



INTERNATIONAL STANDARDS AND GUIDELINES OF QUALITY ASSURANCE IN TERTIARY EDUCATION (ISG) ALIGNMENT

External review report

| | |
|---------------------------|--|
| Organisation | Lembaga Akreditasi Mandiri Kependidikan (LAMDIK) / Accreditation Council for Education (ACE) |
| Place | Surabaya, Indonesia |
| Date of the visit | 15-17 April 2025 |
| Date of the report | 8 July 2025 |

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INTRODUCTION

About the review process

The Accreditation Council for Education (ACE) requested an external evaluation of its performance in compliance with the International Standards and Guidelines for Quality Assurance in Tertiary Education (ISGs) by the International Network for Quality Assurance Agencies in Higher Education (INQAAHE). ACE carried out the self-assessment process and submitted the Self-Evaluation Report and a list of supporting documentation to INQAAHE on 23 September 2023.

About Higher Education System of Indonesia

Indonesia's higher education system operates based on the Law No. 12 of 2012 on Higher Education. The higher education sector is managed and supervised predominantly by two ministries: Ministry of Higher Education, Science, and Technology (MoHEST), and Ministry of Religious Affairs (MoRA).

According to the national Higher Education Database (PDDikti¹) there are 4416 higher education institutions (HEIs) active in Indonesia, offering 33741 study programmes.

Higher education institutions can be grouped according to the following types and ownership structure²:

| Category | Number of institutions | |
|---------------------------|------------------------|---------|
| | Public | Private |
| University | 95 | 788 |
| Institute | 50 | 373 |
| School of higher learning | 40 | 2078 |
| Academy | 44 | 555 |
| Community college | 7 | 29 |
| Polytechnic | 44 | 227 |

¹ <https://pddikti.kemdiktisaintek.go.id> – Statistics for 2024

² [Higher education statistic 2023](#)

In 2024 there were approximately 9.9 million active students enrolled into the higher education institutions to one of three programme tracks available in Indonesia (SER p. 1):

| Academic Path | Professional Path | Vocational Path |
|-----------------|-------------------------|-------------------|
| Doctorate (S3) | Specialist 2 | Applied Doctorate |
| Master's (S2) | Specialist 1 | Applied Master's |
| | Professional Programs | |
| Bachelor's (S1) | Four-Year Program (D4) | |
| | Three-Year Program (D3) | |
| | Two-Year Program (D2) | |
| | One-Year Program (D1) | |

Students of the Indonesian HEIs are enrolled in vast majority to the Bachelor's level programmes³:

| Programme category | Number of students |
|-------------------------|--------------------|
| One-Year Program (D1) | 2 171 |
| Two-Year Program (D2) | 2 767 |
| Three-Year Program (D3) | 544 238 |
| Four-Year Program (D4) | 355 567 |
| Professional Programs | 321 436 |
| Bachelor's | 8 291 058 |
| Master's | 379 615 |
| Doctorate | 67 208 |

External quality assurance and accreditation system in Indonesia is managed by two main categories or actors:

1. National Accreditation Agency for Higher Education (BAN-PT) – responsible for the general oversight of the accreditation system in Indonesia and conducting institutional reviews

³ <https://pddikti.kemdiktisaintek.go.id> – Statistics for 2024

2. Seven discipline-based accreditation bodies (LAM) oversee programme accreditations:

| No. | Name | Discipline |
|-----|--|---|
| 1 | Lembaga Akreditasi Mandiri Pendidikan Tinggi Kesehatan Indonesia (LAM-PTKes) | Health Science |
| 2 | Lembaga Akreditasi Mandiri Ekonomi, Manajemen, Bisnis dan Akuntansi (LAMEMBA) | Economics |
| 3 | Lembaga Akreditasi Mandiri Sains Alam dan Ilmu Formal (LAMSAMA) | Math and Natural Sciences |
| 4 | Lembaga Akreditasi Mandiri Kependidikan (LAMDIK) | Education, including Teacher Professional Education Program |
| 5 | Lembaga Akreditasi Mandiri Informatika dan Komputer (LAMINFOKOM) | Information Technology |
| 6 | Lembaga Akreditasi Mandiri Teknik (LAMTEKNIK) | Engineering |
| 7 | Lembaga Akreditasi Mandiri Sosial, Politik, Administrasi, dan Komunikasi (LAMSPAK) | Social Sciences |

About LAMDIK

The Lembaga Akreditasi Mandiri Kependidikan (LAMDIK) / Accreditation Council for Education (ACE) is Indonesia's independent accreditation body for study programmes in education sciences, including teacher professional education programmes. Established in August 2019 under Ministry approval letter T/497/M/OT.00.00/2019, LAMDIK operates within the national quality assurance architecture alongside BAN-PT and other discipline-based agencies. Its legal mandate derives from Law No. 12 of 2012 on Higher Education and Regulation of the Minister of Education and Culture No. 5 of 2020, which assign independent agencies responsibility for programme-level accreditation. LAMDIK's scope covers teacher-training programmes at Professional, Bachelor's, Master's, and Doctoral levels, including distance-learning provisions. As of December 2024 the agency had accredited 2584 study programmes (SER p. 4):

| No. | Level | Educational Study Program Accreditation by ACE | | | |
|-------|--------------|--|-----------|------|-------------------------|
| | | Excellent | Very Good | Good | Do Not Meet Requirement |
| 1 | Bachelor's | 727 | 1,011 | 340 | 6 |
| 2 | Professional | 6 | 10 | 1 | 0 |
| 3 | Master's | 173 | 166 | 50 | 1 |
| 4 | Doctorate | 65 | 25 | 3 | 0 |
| Total | | 971 | 1,212 | 394 | 7 |
| | | 2,584 | | | |

EXECUTIVE SUMMARY

This report presents the findings of an external review of the alignment of the *Lembaga Akreditasi Mandiri Kependidikan* (LAMDIK) / Accreditation Council for Education (ACE) with the INQAAHE International Standards and Guidelines (ISG).

ACE is a legally recognized accreditation body in Indonesia responsible for the external quality assurance of education-related higher education programmes. Since commencing operations in March 2022, ACE has accredited over 2,500 study programmes at the bachelor's, professional, master's, and doctoral levels.

The panel determined that ACE is **substantially or fully compliant** with the ISG standards, recognizing the agency's rapid development and operational capacity despite its recent establishment. The review identified several **commendable practices**, such as:

- A rigorous and transparent assessor recruitment and training system;
- Strong professional development opportunities for internal staff;
- Commitment to quality culture and operational transparency;
- Significant achievements in building international partnerships and visibility.

The panel also made **key recommendations** to further align ACE with the INQAAHE ISG. These include:

- Clarifying and publicly sharing ACE's mission and objectives;
- Establishing a comprehensive, organization-wide conflict of interest policy;
- Aligning strategic goals with performance indicators and improvement plans;
- Enhancing the follow-up mechanisms on accreditation outcomes;
- Improving opportunities for TE providers to review and respond to factual inaccuracies in accreditation reports;

In addition, **suggestions for improvement** were made regarding the inclusiveness and effectiveness of ACE's standards, increased outreach to remote regions, more robust policies for online/hybrid assessments, and the publication of periodic system-wide evaluation reports.

Overall, the panel concluded that ACE demonstrates a high degree of professionalism, integrity, and commitment to continuous quality improvement.

ASSESSMENT OF COMPLIANCE WITH INQAAHE INTERNATIONAL STANDARDS AND GUIDELINES

1. Legitimacy of the External Quality Assurance Provider

☐ Not compliant
 ☐ Partially compliant
 ☒ Substantially compliant
 ☐ Fully compliant

1.1 MISSION, GOVERNANCE & ORGANIZATION

THE EQAP IS A RECOGNIZED, CREDIBLE ORGANIZATION, TRUSTED BY KEY STAKEHOLDERS: THE GOVERNMENT, TERTIARY EDUCATION PROVIDERS (TEPs) AND THE PUBLIC AT LARGE. ITS GOVERNANCE, STRUCTURE, AND OPERATIONS ENABLE EFFECTIVE AND EFFICIENT OPERATIONS IN LINE WITH ITS MISSION.

The Accreditation Council for Education (ACE) was initiated by a group of educational professional organizations with a mandate to accredit all educational programs in Indonesia. ACE is one of the seven trusted accreditation agencies in Indonesia that are legally recognized by the Ministry of Education, Culture, Research, and Technology (MoECRT) [Decree No. 186/M/2021]. It was officially established on 2 August 2019 according to authorization from the MoECRT [Approval letter No. T/497/M/OT.00.00/2019]. Furthermore, it was officially registered as a legal entity under the Ministry of Law and Human Rights (MoLHR) on 17 December 2019 [Decree No. AHU-0018765.AH.01.04.2019]. These legal documents collectively establish the foundation for ACE's creation and define the scope of its operations.

Since its operation in March 2022 to December 2024, ACE successfully issued 2584 accreditation certificates and is currently in the process of reviewing the Self-Evaluation Reports (SERs) of 559 programs. This demonstrates the wide recognition of its operations among TE providers and public at large.

As outlined in the SER [p.6], ACE operates with independence, objectivity, and autonomy, particularly in assigning assessors, managing finances, and making decisions regarding TE program accreditation outcomes. The government, represented by the National Accreditation Agency for Higher Education Institutions (BAN-PT), oversees ACE's activities to ensure compliance with BAN-PT's regulations.

According to its website, ACE adopted the following mission statement composed of four elements:

1. To carry out internal quality assurance;
2. To carry out accreditation processes in a professional, transparent, and accountable manner;
3. To build partnerships with similar accreditation bodies at both national and international levels;
4. To be fully committed to maintain quality assurance standards of educational study programs.

However, additional evidence provided to the panel during the site visit shows the official approval of five mission elements on 15 December 2021 by the ACE Board of Trustees. The panel observed ambiguity in the first element, as it was unclear whether it referred to the Internal Quality Assurance (IQA) of ACE or that of TE providers. During interviews, it was clarified that the statement is intended to address both. However, the SER [p.6] clearly states that the IQA of TE providers extends beyond ACE's operational scope and the panel is of the view that defining an institution's IQA as a mission should be reconsidered. Furthermore, there is a notable overlap between the second and the fourth elements, which should be addressed for clarity and distinctiveness. Additionally, ACE's collaborations with other agencies or accreditation bodies remain in the early stages, and there is insufficient evidence to substantiate robust partnerships that would warrant including this aspect as part of ACE mission. Therefore, the Panel believes that ACE's mission requires revision to clearly reflect the external quality assurance of TE as a key function of the organization.

While the website and the evidence provided [ACE Foundation Decree on Articles of Association and Bylaws] do not outline ACE's objectives, the SER [p.7] states that "ACE's objectives include professional, transparent, and accountable accreditation; excellent internal quality assurance; national and international collaborations; and public dissemination of information on study program quality". The first objective is phrased more like "values", while the remaining objectives are mirroring the mission statements. The Panel is of the view that the ACE objectives could be revised to clearly outline the purpose and scope of its activities and to make these publicly accessible on its website.

Therefore, the Panel recommends that ACE develop a clear mission statement that explicitly emphasize external quality assurance of tertiary education as a core function of the organization, accompanied by a well-defined set of objectives that clearly outline the purpose and scope of its activities and to make these publicly accessible on its website.

As outlined in the ACE organizational chart [SER, p.7] and the ACE Foundation Decree, ACE's organizational structure is well-established, with clearly defined responsibilities, main tasks, and authorities for its three boards: the Board of Trustees, the Board of Supervisors, and the Board of Executives. The roles of the three boards align with ACE's mission and objectives. The membership of the Board of Trustees is confined to the leaders of the ACE's founding organizations. The Panel is of the view that ACE would benefit from expanding the membership of this Board to incorporate representation from academia and industry. According to the SER [p.8], the Board of Trustees selects the members of both the Board of Executives and the Board of Supervisors, who should "Hold a Doctorate degree, have managerial experiences, minimum as a dean, serve as the leader of the founding organization", and represent diverse institutions and educational professional organizations. The Panel believes that, to enhance transparency, these criteria should be consolidated into a single document and published. Furthermore, including the term limits for board members would improve clarity.

The Panel, hence, suggests that ACE clearly define the selection criteria and term limits for membership on the Board of Executives and the Board of Supervisors and involve key stakeholders from academia and industry in the composition of the Board of Trustees.

