. Therefore, the accreditation of a program of an institute with up to 15 branch offices costs the same as one which is only taught at one

establishment. To the peers it seemed understandable that this price politics was considered opaque. It was understood that the HEIs would appreciate modifications that allowed the bundling of program accreditations into clusters reducing cost and time on their part. Additionally, it would seem recommendable to adapt the price structure more flexibly to the variant reality of the institutes and the programs. The peers appreciate the comments of the CNA on this point outlining that the costs of the procedures do differ depending on the accreditation level (institutional, undergraduate, and graduate) as well as on how many locations need to be visited. Taking this into account the peers still maintain their criticism as expressed by the HEIs that the costs for the regular procedures are high and that any possibility to cluster different procedures would add extremely to easing the tension financially and logistically of the HEIs.

As already mentioned above it needs to be underlined that the adaptation to the deregulated higher education landscape in Chile is one great achievement of the CNA during the past years. Nevertheless, this also implies some difficulties as it requires a certain separation from global quality assurance norms.

Institutional accreditation in Chile can be achieved by five autonomous categories: undergraduate teaching and institutional management are compulsory to all institutes, the areas of research, postgraduate teaching, and community outreach are elective functions. By this division of criteria, the CNA ensures that all institutes – even those that solely rely on teaching, for example – have access to accreditation.

On the other side this implies that accreditation in Chile does not always refer to the same standards. Hence, universities need to be accredited in all five categories in order to gain the longest duration of accreditation which is seven years while others such as Professional Institutes have to fulfil less for the same outcome.

To the peers this seemed problematic from two points:

- First of all they understood that the institute of the armed forces is by law considered a university although, quite naturally, they do not focus on research. Consequently, they are unable to gain a seven-year-accreditation although they would fulfil all the necessary criteria if they were considered a Professional Institute as they themselves prefer.
- On the other hand, the students made clear that the different lengths of accreditation for different types of institutions are not well understood by the public causing a misperception of the respective quality of the accredited institutions.

The peers understand the original necessity of the differentiation but they highly recommend thinking about better ways to communicate the standards and to handle the assessment of institutions more flexibly according to their own preferences. In the subsequent comment on the report the CNA added the information that specific criteria for the evaluation of armed-forces institutes are currently being developed

and will soon be available allowing for a more aligned accreditation of these institutions. The peers see this improvement very positive but maintain their general criticism since the fact remains that the criteria for institutional accreditation are in a constant procedure of revision and that while some are being evaluated according to new and adjusted criteria this is not true for all. The CNA is encouraged to continue its revision process and to finalize it in due time so that once all institutions may be assessed according to criteria of the same level.

The accreditation processes are performed by the CNA as well as the private agencies along published criteria that have been established under proper consultation academic experts in the fields. These criteria are being revised by the area committees if need be, some have just recently been updated. Nevertheless, the peers learned that the criteria are not being revised in certain intervals but only if it is deemed necessary. Consequently, they would recommend establishing fixed periods of revision in order to guarantee that the criteria in all areas are regularly updated and also matched to changing international standards. Furthermore, the peers learned that industry representatives and students only partake in the revision process to a limited degree if at all.

In order to align the Chilean standards with the international ones it appears to be a necessity that all stakeholders in the process of higher education should be involved in the definition of accreditation criteria. During the discussion with the HEI's representatives it also became apparent that the criteria are not always as applicable to different modes of provision such as transnational education, distance or online programs or other non-traditional approaches to higher education. It was lamented that the whole accreditation process, the criteria as well as the on-site-visits, lack flexibility when programmes deviate from the traditional norms. Although the peers did have the impression that the CNA cares about alternative learning approaches they would suggest to further develop the criteria in order to make them more adaptable to non-traditional programmes.

Major criticism was expressed by the students as well as the HEI QA officials at the missing follow-up mechanisms in the accreditation process. Usually the accreditation process ends with a decision by the CNA Commission, stating the duration of the accreditation period which is being explained to the HEIs in a short statement. However, the procedure does not imply the supervision of any improvement processes that may be initiated by the accreditation until the re-accreditation some years later. Students expressed their concern that some institutions may fall back into their routine after a successful accreditation avoiding a permanent QA process. The peers could understand this concern and considered it important that an accreditation procedure always entails a long-lasting enhancement process. In its comment on this report the CNA emphasized on this point the legal restrictions imposed by the law No. 20.129 which defers any control of effected improvements until the re-accreditation leaving no room for follow-up mechanisms to the agency. In

the opinion of the peers this point underlines the importance of the major legal debate which should be led in Chile under the given circumstance that the law No. 20.129 is about to be radically reformed. In the eyes of the peers follow-up mechanisms are essential parts of any accreditation procedure worldwide and if they are not part of the Chilean legal reform this underlines that the CNA and its representatives should be heard more clearly in the political discussions.

