6-2-2014

Kosovo’s Verification Procedure for Diplomas issued by Private Providers of Higher Education

Mirushe Dalipi Latifaj

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Kosovo’s Verification Procedure for Diplomas

issued by the

Private Providers of Higher Education

By

Mirushe Dalipi - Latifaj

Submitted as a Capstone Project Final Report in partial fulfillment of a Master of Science Degree in Professional Studies at the RIT Center for Multidisciplinary Studies

May 02, 2014
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My deep appreciations go to my parents Merieme and Bejxhet and my sisters Adelina, Dëshira and Zamira for their moral support and encouragement.

Thank you!
# Abbreviations

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Full Form</th>
</tr>
</thead>
<tbody>
<tr>
<td>AI</td>
<td>Administrative Instruction</td>
</tr>
<tr>
<td>EHEA</td>
<td>European Higher Education Area</td>
</tr>
<tr>
<td>KAA</td>
<td>Kosovo Accreditation Agency</td>
</tr>
<tr>
<td>LHE</td>
<td>Law on Higher Education</td>
</tr>
<tr>
<td>MEST</td>
<td>Ministry of Education, Science and Technology</td>
</tr>
<tr>
<td>PPHEs</td>
<td>Private Providers of Higher Education</td>
</tr>
<tr>
<td>NQA</td>
<td>National Qualification Authority</td>
</tr>
</tbody>
</table>
Executive Summary

This capstone project addressed the issue of regulation of the verification procedures for diplomas and other documents issued by the Private Providers of Higher Education (PPHEs)\(^1\) in Kosovo. This verification procedure has created a problematic situation. Firstly, in the legal aspect, it violates the applicable 2011 Law on Higher Education\(^2\) which states the principles that “all institutions of higher education are equal before the Law”. “All students and personnel of the institutions of higher education should have equal opportunities without any discrimination”. Secondly, since the Kosovo Accreditation Agency (KAA) evaluates and accredits both public and private institutions of higher education, it guarantees and ensures that all institutions of higher education in Kosovo and their programs meet the quality standards internationally recognized. Thus there should not be a verification procedure only for students from PPHEs.

In this project qualitative and quantitative research methods have been used. It started with archival materials being collected from the Ministry of Education, Science and Technology (MEST), KAA, PPHEs, and the University of Prishtina. Four forms of questionnaires were designed and used for: a) students and graduates, b) officials of the PPHEs, and c) experts of Higher Education and MEST officials and d) experts of higher education in the SEE countries. Interviews with experts of higher education were also conducted.

**Figure 1 Questionnaire for students and graduates “What is your view on the verification procedure?”**

Results showed that 70% of students and graduates from PPHEs responded that the verification procedure is considered as ‘necessary’. 13% responded as ‘bureaucratic procedures’ and 11% responded as ‘not necessary’ and finally 6% as a ‘waste of time’ (see Figure I).

---

\(^1\) Private Providers of Higher Education refer to the private colleges or private higher schools, i.e. institutions of higher education.

\(^2\) Law on Higher Education No 04/L-037, Article 2 Principles, Item 1 Provision of Higher Education in the Republic of Kosovo is based on the following principles, 1.2 “Equality before the Law of all Bearers of Higher Education”,

The project’s top recommendation is the:

- Elimination of the entire verification procedure for accredited programs of PPHEs;

The implementation of this recommendation will solve the issue of equality for students and graduates from PPHEs who ought to be treated equally as the students from the public universities. It will stop violation of the 2011 Law on Higher Education in Kosovo.

Figure 2 Questionnaire for experts of higher education and MEST senior officials
“Students from the PPHEs should be treated equally as the students from public universities”

The results from the Figure 2 show that the 85% of experts of higher education and the MEST senior officials confirm that all students should be treated equally. This result corresponds to the applicable 2011 Law on Higher of Education.

Figure 3 Questionnaire for senior officials from PPHEs - “How does higher education in general benefit from this verification procedure?”

The results from the Figure 3 shows that 50% of the senior officials of PPHEs declare that this verification procedure assures that legal procedure is respected by private colleges. From their point of view, private colleges respect legal procedures set by state institutions, i.e. MEST and KAA.
Chapter I

Higher Education System in Kosovo

1.1. A brief historical overview

The history of development of the Higher Education System in Kosovo can be divided into three phases starting from its foundation until now. During this time it witnessed and bore marks of different political systems from communist to the new European democratic systems.

Table 1.1 Three phases of Higher Education Development in Kosovo

<table>
<thead>
<tr>
<th></th>
<th>Three phases of Higher Education Development in Kosovo</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Early Period</td>
</tr>
<tr>
<td></td>
<td>1958 - 1991</td>
</tr>
<tr>
<td></td>
<td>First phase: Establishment and Early Development of the Higher Education</td>
</tr>
<tr>
<td>2</td>
<td>Pre conflict</td>
</tr>
<tr>
<td></td>
<td>1991 - 1999</td>
</tr>
<tr>
<td></td>
<td>Second phase: Parallel Higher Education System</td>
</tr>
<tr>
<td>3</td>
<td>Post conflict</td>
</tr>
<tr>
<td></td>
<td>1999 - Present</td>
</tr>
<tr>
<td></td>
<td>Final phase: Post War Period; A New Era for Higher Education Development</td>
</tr>
</tbody>
</table>

The first institution of tertiary education in Kosovo, a Higher Pedagogical School, was established in 1958 in Prishtina. It offered teacher training courses of 2 years of studies which led to the degree of primary school teacher. Soon other pedagogical schools opened in other towns of Kosovo including in Gjakova, Gjilan and Prizren. These schools served as the basis when the public University of Prishtina was finally established in 1970 in Prishtina. In the beginning, the University of Prishtina consisted of 4 faculties: Philosophy, Law-Economics, Technical Faculty and Faculty of Medicine (See tables 1.2 and 1.3). By 1990, The University of Prishtina was expanded into 13 faculties and 7 higher schools. This can be considered as the first phase of the development of higher education in Kosovo which lasted until 1991.

---

4 University of Prishtina was established in November 18, 1969 by the Assembly of the Socialist Autonomous Province of Kosovo (Organisation for Economic Co-operation and Development [OECD], 2001).
Table 1.2 First Institutions of Higher Education in Kosovo

<table>
<thead>
<tr>
<th>First institutions</th>
<th>Place</th>
<th>Academic year</th>
<th>Number of students enrolled full time</th>
<th>Number of students enrolled as part time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Higher Pedagogical School</td>
<td>Prishtina</td>
<td>1958</td>
<td>93</td>
<td>55</td>
</tr>
<tr>
<td>Faculty of Philosphic</td>
<td>Prishtina</td>
<td>1960</td>
<td>97</td>
<td>147</td>
</tr>
<tr>
<td>1. Department of Albanian Language and Literature;</td>
<td></td>
<td></td>
<td>(60 Albanian; 32 Serbian; 5 other communities)</td>
<td></td>
</tr>
<tr>
<td>2. Serbo-Croatian and Yugoslavian Literature;</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. Department of Mathematics;</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4. Department of Physics;</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. Department of Chemistry;</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6. Department of Biology</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Higher Economic School of Commercial</td>
<td>Pejë</td>
<td>1960</td>
<td>186</td>
<td>176</td>
</tr>
<tr>
<td>Faculty of Philosphic</td>
<td>Prishtina</td>
<td>1961</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>1. Department of Russian Language and Literature;</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. Department of English Language and Literature;</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Faculty of Law and Economics</td>
<td>Prishtina</td>
<td>1961</td>
<td>43 in Law</td>
<td>142 in Law</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>120 in Economics</td>
<td>281 in Economics</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>(323 Serbian, 134 Albanian 129 other communities)</td>
<td></td>
</tr>
<tr>
<td>Higher Technical School</td>
<td>Mitrovicë</td>
<td>1961</td>
<td>33</td>
<td>18</td>
</tr>
<tr>
<td>Higher School of Agriculture</td>
<td>Prishtina</td>
<td>1961</td>
<td>165</td>
<td>395</td>
</tr>
<tr>
<td>Higher Pedagogical School</td>
<td>Prizren</td>
<td>1961</td>
<td>100</td>
<td>-</td>
</tr>
</tbody>
</table>

Table 1.3 Total number of students and professors in the year 1961 in all Institutions of Higher Education in Kosovo

<table>
<thead>
<tr>
<th>In the Year 1961</th>
<th>2 Albanian Professors</th>
<th>5 Serbian Professors</th>
<th>2 Albanian Associates</th>
<th>5 Serbian Associates</th>
<th>3320 Total number of students enrolment</th>
<th>1046 Full time</th>
<th>2274 Part time</th>
<th>928 Albanian Professors</th>
<th>2010 Serbian Professors</th>
<th>382 Other communities</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

During this period University of Prishtina made an unprecedented influence in the social, economic and political developments in Kosovo. It was this influence that helped turn Kosovo from an agrarian to a relatively developed economy and society.

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6. 2012, Monograph of the University of Prishtina 1970-2012
7. Ibid.
The second phase started in 1991 and lasted until 1999.\textsuperscript{8} It is characterized by a parallel education system set up by the Kosovo Albanians and underpinned by voluntary work and support of the Albanian citizens in Kosovo and abroad (in the diaspora). This was a response by the Albanian population to the closing down of Albanian schools and university by the Serbian regime. After the abolishing of Kosovo’s Autonomy by the Serbian Parliament in 1989 Kosovo students were not allowed to study in their language in the facilities of public institutions. Consequently, for a decade, the higher education system operated on private premises, financed from private sources and from the Republic of Kosovo in exile, and with professors and students constantly prosecuted by the Serbian police. As a result, the University of Prishtina provided minimum teaching to their students and minimum research for their staff and apparently remained underdeveloped in key important elements such as education quality assurance, academic staff development and scientific research etc.