According to the ACE's organizational structure, the Board of Executives comprises four divisions, one of which is the "Accreditation Division". This division is tasked with managing and supervising the external review process. Additionally, there is an autonomous body known as "the accreditation panel", which meticulously examines the review results and presents its findings to the Board of Executives. Using the accreditation panel's findings as a basis, the Board of Executives makes accreditation decisions and communicates them to the TE providers and BAN-PT. This hierarchical reporting structure, as outlined in the organizational structure, facilitates the effective and efficient execution of external review processes.

The Board of Executives, led by a Chairperson and supported by four executive members (Human Resources and General Administration, Accreditation, Development & Evaluation, IT and Data), is primarily responsible for translating the general policies set by the Board of Trustees into operational policies. Key tasks include developing ACE's Strategic Plan, preparing and executing the Annual Work Plan, and reporting its implementation to the Board of Trustees. The Board of Supervisors, comprising a Chairperson and members, oversees the execution of the Board of Executives' work plan, conducts internal audits of financial activities, reports findings to the Board of Trustees, and provides suggestions and recommendations to the Board of Executives. Both boards report to the Board of Trustees, which determines ACE's general policies, selects members for the two boards, reviews and approves the work plan of the Board of Executives, and receives regular reports. This composition fosters trust, independence, and impartiality while ensuring clear and effective management. However, as members of these boards come from diverse institutions and educational organizations, it is critical to address any potential conflicts of interest that may arise. During the site visit, additional evidence was presented under the title "Regulation of the ACE No. 23 of 2022 on Recruitment and Code of Ethics for Assessors of the ACE," which addresses issues related to potential conflicts of interest. Further evidence regarding the implementation of this regulation was also provided. Through interviews, the panel learned that the Regulation primarily applies to external reviewers, including assessors and validators. However, other stakeholders involved in the accreditation process—such as accreditation panel members, the three boards, or administrative staff—are not covered by the regulation. Interviews also revealed that TE providers are unable to report any potential conflicts of interest with assessors or validators, as their identities are not disclosed until the day of the review.

Hence, the Panel recommends that ACE should develop a comprehensive, organization-wide policy on conflict of interest that include explicit measures to prevent potential conflicts of interest across all areas of its operations, including staff, decision-making entities, and external reviewers.

ACE has developed and implemented a Strategic Plan for 2022–2026, consisting of four goals: quality culture, accreditation, relevance, and building a network of partnerships. The panel observed that, although the Strategic Plan includes thirteen Key Performance Indicators (KPIs), they are not directly linked to the four strategic goals. According to the SER [p.11], the progress of the KPIs is monitored through biannual reports submitted to the Board of Trustees and the Board of Supervisors, with achievements reflected in the annual reports provided to BAN-PT. The SER also includes a table outlining the KPIs, along with their targets and achieved percentages for the period 2022–2026 [Table 1.3]. The panel noted that the KPIs related to the fourth strategic goal “building a network of partnerships” were the least achieved in 2024. These include KPI07 “Accredited study programs overseas (66%)”, KPI08 “International accreditation assessors (60%)”, KPI09 “International accreditation instruments (50%)”, KPI10 “ACE international visibility (57%)”, and KPI11 “International partnerships (43%)”. The Panel observed that this issue stems from the continuous increase in targeted performance over the years. As actual performance remained relatively static, the gap between expectations and outcomes led to an apparent decline in overall performance of some KPIs. The panel requested additional evidence on how ACE would address the decline in the achieved performance of these KPIs and was provided with evidence regarding the implementation of national and international partnerships. Interviews also revealed that ACE is still in the initial phases of expanding its operations internationally, with Memorandums of Understanding (MoUs) established with ANAAA in Timor Leste, the Bangladesh Accreditation Agency, and Uzbekistan State World Languages University (UzSWLU). However, the panel was not provided with an improvement plan that clearly outlines how ACE intends to address the least achieved KPIs or whether it will adjust its targeted performance for the coming years to align with its current capabilities.

The Panel hence recommends that ACE aligns its KPIs with the four strategic goals and develops a clear mechanism to address any KPIs that fall below the targeted rate.

1.2 RESOURCES

THE EQAP HAS ADEQUATE RESOURCES — PHYSICAL, FINANCIAL AND HUMAN — TO CARRY OUT ITS MISSION.

External evaluation at ACE is conducted through four divisions: the Accreditation Division, Resources and Financial Administration Division, Development Division, and Information Systems Division. Each division is led by its head, and the Executive Secretary coordinates the activities of the four divisions. As stated in the SER [p.12], there are 11 staff carry out day-to-day operations at the four divisions. Considering the significant workload—nearly 500 programs under review—the staff’s workload is relatively high. However, during interviews, the panel was informed that the workload remains manageable, with ACE intending to recruit one or two additional staff members in the future.

The SER [p.12] highlights that ACE offers its administrative staff professional development opportunities, including English language training, IT-related courses, and accounting certification, tailored to their competency development needs. Table 1.4 [SER, p.12] outlines the list of trainings attended by ACE staff from 2022 to 2024, with the majority conducted in 2023. Through interviews with staff from various divisions, the panel found that their training needs are effectively addressed and that they are provided opportunities to participate in QA-related conferences. The panel was also impressed by their efficiency and professionalism. ACE is commended for providing training and professional development activities for its staff, which have enhanced their efficiency and professionalism in managing the administrative aspects of external QA reviews.

ACE has a pool of 946 qualified external reviewers (assessors) who are meticulously selected through a rigorous three-stage recruitment process comprising portfolio assessment, psychological tests, and interviews, as outlined in ACE Regulation No. 23 of 2022 and the Quality Procedure for Assessor Recruitment. Before their assignment, prospective assessors undergo orientation and training (onboarding), which includes assessing a mock SER. Additionally, ACE registers its assessors with BAN-PT to obtain an Assessor Identification Number. New assessors are paired with senior assessors at the beginning of their assignment to facilitate experience-sharing. Furthermore, ACE conducts annual training sessions to refresh assessors' knowledge and skills in conducting accreditation. To ensure high performance, ACE monitors assessors' work through online questionnaires completed by the TE providers and validators who oversee the assessors' outputs. If an assessor fails to adhere to the established guidelines, they are temporarily suspended and provided with coaching clinics.

The Panel commends the robustness of the assessor recruitment process and the rigorousness of their training and coaching procedures.

The SER [p.14] also highlights ACE's efforts to recruit assessors from across Indonesia. However, it faces challenges in attracting assessors from regions with lower educational quality. To address this, ACE has occasionally implemented an affirmation scheme by lowering the academic rank requirement from Associate Professor to Assistant Professor for specific areas. Despite these efforts, this approach has not fully resolved the challenge of reaching all remote regions.

The Panel suggests that ACE consider adopting further strategies to address this issue effectively, drawing insights from benchmarking exercises with comparable QA agencies in the region.

According to the SER [pp.14-15] and supporting evidence [ACE Office at Surabaya and Jakarta; ACE Furniture and Equipment], ACE operates two main offices: one in Jakarta, dedicated to managing administrative affairs, and another in Surabaya, which focuses on various operational activities. Both offices are well-equipped, as illustrated in Table 1.5 [SER, p.15]. As shown during the demo session presented during the site visit, ACE possesses the technological resources necessary to conduct its processes efficiently, including a database of assessors and a platform to manage accreditation procedures.

The IT system enables ACE to perform activities more quickly and effectively. For financial management, ACE utilizes Zahir Accounting software, which is endorsed by the Public Accounting Firm to ensure reliability and sustainability.

1.3 INTERNAL QA AND ACCOUNTABILITY

THE EQAP HAS IN PLACE POLICIES AND MECHANISMS FOR ITS INTERNAL QUALITY ASSURANCE THAT DEMONSTRATE A CONTINUING EFFORT TO MAINTAIN AND IMPROVE THE QUALITY AND INTEGRITY OF ITS ACTIVITIES.

According to the provided evidence, ACE has established clear policies to ensure its internal quality. These include the Quality Policy; Organizational context guidelines; Risk management guidelines; Organizational context; Risk identification, assessment, and handling; Quality objectives; Scope of Quality Management System (QMS) Implementation; Job description; and Staffing competency standards, etc. This is in addition to 28 quality procedures outlining detailed IQA processes [ACE's Internal Quality Policy Documents]. To ensure compliance with these policies and procedures, ACE undergoes audits through IQA and EQA (by BAN-PT and National Quality Assurance according to ISO standards). Compliance is monitored through mechanisms, such as measurement, monitoring, performance analysis and evaluation, internal audits, and management reviews. The results from IQA and EQA evaluations are utilized to plan continuous improvements and enhance ACE's business processes, as shown in the Additional Evidence provided to the panel. However, the panel noted the absence of a comprehensive policy or procedure specifically addressing EQA.

Therefore, the Panel recommends a clear policy or procedure to address EQA and leveraging its outcomes to enhance ACE operations and processes.

The SER [pp.17-18] provides detailed insights into the mechanism adopted by ACE to ensure that its IQA system facilitates the review of its activities. This enables ACE to respond effectively to the evolving nature of higher education, enhance the efficiency of its operations, and maintain its relevance while contributing towards the achievement of its objectives. Comprehensive evidence supporting this mechanism was provided to the panel including [the IQA System, IQA Manuals, IQA Standards, and IQA Forms]. Furthermore, examples highlight ACE's plans to integrate micro-credentials into the curriculum and learning models, including assessment patterns. This demonstrates ACE's commitment to improving assessors' understanding and capability to implement these patterns effectively, as a direct outcome of the IQA mechanism.

According to the SER [p.18] and the provided evidence [management review meetings (MRM)], ACE initiated the implementation of its IQA system in 2022 through annual management review meetings (MRM). The findings from the IQA are discussed and addressed during these meetings to identify areas for improvement. Additionally, the outcomes of the MRM are utilized to support decision-making processes and drive

improvement initiatives. However, upon reviewing the latest MRM reports, the Panel found them to be lacking essential elements of a thorough self-review.

Consequently, the Panel considers this process inadequate and recommends that ACE should conduct comprehensive self-reviews, which include evaluating its impact on the systems it operates within, aligning with its core values, and leveraging reliable data collection and analysis to inform decisions and drive continuous improvement.

The SER [p.18] explains that as a result of continuous internal and external evaluation of its policies and practices, ACE developed instruments for distance learning and already accredited study programs in open universities. Furthermore, ACE has assessed the opening of new study programs in several universities.

ACE is subject to external reviews by external agencies, such as BAN-PT, ISO, and the Public Accounting Firm, which audit ACE for various purposes: BAN-PT for accreditation, ISO for administrative functions, and the Public Accounting Firm for financial matters. BAN-PT conducts annual reviews of ACE. Since ACE officially began operations on March 31, 2022, it has submitted its performance reports for both 2022 and 2023 to BAN-PT. The review process involves ACE submitting performance reports to the external reviewer (BAN-PT), which then provides outcomes along with recommendations for enhancing ACE's processes. These outcomes are also shared with the MoECRT. Additional evidence has been provided during the site visit regarding the implementation of the recommendations from BAN-PT's reviews of ACE's performance in 2022 and 2023.

Based on the SER [p.19], the evidence provided and interviews with different internal and external stakeholders, the Panel confirmed that ACE has cultivated a comprehensive quality culture through its regulations and quality procedure documents. This culture extends to its assessors, positively influencing their work environment [Survey report on internal quality audit, 2024]. To further embed a quality culture within higher education institutions (HEIs), ACE has increased the number of assessors, expecting them to help instil this culture within their faculties and universities.

Commendations

- The Review Panel commends that ACE provides the training and professional development activities with staff, which have enhanced their efficiency and professionalism in managing the administrative aspects of external QA reviews.
- The Review Panel commends that ACE has developed a robust assessor recruitment process and rigorous training and coaching procedures.

Recommendations

- The Review Panel recommends that ACE shall review and clarify its mission statement. It shall also be accompanied by a well-defined set of strategic objectives and to make these publicly accessible on its website.