While the criteria are commonly known and developed with the aid of several stakeholder groups the peers realized that they are not well understood neither by the students nor by the HEIs. From the self-assessment report of the CNA the peers learned that nearly 25% of the HEI's representatives considered them to be unclear and that for 47% they are clear, but require revision. During many discussions the peers figured out that these statistics only partly reflect the actual situation since they refer to the criteria as before their revision. In fact, the CNA and all stakeholders explained that they are well aware of the problem and that they are trying to deal with it. As a consequence, some of the criteria have already been revised although it is not yet clear if the problem has been solved by the introduced modifications. Other revisions are about to be finalized. Consequently, the peers have no doubt that the CNA is doing its best to improve the situation regarding this aspect.

In any case, many stakeholders expressed their desire for a general glossary common to all criteria that would serve to facilitate their public understanding, a recommendation that could only be supported by the peers. The same is true for the demand for a general working guideline or protocol that serves to explain the different stages of the accreditation process to all groups interested.

After a self-assessment-report is being presented by the HEI, each accreditation procedure implies an on-site-visit of several days that is carried out by peer reviewers and a member of the executive secretariat. In the case of postgraduate studies the peer group always comprises a local peer, as well as an international peer, the latter commenting only on the self-assessment and not participating in the visit.

As has been outlined before the on-site-visits are usually carried out with great efficiency although criticism has been expressed that the protocol of these visits is quite regulated and not always applicable to the reality. Since some institutions teach the same programme in up to fifteen locations throughout the country all fifteen have to be visited within one week seriously reducing the time for consultation with all relevant stakeholders. In this context the peers underline the necessity of a more flexible procedure. They do appreciate the CNA's effort to visit as many places as possible since many of the younger Chilean HEIs are rapidly expanding throughout the country but it should be taken into account that the mere presence of the peer group does not help much of the time is too short for detailed conversations with all the stakeholders. However, it is welcomed that the CNA has already accepted the peers' remarks and started to make adjustments to the visit programmes that may be reviewed during a future evaluation.

The peers available to the CNA are listed in a national register. The peers learned that to become a peer is a lengthy process requiring a number of prerequisites. The registration process can take up to several months. As a consequence, the peers took notice of complaints from several groups that the national peer register does secure a high quality standard among the peers but is not always useful in order to fulfil the CNA's task. Due to the strict requirements and the complicated registration the pool of reviewers is limited and in some cases doesn't even contain any experts on a certain field of study. Hence, the election of process for peer reviewers in preparation of an accreditation procedure can be complicated and time-consuming. At the same time all private agencies most of which are specialized on certain areas do have their own registers and are not permitted to access the national register on their own. Nonetheless, all peers need to be approved by the CNA. As a consequence, for the private agencies, the election of peers is even more complicated than for the CNA. In conclusion, the peers do approve of a strict election of peers guaranteeing the highest quality standards. Nevertheless, in order to ensure a rapid and smooth accreditation procedure and to have area specialists for all programmes they recommend to broaden the national register and maybe to find more flexible entrance requirements.

Concerning the complex situation with the CNA supervising the work of private agencies while the same time being active itself in the same field that CNA commented an earlier version of the report insofar as to refuse any competition with the private agencies. It would only act if there was no private agency capable to deal with the activities required. The peers understand this clarification but still insist that in some cases it might complicate matters of supervisor and the one being supervised are acting on the same level. This was confirmed by the representative of the private agencies who expressed that from time to time they feel intimidated by the overwhelming authority of the CNA.

To summarize, the peers approved of the accreditation procedure carried out by the CNA as adequate and based on valid and publicly known criteria. The procedures include on-site-visits and the consultation of all participating stakeholders. However, they also identified room for improvement.