Finally, the third phase starts in 1999 when the war in Kosovo ended. The University of Pristina\textsuperscript{9} reopened, to undergo a series of substantial changes and reforms: adoption of Bologna Declaration objectives, implementation of the European Credits Transfer System (ECTS) and a substantial review of the outdated curricula. This was the time when Kosovo education was administered by an international administration headed by Dr. Michael Daxner of the Oldenburg University in Germany. He served as the head of education system administration in Kosovo and as an International Rector of the University of Prishtina. He undertook meaningful reforms that were in line with the then most recent trends in the European higher education. As a result Kosovo was and remains among the first to implement various Bologna objectives in its HE system – at least on paper. However, this reform was carried out without the substantial involvement of the local professors and expertise, which would soon prove detrimental for the sustainability of reforms after the handover of powers from international to local authorities in 2002. Regarding private higher education institutions, the international administration only issued a couple of temporary licenses to institutions applying for one, making it clear that they would need to apply for licensing and accreditation by local authorities once the new law on higher education was

---

\textsuperscript{8} Strategy for Development of Higher Education in Kosovo (2005-2015), pg. 9, Higher Education in Kosovo in the period before 1999 was at the same position with other Kosovo segments that resisted the violence and repression by the Serbian regime. Isolation decade of higher education in Kosovo has significantly affected the quality of education and the comparability of higher education outcomes with other countries in the region. HE was identified with the University of Prishtina. In order to keep the existence of Albanian higher education, a special attention was given to the teaching, while other elements like quality, research, service to society, the link with the economy, staff development etc. remained omitted. Complete identification of HE with UP and the lack of other higher education institutions has created a series of problems in relations between the state and the university.

\textsuperscript{9} During 2000/2001 the University of Pristina operated based on an interim Statute drafted by the international educational leaders (United Nations Mission in Kosovo [UNMIK], 2000)
passed (2003/14 of May 2003). In March 2002, the Ministry of Education, Science and Technology (MEST) was established. Making tremendous efforts to settle an approach to a European system, MEST officials engaged all relevant factors involving local and international experts to develop together the process of higher education system by drafting the Strategy for Development of Higher Education in Kosovo 2005-2015. The main objective of MEST in regard to the higher education was for Kosovo to become an integral part of the European Area of Higher Education.

1.2. Higher education institutions in Kosovo

The higher education system in Kosovo currently operates with a total of 33 higher education institutions, i.e. public and private providers of higher education. Only 8 of them are public universities (see Table 1.4) which are established by the Kosovo government, with exception of the University of North Mitrovica which was established by UNMIK\textsuperscript{10}.

Actually, there are 25 private providers of higher education which are licensed by MEST and accredited by KAA. 22 of the PPHEs operate as Colleges, and among them is AUK which operates as non-profitable higher education institution (NGO), while 2 of them are Higher Professional Schools (See table 1.5).

Accredited institutions of higher education offer study programs which lead to a degree or diploma. Almost all institutions of higher education offer Bachelor and Master degree. While the only institution which is actually eligible to offer doctoral studies (PhD) is the public university of Prishtina “Hasan Prishtina”.

\textsuperscript{10} Municipality of Mitrovica North has authority to exercise responsibility for the University of Mitrovica North offering study programs in Serbian language. This University has been operating under the authority of the Government of Serbia. However, following political agreement sponsored by the EU, municipal authorities in Mitrovica North were only recently elected, and it is expected they will cooperate with the Government to ensure full integration of this university in the Kosovo system. Available at: Rexhaj X., Pupovci D. (2014): Access to Higher Education in Kosovo, to appear in Academia.
### Table 1.4: Public Providers of Higher Education in Kosovo

<table>
<thead>
<tr>
<th>Public Providers of Higher Education in Kosovo</th>
<th>Year of establishment</th>
<th>Degree award</th>
<th>Total number of actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>University of Prishtina &quot;Hasan Prishtina&quot;</td>
<td>1970</td>
<td>BA, BSc, LLB, MA, MSc, Dr.Med., Dr.Dent, Dr.Sc., MPh, PhD</td>
<td>53785</td>
</tr>
<tr>
<td>University of Prizren &quot;Ukshin Hoti&quot;</td>
<td>2010</td>
<td>BA, BSc, LLB, MA</td>
<td>5875</td>
</tr>
<tr>
<td>University of Gjakova &quot;Fehmi Agani &quot;</td>
<td>2013</td>
<td>BA, BSc, LLB, MA, MSc</td>
<td>Within</td>
</tr>
<tr>
<td>University of Gjilani &quot;Kadri Zeka&quot;</td>
<td>2013</td>
<td>BA, MA</td>
<td>Within</td>
</tr>
<tr>
<td>University of Peja &quot;Haxhi Zeka &quot;</td>
<td>2012</td>
<td>BA, MA, MSc</td>
<td>4682</td>
</tr>
<tr>
<td>University in Mitrovica with instruction in</td>
<td>2013</td>
<td>BA, MA</td>
<td>10681</td>
</tr>
<tr>
<td>Faculty of Islamic Studies</td>
<td>2013</td>
<td>BA</td>
<td>235</td>
</tr>
<tr>
<td>University in North Mitrovica with</td>
<td>1999</td>
<td>BA, MA, MSc</td>
<td></td>
</tr>
</tbody>
</table>

Source: Kosovo Accreditation Agency

11 The University in North Mitrovica operates under the laws of the Republic of Serbia but holds its campuses in Kosovo.
12 Kosovo Accreditation Agency: Decision of National Council of Quality:
13 Decisions of the Ministry of Education, Science and Technology available at the Department of Higher Education
Kosovo Accreditation Agency: Decisions of the National Council of Quality:

### Table 1.5: Private Providers of Higher Education in Kosovo

<table>
<thead>
<tr>
<th>Private Providers of Higher Education (PPHEs) in Kosovo</th>
<th>Year of establishment</th>
<th>PPHEs offer Degrees</th>
<th>Number of actual students</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 College “AAB”</td>
<td>2004</td>
<td>BA, MA, MSc, LLB, LLM</td>
<td>14817</td>
</tr>
<tr>
<td>2 PPHE (NGO) “AUK”</td>
<td>2004</td>
<td>BSc, MSc</td>
<td>568</td>
</tr>
<tr>
<td>3 College “Biznesi”</td>
<td>2006</td>
<td>BA, MA, MSc</td>
<td>1338</td>
</tr>
<tr>
<td>4 College “Dardania”</td>
<td>2004</td>
<td>BA, MA, LLB</td>
<td>2601</td>
</tr>
<tr>
<td>5 HPS “Design Factory”</td>
<td>2005</td>
<td>BA, MA, MSc</td>
<td>24</td>
</tr>
<tr>
<td>6 *College “DUKAGJINI”</td>
<td>2006</td>
<td>BA, MA, MSc</td>
<td>303</td>
</tr>
<tr>
<td>7 College “ESLG”</td>
<td>2010</td>
<td>BA, MA, LLB</td>
<td>200</td>
</tr>
<tr>
<td>8 HPS “Evolution”</td>
<td>2005</td>
<td>BA, MA</td>
<td>420</td>
</tr>
<tr>
<td>9 College “FAMA”</td>
<td>2004</td>
<td>BA, MA, LLB, BSc</td>
<td>4860</td>
</tr>
<tr>
<td>10 College “Gjilani”</td>
<td>2006</td>
<td>BA, LLB, LLM</td>
<td>560</td>
</tr>
<tr>
<td>11 *College “Globus”</td>
<td>2007</td>
<td>BA, MA</td>
<td>1010</td>
</tr>
<tr>
<td>12 College “Humanistica”</td>
<td>2012</td>
<td>BA</td>
<td>332</td>
</tr>
<tr>
<td>13 College “Iliria”</td>
<td>2004</td>
<td>BA, MA, LLB, Dr.Den.</td>
<td>7316</td>
</tr>
<tr>
<td>14 College “International Prizren”</td>
<td>2013</td>
<td>BA, LLB</td>
<td>29</td>
</tr>
<tr>
<td>15 College “ISPE”</td>
<td>2010</td>
<td>BA, LLB</td>
<td>1598</td>
</tr>
<tr>
<td>16 College “Juridica”</td>
<td>2011</td>
<td>BA</td>
<td>310</td>
</tr>
<tr>
<td>17 College “Pjetër Budi”</td>
<td>2005</td>
<td>BA, MA</td>
<td>880</td>
</tr>
<tr>
<td>18 College “QEAP Heimerer”</td>
<td>2010</td>
<td>BA, BSc</td>
<td>460</td>
</tr>
<tr>
<td>19 College “Rininvest”</td>
<td>2007</td>
<td>BA, MA</td>
<td>405</td>
</tr>
<tr>
<td>20 College “Tempulli”</td>
<td>2004</td>
<td>BA, MA</td>
<td>229</td>
</tr>
<tr>
<td>21 College “UBT”</td>
<td>2004</td>
<td>BA, BSc, MSc</td>
<td>4406</td>
</tr>
<tr>
<td>22 *College “Universi”</td>
<td>2005</td>
<td>BA, MA</td>
<td>293</td>
</tr>
<tr>
<td>23 College “Universum”</td>
<td>2006</td>
<td>BA, MA, BSc</td>
<td>1466</td>
</tr>
<tr>
<td>24 College “Victory”</td>
<td>2006</td>
<td>BA, MA, MSc</td>
<td>697</td>
</tr>
<tr>
<td>25 College “Vizioni për Arsim”</td>
<td>2012</td>
<td>BA, MA, MSc</td>
<td>178</td>
</tr>
</tbody>
</table>

TOTAL: 69276

Source: Kosovo Accreditation Agency

* (*College Universi was formerly named as Eurosport; *College Dukagjini was formerly name as Vizioni Evropian*College Globus was formerly named as International University of Prishtina)
Figure 1.1: Map of Republic of Kosovo with locations of PPHEs

- Public University of Prishtina-Hasan Prishtina
- Public Faculty of Islamic Studies
- Private College “AAB”
- PPHE NGO “AUK”
- Private College “Biznesi”
- Private College “Dardania”
- Private HPS Design Factory
- Private College “ESLG”
- Private Academy “Evolucion”
- Private College “Globus”
- Private College “ISPE”
- Private College “Juridica”
- Private College “FAMA”
- Private College “Iliria”
- Private College Pjetër Budi
- Private College “Riinvest”
- Private College “Tempulli”
- Private HPS “Qeap Heimerer”
- Private College “Universi”
- Private College “Universum”
- Private College “Victory”

- Public University of Mitrovica with Instruction in Albanian
- Private College “FAMA”

- Public University “Haxhi Zeka”
- Private College “Dukagjini”

- Public University “Fehmi Agani”
- Private College “AAB”
- Private College “Biznesi”

- Public University “Ukshin Hoti”
- Private College “FAMA”
- Private College “Iliria” – “Rezonanca” Branch
- Private College “International Prizren”

- Private College “Universum”
- Private College “Humanistica”
- Private College “Vizioni për Arsim”

- Private College “Pedagogical”
Figure 1.1 shows the institutions of higher education which are operational throughout Kosovo. The private colleges mainly operate in Prishtina, the capital of Kosovo. Only few of them have also a branch in other city (see the Figure 1.1).