- The Review Panel recommends that ACE shall align its KPIs with the four strategic goals and develop a clear mechanism to address any KPIs that fall below the targeted rate.
- The Review Panel recommends that ACE shall develop a comprehensive, organization-wide policy on conflict of interest that include explicit measures to prevent potential conflicts of interest across all areas of its operations, including all categories of staff, decision-making entities, and external reviewers.
- The Review Panel recommends that ACE shall develop a clear policy or procedure to address EQA of its activities and to leverage its outcomes in order to enhance ACE operations and processes.
- The Review Panel recommends that ACE shall conduct a comprehensive self-review, including evaluating its impact on the systems it operates within, aligning with its core values, and leveraging reliable data collection and analysis to inform decisions and drive continuous improvement.

Suggestions for further improvement

- The Review Panel suggests that ACE clearly defines and publishes the selection criteria and term limits for membership on the Board of Executives and the Board of Supervisors, and expands the membership of the Board of Trustees to incorporate representation from academia and industry.
- The Review Panel suggests that ACE may consider adopting additional strategies to tackle the challenges of conducting reviews in remote areas of Indonesia, drawing insights from benchmarking exercises with comparable QA agencies in the region.

2. The EQAP's Framework for External Reviews of the Quality of TEPs

☐ Not compliant
 ☐ Partially compliant
 ☐ Substantially compliant
 ☒ Fully compliant

2.1 THE RELATIONSHIP BETWEEN THE EQAP AND TERTIARY EDUCATION PROVIDERS (TEPS)

THE EQAP RECOGNIZES TEPs AS HAVING PRIMARY RESPONSIBILITY FOR QUALITY AND RELEVANCE AND PROVIDING SUPPORT IN PROMOTING TRUST AND CREDIBILITY.

ACE recognizes that institutional and programmatic QA are primarily the responsibility of the TE providers themselves. This is evident through the MoECRT Regulation No.53 of 2023, which requires TE providers to establish their own quality standards and consistently develop and implement IQA. Consequently, ACE's accreditation process emphasizes the implementation of faculties' IQA through EQA. As confirmed from various interview sessions, ACE's assessors are also tasked with encouraging faculties to enhance the effectiveness of their IQA, thereby raising the quality of education.

ACE ensures that the core values of tertiary education - equitable access, accountability, academic freedom, institutional autonomy, and social responsibility – are respected and promoted. This is demonstrated through the implementation of the ACE's nine Standards/Criteria and emphasized in the guideline to write a Self-Evaluation Report (SER) [Bachelor's Accreditation Instrument]. Furthermore, ACE monitors the adherence to and promotion of these core values, including autonomy, quality culture, relevance, academic freedom, equal access, social responsibility, accountability, and academic integrity, through comprehensive data analysis [Examples of Core Values Data Analysis].

ACE implements suitable mechanism that promotes appropriate implementation and continuous enhancement of the TE IQA system. This is achieved through "Criterion 2: Governance, Cooperation, and IQA" of ACE's Standards, which emphasizes, among other aspects, the application and enhancement of IQA. In addition, ACE encourages TE providers to develop, implement, enhance, and monitor IQA practices and processes using the cycle of Stipulation, Implementation, Evaluation, Control, and Improvement (*PPEPP cycle*) for each criterion. According to the SER [p.23], ACE maintains records of the TE providers' commitment to sustaining and improving their IQA. Based on these records, actions have been taken to encourage TE providers to improve their IQA practices. These actions include fostering collective awareness of IQA as a fundamental component of quality culture, disseminating instruments, hosting accreditation clinics *via* web meetings with recordings made available on ACE's official website, and collaborating with the Regional Board of Higher Education Services (LLDIKTI) for IQA socialization.

According to the SER [p.23] and as collected from interviews, ACE is mindful of the level of workload and related costs associated with its accreditation process. With

regard to the workload, ACE has implemented a mechanism to send early reminders 12 months before the expiration of a TE program's accreditation status, allowing TE providers sufficient time to prepare before the review process begins. Furthermore, ACE minimizes the burden on faculties by requiring only three years of performance data related to quality assurance, teaching, research, and outreach programs. Additionally, during interviews with TE providers, they mentioned that they regard the preparation of the SER and its supporting materials as an integral part of the IQA process. As such, this task is expected to be performed regularly and is not considered an additional burden, as it reflects the ongoing IQA practices. However, the panel formulates a consideration regarding the workload related with the extensive set of accreditation criteria (see Standard 3).

With regard to accreditation costs, ACE establishes its fees through consultations with stakeholders, adhering to a not-for-profit approach. The fees are based on cost recovery to cover operational expenses, such as evaluations and document reviews. This method ensures transparency and fairness, preventing excessive charges. Once the fee structure is determined, ACE seeks approval from MoECRT. TE providers are given the flexibility to pay the fees either in full or through instalments. Moreover, smaller TE providers facing financial difficulties may qualify for government support in the form of partial reimbursements upon providing proof of payment [SER, p.24; MoECRT Approval Letter on Accreditation Fee; "Accreditation Transformation 2024" Funding Subsidy Guideline].

As provided in the SER and during the interviews, ACE offers TE providers clear guidance on the requirements for the self-assessment and external review process, through the publication of accreditation instruments including the White Paper; SER Preparation Guidelines; Assessment Guidelines and Rubric; and Accreditation Procedures [ACE's website]. These instruments are also disseminated through various channels, such as regular meetings with HEIs, study program associations, LLDIKTI, assessors, and international accreditation agencies. ACE also provides training on the requirements of external review processes through accreditation clinics. However, the panel found that accreditation clinic sessions are optional for TE providers and that ACE depends on its trained assessors to share their expertise within the institutions where they are employed.

Thus, the Panel suggests that ACE consider implementing mandatory training sessions for TE providers prior to their review. These sessions would ensure they are well-prepared for various accreditation processes, including the SER preparation.

2.2 THE EQAP'S STANDARDS FOR EXTERNAL QUALITY REVIEW

THE STANDARDS VALUE DIVERSITY OF PROVISIONS AND PROMOTE TRUST, RELEVANCE, ENHANCED QUALITY OF TE PROVISIONS, AND THUS PROMOTE A QUALITY CULTURE.

In line with BAN-PT Regulation No. 24 of 2024 on Guidelines for Governance in Accreditation Agencies, ACE has developed nine criteria/standards for TE program accreditation based on the National Accreditation System for Higher Education (SAN-

Dikti). These criteria/standards are: Vision, Mission, Objectives, and Strategy (VMGS); Governance; Students; Human Resources; Infrastructure; Teaching; Research; Outreach; Outcome to be applied in its accreditation process of TE programs. These standards are applied across various types of TE programs such as bachelor's, master's, doctorate, and teacher professional education, as well as across different delivery modes, such as face-to-face and distance learning. The panel deemed these nine standards sufficient, in general, to evaluate diverse program types and delivery methods. However, the sub-criteria under each standard could be improved to recognize the diversity of TE providers and their unique identity. For instance, TE providers could have full autonomy in defining their mission based on their available resources and future vision. In this regard, ACE standards should assess the performance of TE providers based on the mission they have chosen to pursue, acknowledging their unique identity. Thus, it is recommended that ACE undertake a benchmarking exercise to compare its sub-criteria with those of similar agencies with the aim to accommodate the diversity of TE providers and their unique identity.

As outlined in the SER [p.26] and confirmed during the interviews, ACE standards were developed in 2021, "Instrument 1.0", by involving relevant stakeholders including study programs, senior assessors, and experts [Additional Evidence]. Instrument 1.0 underwent a review in 2023, which identified several ambiguous or incomplete items. In response, ACE developed a guideline to support assessors in drafting descriptions and assigning scores more effectively. Currently, ACE has developed "Instrument 2.0" and is conducting its pilot testing phase. The Panel is concerned that the intervals for reviewing the standards are too short and believes they should align with a review cycle, ensuring that standards are reviewed at the conclusion of each cycle. The Panel also is of the view that meticulous review of the standards would be enhanced by conducting a benchmarking exercise with comparable QA agencies both regionally and internationally.

Consequently, the Panel recommends that ACE should establish and implement a policy defining the process and reasonable timeline for reviewing its standards, ensuring their continued relevance to the system's needs.

ACE's nine accreditation standards explicitly cover the areas of a TEP's activity including governance and management (Criteria 1& 2), program design and approval (Criterion 1), teaching and learning processes (Criterion 6), student admission (Criterion 3), progression and certification (Criterion 3), research (Criterion 7), community engagement (Criterion 8), and the availability of necessary resources (Criteria 4&5).

Based on the accreditation results, ACE provides commendations and recommendations to ensure faculty continuously improves their quality. However, the panel confirmed during the interviews that ACE does not monitor whether those recommendations are acted upon. Also, ACE standards lack provisions for an effective internal follow-up mechanism to track the outcomes of external reviews.

Therefore, the Panel recommends that ACE should revise its standards and framework to incorporate and ensure an effective follow-up mechanism for the outcomes of its external reviews.

ACE has a range of policies that specifies how standards are applied and the types of evidence needed. These include the ACE Regulations on standards and criteria, the guidelines for writing the SER, and the assessment rubric, all of which are accessible on the website. In addition, ACE develops guidelines that list supporting evidence requested and to be checked during onsite assessment. Table 2.5 in the SER [p.30] serves as an example of the required documents in line with onsite assessment guidelines.

The panel examined the ACE's nine criteria and their respective sub-criteria and is of the view that more focus on the academic integrity could be included under criterion 7 "Teaching" and criterion 8 "Research".

Therefore, it is recommended that ACE revise its standards to ensure that they adequately address and promote academic integrity.

2.3 THE EQAP'S EXTERNAL REVIEW PROCESS

THE EXTERNAL REVIEW FRAMEWORK HAS A CLEAR SET OF PROCEDURES FOR EACH TYPE OF REVIEW.

ACE's accreditation mechanism comprises two key stages: adequacy assessment and onsite assessment carried out by two assessors. Each stage involves verifications and validations by a validator. The results of both assessments are used by the "Accreditation Panel" to determine the accreditation result. Then, ACE, represented in the Board of Executives, issues an accreditation decree. If the TEP agrees with the result, an accreditation certificate is issued; otherwise, if dissatisfied, the TEP has the option to submit an appeal.

According to the SER [p.31] Figure 2.3, ACE's website, and interviews, ACE employs comprehensive instruments for its accreditation process. These instruments ensure independence, trust, reliability, and relevance to the current context [Accreditation Instruments]. They are publicly accessible to various stakeholders through ACE's website. During interviews, stakeholders informed the Panel that these instruments are regularly updated, provide clear guidance, and are easy to access.

As stated in the SER [p.32], ACE typically conducts external reviews on site. However, in exceptional circumstances such as severe weather, natural disasters, or pandemics, reviews are conducted virtually. During the COVID-19 pandemic, ACE accredited study programs using hybrid and online formats. The panel learned during the interviews that, after the pandemic, online reviews were conducted only in rare instances, primarily due to severe weather conditions. In such cases, ACE adheres to its "Guidelines for the Implementation of Field Assessments Accreditation of Education Study Programs in the Era of COVID-19", which were presented to the panel as additional evidence. After reviewing the guidelines, the Panel believes they could be improved by clearly outlining the protocols for online reviews and providing a more

detailed description of the procedures for both online and hybrid assessments. Consequently, the Panel suggests that ACE establish comprehensive guidelines for conducting reviews in hybrid and online modes, ensuring they can be effectively applied in exceptional circumstances.

As per the SER [p.32] and the provided evidence, ACE has made various instruments available on its website to clarify the external review process and its steps. This was also confirmed during the interviews with various stakeholders, including TE providers, assessors, validators, etc. The Panel observed that most of these instruments are available in Indonesian, while the English version of the website is not as up-to-date as the Indonesian version.

Therefore, given ACE's ambitious plans for international expansion, the Panel believes it will be necessary to provide all instruments in English and ensure the English version of the website is consistently updated.

The “ACE Regulation on Assessor Recruitment and Code of Conduct (Regulation No 23 of 2022)” provides detailed information on the selection, assignment, and qualifications of expert panels. According to the regulations, ACE involves an expert panel of assessors, consisting of two experts from the same study program with an equal or higher accreditation status and are based in provinces different from the study program under review. Additionally, each assessment undergoes verification and validation by a designated validator. However, during the interviews, validators were not aware of the criteria for their selection. Evidence was provided on the rigorous selection process of assessors, leading to a relatively low acceptance rate, as the number of applicants remains high but many fail to meet the specified requirements [SER, p.33]. Thus far, assessors have been drawn from seven regions across Indonesia. ACE also emphasizes gender balance, with the current ratio of assessors being 67% male and 33% female.