The criteria should be updated in regular intervals under participation not only of academics but also of students and industry representatives. Then it must be made sure that the criteria for the accreditation procedures are understandable although with the recent revision improvement may already have been achieved. In order to guarantee an adequate assessment of all programmes equally by peer experts it should be ensured that the agencies' registers are open to interested reviewers of all study fields. Further, the peers understood that the costs for the accreditation procedures are not always transparent to the institutions and might be reduced in cost and time for example by combining related programmes into accreditation clusters.

Strengths:

1. Criteria have been established including general as well as particular aspects according to each area or discipline.
2. Experts groups are continually working on the further development of the criteria for accreditation of programmes as well as institutions.
3. The diverse sectors of the HEIs are adequately being integrated into the accreditation process.

Weaknesses:

1. No systematic process for the revision of criteria has been established; their revision is only being initiated in the case of necessity or legal requirement.
2. No minimum standards for the entrance into the accreditation system have been formulated such as previous requisites outlining the maturity of the institution of programme under review. This would be considered important given the deregulated education landscape. While the CNA has set admission criteria pursuant to Law 20.129 restricting the institutional accreditation process to recognized and independent higher education institutions, the peers agreed that more specialized quality standards for the ingress into the system might be set due to the great variety of different accreditation options.
3. Although the accreditation system respects the diverse nature of Chilean higher education internal peculiarities should also be taken into consideration, offering for example the institutions of the armed forces the possibility to be accredited not as a university but as a technical institute according to its own assessment.
4. It does not seem recommendable that the CNA competes at undergraduate and postgraduate level with the private agencies it supervises at the same time.
5. The cost of accreditation processes seems to be intolerable for the HEIs on short terms. Additionally, the HEIs outline that in some aspects the distribution of the costs is not transparent.
6. Similarly, the sequence of visits by peer reviewer is estimated to be too rigid in its structure. Often, HEIs have weekly visits of peers making the organisation of the visits extremely difficult, especially at all such institutions that consist of various branches.

3. 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 program. It provides effective procedures to deal with appeals and complaints.

Not compliant Partially compliant Substantially compliant Fully compliant

Decisions in the accreditation process are being taken by the Commission of the CNA described above. These decisions are being published and generally accessible. Further, the peers appreciated that all institutions have the possibility to launch complaints against decisions and frequently do so if they consider themselves treated wrongly. All decisions are made only by the votes of the Commission, no other group participating in the accreditation process – peers or area committees – have the right to vote.

Generally the procedure of decision-making is based on three pillars: the self-assessment-report of the HEI, the assessment of this report by expert members of the area committees, and the report of the peer reviewers who also have attended the on-site-visit. The results are being presented to the commission but neither group is allowed to make recommendations concerning its final decision.

Hence, the peers are of the opinion, that the decisions are based on thorough examination of various sources of information but that the panels involved in the review process are very much disconnected.

Following the complaints of students and HEIs, afterwards it is impossible to follow the line of reasoning that led to certain decisions since the commission does not have to explain why and to which degree it deviates in its decision from the assessment of the peers or the area committees. From the point of view of the HEIs this is especially problematic because the commission – contrary to the peers and the area committees – does not necessarily include experts on the programme under review. They deem it most important that the decision-making process from the self-assessment-report to the decision of the commission is transparent and that contradictory assessments by different groups need to be explained. This would very much facilitate the understanding of the verdict. Following the comments of the CNA on this report the peers understand that all resolutions that constitute the grounds of the decision are available in their entirety at all times on the CNA's website together with the Acts of sessions, down to the detail of the votes in favour of and against the decision. While the peers consider this transparency laudable it is not the transparency of the process that they criticise but the lack of consideration of the peers' conclusions in the decision-making process. The fact that the CNA has already developed an improvement plan of the articulation mechanisms of the different evaluation entities demonstrates to the peers that the CNA has already understood the core of the

problem and is trying to improve the procedure so as to improve the consistency of the decision-making process and not only its transparency.

The same is true for the process of complaints. Since complaints against decisions are first of all returned to the commission itself to give it the opportunity to correct possible errors an intervention against subject-specific mistakes or misunderstandings is unlikely to succeed due to the limited expertise of the commission members. The CNA subsequently informed the peers that they do understand the issue raised by the peers but also hinted at the fact that in 2016 15 institutional accreditation procedures were reintroduced to the Committee for revision out of which 4 were accepted. Similarly in 20% of the postgraduate procedures complaints returned to the Committee these were accepted while there were no complaints at all against undergraduate appeals.