Public Providers of higher education are established by the government of the Republic of Kosovo, and financed by the Government, while private providers are established as for profit or non-profit organizations by any person or a group of persons or organization other than Government of the Republic of Kosovo. When an institution is non-profitable it is called Non-governmental Organization which can operate in compliance with the legislation into force.

The functioning of public and private providers of higher education in Kosovo is regulated by the Law No. 04/L-037 on Higher Education in the Republic of Kosovo and other bylaws which provide rules and procedures in relation to the higher education system as a whole, e.g. establishment, accreditation, licensing, functioning, financing, quality assurance which are fully in compliance with European standards. Both public and private institutions of higher education operate and base their entire work on their own internal statutes and regulations. The Law and their statutes guarantee the academic freedom of the personnel and students. They have their own autonomy to operate that is regulated by the Law on Higher Education.

The Law on Higher Education in the Republic of Kosovo regulates the financing of the public institutions of higher education which also may receive funding from the sources such as allocations made by the Ministry for Education and Research; tuition and other fees paid by students; income from commercial and other services; donations, gifts and endowments; and contracts with local, international, public or private bodies involved in teaching, research and consultancy activities. While private institutions of higher education are self-financed, mostly by students’ fee.

Both public and private institutions of higher education have to go through a process of accreditation. Firstly, they have to obtain institutional accreditation and then they have to go

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14 2011 Law on higher Education in Kosovo, Article 3, item 1.11.
15 Administrative Instructions issued by MEST [http://www.masht-gov.net/advCms/#/id=561](http://www.masht-gov.net/advCms/#/id=561)
16 Supra at 9 Article 13
17 Law on Higher Education in the Republic of Kosovo, Article 20, Item 1.1, 1.2, 1.3, 1.4, 1.5
18 Ibid.
under an accreditation of their programs. This process is done by the Kosovo Accreditation Agency for both public and private institutions of higher education\textsuperscript{19}.

Only private providers of higher education have to go under a licensing process at the Ministry of Education, Science and Technology. This process is regulated by the Administrative Instruction for Licensing of Private Providers of higher Education in Kosovo which stipulate specific criteria for getting a license. The private providers of higher education in Kosovo started appearing in 2002 when the first applications for licensing were submitted to the then international administration (by the AAB College and Tempulli College). There were liberal policies and consequently an inflation of these providers between 2004 and 2007 that eventually led to stricter policies on the part of government in 2008. In 2008 also the Kosovo Accreditation Agency was made fully operational and started a robust process of accreditation that used international evaluators (due to the lack of expertise and to avoid potential conflict of interest).

1.3 Main challenges of higher education in Kosovo

Higher education in Kosovo started only half a century ago. For various reasons such as political and economic, in particular 10 years of isolation of education development towards international trends in higher education, Kosovo HE institutions could not pursue the European objectives and trends.

Figure 1.2: Main challenges in Kosovo Higher Education System

\textsuperscript{19} Administrative Instruction 12/2013 on the Accreditation of Higher Education Institutions in the Republic of Kosovo
Figure 1.2 presents only three main challenges which the higher education system in Kosovo actually faces.

- **Ensure that programs meet the labor market needs, i.e. help on employability of the graduates and impact on the image improvement of the higher education in Kosovo** - In this regard, Kosovo with around 60% of its population is under the age of 30, is currently faced with a poor economy and a high rate of unemployment, and therefore there is an immediate need to provide graduates with jobs. Therefore, there should be a better connection between labor market and private and public sector higher education institutions. This because there is currently a huge discrepancy between high percentage of the graduates in the tertiary education with the low percentage of employment in Kosovo, and there is also a need for the private sector to define its needs, and the higher education institutions provide the labor market with potential employees.

- **Quality assurance** – Quality that is provided by both public and private institutions of higher education in Kosovo is one of the key challenges of the Higher Education in Kosovo, which is also foreseen as one of the main goal by the 2011 Law on Higher Education.

- **Academic personnel** – Another challenge of the higher education in Kosovo is the lack of academic staff. Currently, the only institution of higher education in Kosovo which is eligible to provide doctoral studies (PhD) is the public University of Prishtina. At the same time, with the founding of five new public universities in 2013 the demand for qualified staff has increased immensely. As a consequence of this lack of qualified staff, most of the academic staff of the University of Prishtina works in at least another public or / and private higher education institution.

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20 European Commission, (2012), Higher Education in Kosovo – Current challenges and needs
22 Kosovor Institute for Policy Research and Development (KIPRED) (2007), Governance and Competition in Higher Education
23 ibid
1.4. Bologna Process

Starting from the first meeting of ministers responsible for higher education in Bologna in 1999, the so called Process of Bologna determined a set of objectives that would guide the harmonization of higher education structures in the European Higher Education Area (EHEA). There are already over a dozen of such objectives set during the eight meetings at the ministerial level, including 6 essential objectives which derive from the Bologna Declaration:

- Adoption of a system of easily readable and comparable degrees;
- Adoption of a system essentially based on two main cycles, undergraduate and graduate;
- Establishment of a system of credits – such as in the ECTS;
- Promotion of mobility by overcoming obstacles to the free movement of students, teachers, researchers and administrative staff;
- Promotion of European co-operation in quality assurance;
- Promotion of the necessary European dimensions in higher education.

Since Kosovo has not yet signed the Cultural Convention of the Council of Europe it is not eligible formally to be a member to the Bologna Process, i.e. Kosovo cannot join officially the European Higher Education Area. Notwithstanding, Kosovo is attending Bologna Ministerial meetings as an observer. On the other hand, the Ministry of Education, Science and Technology drafted relevant legislation and other sublegal acts, the Strategy for the Development of Higher Education in Kosovo 2005-2015 and the Kosovo Education Strategic Plan 2011-2016 which regulate the Kosovo higher education system in line with the Bologna process. Kosovo higher education system is completely implementing these objectives (apart from the American University which operates according to the structures of the USA education system).

The Bologna Process is a European reform process aiming at establishing a European Higher Education Area by 2010. It is an unusual process in that it is loosely structured and driven by the 46 countries participating in it in cooperation with a number of international organizations, including the Council of Europe.

http://www.coe.int/t/dg4/highereducation/ehea2010/bolognapedestrians_en.asp

The Bologna Declaration of 19 June 1999 (Joint declaration of the European Ministers of Education)
Chapter II
Legislative and Policy Framework for Higher Education

Introduction
Until the declaration of the independence of Kosovo, in order that a Law becomes effective, it had to be signed by the SRSG. Nowadays, they should be adopted by the parliament and signed by the president of Kosovo. In the legal framework, the Constitution of Kosovo is the higher legal document. All laws and by laws need to be in accordance with Constitution and the principles enshrined in the Constitution.

Figure 2.1 Legal Framework and Strategy

Figure 2.1 presents the legislation and the policy framework by which higher education system is based on, thus they have to be in line with each other.

In May 12, 2002 SRSG\(^{26}\) for the purpose of regulating the higher education in Kosovo issued a Regulation 2003/14\(^{27}\) On the Promulgation of a Law Adopted by the Assembly of Kosovo on Higher Education in Kosovo\(^{28}\), this aimed to “establish, develop, protect and transmit knowledge through teaching and scientific work and research and also to provide opportunities for all inhabitants of Kosovo with the ability to benefit from such education,\(^ {28}\)

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\(^{26}\) SRGS referred to a Special Representative of the Secretary General (head of UNMIK).


throughout their lives” 29. This Regulation was enforced until 2011, when it was amended and ratified as the Law on Higher Education by the Kosovo Assembly 30, which is considered as the legal base of higher education system since it regulates the establishment, accreditation, licensing, functioning, financing, quality assurance of all public and private providers of higher education in Kosovo aiming to be fully in compliance with European standards.

Nevertheless, in 2004 Ministry of Education, Science and Technology (MEST) developed the Strategy for Development of Higher Education in Kosovo 2005-2015 which aims the transformation, reform and development of the higher education according to a more efficient model, planning, administration and managing 31.

2.1. The 2011 Law on Higher Education (LHE)

The Kosovo higher education system is regulated by the Law on Higher Education 32 (LHE). The aim of LHE is to establish a “legal base for regulating, functioning, financing, providing quality in higher education in compliance with European standards … in development of higher education in the Republic of Kosovo” 33. It also regulates the establishment, accreditation, licensing, functioning, financing, quality assurance of all public and private providers of higher education in Kosovo aiming to be in compliance with European standards.

The higher education system in Kosovo defines the responsibilities and competences in relation to the planning, development and implementation of higher education system in Kosovo which are MEST responsibility. Furthermore, according to the LHE, MEST is also responsible for licensing private providers of higher education in Kosovo 34. While Kosovo Accreditation Agency 35 (KAA) is an independent body which is responsible for assessing and

29 Ibid p.3
30 Official Gazette of the Republic of Kosovo / N. 14 / 9 September 2011, Prishtina - Law No. 04/L-037 on Higher Education in the Republic of Kosovo.
33 The First Law on Higher Education in Kosovo (Law 2003/14) was drafted under close supervision by the Council of Europe (CoE) is fully compliant to the Bologna Declaration.
34 According to the Article 6 item 1.11 of the Law on Higher Education No. 04/L-037
35 Establishment of the Kosovo Accreditation Agency was foreseen with the Administrative Instruction 11/2004, No. 16.02.2004 Establishment of Kosovo Accreditation Agency, but it started to operate only from 2008.
promoting quality of higher education in Kosovo\textsuperscript{36}. KAA is responsible for the accreditation of all public and private institutions of higher education in Kosovo.

According to the Law on higher education in Kosovo, all institutions of higher education are equal before the Law and all students and the academic personnel in the institutions of higher education should have equal opportunities without discrimination\textsuperscript{37}.


In 2004 Ministry of Education, Science and Technology (MEST) developed the “Strategy for Development of Higher Education in Kosovo 2005-2015”. This strategy envisages a vision for the whole higher education system. The crucial aim of this Strategy is the facilitation of the journey of Kosovo to be an integral part of European Higher Education Area which is considered as the most difficult challenge. The strategy regulates the national higher education system which is completely in compliance with the principles of the Bologna Process. Although Kosovo has not ratified the European Cultural Convention, it is still a priority for the Strategy to fully implement the Bologna process. The aim of this Strategy is the transformation, reform and development of the higher education according to a more efficient model of planning, administration and management.\textsuperscript{38} The Strategy now is in the second phase\textsuperscript{39} of its implementation which priorities the development of institutional and human capacities and piloting of innovations in the system.