The Panel, hence, recommends that ACE establish clear criteria for validator selection and make them publicly available to promote transparency, while also ensuring greater gender balance in the selection of assessors and validators.

As indicated in the SER [p.33], the expert panel, when evaluating the review program, seeks input from a range of stakeholders, such as academics, students, and professional practitioners. A sample on-site schedule for an external review included dedicated sessions with university leaders, heads of study programs, lecturers, students, alumni, employers, and partner institutions. Additionally, assessors observe the lecture process, curriculum management, learning facilities, research, and outreach programs during onsite visit.

The “ACE Regulation on Assessor Recruitment and Code of Conduct (Regulation No 23 of 2022)” offers clear specifications on the characteristics and selection of external reviewers. Prior to their assignment, prospective assessors are required to complete orientation and training (onboarding) to evaluate mock SER [Interviews]. This training focuses on the assessor's code of conduct, ensuring compliance with accreditation principles. In addition, at the start of their assignments, new assessors are paired with

experienced senior assessors to facilitate knowledge and experience sharing [Interviews]. Moreover, annual training sessions are organized to refresh assessors' skills and knowledge. Accreditation Instruments are made available on the ACE website for further reference.

The Panel commends the rigorous training process for external experts, which includes extensive preparation prior to their assignment and annual refresher sessions to ensure they remain well-equipped for their roles.

To prevent conflicts of interest between assessors and study programs, ACE has implemented several regulations concerning the assessor panel, instruments, assessment rubrics, and decision-making processes. According to these regulations, the panel of assessors responsible for accrediting a study program must be from provinces other than the location of the study program [ACE Regulation No. 23 of 2022, Article 7]. Furthermore, assessors involved in accrediting a study program are prohibited from providing any form of assistance to the program—such as teaching, training, research collaboration, or partnerships—within two years before or after the accreditation process [ACE Regulation No. 23 of 2022, Article 9]. Additionally, the accreditation panel independently determines the accreditation outcomes without external influence [ACE Regulation No. 27 of 2023, Article 12]. During interviews, the panel also learned that ACE implements systematic conflict-of-interest screening procedures for assessors, which include mandatory self-disclosure requirements and independent verification mechanisms.

To ensure consistency in evaluations across different TE programs, review assessment and reports are raised by the assessors to the accreditation panel. The accreditation panel is an autonomous organ with nine members who represent the following clusters: pedagogy, educational administration, social sciences education, language education, math and natural sciences education, sports education, vocational education, arts education, and religious education. The accreditation panel reviews the results of both adequacy and onsite assessments to determine a study program's accreditation status. It holds the authority to revise outcomes or request further clarification from assessors before finalizing decisions. During the interviews, the panel was informed that ACE reviews approximately 1,000 programs annually, with only nine accreditation panel members. This means each member is responsible for reviewing 8–9 programs per month, in addition to checking the other +90 programs and provide comments on the system. This increases each member's workload to over 90 programs that are checked and discussed during the accreditation panel's monthly meeting. The panel recognizes this as a substantial workload, particularly considering the additional responsibilities of its members.

Technically, the accreditation panel reviews both the consolidated assessment sheets completed by assessors and the "Recommendation" document (the final review report). Its primary role is to verify the assessment values, ensuring they align correctly with the relevant rubrics. Additionally, the accreditation panel reviews the Recommendation document before submitting it to the Board of Executives, which then forwards it to the concerned TE providers and BAN-PT. The panel is of the view

that the Recommendation document is the most crucial element of the review, as it represents the outcome of ACE's extensive efforts and aims to support TE providers in enhancing their IQA. Therefore, further refinement is necessary.

Hence, the panel suggests improving the Recommendation document by including justifications for each recommendation and shifting the accreditation panel's focus more toward this document rather than the assessment sheets. The panel also suggests that ACE may consider publishing the Recommendation document on its website.

As indicated in the SER [p.31], the review process is designed to be completed within a maximum of four months, with the average accreditation time by ACE currently being 115 days [data retrieved on 30 December 2024]. Nonetheless, interviews reveal that certain stages, such as verifying incomplete documents, often exceed the proposed timeline. To tackle this issue, ACE has established a helpdesk to assist in resolving and clarifying matters related to incomplete SER documents. Furthermore, significant difficulties often arise in scheduling onsite assessments for both assessors. To address this, ACE considers introducing an early scheduling system in the future, allowing assessors to better plan their availability for onsite visits. The panel is satisfied with the current arrangements.

The review outcome is documented in the consolidated assessment sheet, an internal document, and the Recommendation document, which serves as the final review report sent to TE providers. However, as stated in the SER and confirmed during interviews, TE providers currently do not have the opportunity to correct factual errors in the Recommendation document; they are only permitted to appeal the review result.

Therefore, the Panel recommends that ACE revise its accreditation process to allow TE providers to address any factual inaccuracies in the external review report (the Recommendation document).

As per the SER [p.36], ACE provides clear guidance, as stated in Instrument 4 "Assessment Guidelines and Rubric", on the description of assessment results and scores based on the rubrics. The score difference between the first and second assessor must not be more than 1 point for each item and no more than 10 points for the overall items. It is the validator's responsibility to ensure that this requirement is fulfilled. The SER [pp.35-36] states that ACE relies on several methods for assessing assessor performance. These include distributing questionnaires to study programs to evaluate the assessors, and assigning validators, as well as recording the onsite assessment process. As of November 8, 2024, the onsite assessors' performance evaluation score exceeded 97.6 out of 100 across all aspects. Additionally, ACE holds meetings with representatives from selected study programs to gather feedback on assessor performance. Validators are also appointed for each review to conduct blind evaluations of assessors' performance.

2.4 REGULAR SYSTEMIC REVIEWS

THE EQAP CONDUCTS REGULAR SYSTEMIC/THEMATIC REVIEWS TO INFORM ITS STAKEHOLDERS AND PUBLIC AT LARGE ON SYSTEMIC ISSUES/DEVELOPMENTS. AND TRENDS.

Not Applicable

As a relatively young agency established just three years ago, the panel believes that it may be premature for ACE to regularly produce and distribute integrated, system-wide reports on the overall outcomes of QA processes, their impact on the TE system and its performance, and other relevant activities.

However, the Panel suggests that ACE consider issuing such reports periodically in the future.

Commendations

- The Review Panel commends that ACE provides a rigorous training process with external assessors, including extensive preparation prior to their assignment and annual refresher sessions to ensure they remain well-equipped for their roles.

Recommendations

- The Review Panel recommends that ACE shall undertake a benchmarking activity to compare its sub-criteria with those of similar agencies with the aim to accommodate the diversity of TE providers and their unique identity.
- The Review Panel recommends that ACE shall establish and implement a policy defining the process and reasonable timeline for reviewing its standards, ensuring their continued relevance to the system's needs.
- The Review Panel recommends that ACE shall revise its standards and framework to incorporate and ensure an effective follow-up mechanism for the outcomes of its external reviews.
- The Review Panel recommends that ACE shall revise its standards to ensure that they adequately address and promote academic integrity.
- The Review Panel recommends that ACE shall establish clear criteria for validator selection and make them publicly available to promote transparency, while also ensuring greater gender balance in the selection of assessors and validators.
- The Review Panel recommends that ACE shall revise its accreditation process to allow TE providers to address any factual inaccuracies in the external review report (the Recommendation document).

Suggestions for further improvement

- The Review Panel suggests that ACE implements training opportunities for TE providers prior to their review to ensure that they are well-prepared for various accreditation processes, including SAR preparation.
- The Review Panel suggests that ACE establishes comprehensive guidelines for conducting reviews in hybrid and online modes, ensuring they can be effectively applied in exceptional circumstances.
- The Review Panel suggests that ACE shall provide all instruments in English and ensure the English version of the website is consistently updated.
- The Review Panel suggests that ACE shall improve the Recommendation document by including justifications for each recommendation and availing it to public on its website, and shifting the accreditation panel's focus more toward this document rather than the assessment sheets.
- The Review Panel suggests that ACE considers issuing periodic system-wide reports on the overall outcomes of QA processes, impacts on the TE system and its performance, and of any other relevant activities.

3. The EQAP's Review of TE Providers: Evaluation, Decision Making and Appeals

☐ Not compliant
 ☐ Partially compliant
 ☒ Substantially compliant
 ☐ Fully compliant

3.1 EVALUATION

THE EVALUATION CONDUCTED BY EXTERNAL PANEL IS BASED ON A CLEARLY ARTICULATED AND PUBLICLY AVAILABLE CRITERIA AND METHODOLOGY.

ACE's evaluation criteria/ standards are indicated in the set of accreditation instruments for different levels of higher education (teacher professional education (PPG), Bachelor's, Master's and Doctoral). The evaluation criteria include nine areas:

| No. | Criterion |
|-----|---|
| 1. | Vision, Mission, Objectives, and Strategy |
| 2. | Cooperation and Quality Assurance |
| 3. | Students |
| 4. | Human resources |
| 5. | Finance, Facilities and Infrastructure |
| 6. | Education |
| 7. | Research |
| 8. | Community service |
| 9. | Outputs and Outcomes of the programme |

Each criterion is further broken down into set of sub-criteria and indicators with assigned weights (criteria) and points reflecting level of fulfilment of each indicator. Therefore, each the accreditation decision is based on total sum of points multiplied by their respective weights (see Standard 3.2). Accreditation instruments (guidelines and assessment matrix) for each type of programme are publicly available and constitute a very comprehensive set of evaluation criteria. They cover a plethora of aspects having direct or indirect impact on the quality of programme under evaluation.

Furthermore, in order to support providers in the accreditation process, ACE has also developed and published detailed guidebooks for development of the self-evaluation reports for programme accreditation processes. Moreover, ACE also provides detailed methodological guidance for the education providers in the form of supplements for the accreditation instruments, which contains further elaborations and guidelines for the providers.

The evaluation standards (instruments) are stipulated by the respective regulations of BAN-PT (Regulation of the National Accreditation Board for Higher Education Number 10 of 2021 concerning Instruments for Accreditation of Study Programs in Bachelor's Programs in the Scope of Education; Regulation of the National Accreditation Board for Higher Education Number 2 of 2022). The application of the adopted evaluation criteria within the accreditation process involves several stages and is conducted within the following steps (see Standard 3.2)

Based on the above indicated outline of the process, the panel highlights the importance of the distinctive roles of the verifiers, assessors and validators in ensuring the correct and consistent implementation and execution of each step of the process.

The panel conducted a thorough review of the relevant documents and accreditation instruments provided by ACE. Additionally, the panel engaged in detailed discussions with representatives of relevant stakeholders to examine the fitness for purpose of the content, application, and effectiveness of these documents and instruments.

The panel's analysis of the accreditation instruments revealed that the criteria within these documents demonstrate significant breadth and depth, covering a wide range of essential aspects relevant to accreditation practices. In the panel's view, yet, the current set of criteria may create an imbalance between factors that indirectly affect programme quality (e.g. institutional governance and regulations) and those with a direct impact (e.g. teaching practices, programme design, and student outcomes). Nonetheless, the panel observed that the criteria used during reviews exhibit a highly detailed nature, at times possibly narrowing the evaluative focus. Although the current approach offers a detailed breakdown of assessment criteria and indicators, it may cause misinterpretation because the differences between descriptions for each level are often minimal—especially for non-quantitative criteria and indicators. The Panel observed that the detail-oriented approach predominantly emphasizes institutional context and organizational characteristics, which may detract from a focused assessment of the intrinsic quality and outcomes of the educational programmes themselves.

3.2 DECISION-MAKING

THE EQAP HAS POLICIES AND PROCEDURES IN PLACE THAT ENSURE FAIR AND INDEPENDENT DECISION-MAKING ON THE REVIEW CASES.

Based on the Regulation of the Accreditation Council for Education number 27 of 2023 concerning the study program accreditation mechanism in the scope education, the accreditation decisions are taken by the Accreditation Panel. It is composed of a minimum of five members appointed by the Board of Directors, comprising representatives from the Board of Directors, academic and/or professional experts in the field of education, public representatives, and the Director of Accreditation. Currently, the Accreditation Panel consists of nine members.