Also, as already outlined above, the Chilean accreditation system lacks follow-up mechanisms that ensure the long-term development of improvements.

Missing elements are qualitative deficits are merely expressed by a reduced number of years of accreditation which is also problematic because of the diverging types of institutions as described before.

Therefore, the peers summarize that the decision-making process is well-established and offers possibilities of complaint but that the development from expert review to the objective decision of the commission needs to be better outlined in order to increase the public understanding and appreciation of the accreditation decisions.

Strengths:

1. The CNA complies with international standards regarding the decision-making process.
2. The HEIs have a clear understanding of the appeal process and make use of it if necessary.

Weaknesses:

1. No follow-up or continuous support process has been established for the interval between accreditation and re-accreditation.
2. It would be recommendable that for appeals discussing technical or area-specific aspects an expert group of similar institutions should be involved in the appeal process.

4. The EQAA and its relationship to the public

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

Not compliant Partially compliant Substantially compliant Fully compliant

Through the material provided by the CNA and the discussions during the on-site-visit the peers got a full insight into the agency's relevant policies, procedures and criteria. They learned that all regulations are accessible to the public as are also the decisions made by the CNA Commission.

However, they understood that public knowledge of the decision-making process and the criteria for accreditation is still limited. The students outlined that accreditation is perceived in Chile as an important factor for the election of higher education institute but mostly because economic student support from government funds is closely tied to the accreditation. Students of institutions that are not accredited may not apply for public scholarship.

Therefore, the indication of quality that is implied in the accreditation process is not too well-known as is the meaning of the quality gradations indicated through the years of accreditation.

The peers understand that in widespread perception quality assurance and accreditation have improved the Chilean higher education system during the last ten years but that with respect to public understanding and appreciation there is still room for improvement. In any case, they affirm that the CNA is doing its best to promote quality assurance through publications on the matter as well as public co-operations and presentations in schools.

Strengths:

1. The CNA is well-known to and acknowledged by the public on a national as well as international level.
2. The public understand and appreciates its task and achievements in the furthering of higher education in Chile.
3. An external, international peers is also involved in the accreditation process, evaluating independently the documents handed in by the HEI thus ensuring an objective, international input.

Weaknesses:

1. It appears to be problematic if the CNA acts as supervisor of the private agencies while at the same time it competes with them on the market of undergraduate and postgraduate programmes.

2. It is important that the public is being continually informed about the CNA's decision-making policy, its criteria and different levels of accreditation creating maximum transparency and understanding of the quality assurance process.

5. 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.

Not compliant Partially compliant Substantially compliant Fully compliant

After the discussions during the on-site-visit the peers have no doubt that transparency, integrity and professionalism is of utmost importance to the CNA, especially after the cases of corruption and the decrease of legitimacy in 2011. It is very much interested in constantly adapting to the heterogeneous Chilean higher education systems as well as global QA developments. As has been described before, this is understood to be a balancing act for the CNA. Committees are in place that are dedicated to the revision of criteria under constant participation of various stakeholders.

Despite these laudable efforts the CNA appears to lack any institutionalized internal quality assurance mechanisms. The peers learned that the current evaluation is the first procedure of the kind for the CNA, initiated due to the expected legal reform discussed in another chapter.

With the prospect of fundamental organizational changes the CNA considered it important to have externally assessed what it is doing, to analyze its procedures and to present the result as a legacy to any successor organization. Since at the time of the visit it seemed probable that the CNA would remain in place in most of its structure the peers considered it important that for the future the self-assessment processes and mechanisms of quality management initiated for the INQAAHE-evaluation are being institutionalized.

A periodic and transparent process of self-evaluation would not only help to improve the working system, it will also help to further regain the agency's legitimacy and public approval.

In terms of international organizations the CNA is, of course, an active member of the INQAAHE as well as the Network of national Agencies for Accreditation (NNAA) in the educational sector of the MERCOSUR.

Nonetheless, to the peers it seemed that international co-operation and exchange to the purpose of internal self-evaluation can still be enhanced, since the CNA affirmed itself in the self-assessment-report the absence of a policy of participation in national and international quality assurance networks, which would determine the strategic character of the set of activities and bilateral relations the CNA undertakes.