The main objectives of the Strategy for Development of Higher Education 2005-2015 are as follows:

- “To elaborate and implement a contemporary and all-inclusive education policy and finalizing the higher education legislation;
- To advance the management and coordination in higher education;
- To develop a management system of the higher education quality;
- To advance the capacity for research and scientific work;
- To establish mechanisms for the provision and efficient managing of financial resources for the higher education development;

\textsuperscript{36} Article 7 item 1of the Law on Higher Education No. 04/L- 037
\textsuperscript{37} Article 2 item 1.1, 1.2 of the Law on Higher Education No. 04/L- 037, p.1.
\textsuperscript{38} Strategy for Development of Higher Education 2005-2015, p. 5
\textsuperscript{39} Strategy for Development of Higher Education, p.8 Available at: \url{http://www.masht-gov.net/advCms/documents/Strategy_EN.pdf}
To develop a complete and functional infrastructure of the higher education.

Some of the objectives of this strategy have been implemented, e.g. All institutions of higher education established the office for quality assurance, the implementation of ECTS in higher education in Kosovo,

2.3. Kosovo Education Strategic Plan 2011-2016 (KESP)

The Kosovo Education Strategic Plan 2011-2016 (KESP) is the main document which is developed by the Ministry of Education, Science and Technology and it is in line with the Strategy for Development of Higher Education 2005-2015. KESP is a document which includes all levels of education in Kosovo, and there is a subchapter in relation to the Higher Education, which sets the main challenges and objectives of the higher education in Kosovo. Among the priorities is also the increase participation and ensuring equal access in higher education, ensure that programs are in harmony with the labor market needs, enhance the international cooperation and mobility of academic personnel and students as well.

2.4. Bylaws and regulations (Administrative Instructions)

Besides the Law on Higher Education which regulates the organization and functioning of the higher education system in Kosovo, there are numerous Administrative Instructions issued the Ministry of Education, Science and Technology which addresses and concretizes in details specific issues regarding higher education.

Since the Law on Higher Education regulates the sphere, in general, of the higher education system, indeed the Administrative Instructions determine the rules and procedures and concretize in details the issues which cover the field of higher education and the establishment of private institutions of higher education. For example, the Administrative Instructions regulate the licensing of institutions of higher education in Kosovo,

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41 Administrative Instruction No.14/2008, date 02.07.2008 Implementation of ECTS in Higher Education in Kosovo
42 Kosovo Education Strategic Plan 5.5 Higher Education p. 123
43 There is a large number of Administrative Instructions such as: Administrative Instruction No. 11/2013 on the Verification of diplomas and other documents issued by the PPHEs; Administrative Instruction 21/2006 dated 31.05.2006 on the Student’s Registration Books; Administrative Instruction No. 22/2012 on the Student’s Registration Books of PPHEs; etc.
establishment of Kosovo accreditation Agency, accreditation of public institutions of higher education in Kosovo, regulation of the title and names of the institutions of higher education, content and the form of diplomas and diploma supplement, degrees and diplomas of higher education, verification of diplomas issued by private institutions of higher education, comparability and equivalence of degrees and study programs of pre-Bologna system and the Bologna System.

The Administrative Instructions are related to each other. For example, the Administrative Instruction on the Accreditation of Institutions of Higher Education determines the whole procedure of the accreditation process for an institution that applies for accreditation. Although an institution (and its programs) is accredited by the Kosovo Accreditation Agency, it cannot start operating without being licensed by the Ministry of Education, Science and Technology. Hence, there is a special Administrative Instruction for Licensing of Private Providers of Higher Education in Kosovo which determines the rules and procedures, criteria and conditions must be fulfilled by the accredited institution in order to get licensed and start its operation. As noted above AI are quite important for the functioning of the higher education system in Kosovo, since they regulate specific topics in detail thus enabling better function of higher education system in Kosovo.

Chapter III

Quality Assurance Mechanisms

Available at: http://www.masht.gov.net/advCms/#id=561, last accessed on 03.05.2014.
Introduction

All private institutions of higher education in Kosovo need to go through a licensing process at MEST before starting its operations. Since these institutions provide higher education and issue degrees for their students, there are mechanisms which control the quality of education and the alignment of these institutions with the effective law and regulations. Therefore, this chapter will firstly try to examine the importance and the role of the National Qualification Authority; secondly, it will address the issue of the qualifications provided by the higher education institutions of Kosovo; and finally it will deal with the process of licensing the providers of higher education in Kosovo.

Figure 3.1 Hierarchies of the Institutions

Figure 3.1 presents the hierarchy of the state institutions. According to the Article 11 of the applicable Administrative Instruction 11/2004 on the Establishment of Kosovo Accreditation Agency (KAA), KAA is obliged to annually report to MEST regarding the developments of its activities.

3.1. National Qualifications Authority (NQA)

The National Qualification Authority (NQA) is an independent agency which is established by the Ministry of Education, Science and Technology in accordance with the Law on...
National Qualifications Framework\textsuperscript{44} (NQF). The NQA aims to develop the national qualifications system in all levels of education and also ensure that qualifications meet the labor market needs\textsuperscript{45}. The NQA works closely with higher education institutions and the Kosovo Accreditation Agency.

### 3.2. Qualifications in Higher Education

There are three cycles of qualifications in higher education which are based on the European system for accumulation and transfer of credits\textsuperscript{46}, i.e. officially named ECTS (European Credit and Transfer System).

**Figure 3.2 Three cycles of qualifications in higher education system\textsuperscript{47}**

- **First cycle:** 2 year professional studies (120 ECTS)
- **Second cycle:** 1-2 year studies (MA, MSc)
- **Third cycle:** Minimum 3 year studies (PhD)

Figure 3.2 shows the cycles of higher education system which are in compliance with the Bologna system.

- **Bachelor Degree**\textsuperscript{48} is defined to be the first cycle of higher education studies in which a student should accumulate 180-240 ECTS. It can be 3 or 4 year studies.
- **Master Degree** is defined to be the second cycle of higher education studies in which a student should accumulate 60-120 ECTS. Master degree can be 1 or 2 year studies.

\textsuperscript{44} Law on National Qualifications No.03/L-060
\textsuperscript{45} Law on National Qualifications No.03/L-060
\textsuperscript{46} Administrative Instruction No.14/2008, date 02.07.2008 Implementation of ECTS in Higher Education in Kosovo.
\textsuperscript{47} Administrative Instruction No.14/2008, date 02.07.2008 Implementation of ECTS in Higher Education in Kosovo.
\textsuperscript{48} Administrative Instruction No.14/2008, date 02.07.2008 Implementation of ECTS in Higher Education in Kosovo.
- **PhD (Doctoral Degree)** is the third cycle of higher education studies in which a student should accumulate 180 ECTS. Doctoral studies last minimum 3 years.

One semester is determined to accumulate 30 ECTS, thus each subject course should be evaluated with a certain number of credits. While the study programs such as Medicine, Pharmacy should be considered in compliance with the European Commission 49.

Currently, Bachelor and Master Degree are offered by almost all public and private institutions of higher education. Subsequently, only the public university “Hasan Prishtina” is can offer PhD programs and is eligible to grant academic titles.

### 3.3. Licensing and Accreditation in Higher Education in Kosovo

The key criteria and conditions for a provider of higher education which aims to operate in Kosovo is the accreditation which is granted by KAA and the license which is granted by MEST. Both of them are mandatory.

The Kosovo Accreditation Agency is responsible for evaluation and promotion of quality in higher education in Kosovo 50 and accreditation or reaccreditation of institutions and their programs including the awarding of titles and diplomas 51. The accreditation is a formal recognition that an institution of higher education and its programs meet the quality standards internationally recognized. The Kosovo Accreditation Agency (KAA) is an independent body which was established by the Ministry of Education, Science and Technology in 2004, but only in March 2008 started its operation. KAA guarantee the quality of education and scientific work for both public and private institutions of higher education in Kosovo. It is responsible for evaluation and promotion of the quality of higher education in Kosovo and their programs including the awarding of titles and diplomas. The accreditation process ensures the Kosovo society that the quality of teaching and learning are comparable with the international standards. The accreditation is transparent and trustful that is internationally comparable. KAA does professional and transparent evaluations which meet the best international practices. KAA ensures that the standards and the quality in the institutions of higher education meet the standards and expectations of the European Network Association for Quality Assurance in Higher Education (ENQA) 52. Criteria for accreditation are foreseen

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49 Article 3 of Administrative Instruction No.14/2008, date 02.07.2008 Implementation of ECTS in Higher Education in Kosovo
50 Law on Higher Education, Article 7, item 1*
51 Law on Higher Education, Article 7, item 2.3
in the AI 02/2013 on the Accreditation of the Providers of Higher Education in the Republic of Kosovo.

According to the Article 12 item 6 of the 2011 Law on Higher Education, “a private provider of higher education may not advertise itself as ‘accredited’ unless accredited in Kosovo under the procedures set out in the this law and other instruments issued under it. If it’s accredited for programs by a state or other organizations, a private provider must clearly state the origin of such accreditation and that the same has to be approved even from KAA as an accreditation in Kosovo”.

The Ministry of Education, Science and Technology (MEST) is responsible for licensing process for all providers of higher education which operate in Kosovo. Through the licensing process, MEST namely permits an accredited institution to be operational. None of the providers of higher education is eligible to operate without a prior license from MEST. After the accreditation decision made by KAA, a provider of higher education is obliged to request from MEST for a licensing process. Licensing process includes both reviewing and scrutiny of the documentation which is submitted by accredited institutions at MEST, and the site visits at the institution. Criteria and conditions for licensing are foreseen by AI on Licensing of Institutions of Higher Education in Kosovo.

The 2011 Law on Higher Education and the Administrative Instruction on Licensing of Providers of Higher Education in Kosovo foresee that all providers of higher education should be licensed by MEST. However, the licensing process is implemented only for private providers of higher education in Kosovo. Namely, public universities until now did not undergo through a licensing process since it is established by the government.

There are numerous conditions in order to get a license from MEST. The main precondition provisions for a license are “Adequate facilities and equipment; Financial viability, including

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53 Ibid
55 2011 Law on Higher Education in Kosovo No. 04/L-037 date 31.08.2011, Article 14, item 1. Available at: http://www.masht-gov.net/advCms/documents/02_Ligi_per_arximin_e_larte_anglisht.pdf
57 2011 Law on Higher Education in Kosovo No. 04/L-037 date 31.08.2011, Article 14, item 5. Available at: http://www.masht-gov.net/advCms/documents/02_Ligi_per_arximin_e_larte_anglisht.pdf
the provider’s commitment to the creation of a fund for the support of students; A three-year business plan.