The process of accreditation carried out by ACE is initiated by the TE provider by submitting their application and self-evaluation via dedicated online platform. It is followed by the process of verification of the documentation submitted. The process of assessment of the level of fulfilment of the accreditation criteria comprises of two formal stages:

1. Evaluation based on the information provided in the SER by the assessors,
2. Onsite visit which aims to verify the initial assessment done in the previous step.

Subsequently, the assessment results are presented to the Accreditation Panel for the formal decision-making process. Overall, the accreditation process follows nine steps (SER p.32 table 2.7):

| No | Step | Action |
|----|---|--|
| 1 | Registration | TE provider registers the application in the online platform and issues payment accordingly. |
| 2 | Submit Accreditation Documents | The faculty uploads accreditation documents (Self-evaluation reports and quantitative data of study program) in the registered account. The university's IQA system then submits the documents. |
| 3 | Verification of Accreditation Documents | The verifier verifies the study program accreditation document and determines whether it is eligible or not. In case its ineligible, the accreditation document is returned to the program study for revision. |
| 4 | Adequacy Assessment | Two assessors assess the accreditation document individually by writing the assessment description and score. |
| 5 | Validation of Adequacy Assessment Results | The validator validates the suitability of the description with the score based on the assessment rubric. |
| 6 | Onsite Assessment | The two assessors visit the faculty and study program to clarify the evidence onsite and write the results in the assessment description and score. |

| No | Step | Action |
|----|--|---|
| 7 | Validation of Onsite Assessment Results | The validator validates the suitability of descriptions with scores based on the assessment rubric. |
| 8 | Accreditation Panel Meeting | The accreditation panel verifies the results of the adequacy assessment and onsite assessment to make decisions on the study program's accreditation status. |
| 9 | Issuance of Accreditation Decree and Certificate | If the faculty accepts the accreditation result determined by the accreditation panel, ACE issues its accreditation decree and certificate. If the faculty objects to the accreditation result, the faculty can submit an appeal. |

Based on the information provided in the ACE's self-evaluation report and the conducted interviews, the panel observed that the TE provider is informed about the findings of the assessors only orally during the onsite visit. The comprehensive report in the written form is not subject to factual verification by the provider.

The ACE utilizes a structured scoring system within its decision-making process. This system involves assigning numerical values to each evaluation criteria, sub-criteria and indicators (4 point scale) assessed during the accreditation process. Each criterion carries a predetermined weight reflecting its relative importance within the overall assessment framework. The total score is calculated by aggregating the weighted scores from all assessed criteria. These scores are the basis for the decision-making process regarding the programme accreditation and its grade (see table below). The detailed scoring methodology, including the weighting of specific criteria, is documented clearly in ACE's published accreditation guidelines and instruments. The decisions issued by ACE are published on its website and are publicly available.

| | Overall sum of points | Decision | Grade |
|---|-----------------------|----------|----------------|
| 1 | ≥ 361 | Positive | Superior |
| 2 | $301 \leq NA < 361$ | Positive | Very well |
| 3 | $200 \leq NA < 301$ | Positive | Good |
| 4 | $NA < 200$ | Negative | Not accredited |

The panel observed that ACE has implemented multiple measures aimed at supporting consistency in accreditation outcomes. These measures include mandatory training, calibration sessions for external assessors and introducing the role of validators into

the process. The panel noted that each measure is accompanied by documented procedures specifying responsibilities, timelines, and expected evidence, indicating an organised approach to maintaining consistency across reviews.

However, taking into consideration adopted approach to determination of the final accreditation decision, the panel considers the roles of assessors and validators as crucial in ACE's decision-making process. Since the accreditation decision largely depends on the aggregated scores assigned by assessors based on their analysis of the TE SER and onsite visit, the accuracy of their findings and evaluations of each criterion and indicator is crucial to ensuring consistency in the decision-making process. Therefore, the panel strongly recommends introducing the opportunity for the TE providers to submit their comments to the panel findings based on the factual analysis of the assessors' reports.

3.3 APPEALS AND COMPLAINTS

THE EQAP DEPLOYS CLEAR POLICIES AND PROCEDURES FOR APPEALS AND COMPLAINTS.

ACE has introduced the appeals mechanism in the ACE Regulation No. 27 of 2023 Article 13. TE provider may submit an appeal within one month of the accreditation decree date. The appeal file consists of an official request letter and supporting evidence identifying specific points of disagreement. The Accreditation Division submits the appeal to the Appeal Panel. Based on the information provided in the ACE's SER, the Appeal Panel may accept an appeal if the accreditation score falls within ten points of the minimum threshold for the next higher grade and the provider presents a reasonable and substantiated argument.

If the Appeal panel accepts the appeal, ACE appoints new assessors and one Appeal Panel member to conduct a second onsite assessment. The Appeal Panel sets the final score and status on the basis of this second assessment. ACE then issues a revised decree and certificate. The decision of the Appeal Panel is final. Between March 2022 and December 2024, ACE received 18 appeals from 2,253 completed accreditations (0,7 %).

However, the review panel would like to highlight that the appeals process might require further considerations. As indicated in the previous sections, a written copy of the assessment report is not provided to the TEP. The panel observed that the absence of access to the assessors' report restricts institutions' ability to prepare a substantiated appeal. Moreover, the panel would recommend ACE to reflect on the formal limitations in the appeals process only to the programmes which score in the assessment process is no more than ten points from the threshold of the next grade. In panel's opinion, this restriction might unjustifiably exclude a programme from the possibility of appeal in potential case of more significant differences than the adopted limitation.

Regarding compliant procedure, ACE enables TE providers to issue a formal complaint by various communication channels, such as formal letters, emails, helpdesk, website

form and call centre. The procedure has been formally articulated in ACE Regulation No.27 of 2023 Article 13 paragraph 3.

Commendations

- The Review Panel commends that ACE develops documents relevant to the accreditation procedure in a manner that is highly commendable. This approach is very supportive to the TE providers, in particular taking into consideration the short time of operations of ACE.
- The Review Panel commends that ACE makes significant efforts in order to ensure consistency of the application of the adopted accreditation criteria and supporting methodology
- The Review Panel commends ACE for ensuring transparency in its proceedings by making all regulations and supporting documents publicly available.

Recommendations

- The Review Panel recommends that ACE shall initiate a dialogue with all its relevant stakeholders with the aim to reflect on the adequacy of the adopted set of criteria.
- The Review Panel recommends that ACE shall revise its accreditation criteria to focus more directly on programme quality. This would help reduce the administrative and bureaucratic burden on TE providers by eliminating the need to submit overlapping or repetitive information for different accreditation processes.
- The Review Panel recommends that ACE shall develop a more inclusive approach to engage TE providers in the accreditation process—for example, by granting them access to assessors' written reports and allowing them to provide feedback on the factual accuracy of the assessments.

Suggestions for further improvement

- The Review Panel suggests that ACE revises the text descriptions for the four levels of fulfilment in its accreditation tools and provides standardized descriptors with concrete examples for each level, ensuring more consistent evaluations.

4. Internationalization and External Relations

- ☐ Not compliant
 ☐ Partially compliant
 ☐ Substantially compliant
 ☒ Fully compliant

4.1 INTERNATIONALIZATION

THE EQAP HAS A ROBUST INTERNATIONALIZATION STRATEGY THAT LEADS TO ENHANCED EFFECTIVENESS AND EFFICIENCY IN ITS OPERATIONS.

ACE's Strategic Plan for 2022-2026 highlights the agency's commitments towards internationalisation. It includes the following areas of internationalisation of the agency:

1. Obtaining recognition from international agencies
2. Cooperating with international agencies
3. Accrediting study programs abroad
4. Transforming into an International Accreditation Council
5. Establishing the ACCORD agency in Indonesia

The Strategic Plan also includes several tangible objectives and performance indicators regarding the internationalisation. These mainly referring to the number of international partnerships, accreditation processes conducted outside of Indonesia, inclusion of international assessors into ACE's operations.

The review panel acknowledges that ACE has engaged in an extensive set of internationalisation initiatives, including international network memberships, bilateral memoranda of understanding, etc. The range and frequency of these activities are regarded as particularly noteworthy when viewed against the agency's establishment date of 2019, indicating early and deliberate integration of cross-border collaboration into its operations.

The agency holds full membership in the International Network for Quality Assurance Agencies in Higher Education (INQAAHE) and the application for full membership of the Asia-Pacific Quality Network (APQN) is under review. Furthermore, ACE delegates attend frequently relevant conferences and events.

ACE is actively pursuing cooperation with foreign accreditation agencies. ACE has signed Memoranda of Understanding with BAC (Bangladesh) and ANAAA (Timor-Leste). Meanwhile, ACE is currently seeking for formal collaboration with JUAA, HEEACT, ONESQA, and AACUP to follow up on previous virtual and onsite meetings with them.

Furthermore, ACE is also actively seeking measures to expand its operations internationally by offering their accreditation services to foreign providers. These initiatives are conducted by ACE independently or in cooperation with foreign accreditation agencies. These activities demonstrate ACE's systematic engagement with international partners and its integration of cross-border collaboration into routine operations.

4.2 EXTERNAL RELATIONS

THE EQAP EFFECTIVELY PROMOTES ITS COLLABORATIONS WITH KEY PLAYERS IN NATIONAL, REGIONAL, INTERNATIONAL CONTEXTS.

ACE originated through a coalition of education-sector professional institutions and organisations: Indonesian Educationist Association (ISPI), Indonesian Guidance and Counselling Association (ABKIN), Indonesian Association of Pancasila and Civic Educators (AP3Kni), Indonesian Society for Science Educators (PPII), the Indonesian Association of Vocational Lecturers and Teachers (ADGVI), and several associations of Teacher Training Institutes, Association of Private Teacher Training Institutes, the Forum of Faculties of Teacher Training and Education (Forkom FKIP) and the Tarbiyah Deans' Forum (FDFTK). These subject-specific and specialised organisations remain in active collaboration with LAMDIK.

During the interviews conducted with the representatives of these key stakeholders relevant to the ACE operations, the panel was informed that ACE involves them in their strategic developments through extensive consultation processes. Furthermore, the representatives of the professional organisations have indicated numerous cases of practical use of ACE's accreditation results in their daily operations.

The panel concludes that ACE has established a dynamic and wide-ranging portfolio of collaborations at national, regional, and international levels. Within a relatively short period since its inception, ACE has formalised multiple memoranda of understanding, contributed to regional and global quality assurance networks, and promoted active engagement of its key national partners into its activities. These activities demonstrate a proactive approach to external engagement.

Commendations

- The Review Panel commends ACE's commitment to internationalization, especially given its relatively short period of operation.

5. Integrity, Disclosure and Transparency

- ☐ Not compliant
 ☐ Partially compliant
 ☐ Substantially compliant
 ☒ Fully compliant

5.1 INTEGRITY

THE EQAP OPERATES WITH INTEGRITY AND PROFESSIONALISM AND ADHERES TO ETHICAL AND PROFESSIONAL STANDARD.

The ACE has a clear policy and procedures to underpin integrity in its functions. As provided in the SER and during the interviews, the ACE manifests integrity openly and transparently according to Law No. 25 of 2009 on Public Services. Every Assessor and validator is obligated to adhere to the Code of Ethics as stipulated in this ACE Regulation No. 23 of 2022 - recruitment and code of ethics for assessors of the accreditation council for education. To facilitate professionalism of the accreditation activities, training workshops are provided with both assessors and professional staff. In compliance with code of ethics, accreditation decisions are made by accreditation panel that are not influenced by bias or conflicts of interest. To ensure the implementation of integrity and the code of conduct, the Board of Executives are responsible to monitor, inspect, and evaluate resource utilization of the agency.

ACE is certified under the ISO 9001:2015 Quality Management System and carries out internal quality audits. A series of internal quality procedure documents are in place to ensure the ACE operations with integrity and professionalism, such as quality policy, quality procedures, risk management, staff qualification, internal communication, etc.

In the view of the Review Panel, the ACE has policies and procedures in place to ensure integrity in its functions. This is evident in its governance, internal quality audits, ethical guidelines for all its members involved in the accreditation procedure and accreditation final decision making. However, the Review Panel suggests that ACE develops a more comprehensive approach to ensure and promote the integrity in its operations as indicated in Standard 1.1

5.2 DISCLOSURE

THE EQAP ENSURES DISCLOSURE AT DIFFERENT LEVELS OF ITS ACTIVITY IN LINE WITH THE CULTURE WITHIN WHICH OPERATES.