In conclusion, the peers support the CNA's desire for external review and internal quality assurance and emphasize that the processes initiated for the current evaluation need to be transferred into permanent self-review which should be revised frequently by an external review in the future.

Strengths:

1. The CNA is a member of international networks and participates in international co-operations in order to strengthen the aspects of internationalization.

Weaknesses:

1. The membership in international networks has not yet led to a systematic revision of the Chilean accreditation policy as has been outlined in the example of the accreditation of different areas, leaving the Chilean quality assurance system to a certain degree isolated from the rest of the community.
2. There are no mechanisms in place to allow for international accreditation, they only experiences having been made by private agencies whose assessment has not been recognized. Such a process should be initiated and headed by the CNA.

6. 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.

Not compliant Partially compliant Substantially compliant Fully compliant

The peers learned from the self-assessment report as well as the discussions during the on-site-visit that the CNA is generally interested in the quality assurance of cross border higher education but that this rarely takes place and meets serious obstacles. Apparently the CNA has not performed any accreditation processes in other countries.

The only experiences in this context have been made by a few of the private agencies licensed by the CNA, Acredita CI, Qualitas, and Acreditadora de Chile.

Their accreditation label, however, is not being acknowledged which may be explained by the peculiarities of the Chilean accreditation system described before which helps to deal with the deregulated Chilean higher education system but complicates the adaptation to international quality assurance standard.

Consequently, the peers again affirm the importance to adjust the Chilean accreditation standards to the global procedure in order not to lose contact while education is becoming more and more internationalized.

Recommendation:

1. The educational landscape evolves rapidly in terms of programmes, transnational or interdisciplinary careers or virtual applications. Therefore, the CNA should advance on these aspects given its prominent role in the quality assurance system in Chile.

ANNEX A – Agenda of the Site Visit

Date	Discussion round	Discussion partners from HEI
Tuesday, 23.05.2017	Preliminary meeting of the panel (internal) 15.00 – 18.00 h	
Wednesday, 24.05.2017 Morning	Discussion No. 1: Members of the Collegiate Body 09.00 – 10.30 h	<p>Alfonso Muga (Presidente) Jaime Alcalde (Vicepresidente – Designado por Institutos Profesionales) Alejandra Contretas (Divesup) Víctor Cubillos (Designado por CRUCH) Dora Altbir (Designado por CRUCH) Víctor Fajardo (Designado por CRUCH) María Fernanda Juppet (Designada por Universidades Privadas) Blanca Palumbo (Designada por Universidades Privadas) María de la Luz Mora (Designada por CONICYT) José Luis Martínez (Designada por CONICYT) Alejandro Weinstein (Designado por Centros de Formación Técnica) Hernán Burdiles (Proveniente del Sector Productivo) Fernando Escobar (Proveniente de Asociaciones disciplinarias) Ezequiel Martínez (Representante Estudiantil) Walter Reccius (Representante Estudiantil) Paula Beale (Secretaria Ejecutiva)</p>
	Discussion No. 2: Members of the Coordinating Committee 10.40 – 12.10 h	<p>Pedro Montt (Presidente de CNED) Paula Barros (S. Ejecutiva del CNED) Alejandra Contreras (Jefa DIVESUP)</p>
	Discussion No. 3: Members of the Executive Secretariat 12.20 – 13.20 h	<p>Paula Beale (Comité Directivo / Secretaria Ejecutiva) Pablo Baeza (Equipo Coordinación / Jefe de Análisis y Estudios) Guillermo Valdés (Equipo Coordinación / Jefe de Planificación y Control de Gestión) Cristian Gálvez (Sección 1 GGP: Gobierno / Encargado de Tecnologías de la Información) Claudia Venegas (Sección 2 GGP: Autoevaluación / Jefa de Acreditación Institucional) Alejandro Sotomayor (Sección 3 GGP: Decisión / Jefe de</p>