Figure 3.3 Accreditation and Licensing Process of Institutions of Higher Education in Kosovo

Figure 3.3 clarifies two phases which are obligatory and should necessarily be respected by all institutions of higher education. The Licensing process of private institutions of higher education is regulated by an Administrative Instruction (No. 25/2012\textsuperscript{58}) on Licensing of Private Providers of Higher Education (PPHE), which should be obtained by the institutions after the accreditation of their programs. Therefore, no institution is eligible to start its operation without a prior license from MEST

MEST competences are emphasized on supervising the progress of the work of PPHEs. MEST has the right to take measures against any Institution in case it does not respect legal provisions which derives from this AI\textsuperscript{59}.

Nevertheless, the 2011 Law on Higher Education Article 6 item 1.11 foresees the licensing of all providers of higher education. Hence, it can be considered as the Law itself has elements of disharmony. Until today none of the public providers of higher education has been licensed by MEST since according to the AI 25/2012 only PPHEs should undergo this process.

\textsuperscript{58} Administrative Instruction 14/2003, on licensing private providers of higher education as amended with Administrative Instruction 25/2012, on licensing private providers of higher education.

\textsuperscript{59} Article 1 item 2 of the Administrative Instruction 25/2012, on licensing private providers of higher education
The legal framework regarding the accreditation and licensing of the institutions of higher education is as follows:

1) The 2011 Law on Higher Education No. 04/L-037 date 31.08.2011;

2) Administrative Instruction No. 25/2012 dated on 22.10.2012 on Licensing of Institutions of Higher Education in Kosovo;


4) Administrative Instruction No. 2/2013 dated on 16.01.2013 on the Accreditation of Institutions of Higher Education in the Republic of Kosovo;


Chapter IV

There have been intensive discussions on the precedence between accreditation and licensing. The recent amendments to the Law on Higher Education (Draft from February 2014 submitted to the National Assembly) provide that MEST Licensing precedes AKA Accreditation. There will probably be more discussion before the final draft of the Law is approved by the Assembly.
Private Sector in Kosovo Higher Education

Introduction

Private Higher Education Institutions in Kosovo are licensed by MEST since 2004. According to the current legislation, before the licensing procedure, PPHEs should get accreditation from KAA. After graduation, students of these private institutions ought to validate their diplomas within MEST and KAA. This chapter will initially give a brief historical overview of the PPHEs in Kosovo since their establishment and onwards. Secondly, the accreditation process and its importance will be described, and finally, the verification procedure and the validation of diplomas will be elaborated.

4.1. Brief history of PHEIs in Kosovo

In 2004, the first Private Providers of Higher Education (PPHEs) were licensed by the Ministry of Education, Science and Technology (MEST)\(^ {61}\). Between 2004 and 2007, MEST licensed 30 PPHEs based on the 2003 Law on Higher Education\(^ {62}\), which stipulates that until the Kosovo Accreditation Agency\(^ {63}\) (KAA) is established and made fully operational, all functions of this Agency will be carried out by the Ministry. The other legal act was the Administrative Instruction\(^ {64}\) on Licensing of Private Providers of Higher Education which set specific and general licensing criteria.

From academic year 2004-05 to 2007-08, MEST kept a record of students enrolled in private providers registering the number of 20,128 student registrations ending with 2008. This is the evidence in which both MEST and PPHEs keep students’ registration books\(^ {65}\) in hard copy. All PPHEs have been obliged to update new enrolment at the beginning of every academic year.

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\(^ {61}\) AAB, ASAU, Design Factory, Evolution, Tempulli, Gjilani, UBT, Film & TV, Rininvest, Dardania, FAMA, Iliria, Biznezi, European Vision, University of Prizren, Pjetër Budi, Eurosport, Rezonanca, Universum, NIC Holdings, Katana, Victory, Faculty of Pharmacy, AUK, KUF, Ecology, IUP, Academy of Arts.

\(^ {62}\) UNMIK Regulation Nr. 2003/14 on the Announcement of the Law approved by the Kosovo Assembly on Higher Education, Article 4 Item 4.7 “Until the KAA establishment, all functions of this Agency will be carried out by MEST.

\(^ {63}\) Kosovo Accreditation Agency (KAA) operates within MEST. KAA accredit programs for both PPHEs and public universities in the Republic of Kosovo.

\(^ {64}\) Administrative Instruction 14/2003 dated on 17.07.2003 on Licensing of Private Providers of Higher Education, which was then amended with an Administrative Instruction 25/2012 dated 22.10.2012 on Licensing of Private Providers of Higher Education.

\(^ {65}\) Amended Administrative Instruction 22/2012, date 22.10.2012 on the Students’ Registration Books
Table 4.1 Names/titles and the total number of student enrolments between the academic years 2004-05 to 2007-08.

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<td>70</td>
<td>132</td>
</tr>
<tr>
<td>University College Ferizaj</td>
<td>University College</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>258</td>
<td>258</td>
</tr>
<tr>
<td>University for Business &amp; Technology</td>
<td>University</td>
<td>127</td>
<td>173</td>
<td>130</td>
<td>440</td>
<td>870</td>
</tr>
<tr>
<td>University of Prizren</td>
<td>University</td>
<td>0</td>
<td>0</td>
<td>206</td>
<td>96</td>
<td>302</td>
</tr>
<tr>
<td>University Pjetër Budi</td>
<td>University</td>
<td>0</td>
<td>71</td>
<td>133</td>
<td>257</td>
<td>461</td>
</tr>
<tr>
<td>University Riinvest</td>
<td>University</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>129</td>
<td>129</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td></td>
<td><strong>1316</strong></td>
<td><strong>4017</strong></td>
<td><strong>5909</strong></td>
<td><strong>8521</strong></td>
<td><strong>20128</strong></td>
</tr>
</tbody>
</table>

*Source: BAC Kosovo Accreditation Project Report, July 2008.*

Table 4.1 shows the PPHEs which operated before 2008. Since KAA was operational only in 2008, these PPHEs had no accreditation, but only a license granted by MEST. This situation occurred between the academic years 2004-05 to 2007-08. Before the year 2008, PPHEs in Kosovo were licensed holding various titles/names such as University, University College, Academy, Institute and Higher School. Conversely, with exception of the title “university”, other titles/names were neither regulated by the 2003/14 Law on Higher Education nor with any special regulation or Administrative Instruction. According to the Article 8 item 8.2 of the 2003/14 Law on Higher Education, “the name/title “university” can be granted only to an accredited provider of higher education which has at least 3,000 full time students and which provide courses or programs in at least 5 different subject groups as prescribed in the

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66 BAC Kosovo Accreditation Project Report, July 2008. (This table refers to private providers of higher education until the academic 2007-2008. These institutions operated only as licensed institutions, but not accredited).
administrative instructions issued by the Ministry”. This functioned as described above until 2008 when KAA started operating and took the responsibility on evaluation of programs according to the Law on Higher Education.

4.2. Accreditation of PPHEs

Although the establishment of Kosovo Accreditation Agency (KAA) was foreseen with the Admin Instruction 11/2004 of the date 16.02.2004, it was not operational until 2008. However, in 2008 KAA did not commence its mission and therefore, the government of Kosovo asked the British Accreditation Council\textsuperscript{67} to carry out an initial evaluation of 30 PPHEs licensed between the years 2004 to 2007.

In 2008 the British Accreditation Council (BAC) issued a report on the actual state of private institutions of higher education, their offering programs and the academic staff. According to the BAC report, recommendations were given that none of the institutions fulfills criteria to be accredited or licensed, thus in the academic year 2008/2009 none of the private institutions were entitled to enroll new students. Besides this in 2009, 63 international experts from different countries were engaged in the review of the process in which they made recommendations for improvement and for accreditation\textsuperscript{68}.

Nowadays the accreditation of PPHE is regulated by a) the Administrative Instruction for Accreditation of Institution of Higher Education No. 02/2013 dated 02.01.2013, which foresees conditions and criteria for the accreditation, b) the AI 02/2013, the procedure for accreditation and quality assurance standards are in compliance with the LHE and European standards\textsuperscript{69}. Kosovo Accreditation Agency is responsible for the accreditation and the quality of education of all institution of higher education in Kosovo\textsuperscript{70}.

The accreditation confirms that an institution meets the quality standards required to operate as an institution of higher education\textsuperscript{71}.


\textsuperscript{68} Bristow, S., Licensing and Accreditation under the Law on Higher Education in Kosovo 2002-2009

\textsuperscript{69} Article 2, Administrative Instruction no.02/2013 date 02.01.2013, for Accreditation of Higher Institutions in the Republic of Kosovo available at: http://www.mashgov.net/advCms/documents/02_2013_UA_mbi_akreditimin_e_institucioneve.pdf

\textsuperscript{70} Ibid article 8

\textsuperscript{71} Ibid Article 7
4.3. Diploma validation procedure

In 2008, The British Accreditation Council in their report “Kosovo Accreditation Project Report” of July 2008 among others recommended that “the Ministry should consider whether, in the interest of secure control of degree and diploma awards, all graduates should be required to have their Degree certificate verified in this way, whether by the Ministry directly or by the KCAA”72 (and proposed that a Kosovo Council for Academic Awards73 be established for this purpose).

Diplomas issued by the private providers of higher education (PPHEs) were not recognized by the institutions in Kosovo and abroad. That is because these private institutions were not accredited or simply said there was no trust regarding the quality of education in the private institutions. Afterwards, the Ministry of Education, Science and Technology issued an Administrative Instruction Nr. 3/2010 dated 14.04.2010 on the Verification of diplomas and other documents issued by the PPHEs with the aim to regulate the procedures and preconditions for verification of diplomas and other documents issued by licensed and accredited PPHEs. This AI regulates that the diplomas issued PPHEs must be verified and sealed by MEST and KAA.

The validation of diplomas and other documents issued by PPHEs is also foreseen by the Administrative Instruction No. 22/2012 dated 22.10.2012 on the Students’ Registration Books74 which cites that “none of the PPHEs can issue diploma or document or certificate without being verified preliminary at MEST”, i.e. the document will not be considered as valid if it is not verified at MEST.

The Administrative Instruction 11/2013 on the Verification of diplomas and other documents issued by the Private Providers of Higher Education targets only private providers of higher education. However, diplomas issued by the public providers are automatically recognized by all institutions without being verified by MEST or KAA.