According to Law of Public Information Disclosure Number 14 of 2008, ACE shall disclose the related QA information on the ACE website as well as through SIMALAMDIK, including accreditation standards, procedures, and outcomes. ACE provides related accreditation documents and materials with the assessors and study of programs to enhance their understanding of QA and related accreditation. ACE publishes audit reports by BAN-PT, ISO, and a public accounting firm on the website. Additionally, the website contains articles related to regulation of QA, press releases, progress of accreditation in real time, partnerships, QA Glossary, and announcements.

To support the study of programs to access the information they need, ACE also provides a helpdesk to guide faculties/study programs.

ACE develops related policies to ensure that accreditation activities can respond to the local needs and regional cultures, while being alignment with international best practice at the same time. Given that quantitative data are fixed because SN-Dikti sets some minimum requirements in numerical form, ACE remains flexible on some process-based criteria, in particular, criteria on student guidance, research, outreach (SAR, p.46). To avoid conflicts of interests, ACE recruit assessors from provinces outside the study program locations. According to Paragraph 9 of the code of conduct, assessors shall uphold etiquette, courtesy, and prevailing ethical standards during onsite assessments. With respect to local and regional cultures and religious celebrations within region, ACE avoid to arrange onsite assessments on weekdays. However, ACE admits that more training works are still needed to enhance assessors' understanding of local cultural context.

During the interview and by visiting the website, the review Panel confirms that ACE discloses decisions from external review of the performance of the study of program on the Page of Accreditation Directory publicly (<https://lamdik.or.id/en/accreditation-directory/>). ACE also provides varying communication channels with stakeholders to share their feedback or suggestions on ACE's QA activities or operation. For example, they can post their recommendations and suggestions through the website, (<https://lamdik.or.id/en/kritik-dan-saran/>), share their opinions via satisfaction surveys, and participate focus Group Discussions, etc.

5.3 TRANSPARENCY

THE EQAP HAS ROBUST SYSTEMS IN PLACE TO ENSURE TRANSPARENT AND TRUSTWORTHY OPERATIONS.

According to Law No. 14 of 2008 on Public Information Disclosure, ACE is committed to transparency, by making its policies and decisions public and disseminating reports on decisions of its QA processes. ACE publishes three types of information regularly, including regulations and procedures related to accreditation, the real-time progress of accreditation process and accreditation status, accreditation results of the study of program. These information shall be accessible for all stakeholders through ACE's website and SIMALAMDIK. The SIMALAMDIK is the reciprocal IT platform that the study of program can register and submit accreditation; vice versa, ACE can verify documents, undertake adequacy assessment and onsite assessment, and holding accreditation panel meeting for decision-making. Throughout SIMALAMDIK demonstration during onsite visit, the Review Panel observes that SIMALAMDIK serves as a comprehensive platform for program development and review, while ACE provides a valuable space for mutual engagement and collaborative follow-up. The review process supports academic planning, ensuring quality enhancement and accountability. For example, at the verification stage, study programs can check whether the documents submitted for accreditation are complete or not. At the conclusion of the onsite assessment, study programs can access the minutes

summarizing the assessment findings through SIMALAMDIK. However, the Review Panel noted during interviews that study programs are not afforded an opportunity to provide feedback on the review report in the period between the onsite visit and the issuance of the final accreditation decision (As indicated in Standards 2.3 and 3.2). To summary, the SIMALAMDIK helps faculties make payments, upload documents, and monitor accreditation progress independently. Alternatively, the System supports assessors, validators, and committee panel to carry out their accreditation tasks online. In addition to adequate documents and materials provided with assessors and study of programs, ACE launches the Accreditation Clinic to facilitate HEIs' understanding of the accreditation procedures and system.

The review panel confirms that ACE has policies and procedures on the external evaluation of tertiary education providers and provisions underpin the transparency principle in dealing with reviews and decision-making. Specifically, ACE has a robust information management system to facilitate the accreditation procedures effectively and efficiently. However, the Review Panel observes that ACE provides limited information on procedures and outcomes of alternative learning modalities that are addressed in the SER, such as online/distance education provisions and cross-border education. Currently, ACE collects the rich data throughout SIMALAMDIK, but does not carry out the meta-analysis that can be used for self- improvement of the ACE operation in the future.

Commendations

- The Review Panel commends ACE for its commitment to transparency by making key documentation publicly available on its website. These include policies related to its establishment, accreditation documents, accreditation outcomes and criteria, and assessment process.
- The Review Panel also praises ACE for the development of its robust IT platform, SIMALAMDIK, which serves multiple functions across the accreditation process and is widely endorsed by the agency's staff for its effectiveness and usability.

Recommendations

- The Review Panel recommends that ACE shall re-evaluate its publication policy concerning the release of experts' reports, or at a minimum, provide summaries of these reports to improve transparency and public access to key findings.
- The Review Panel recommends that ACE shall regularly inform the public, as well as its partners and stakeholders, about its activities and achievements through updates on its website, providing content in both Indonesian and English.
- The Review Panel recommends that ACE shall organize training workshops for assessors and staff, focusing on cultural contexts, and review accreditation standards to better address the diverse needs of local and regional contexts.

Suggestions for further improvement

- The Review Panel suggests that ACE considers publish its annual report or newsletters in the future
- The Review Panel suggests that ACE organizes training workshops for assessors and staff, focusing on cultural contexts, and review accreditation standards to better address the diverse needs of local and regional contexts

6. Stakeholder role and engagement

- ☐ Not compliant
 ☐ Partially compliant
 ☐ Substantially compliant
 ☒ Fully compliant

6.1 STAKEHOLDER ROLE

THE EQAP IS CLEAR IN THE EXPECTATIONS OF EACH STAKEHOLDER GROUP.

The ACE clearly identifies its internal and external stakeholders in the SER (p. 52). The internal stakeholders include the Board of Trustees, Board of Supervisors, Board of Executives, assessors, and staff. Their roles and functions are defined receptively in the job description No. JD/LAMDIK (issued on 15 November 2022). Through SIMALAMDIK, all members of ACE perform their works and interact with the study of programs in an efficient manner. ACE also outlines the key external stakeholders in the SAR, including MoHEST, MoRA, HEIs, graduate users, and professional associations and organizations. To receive feedback from the external stakeholders, they are invited to take part in surveys, panels and consultations, focus group discussions that support the development of accreditation standards and processes of ACE. For example, ACE conducted one survey on the quality of accreditation implementation by involving twelve deans from HEIs. The survey shows that the ACE has provided the study of programs with the related Information on assessment criteria, procedures, and accreditation results. Besides, the survey shows that most of them are satisfied with the quality of the accreditation implementation, that is evident during interviews. Moreover, the Development and Evaluation Staff, supported by the IT and Data Division, is responsible for collecting, processing, and analysing customer questionnaire data. As assessors play a central role in the accreditation process, the ACE collects feedback on their performance from reviewed programs via SIMALAMDIK to continuously enhance the reliability and credibility of its accreditation activities.

During interviews, several external stakeholder's representatives indicate that they collaborate with ACE closely in varying ways. For example, National partners collaborating with ACE to develop instruments via Forum of Accreditation Agencies by a regular meeting. School representatives point out that they make use of accreditation result of the study of programs for student admission and teacher recruitment. However, they expect that ACE can pay more attention to ethics and learning outcomes while assessing quality of the study of programs in the future.

The Review Panel observes that the SER does not specifically address the role of students in the SER. Currently, the role of students in ACE's governance and accreditation processes remains limited. Students' influence or power is considered low and their role is described as a recipient rather than an active participant in QA. During interviews, the situation is confirmed and ACE mentions that they will take student involvement in accreditation governance and procedures into consideration in the future. During site visit, the Review Panel validates its preliminary observations and notes a strong willingness among students to participate more actively in quality

assurance processes. To translate this motivation into meaningful involvement, the Review Panel observes that there is a need for a cultural shift within institutions. It is suggested that ACE can provide targeted training to help students develop the skills and knowledge required for effective engagement of accreditation governance and procedures. ACE shall consider integrating student QA training into orientation programs, leadership workshops, or extracurricular initiatives to build long-term capacity and foster a culture of shared responsibility.

6.2 STAKEHOLDER ENGAGEMENT

THE EQAP ENSURES MEANINGFUL AND IMPACTFUL STAKEHOLDER ENGAGEMENT IN ITS FUNCTIONS.

It is emphasized that the assessor is one of the key stakeholders of the ACE accreditation. ACE has policies for assessor's recruitment, qualification and training. According to Article 3 of recruitment and code of ethics for assessors, number 23 of 2022, assessors shall meet established qualifications, competencies, and integrity requirements. Besides, the recruitment process for assessors shall be conducted based on meritocracy, ensuring fairness and the absence of conflicts of interest. To reflect gender and geographical balance, yet, the ACE has 946 assessors (male = 634 (67%), female = 312 (33%)) who come from all regions in Indonesia. In particular, ACE adjusts the requirements for recruiting assessors from remote areas in Indonesia. ACE provides assessors with adequate training sessions and the training materials are accessible on the website (<https://lamdik.or.id/en/resource-categories/assessor-training-materials/>). Moreover, opinion surveys involving higher education providers and academic programs are conducted to support ACE in making evidence-based policy and management decisions.

ACE has adopted a multi-stakeholder approach in the development of accreditation policies, systems, standards, and procedures. It collaborates with the Ministry of Higher Education, Science and Technology (MoHES) to ensure alignment with national education priorities, in particular, enhancing teacher quality and promoting educational equity. Professional associations and university representatives are also invited to get involved in the design of accreditation instruments. It is evident that ACE incorporates diverse perspectives into accreditation activities while preserving ACE's autonomy and professionalism. During interviews, representatives from higher education institutions and student groups emphasize that ACE accreditation has significantly enhanced teaching quality and learning outcomes. They also point out that the accreditation process encourages universities to deepen their engagement with local communities, fostering a deeper connection between academic institutions, and responding to societal needs. However, the Review Panel observes that the engagement of key stakeholders, such as students and employers—who are the primary beneficiaries and end-users of higher education—remains limited or insufficiently institutionalized within this framework.

The Review Panel, based on the SER and interviews with key stakeholders, acknowledges that ACE has developed partnerships with a variety of external

stakeholders. Some collaborations with different stakeholders, however, are primarily activated during formal review processes and do not appear to be consistently sustained or strategically integrated into ACE's broader operations. To ensure continuous improvement and relevance in ACE's accreditation practices, it is suggested that the ACE shall revisit the current stakeholder engagement framework and strengthen the actual impacts of their involvement. In particular, the involvement of students—who are the central beneficiaries of higher education—is insufficiently institutionalized. Despite their crucial role in the educational ecosystem, their perspectives and feedback are suggested to adequately represented in the accreditation process.

Commendations

- The Review Panel commends ACE for effectively carrying out its responsibilities and interacting with academic programs in a streamlined and efficient manner through the SIMALAMDIK system.
- The Review Panel commends ACE for delivering thorough training to assessors and making commendable efforts to achieve a balanced representation in terms of gender and geography.

Recommendations

- The Review Panel recommends that ACE shall engage students in accreditation procedures in a more proactive approach
- The Review Panel recommends that ACE shall provide more relevant QA information and results with students on the website in both English and Indonesia

Suggestions for further improvement

- The Review Panel suggests that ACE starts to develop the new strategic plan for their long term development and approaches for stakeholder engagement

CONCLUSION

Summary of commendations

The review panel commended the Accreditation Council for Education (ACE) for several notable practices that reflect a strong commitment to quality assurance, operational professionalism, and stakeholder engagement. These commendations highlight areas where ACE demonstrated excellence, particularly given its relatively recent establishment.