Date	Discussion round	Discussion partners from HEI
		Agencias y Pregrado) Alonso Núñez (Sección 4 GGP: Vínculo Externo / Jefe de Promoción)
	<i>Lunch Break 13.30-14.30</i>	
Wednesday, 24.05.2017 Afternoon	Discussion No. 4: Rectors of HEIs accredited with CNA Chile 14.30 – 15.30 h	Ennio Vivaldi (UCH) Aldo Valle (UVALPO) Ignacio Sánchez (PUC) José Antonio Guzmán (UANDES) Ricardo Paredes (IP DUOC) Fernando Martínez (IP AIEP) Sergio Morales Díaz (CFT San Agustín) Gonzalo Vargas (CFT INACAP) Cristián Guedelhofer Erbetta (Escuela Militar)
	Discussion No. 5: Quality Assurance staff of HEIs accredited with CNA Chile 15.40 – 17:10	Universidad Estatal Teresa Bruna Valiente (UPLA) Carlos Medrano (USACH) Universidad Privada del Cruch: Irene Ortega (UTFSM) Universidades Privadas Claudia del Campo (UDD) Gonzalo Puentes (USS) IP y CFT Cristina Mardones (IP INACAP) María Teresa Villagrán (IP AIEP) Jorge Espinoza (CFT ENAC)
	Discussion No. 6: Representatives of private agencies licensed by CNA Chile 17:20 – 18:20	Jessica Pizarro (ACREDITA CI) Carlos Reyes (ACREDITACIÓN) Sandro Tapia (ACREDITADORA DE CHILE) Juan Carlos Cuiñas (ADC) Manuel Garay (AESPIGAR) Vicente Valdivieso (APICE) Judith Scharager (QUALITAS)
Thursday,	Discussion No. 7:	Pregrado

Date	Discussion round	Discussion partners from HEI
25.05.2017	Members of the Area Committees 09.00 – 10:00 h	<u>Parvularia / Básica / Diferencial</u> Emy Suzuki (PUC) <u>Humanidades</u> Carmen Montes (UDP) <u>Ciencias</u> Lorena Espinoza (USACH) <u>Educación Física / Música / Artes</u> Alejandra Orbeta (UAH) Postgrado <u>Comité de Química</u> Claudio Olea (UCH) <u>Comité de Humanidades</u> Julio Pinto (USACH / Coordinador) <u>Comité de Ingeniería y Ciencias de la Tierra</u> Cristian Vial (PUC) <u>Comité de Ciencias Jurídicas</u> Carmen Dominguez (PUC)
	Discussion No. 8: Members of the Advisory Committees 10.10 – 11.10 h	Supervisión de Agencias Mercedes Tagle (Independiente) David Cademartori (PUCV) Pregrado Patricia Castañeda (UMCE) Jaime Díaz (UCH) Postgrado Lucero de Vivanco (UAH) Hernán Henríquez (USACH) Institucional Oscar Jerez (UCH) María Inés Icaza (UTALCA)
	Discussion No. 9: Peers 11.20 – 12.50	Universidad Luz María Pérez (Independiente) IP Alejandra Gaete (IP AIEP) CFT Jorge Azócar (IP INACAP) Pedagogía

Date	Discussion round	Discussion partners from HEI
		Germán Greene (UCSH) Medicina Roberto Barna (Secretaría General de Salud, Asesor) Doctorado Gonzalo Acuña (USACH) Magíster Ana María Ronco (UCH) Especialidad Odontológica Hernán Palomino (UNAB)
	Discussion No. 10: Students of all types of institutions 12:50 - 13:50	Universidades: Maria Fernanda Becerra Paredes José Manuel Alvial Quilodran Daniel Fuentealba Nuñez Antonio Cepeda Peña Fernando Ruiz de Gamboa Rodríguez Mauricio Oyarzun Caro Pauline Böhm María Josefina Aliaga Carla Ferrada Camilo Erices IP y CFT Gabriel Valdés Torres Javiera Bravo Núñez Claudio Avendaño
	<i>Lunch Break 13:50-15:00</i>	
	Review Panel 15:00-16:30	
	Feedback 16:30 - 17:00 h	

ANNEX B – Members of the Review Panel

Diana María Ramírez Carvajal, Presidenta	Abogada Doctora en Derecho de la Universidad Externado de Colombia, Decana de Posgrados en la Universidad Católica de Oriente - Colombia. Fue consejera y coordinadora del Consejo Nacional de Acreditación de Colombia.
Rafael Guitérrez Niebla, Académico	Maestro en Gestion para el Desarrollo, Presidente del Consejo Nacional para la Calidad de la Educación Turística A.C. de México (CONAET)
Martin Foerster, Secretario	Doctor en Historia Moderna. Gerente de Proyectos ASIIN – Alemania.