73 BAC Report recommended also the Creation of a Kosovo Council for Academic Awards, p. 20 Available at http://www.masht-gov.net/advCms/#id=120.,&limitId=40
74 Administrative Instruction 22/2012 22.10.2012 on the Students’ Registration Books, Article 5, item 1, 2, 3 Available at: http://www.masht-gov.net/advCms/documents/UA_22_2013_new.pdf
Table 4.2 Private Providers of Higher Education from 2004-05 to 2013-14 (Enrolments, graduates, verified diplomas and current diploma to be verified at MEST)

<table>
<thead>
<tr>
<th>Total number of enrolled student in PPHEs From academic year 2004 – 2013</th>
<th>Total number of Graduated at PPHEs till March 2014</th>
<th>Total number of verified diplomas at MEST until March 2014</th>
<th>Total number of current diplomas to be verified submitted at MEST</th>
</tr>
</thead>
<tbody>
<tr>
<td>81116</td>
<td>16781</td>
<td>13177</td>
<td>Approximately 500</td>
</tr>
</tbody>
</table>

Source: Statistics provided by PPHEs to MEST in March 2014.

Figure 4.1 Academic year 2004-05 to 2013-14 Private Providers of Higher Education (Enrolments, graduates, verified diplomas and current diploma to be verified at MEST)

Table 4.2 and Figure 4.1 the gross number of students’ enrolments in all PPHEs from academic 2004-05 till 2013-14 is 81116 and only 16781 of them graduated. Actually there is only 1%, i.e. 13177 diplomas which are verified from MEST until March 2014). The low number of the graduates in comparing with the number of enrolments is well known problem in the higher education in Kosovo. The prolonged period of studies occurs because there is no mechanisms that require from the students to complete their studies within a certain period of time, or such mechanism are not implemented by PPHEs.

According to the abovementioned AI, MEST uses three types of stamps which are dedicated specifically only for PPHEs diplomas for a) accredited program; b) licensed program; and c) unlicensed program.

Each of three stamps of MEST possesses a declaration which states:
Diplomas with stamp 1: “This diploma is recognized by the Ministry of Education Science and Technology of the Republic of Kosovo, as a document/diploma issued by a licensed institution that is based on an accredited study program. This Stamp contains the number 1. Such diplomas are also stamped by the KAA, that is the institution and the program is accredited by KAA.

Diplomas with stamp 2: Diplomas issued by PPHEs before the commencement of accreditation process will be sealed with the Stamp 2 which contains this text “Ministry of Education, Science and Technology of the Republic of Kosovo confirm that the student attended a program in a licensed institution. Although these diplomas are verified by MEST, many of the Kosovo institutions do not recognize it.

Diplomas with stamp 3: Diplomas issued by institutions which do not provide evidence for a license will be sealed with the Stamp 3 and it will contain this text “Ministry of Education, Science and Technology of the Republic of Kosovo” confirms that the student attended studies in an unlicensed institution. In 2006, there were 3 institutions in Kosovo which started to operate without license with the program ‘Pre-primary Education’ and ‘Primary Education’ (but they had licenses for other programs). Students who are supposed to become Teachers of the respective program attended 4 years of studies. They were not aware of the unlicensed program in the institution they were studying. Although these institutions applied for license at MEST, they neither got any reply from MEST nor they were stopped to operate. Moreover, these institutions did not receive any warning by MEST inspectors or the municipality where they operated. Consequently, nearly 197 students remained without a solution from the state.

Table 4.3 Three PPHEs which operated with unlicensed program in 2006

<table>
<thead>
<tr>
<th>European Vision University College</th>
<th>Gjiłani University College</th>
<th>Universum University College</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total number of students</td>
<td>75</td>
<td>97</td>
</tr>
</tbody>
</table>

Source: Statistics provided by PPHEs to the MEST

There is a different situation for diplomas issued by RIT/AUK and also in the near future diplomas which will be issued by the Staffordshire University which got accreditation in 2013 by KAA as a franchise operating at Riinvest College. Diplomas issued by international

75 Administrative Instruction 11/2013, 04.03.2013 on the Verification of Diplomas issued by the PPHEs in Kosovo
institutions licensed by MEST and accredited by KAA are not verified or sealed by MEST and KAA. The reason is that diplomas are not in accordance with the Admin Instruction, i.e. they do not have the content and the form of diploma which is regulated by this AI.

Due to the diplomas issued by PPHEs undergoing a verification procedure, the Kosovo institutions require from the AUK graduates to verify and seal their diplomas. Consequently, the students request from MEST to issue an attestation of confirmation regarding the respective institutional status.

Apart from the MEST verification procedure, there is another procedure which has to undergo at the KAA. Again, after a verification procedure, KAA seals each diploma with its stamp which states: “Kosovo Accreditation Agency”. Three stamps from MEST caused a confused issue at all focused groups including students, PPHEs, Kosovo institutions. Subsequently, Diplomas sealed by MEST with the Stamp 2 and 3 caused a sensitive conflict since the most of the Kosovo institutions and institutions abroad do not recognize them. On the other hand, the PPHEs diplomas with an accredited program and institution (Stamp 1) still are not recognized by the public universities.

As a consequence, being aware that PPHEs diplomas once were verified and sealed by MEST and KAA, many of Kosovo institutions strictly request a special attestation from MEST and KAA to confirm regarding the whole students data, program and the PPHE. Then the PPHEs students are obliged to do so. Thus, they request from MEST and KAA to issue a special attestation of confirmation with all relevant students data. This has become a very ineffective practice at MEST and KAA.

**Figure 4.2 Shows the documents submitted to MEST as evidence for verification procedure**

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76 Administrative Instruction No. 02/2012 date 30.03.2012 Form and Content of Diplomas and Supplement diploma
Figure 4.2 shows that apart from original Diploma which should be submitted to MEST for validation, there are additional documents attached to Diploma in order to start verification procedure. In order for a document to be considered valid, additional documents showed in figure? should contain the date when the document was issued by a certain institution, the protocol number, signature of the official and the seal of PPHE. According to the AI 11/2013 on the verification of diplomas and other documents issued by PPHEs and the AI 22/2012 on the students’ registration books, to start verification procedure of diplomas and other documents the following process should be pursued:

- Verification of additional documents (official request by PPHE with all relevant data, a copy of each transcript of records from the secondary school, a copy of certificate of Matura exam, a copy of ID, an attestation which proves the dates of each passed exam and the registration dates of each semester;
- Verification of each student’s data in the students’ registration books which are hard copy in MEST (Students’ registration books reached the number 60 and every student must be found to verify whether he was evidenced by the PPHE with all relevant data;
- Verification of each students’ data in the graduate books in hard copy which all PPHEs possess in their institutions;
- If the student is transferred from other institution, the PPHE should submit the Decision on the approval of the students’ grades etc.
- There is a specific case when a student was not evidenced at the beginning of academic year. In this case, MEST should create a special commission composed of 5 members in order to do a scrutiny in detailed documentation.

Figure 4.3 Shows the verification procedure which starts in PPHEs and goes through different institutions to get validated by MEST and KAA
Figure 4.3 shows how procedure for verification of diplomas and other documents issued by PPHEs. This is in fact a multiple and complex procedures followed through and by different institutions. It all starts with the student’s application for Diploma within PPHE (i.e. an administrative procedure within PPHE). Secondly every PHEE is obliged to submit an official request to MEST for a verification procedure and necessary documents foreseen by Admin Instruction.

The verification procedure is carried out within the Department of Higher Education at MEST. Then MEST invites PPHE to verify the graduates’ data in the Student’s Graduation Books. After all that, PPHEs should pay a 5 euro tax for MEST for every student for this verification procedure (can be done at any bank). Herein MEST accept the tax fees from PPHEs. Then the list of diplomas goes through the protocol at MEST archives for the completion of the MEST verification procedure. However, the PPHEs have to undergo another verification procedure at Kosovo Accreditation Agency. Since KAA has not as yet hired a person for the verification procedure, this is another obstacle for the student to get the diploma in a shorter period of time (i.e. there is no legal provision for MEST and KAA which sets a limit time for the completion of this verification procedure). After getting diplomas from KAA, the students finally are invited by PPHE to get diploma which possess the seal of MEST and KAA.

*Figure 4.4 Shows the procedure circulated within MEST Departments and Offices (When PPHE submit diplomas to MEST Archive Office)*
Table 4.4 PPHEs with the total number of students enrolled from academic year 2004-05 till 2013-14, and the actual students

<table>
<thead>
<tr>
<th>Private Providers of Higher Education</th>
<th>Total number of students enrolled at PPHEs (from the academic 2004-05 to 2013-14)</th>
<th>Actual students</th>
</tr>
</thead>
<tbody>
<tr>
<td>College “AAB”</td>
<td>25684</td>
<td>14817</td>
</tr>
<tr>
<td>PPHE (NGO) “AUK”</td>
<td>1449</td>
<td>568</td>
</tr>
<tr>
<td>College “BIZNESS”</td>
<td>4358</td>
<td>1338</td>
</tr>
<tr>
<td>College “DARDANIA”</td>
<td>3491</td>
<td>2601</td>
</tr>
<tr>
<td>PHS “DESIGN FACTORY”</td>
<td>98</td>
<td>24</td>
</tr>
<tr>
<td>College “DUKAGJINI”</td>
<td>1541</td>
<td>303</td>
</tr>
<tr>
<td>College “ESLG”</td>
<td>350</td>
<td>200</td>
</tr>
<tr>
<td>PHS “EVOLUTION”</td>
<td>545</td>
<td>420</td>
</tr>
<tr>
<td>College “FAMA”</td>
<td>13877</td>
<td>4860</td>
</tr>
<tr>
<td>College “GJILANI”</td>
<td>1308</td>
<td>560</td>
</tr>
<tr>
<td>College “GLOBUS”</td>
<td>2280</td>
<td>1010</td>
</tr>
<tr>
<td>College “HUMANISTICA”</td>
<td>306</td>
<td>332</td>
</tr>
<tr>
<td>College “ILIRIA”</td>
<td>10637</td>
<td>7316</td>
</tr>
<tr>
<td>College “INTERNATIONAL PRIZREN”</td>
<td>29</td>
<td>29</td>
</tr>
<tr>
<td>College “ISPE”</td>
<td>1904</td>
<td>1598</td>
</tr>
<tr>
<td>College “JURIDICA”</td>
<td>345</td>
<td>310</td>
</tr>
<tr>
<td>College “PJETER BUDI”</td>
<td>1680</td>
<td>880</td>
</tr>
<tr>
<td>College “QEAP HEIMERER”</td>
<td>549</td>
<td>460</td>
</tr>
<tr>
<td>College “RIINVEST”</td>
<td>534</td>
<td>405</td>
</tr>
<tr>
<td>College “TEMPULLI”</td>
<td>732</td>
<td>229</td>
</tr>
<tr>
<td>College “UBT”</td>
<td>5489</td>
<td>4406</td>
</tr>
<tr>
<td>College “UNIVERSI”</td>
<td>529</td>
<td>293</td>
</tr>
<tr>
<td>College “UNIVERSUM”</td>
<td>1115</td>
<td>1466</td>
</tr>
<tr>
<td>College “VICTORY”</td>
<td>973</td>
<td>697</td>
</tr>
<tr>
<td>College “VIZIONI PER ARSIM”</td>
<td>178</td>
<td>178</td>
</tr>
<tr>
<td><strong>TOTAL: 81116</strong> (Gross students enrolment in PPHEs from academic year 2004 – 2013)**</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The Table 4.4 is related to the Table 4.2 and Figure 4.1. It can be seen that in most of the PPHEs the number of enrolments in PPHEs from 2004-05 until 2013-14 in comparison with the total number of actual students is very low.
Chapter V
Research Methodology

5.1. Research question

The research question of this capstone project addresses:

- Is the verification procedure for diplomas and other documents issued by PPHEs in compliance with the 2011 Law on Higher Education?
- Do the diplomas from the accredited institutions and programs need the verification procedure?