1. **Staff training and professional development.** ACE provides systematic and well-structured training and development opportunities for its administrative staff. These initiatives—including language training, IT courses, and quality assurance workshops—have contributed to the expert panel's efficiency and professionalism in managing external review processes.
2. **Assessor recruitment and capacity building.** The assessor recruitment and training process were praised for its rigor and comprehensiveness. ACE follows a multi-stage recruitment process, provides onboarding and mentoring for new assessors, and conducts regular refresher training. The use of performance monitoring and coaching clinics further supports high assessment standards.
3. **Transparency and public accessibility.** ACE was commended for its commitment to transparency. It publishes regulations, procedures, and accreditation results online and maintains public access through its SIMALAMDIK platform. This approach fosters public trust and accountability.
4. **Internationalization and strategic partnerships.** Despite being a relatively new agency, ACE has actively pursued international partnerships and engagements. Its membership in global QA networks and MoUs with several foreign accreditation bodies reflect a strong international outlook and commitment to global best practices.
5. **Supportive and detailed accreditation documentation.** The agency's approach to accreditation documentation—including detailed instruments, guidelines, and supplements—was found to be exceptionally supportive of tertiary education providers, aiding them in navigating the accreditation process effectively.
6. **Consistency measures, integrity and professionalism.** ACE has implemented multiple mechanisms to ensure consistency in accreditation outcomes, such as training, calibration exercises, and the use of validators. ACE develops internal quality procedure documents to ensure the ACE operations with integrity and professionalism.

7. **Dynamic external relations.** ACE has fostered wide-ranging collaborations with national, regional, and international stakeholders, which enhance the relevance and credibility of its QA activities.

Result per standard

| STANDARD | ASSESSMENT |
|---|-------------------------|
| 1. Legitimacy of the External Quality Assurance Provider (EQAP) | Substantially compliant |
| 2. The EQAP's Framework for External Reviews of the Quality of Tertiary Education Providers (TEP) | Fully compliant |
| 3. The EQAP's Review of TEP: Evaluation, Decision Making and Appeals | Substantially compliant |
| 4. Internationalization and External Relations | Fully compliant |
| 5. Integrity, Disclosure and Transparency | Fully compliant |
| 6. Stakeholder role and engagement | Fully compliant |

Overview of judgements and recommendations

The review panel provided several targeted recommendations to enhance ACE's alignment with the INQAAHE ISG and improve its overall effectiveness, transparency, and impact of its operations. These recommendations focus on strengthening governance, procedures, and stakeholder engagement.

1. **Clarify mission and objectives.** ACE should revise its mission statement to clearly reflect its core function as an external quality assurance provider and develop a publicly accessible, well-defined set of organizational objectives.
2. **Strengthen conflict of interest policy.** Further enhance and implement a comprehensive, agency-wide policy to prevent conflicts of interest. This policy should apply to all personnel involved in the accreditation process, including board members, staff, assessors, and validators.
3. **Align strategic goals with KPIs.** ACE should revise its Key Performance Indicators (KPIs) to ensure clear alignment with its four strategic goals. Additionally, a responsive mechanism should be developed to address underperformance in specific KPIs.
4. **Improve internal self-review mechanisms.** ACE should conduct more comprehensive and reflective internal self-reviews that assess its broader impact on the higher education system and use data systematically to inform improvements.
5. **Promote academic integrity.** Revise accreditation criteria to include more explicit emphasis on academic integrity, particularly in teaching and research components.

6. **Improve Validator Selection Transparency.** Define and publicize clear criteria for validator selection and ensure better gender balance in the recruitment of assessors and validators.
7. **Strengthen follow-up and monitoring.** Incorporate mechanisms into the accreditation process to monitor whether recommendations to institutions are acted upon post-review.
8. **Facilitate providers' factual analysis feedback.** Allow TE providers to review and correct factual errors in the final Recommendation report before the accreditation decision is finalized.
9. **Enhance appeals and complaints procedures.** Improve transparency and fairness in the appeals process by:
 - Providing TE providers access to the assessors' written report,
 - Allowing broader grounds for appeal beyond narrow score thresholds, and
 - Developing a formal complaints procedure and publishing it.

Suggestions for further improvement

The review panel also provided several suggestions aimed at strengthening ACE's operational and strategic performance. These suggestions are not mandatory but are intended to support the Agency's continuous improvement.

1. Strategic planning

- Start developing its new strategic plan beyond 2026

2. Governance and stakeholder involvement

- Define and publish the selection criteria and term limits for the Board of Executives and the Board of Supervisors.
- Expand the membership of the Board of Trustees to include representatives from academia and industry.
- Engage students in accreditation procedures in a more proactive approach

3. Operational flexibility and digital readiness

- Establish comprehensive guidelines for conducting hybrid and online reviews, ensuring readiness in exceptional situations

4. Internationalization and accessibility

- Ensure that all accreditation instruments and documentation are translated into English and that the English version of the ACE website is regularly updated to reflect current content.

- Adopt additional strategies to tackle the challenges of conducting reviews in remote areas of Indonesia.

5. Transparency and reporting

- Improve the Recommendation document by:
 - Including justifications for each recommendation;
 - Shifting the accreditation panel's focus toward this document rather than just the assessment sheets;
 - Making the document publicly available on the website.
- Consider issuing periodic system-wide reports or thematic reviews on the outcomes of quality assurance processes and their impact on the higher education system.

6. Evaluation instrument clarity

- Reflect on and possibly revise the textual descriptions of performance indicators in accreditation instruments to avoid ambiguity, especially for non-quantitative criteria.

ANNEX 1: EXTERNAL REVIEW PANEL AND VISIT PROGRAMME

Panel composition

| Rol | Name | Position | Institution | World region |
|--------------------|----------------------------|---------------------------|---|--------------|
| Chair | Angela Yung Chi Hou | Professor | College of Education, National Chengchi University | Taiwan |
| Expert | Salwa Elekyabi | Academic Affairs Advisor | Education and Training Quality Authority | Bahrain |
| Secretary | Maciej Markowski | Former Chair of the Board | European Consortium for Accreditation in Higher Education | Poland |
| | | | | |
| Coordinator | Concepción Herruzo Fonayet | | | |

Date of the final report

Visit programme

| Time | Activity | Attendees |
|-------------------------|---------------------------------------|--|
| Day 1:15/04/2025 | | |
| 08:30 | Arrival | |
| 08:30-09:30 | Preparatory Meeting | |
| 9:30-10:30 | Session 1: ACE Leadership team | ACE Board of Executives: Chairperson and Directors |
| 10:30-10:45 | Coffee Break | |
| 10:45-11:45 | Session 2: ACE's legal basis | Ministry of Higher Education, Science, and Technology <i>BAN-PT</i> <i>Regional Board for Higher Education Services/ LLDIKTI</i> |
| 11:45-12:00 | Transition/break | |
| 12:00-12:45 | Session 3: ACE's governance | Board of Trustees Board of Supervisors |

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| 12:45-14:00 | Lunch | |
| 14:00-15:15 | Session 4: Rectors or senior management representatives from HE institutions with accreditation experience | Representatives of Rectors, Faculties, Study Programmes, and IQA units from HEIs |
| 15.15-15.30 | Transition | |
| 15.30-16.45 | Session 5: Assessors from System Coordination and Organization Review Committee And Program Reviews Assessors | Assessors and validators |
| 16:45-17:30 | Panel Internal Meeting | |
| Day 2: 16/04/2025 | | |
| 9:00 | Arrival | |
| 9:00 -09:30 | Preparatory Meeting | |
| 09:30-11:00 | Session 6: Professional Staff related to EQA system for Higher Education and ACE's IQA system | <p>ACE Divisions in charge of EQA system:</p> <ol style="list-style-type: none"> 1. Executive Secretary 2. Divisions: Accreditation 3. Division of Development and Evaluation 4. IS and Data 5. Financial Resources and Administrations <p>ACE Division in charge of IQA system</p> <p>ACE Division in charge of internationalization</p> |
| 11.00-11:15 | Coffee Break | |
| 11:15-12:15 | Session 7: Administrative Staff Online Platform for Data Management inclusive of QA Processes and Reviews and Automated QA | <p>Secretariat</p> <p>Finance</p> <p>Administrative</p> <p>IT</p> <p>Accreditation</p> <p>International Relations</p> |
| 12:15-12:30 | Transition/break | |
| 12:30-13:30 | Session 8: External stakeholders | <p>National partners:</p> <p>Forum of Accreditation Agencies</p> |

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| | | International partner: ANAAA (Timor Leste's Board of Accreditation) Professional associations School foundations Educational agencies at the regional level |
| 13:30-15:00 | Lunch | |
| 15:00-16:00 | Session 9: External stakeholders (iii) | Student representatives of study programs accredited by ACE |
| 16:00-17:30 | Panel Internal Meeting | |
| Day 3: 17/04/2025 | | |
| 09:00 | Arrival | |
| 09:00-09:30 | Preparatory Meeting | |
| 09:30-09:45 | Coffee Break | |
| 09:45-10:45 | Session 10: Review results decision-making | Accreditation Panel |
| 10:45-11:15 | Call back session | |
| 11:15-11:45 | Panel Internal Meeting | |
| 11:45-12:15 | Oral Exit Report | Board, Executive Director and staff |
| 12:15-13:15 | Lunch | |
| 14:00 | Departure | |

ANNEX 2: GLOSSARY

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| AACCUP | Accrediting Agency of Chartered Colleges and Universities in the Philippines |
| ACE | Accreditation Council for Education |
| ANAAA | Agência Nacional para a Avaliação e Acreditação Acadêmica |
| AQAS | <i>Qualitätssicherung durch Akkreditierung von Studiengängen</i> |
| BAC | Bangladesh Accreditation Council |
| <i>BAN-PT</i> | National Accreditation Agency for Higher Education Institution |
| EQA | External Quality Assurance |
| HE | Higher Education |
| HEIs | Higher Educational Institutions |
| HEEACT | Higher Education Evaluation & Accreditation Council of Taiwan |
| INQAAHE | International Network of Quality Assurance Agencies in Higher Education |
| IQA | Internal Quality Assurance |
| ISO | International Organization for Standardization |
| JUAA | Japan University Accreditation Association |
| MoECRT | Ministry of Education, Culture, Research, and Technology |
| MoEC | Ministry of Education and Culture |
| MoHEST | Ministry of Higher Education, Science, and Technology |
| MoRA | Ministry of Religious Affairs |
| MoRTHE | Minister of Research, Technology, and Higher Education |
| ONESQA | Office for National Education Standard and Quality Assessment, Thailand |
| <i>PDDikti</i> | National Database of Higher Education |
| NQA | National Quality Assurance |
| QA | Quality Assurance |
| SER | Self-Evaluation Report |
| <i>SN-Dikti</i> | National Standards for Higher Education |
| <i>SAN-Dikti</i> | National Accreditation System for Higher Education |
| TE | Tertiary Education |
| TEP | Tertiary Education Provider |

ANNEX 3: INTERNATIONAL STANDARDS AND GUIDELINES

Module 1: Baseline standards

| STANDARDS | | GUIDELINES |
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| 1. LEGITIMACY OF THE EXTERNAL QUALITY ASSURANCE PROVIDER (EQAP) | 1.1 Mission, Governance & Organization: The EQAP is a recognized, credible organization, trusted by key stakeholders: the government, TE providers (TEPs) and public at large. Its governance, structure and operations enable effective and efficient operations in line with its mission. | 1.1.1 The EQAP has an established legal basis and is recognized by key stakeholders: government, TE providers and the public at large. The EQAP is guided by principles of good practice in formulating its policies and practices (e.g. independence, objectivity, autonomy). |
| | | 1.1.2 The EQAP has a clearly articulated mission statement and a set of objectives that explicitly state that the external quality assurance of tertiary education is a key function of the organization, describe the purpose and scope of its activities and can be translated into verifiable policies and measurable performance indicators. The interest of students and society are at the forefront of its aspirations. |
| | | 1.1.3 The EQAP has a well-articulated governance model consistent with its mission and objectives and adequate mechanisms to involve relevant stakeholders at pertinent levels of governance and management. |
| | | 1.1.4 The composition of its decision-making body and/or its regulatory framework ensure trust, independence and impartiality in decision-making. A clear policy and adequate mechanisms preventing conflict of interests are in operation and apply to its staff, its decision-making body, and external reviewers. |
| | | 1.1.5 The EQAP's organizational structure makes it possible to carry out its external review processes effectively and efficiently. |
| | | 1.1.6 The EQAP's activities are premised on a robust strategic planning. Adequate mechanisms are in place to assess its progress, impact and plans for future developments. |

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| | <p>1.2 Resources: the EQAP has adequate resources – physical, financial and human – to carry out its mission.</p> | <p>1.2.1 The EQAP is equipped with a well-trained, appropriately qualified staff to enable external evaluation effectively and efficiently in accordance with its mission statement and its methodological approach. The staff has the needed skills to carry out the functions associated with external QA. The EQAP provides systematic opportunities for the professional development of its staff.</p> |
| | | <p>1.2.2 The EQAP has established, maintains and enhances a robust pool of qualified external reviewers supported by necessary recruitment, on-boarding, training and professionalization opportunities.</p> |
| | | <p>1.2.3 The EQAP has adequate physical, virtual and financial resources to fulfil its goals and carry out the activities that emerge from its mission statement and objectives. Its funding approach instils trust and sustainability in operations. It is equipped with the necessary technological resources to carry out efficiently its processes including a database of external reviewers, a respective platform for managing its evaluation procedures, etc.</p> |
| | <p>1.3 Internal QA and Accountability: The EQAP has in place policies and mechanisms for its internal quality assurance that demonstrate a continuing effort to maintain and improve the quality and integrity of its activities.</p> | <p>1.3.1 The EQAP has a clear policy for its own internal and external quality assurance linked to organizational planning, funding and performance. Outcomes are evinced through robust accountability measures available to the TE community and the society it serves.</p> |
| | | <p>1.3.2 The EQAP has robust internal quality assurance mechanisms that enable it to review its own activities in order to respond to the changing nature of tertiary education, the effectiveness of its operations, and to maintain its relevance and contribution towards the achievement of its objectives.</p> |
| | | <p>1.3.3 The EQAP periodically conducts a self-review of its own activities, including consideration of its own effects on the system(s) it operates within and its overriding values. The review is premised on reliable data collection and analysis to</p> |

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| | | inform decision-making and trigger improvements. |
| | | 1.3.4 The EQAP's plan for internal and external evaluation of its policies and practices identifies and integrates its practices in reviewing diverse modalities of delivery (e.g. distance education provision, hybrid) and UNESCO ISCED levels 4-8, as applicable. For example, while assessing postgraduate programs, necessary dimensions, such as research capacity should form the core of evaluation, focused on links between research and learning through an integrated approach to external QA review. |
| | | 1.3.5 The EQAP is subject to external reviews at regular intervals, ideally not to exceed five years. Evidence of any required action(s) is (are) implemented and disclosed. |
| | | 1.3.6 Strong evidence exists of a well-established and robust quality culture, which drives enhancement, relevance of and trust in the EQAP. The evidence is present throughout all the functions of the EQAP, as per its mandate. |
| 2. THE EQAP'S FRAMEWORK FOR EXTERNAL REVIEW OF QUALITY OF TEPs | 2.1 The relationship between the EQAP and Tertiary Education Providers (TEPs): The EQAP recognizes TEPs as having primary responsibility for quality and relevance and providing support in promoting trust and credibility. | 2.1.1 The EQAP recognizes that institutional and programmatic quality and quality assurance are primarily the responsibility of the tertiary education providers themselves and respects the specific feature of each TEP. |
| | | 2.1.2 The EQAP ensures that the core values of tertiary education - equitable access, accountability, academic freedom, institutional autonomy, and social responsibility - are respected and promoted. |
| | | 2.1.3 The EQAP promotes development, appropriate implementation, and continuous enhancement of the TE IQA system in accordance with the understanding that the primary responsibility for assuring quality resides with the providers. |
| | | 2.1.4 The EQAP is mindful of the level of workload and related costs that its procedures will place on TEPs and strives to make the procedures as time and cost effective as possible. |

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| | | 2.1.5 The EQAP provides tertiary education providers with clear guidance on the requirements for self-assessment and external review processes. |
| | 2.2 The EQAP's standards for external quality review: The standards value diversity of provisions and promote trust, relevance, enhanced quality of TE provisions, and thus promote a quality culture. | 2.2.1 The EQAP recognizes and values the diversity of providers and translates this institutional aspect into standards that take into account the TEP's identity and mission. |
| | | 2.2.2 The standards adopted by the EQAP have been subject to reasonable consultation with stakeholders and are revised at regular intervals to ensure relevance to the needs of the system. |
| | | 2.2.3 The standards explicitly address the areas of a TEP's activity that fall within the EQAP's scope, (e.g., governance and management, program design and approval, teaching and learning processes, student admission, progression and certification, research, and community engagement) and on the availability of necessary resources (e.g., finances, staff and learning resources). |
| | | 2.2.4 The standards take into account and provide for an effective internal follow-up on the outcomes of the external reviews. |
| | | 2.2.5 The EQAP has a clear policy that specifies how standards are to be applied and the types of evidence needed to demonstrate that they are met. |
| | | 2.2.6 The EQAP standards adequately address and promote academic integrity. |
| | 2.3 The EQAP's external review process: the external review framework has a clear set of procedures for each type of review. | 2.3.1 The EQAP carries out an external review process that is driven by a publicly available and reliable methodology ensuring independence, trust, relevance to the existing context and credibility of its procedures. Where applicable, the EQAP should demonstrate its capacity to conduct reviews in both virtual and in-person modes supported by purpose-built methodology. This distinction should be clear to avoid any issues of misconduct. |
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| | | 2.3.2 The EQAP has published documents clearly articulating expectations from TEPs in the form of quality standards and procedures for each step/phase of the external review. |
| | | 2.3.3 The external review process is carried out by a panel(s) of experts consistent with the characteristics of the provider/provision under review. Experts can provide input from various perspectives, including those of institutions, academics, students, employers or professional practitioners. Experts represent a balance of diversity, equity, and inclusion as appropriate for the mission of the EQAP. |
| | | 2.3.4 The EQAP has clear specifications on the characteristics and selection of external reviewers, who must be supported by appropriate training and relevant materials such as guidelines/handbooks and manuals for evaluation. |
| | | 2.3.5 External review procedures include effective and comprehensive mechanisms for the prevention of conflicts of interest and ensure that any judgment(s) resulting from external reviews are based on explicit and published criteria. |
| | | 2.3.6 The EQAP's system has mechanisms in place that ensure each TEP or program is evaluated in a consistent way, even if the external panels, teams, or committees differ. |
| | | 2.3.7 The EQAP carries out the external review within a reasonable time-frame to ensure that information is current and updated. |
| | | 2.3.8 The EQAP ensures the tertiary education providers have an opportunity to correct any factual error that may appear in the external review report. |
| | | 2.3.9 The EQAP provides clear guidance to the providers in the application of each step within the external review procedure, the solicitation of assessment/feedback from the public, students, and other constituents, or the |

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| | | preparation for external review as necessary and appropriate. |
| | 2.4 Regular Systemic Reviews: the EQAP conducts regular systemic/thematic reviews to inform its stakeholders and public at large on systemic issues/developments. and trends. | 2.4.1 Where applicable, the EQAP conducts regular systemic/thematic reviews within the domain it operates in and makes reports on trends and impacts publicly available for broader use by stakeholders. |
| | | 2.4.2 The EQAP prepares, and periodically disseminates, integrated, system-wide reports on the overall outcomes of QA processes, impacts on the TE system and its performance, and of any other relevant activities. |
| 3. THE EQAP'S REVIEW OF TE PROVIDERS: EVALUATION, DECISION MAKING AND APPEALS | 3.1 Evaluation: The evaluation conducted by external panel is based on a clearly articulated and publicly available criteria and methodology. | 3.1.1 The evaluation criteria are clearly articulated and supported by a robust methodology. |
| | | 3.1.2 The evaluation criteria and methodology are consistently applied across all cases. |
| | | 3.1.3 The EQAP provides full and clear disclosure of its policies, procedures, criteria and methodology for evaluation and judgements of TE performance, made publicly available prior to its application. |
| | 3.2 Decision-making: The EQAP has policies and procedures in place that ensure fair and independent decision-making on the review cases. | 3.2.1 EQAP decisions take into consideration the outcomes of both the provider's internal review process and the external review panel while considering any other relevant information, provided this has been communicated to the provider. |
| | | 3.2.2 EQAP decisions are based on published standards and procedures and can be justified only with reference to those standards and procedures. |
| | | 3.2.3 The EQAP decision-making process is impartial, rigorous, and transparent. The approach to decision-making and actions for imposing recommendations for follow-up by TEPs are consistent throughout all procedures. |
| | | 3.2.4 The EQAP makes its decisions and/or review reports public. The content and extent of reporting accords with the cultural context and applicable legal and other requirements. |

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| | | 3.2.5 The EQAP has mechanisms to facilitate a fair public understanding of the reasons supporting decisions taken. |
| | 3.3 Appeals and Complaints: The EQAP deploys clear policies and procedures for appeals and complaints. | 3.3.1 The EQAP has procedures in place to deal in a consistent way with complaints about its procedures or operations. |
| | | 3.3.2 The EQAP has clear, published procedures for handling appeals related to its external review and decision-making processes. |
| | | 3.3.3 Appeals are conducted by an independent panel/commission not responsible for the original decision and has no conflicts of interest. Appeals need not necessarily be conducted outside the EQAP. |
| 4. INTERNATIONALIZATION AND EXTERNAL RELATIONS | 4.1 Internationalization: The EQAP has a robust internationalization strategy that leads to enhanced effectiveness and efficiency in its operations. | 4.1.1 The EQAP abides by an <i>internationalization principle</i> in its functions and operations as applicable and which accord with its mission. |
| | | 4.1.2 The EQAP is open to international developments in quality assurance and tertiary education at large and has mechanisms that enable it to learn about and analyse the main trends in the field, thus enhancing relevance. |
| | | 4.1.3 The EQAP collaborates with other QA bodies internationally where possible in areas such as exchange of good practices, capacity building, review of decisions, joint projects, and/or staff exchanges. |
| | 4.2 External relations: the EQAP effectively promotes its collaborations with key players in national, regional, international contexts. | 4.2.1 The EQAP appropriately coordinates and communicates with other national, regional international government and non-government organizations in the oversight of its provisions. |
| | | 4.2.2 The EQAP's external relations, partnerships and collaborations promote its mission and successful implementation of its strategies. |

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| 5. INTEGRITY, DISCLOSURE AND TRANSPARENCY | 5.1 Integrity: The EQAP operates with integrity and professionalism and adheres to ethical and professional standards. | 5.1.1 The EQAP has a clear policy and procedures in place to underpin integrity in its functions and manifests it openly and transparently. Integrity is integral to the culture of the organization and is consistently respected in all the modes of delivery of services (face-to-face; distance; hybrid; cross-border). |
| | 5.2 Disclosure: The EQAP ensures disclosure at different levels of its activity in line with the culture within which operates. | 5.2.1 The EQAP's policies and procedures on external evaluation of tertiary education providers and provisions underpin adequate disclosure of its reviews and related outcomes/decisions made, based on consideration of the local and regional cultures, while ensuring alignment with international best practice. |
| | | 5.2.2 The EQAP makes public its policies and decisions and disseminates reports on outcomes of its QA processes. The EQAP publicly discloses decisions about the EQAP resulting from any external review of its own performance. |
| | 5.3 Transparency: The EQAP has robust systems in place to ensure transparent and trustworthy operations. | 5.3.1 The EQAP's policies and procedures on the external evaluation of tertiary education providers and provisions underpin the transparency principle in dealing with reviews and decision-making. |
| | | 5.3.2 The EQAP has a robust information management system, which supports transparent, efficient, data driven and reliable decision-making. The EQAP has a process for data collection and reporting about its review/accreditation activity for all types of modalities and reviews (e.g., online/distance education provisions, cross-border education, short programs) which are consistent and comply with national/governmental requirements. |
| | 6.1 Stakeholder role: The EQAP is clear in the expectations of each stakeholder group. | 6.1.1 The EQAP clearly defines its internal and external stakeholders along with comprehensive statements of expectations and level of impact from each stakeholder group. |
| 6. STAKEHOLDER ROLE AND ENGAGEMENT | | |

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| | <p>6.2 Stakeholder engagement: The EQAP ensures meaningful and impactful stakeholder engagement in its functions.</p> | <p>6.2.1 The EQAP's policies ensure proactive stakeholder engagement in matters related to standards, procedures, reviews, and decision-making. The EQAP, where applicable, should demonstrate an inclusive approach to stakeholder engagement, e.g., in its procedures in terms of ensuring gender and geographical balance, and other non-discriminatory policies.</p> <p>6.2.2 To ensure meaningful engagement, the EQAP has targeted induction, training and professionalization measures, which are consistently applied and regularly enhanced as needed.</p> |
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