Presumptions:

- The verification is not in compliance with the 2011 Law on Higher Education. Since the principles of the 2011 Law on Higher Education which stipulates that “all institutions of higher education are equal before the Law and that there should be equal opportunities for all students and personnel in the institutions of higher education without any discrimination”

- Diplomas from the accredited institutions and programs should not undergo through any verification procedure. The accreditation process ensures the Kosovo society that the quality of teaching and learning are comparable with the international standard. KAA guarantee and ensure that the institutions of higher education in Kosovo and their programs meet the quality standards internationally recognized. The accreditation is transparent and trustful that is internationally comparable. It ensures that the standards and the quality in the institutions of higher education meet the standards and expectations of the European Network Association for Quality Assurance in Higher Education (ENQA).\footnote{2011 Law on Higher Education in Kosovo No. 04/L-037 date 31.08.2011. Available at: \url{http://www.msdht.gov.net/advCms/documents/02_Ligji_per_arsimin_e_larte_anglisht.pdf}}
5.2. Research methods

The research methodology which is used for this capstone project was empirical exploratory method and it is used both qualitative and quantitative research methods.

The research instruments which are used for this capstone project was the primary source of data that are archival source, interviews, questionnaires and comparison with practices in other countries.

Archival sources - Updated data have been collected from MEST and KAA regarding the total number of students, programs. Part of the archival work will also be done in the PPHEs in order to get first-hand information on aspects identified during the MEST and KAA phase. Each PPHE has an office for issuing certificates and diplomas and we will collect documents from them together with feedback on their perspectives, views and challenges encountered in the process of verification.

Interviews - Several interviews have been performed specifically with the MEST senior officials from the Department of Higher Education within MEST, the Minister’s advisor in charge of higher education, with the respective expert in the KAA and three experts in higher education. A protocol for interviews for this purpose has been developed. Interviews with seven randomly selected officers in charge of certification and verification of degrees in the PPHEs were conducted. Interviews served to find out about the views of interviewees on the verification process, their views on the process flow, and ideas on how to make the process more efficient and more useful for the graduated students. The interviews (protocols) consisted of some similar and some different questions having in mind the different functions of the institutions in the verification process. Interviews with the PPHE officers served as a follow up to the questionnaires distributed to them electronically. Having in mind the sensitivity of the issue, if agreed, interviews with the PPHE officers were carried out in a neutral venue. All interviewees were explained that the results will be used anonymously and only for the purpose of improving the procedure of verification.

Questionnaires

Four types of questionnaires have been drafted. They are prepared specifically for:

- PPHEs students; 175 questionnaires for students and graduates were delivered. (See Appendix I Questionnaire for students and graduates of PPHEs).
- PPHEs: 37 delivered for 37 senior officials of PPHEs. (See Appendix II Questionnaire for senior officials of PPHEs).
- Experts of higher education and senior officials of MEST; 21 questionnaires were delivered. (See Appendix II Questionnaire for experts of higher education and senior officials of MEST)
- Experts and HE officials of the SEE countries; 15 questionnaires were sent to SEE countries, but only 4 of them responded (See Appendix II Questionnaire for experts of higher education in the SEE countries)

Questionnaires served to obtain views of a wider population in order to obtain information that could not be obtained through interviews. In particular, the questionnaires addressed the student population in the PPHEs. I have opted for 260 questionnaires distributed electronically to randomly selected students since I consider it provided sufficient feedback. Students are selected from the updated PPHE student registration lists in the Ministry. The questionnaire addressed their views on relevance of verification for their career, fees that they may pay for the process, ideas how to make the process simpler and more useful, and so on.

The questionnaires sent out to PPHEs are distributed electronically to be completed by the officers in charge of the certification and verification. Results of the questionnaires are served to inform the interview with a number of these officers later in the process.

**Comparison from other countries**

Initially an archival and literature review on the verification practices among the countries in the region and wider in Europe was conducted. Based on results of this initial archival research 12 neighboring countries were asked to inform me how this procedure is regulated within their countries, including on legislation, practices, procedures, and difficulties they face in the process. In the end, an inventory of good practices that could be used in our country was planned. From these 12 neighbouring countries Albania, Macedonia, Montenegro, Bulgaria, Turkey, Germany, Austria, Romania, Hungary, Slovenia, Italy and Croatia, only 4 countries have responded (Montenegro, Croatia, Austria Germany and Bulgaria)

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78 From these 12 neighboring countries Albania, Macedonia, Montenegro, Bulgaria, Turkey, Germany, Austria, Romania, Hungary, Slovenia, Italy and Croatia, only 4 countries have responded (Montenegro, Croatia, Austria Germany and Bulgaria).
Chapter VI

Questionnaires and Response Rates

Introduction

This chapter shows the results of three types of the questionnaires which addressed interested groups such as students and graduates, senior officials of Private Providers of Higher Education (PPHEs) and experts of Higher Education. The aim of these questionnaires was to obtain information regarding their opinion and views on relevance of the verification procedure in order to get their ideas to make the process simpler and more viable.

6.1. Discussion of results from the students’ questionnaires

Table 6.1 Students and Graduates Percent of Responses

<table>
<thead>
<tr>
<th>Question</th>
<th>No. of Respondents</th>
<th>A</th>
<th>B</th>
<th>C</th>
<th>D</th>
<th>E</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>A1</td>
<td>175</td>
<td>64%</td>
<td>13%</td>
<td>23%</td>
<td>n/a</td>
<td>n/a</td>
<td>100%</td>
</tr>
<tr>
<td>A2</td>
<td>173</td>
<td>65%</td>
<td>18%</td>
<td>17%</td>
<td>n/a</td>
<td>n/a</td>
<td>100%</td>
</tr>
<tr>
<td>A3</td>
<td>172</td>
<td>77%</td>
<td>12%</td>
<td>11%</td>
<td>n/a</td>
<td>n/a</td>
<td>100%</td>
</tr>
<tr>
<td>A4</td>
<td>173</td>
<td>69%</td>
<td>20%</td>
<td>3%</td>
<td>8%</td>
<td>n/a</td>
<td>100%</td>
</tr>
<tr>
<td>A5</td>
<td>175</td>
<td>39%</td>
<td>43%</td>
<td>18%</td>
<td>n/a</td>
<td>n/a</td>
<td>100%</td>
</tr>
<tr>
<td>A6</td>
<td>175</td>
<td>46%</td>
<td>28%</td>
<td>14%</td>
<td>13%</td>
<td>n/a</td>
<td>100%</td>
</tr>
<tr>
<td>A7</td>
<td>133</td>
<td>38%</td>
<td>22%</td>
<td>40%</td>
<td>n/a</td>
<td>n/a</td>
<td>100%</td>
</tr>
<tr>
<td>A8</td>
<td>135</td>
<td>51%</td>
<td>30%</td>
<td>8%</td>
<td>10%</td>
<td>n/a</td>
<td>100%</td>
</tr>
<tr>
<td>A9</td>
<td>135</td>
<td>64%</td>
<td>17%</td>
<td>19%</td>
<td>n/a</td>
<td>n/a</td>
<td>100%</td>
</tr>
<tr>
<td>A10</td>
<td>137</td>
<td>70%</td>
<td>11%</td>
<td>13%</td>
<td>6%</td>
<td>n/a</td>
<td>100%</td>
</tr>
<tr>
<td>B11</td>
<td>136</td>
<td>47%</td>
<td>29%</td>
<td>20%</td>
<td>4%</td>
<td>n/a</td>
<td>100%</td>
</tr>
<tr>
<td>B12</td>
<td>137</td>
<td>50%</td>
<td>14%</td>
<td>18%</td>
<td>14%</td>
<td>4%</td>
<td>100%</td>
</tr>
<tr>
<td>B13</td>
<td>137</td>
<td>46%</td>
<td>25%</td>
<td>19%</td>
<td>10%</td>
<td>n/a</td>
<td>100%</td>
</tr>
<tr>
<td>B14</td>
<td>134</td>
<td>66%</td>
<td>20%</td>
<td>3%</td>
<td>11%</td>
<td>n/a</td>
<td>100%</td>
</tr>
</tbody>
</table>

Table 6.1 Students and Graduates Percentage Responses shows the percentage of responses of both students and graduates of 14 questions in the respective questionnaire. There are in total 175 respondents who answered questions (See table above). N/A stands for not having answering option since some questions have 3 or 4 options, and only 1 question had 5 options.

In the question A1 Are you aware of the verification procedure of diplomas and other documents which had 3 options a) yes b) no c) only a little, 64% of respondents answered a, 13% answered b, and 23% answered c showing that most students were aware of the procedure, but still a significant number lacked relevant information.
On the second question A2 Have you been informed by the college/ PPHE that every
document should be verified by MEST and KAA, which also had 3 answering options a) yes
b) no and c) I have heard from the college, the 65% respondents answered the option a, 18%
answered the option b, and 17% answered the option c. This showed relatively good level of
dissemination of information from the colleges to their students.

On the third question A3 Would you like to know more about the verification procedure,
which has 3 possible option a) yes, b) no, and c) not sure, 77% respondents chose the option
a, 12 % respondents answered the option b, and 11% respondents answered the option c.

Fourth question A4: Every diploma and other documents will not be valid without being
verified at MEST and KAA? How important is this for you? This question had option of 4
answers a) it is important; b) it is bureaucratic C) not relevant, and d) waste of time. 69%
answered the option a, 20 %, answered the option b, 3 % answered the option c, and 8%
answered the option d. Over two-thirds find the procedure important, but almost one-third
think it is either needless or bureaucratic.

Fifth question A5: Did you know that diploma verification have to go through a complex
verification procedure? This question had 3 answering options such as: a) Yes, b) no, c) only
a little. To this question 39 % respondents answered the option a, 43 % respondents
answered the option b, and 18% respondents answered the option c. Answers to this question
gave an interesting result that students were informed about the beginning and end of the
procedure, but not about how cumbersome it is. This meant that the brunt of the procedure
seems to be mainly a burden for the institutions.

Sixth question A6: What is your opinion about the fact that MEST / KAA need to first verify
and seal your diploma certificate? This question had 4 answers options: a) Happy to get
diploma stamped by MEST and KAA, b) Perceived as normal procedure; c) You were
shocked (because you think you will lose any term for job or further studies); d) Very
bureaucratic. 46 % of respondents answered the option a, 28 % of respondents answered the
option b, 14 % of respondents answered the option c, and 13 % of respondents answered the
option d. This shed further light to the fact that almost half of the students did not have
enough information regarding the intricacies of the entire process. This calls for a more
careful treatment of the entire process by the MEST and KAA.
Seventh question A7: Did you have your diploma certificate verified by MEST / KAA? This question had 3 answer options: a) Yes, b) No, and c) it is under the procedure at MEST and KAA. To this question 38% of respondents answered the option a, 22 % of respondents answered the option b, and 40 % of respondents answered the option c. This is logical since most of the respondents were current students of the PPHEs.

Eighth question A8: How do you consider this verification procedure? This question had 4 answering options: a) Very important; b) Quite important; c) Not relevant; d) Waste of time. To this question 51 % of respondents answered the option a, 30% of respondents answered the option b, 8% of respondents answered the option c, and 10% of respondents answered the option d. Information from this question should be verified again since it gave a slightly different result from another similar question No. 4 above.

Ninth question A9: Did you know that your Diploma firstly had to go through a verification procedure before it received? This question had 3 answering options a) yes, b) no, and c) I have heard but I’m not sure. To this question 64 % of respondents answered the option a, 17 % of respondents answered the option b, and 19 % of respondents answered the option c. Similar to above, institutions had done a relatively good job in informing their students about the procedure. However, there seems to be room for more information and feedback on it.

A 10: What is your opinion about this verification procedure? This question had 4 answering options: a) Necessary, b) Not necessary, c) Bureaucratic, and d) Waste of time. 70% of respondents answered the option a, 11% of respondents answered the option b, 13% of respondents answered the option c, 6 % of respondents answered the option d.

Eleventh question B11: How effective is it? This question had 4 answering options a) Very effective; b) Quite effective; c) Somewhat effective; d) Ineffective. 47% of respondents answered the option a, 29% of respondents answered the option b, 20% of respondents answered the option c, and 4 % of respondents answered the option d.

B12: Do you believe that this verification procedure and MEST and KAA stamps increase the diploma value? This is the only question that had answering options: a) I fully agree; b) I partially agree; c) Agree, d) I don’t agree, e) I strongly disagree. 50% of respondents answered the option a, 14 % of respondents answered the option b, 18 % of respondents
answered the option c, 14% of respondents answered the option d, and 4% of respondents answered the option e.

B13: How does this verification procedure affect your employment opportunities? This question had 4 answering options a) Very much, b) Only a little, c) Not at all; d) Depend on MEST influence policies. 46% of respondents answered the option a, 25% of respondents answered the option b, 19% of respondents answered the option c, and 10% of respondents answered the option d. Answers to this question indicated that students need their degree for their own purposes and various certification and verification by MEST, even though welcome, did not matter to a significant extent.

Last question under B14: How could this procedure be improved? This question had also 4 answering option: a) Having faster processing, b) Providing a clear rationale, c) Simplifying the process, d) Verify only Diploma, not other documents, e) Eliminate the whole procedure from MEST and KAA. 66% of respondents answered the option a, 20% of respondents answered the option b, 3% of respondents answered the option c, and 11% of respondents answered the option d. Answers to this question showed that graduates and student were worried about the length of the procedure more than by its quality and nature.

Table 6.2: Students and Graduates Counts of Responses

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<tr>
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<th>C</th>
<th>D</th>
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Table 6.3: Senior Officials PPHE Percent of Responses

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<th>B</th>
<th>C</th>
<th>D</th>
<th>E</th>
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</tr>
<tr>
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<td>100%</td>
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<tr>
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</tr>
<tr>
<td>13</td>
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<td>16%</td>
<td>16%</td>
<td>24%</td>
<td>43%</td>
<td>n/a</td>
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</tr>
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</table>

Table 6.3: Senior Officials PPHE Percent of Responses shows the figures and percentage of answers by senior officials on 13 questions made. In total there were 37 respondents who answered in all questions, 11 questions had a scale with four answering options and 2 had only 3 answering options.

Question 1: What do you think about the verification procedure of diplomas and other documents issued by PPHEs? This question had 4 options a) Necessary, b) Valuable, c) Not so useful; c) Waste of time. 28% answered of respondents answered the option a, 36% of respondents answered the option b, 19% of respondents answered the option c, and 17% of respondents answered the option d.

Second question: This procedure is being adequately implemented; it had 4 options: a) I fully agree; b) I agree, c) I disagree, d) I strongly disagree. 17% answered of respondents answered the option a, 44% of respondents answered the option b, 31% of respondents answered the option c, and 8% of respondents answered the option d. Answers to the first two questions showed significant reservations among the PPHE officials both regarding its nature (36%) and quality of implementation (39%).

Third question: The procedure is quick and efficient had 4 options. a) Quick and efficient, b) It is not quick, c) Tends to be slow, d) It is too slow and time consuming. 24% of
respondents answered the option a, 29% of respondents answered the option b, 15 % of respondents answered the option c, 32 % of respondents answered the option d. Here already we see similar opinions expressed also by students: they all have critical objections to the efficiency of implementation of the procedure. Over 70 % think that the procedure is too cumbersome and takes too much time.

On the Fourth question: This verification procedure increases the value of the colleges’ reputation; It had 5 answering options: a) Very much, b) Quite a lot, c) Only a little, d) Somewhat, e) No

36 % of respondents answered the option a, 17% of respondents answered the option b, 14% of respondents answered the option c and 17 % of respondents answered the option d.

Fifth question: How does education in general benefit from this verification procedure; It had 4 answering options: a) Assure that legal procedure is respected by private colleges: b) The integrity of information is assured and confirmed, c) Confirm the reputation of the colleges; d) Nothing. 50 % of respondents answered the option a, 14 % of respondents answered the option b, 14 % of respondents answered the option c and 22 % of respondents answered the option d.

Question 4 and 5 received similar answers indicating to the fact that despite the complexities of the process, the verification adds significantly to the status and appreciation of the degree by the graduates and employers.

Sixth question: Students from the private colleges should be considered equal with the students of public institutions; it had 4 answering options: a) I fully agree, b) I agree, c) I disagree, d) I strongly disagree, e) No answer. 95 % of respondents answered the option a, 5 % of respondents answered the option b, and 0 % for option 3 and 4. This was expected and confirmed.

On the Seventh: This verification procedure is violating the Law on Higher Education. This question with 4 answering options: a) I fully agree, b) I agree, c) I disagree, d) I strongly disagree, e) No answer. 11 % of respondents answered the option a, 8 % of respondents answered the option b, 51 % of respondents answered the option c, 3 % of respondents answered the option d.
On the eighth question: This verification procedure should be carried out by MEST and KAA for the Public Universities too. It had 4 answering options: a) I fully agree, b) I agree, c) I strongly disagree, d) Maybe, e) It’s up to MEST and KAA decision. 46 % of respondents answered the option a, 27 % of respondents answered the option b, 5 % of respondents answered the option c, 8 % of respondents answered the option d. The private providers think that all higher education institutions should be treated equally.

Ninth question: This verification procedure should be carried out only by KAA. It had 4 answering options: a) I strongly agree, b) I agree, c) I disagree, d) It is not fair, e) I don’t know. 11% of respondents answered the option a, 0% b, 51 % of respondents answered the option c, and 38 % of respondents answered the option d. Private higher education institutions prefer to have the procedure carried out by the MEST instead of the KAA.

Question 10: Do you think that this verification procedure should be changed? It had 3 answering options: a) I agree, b) I disagree, c) It is up to MEST decision, d) I don’t know. 54 % of respondents answered the option a, 11% of respondents answered the option b and 35 % of respondents answered the option c. PPHEs think that things ought to change but leave it to MEST to decide the possible course.

On question 11: This verification procedure should be carried out only by MEST. It had 4 answering option: a) I agree, b) I strongly disagree, c) It should be done by both MEST and KAA, d) Neither MEST nor KAA should verify diplomas. 41 % of respondents answered the option a, 3% of respondents answered the option b, 27 % of respondents answered the option c and 30 % of respondents answered the option d.

Question 12: What should be done to have better verification procedure? It had 3 answering options: a) Speeding up the process, b) Provide more staff at MEST and KAA, c) Provide digital data base. 42 % of respondents answered the option a, 17 % of respondents answered the option b and 42 % of respondents answered the option c.

And finally, on question 13: There should not be any verification procedure for accredited institutions. It had 4 answering options: a) I strongly agree, b) I agree, c) I strongly disagree, d) I don’t know. 16 % of respondents answered the option a, 16 % of respondents answered the option b, 24 % of respondents answered the option c and 43 % of respondents answered
the option d. This calls for an information campaign and a round table discussion on the issue since a large percentage of respondents (over 40%) did not have an opinion, whereas those in favor and against abolishing the procedure we divided almost equally at around one third of the respondents.

Table 6.4: Senior Officials PPHE Counts of Responses

<table>
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<th>Question</th>
<th>No. of Respondents</th>
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<th>C</th>
<th>D</th>
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6.3. Discussion of results from the experts’ of higher education questionnaires

Table 6.5: Experts of HE Percent of Responses

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<tr>
<td></td>
<td>21</td>
<td>43%</td>
<td>5%</td>
<td>52%</td>
<td>0%</td>
<td>n/a</td>
<td>100%</td>
</tr>
</tbody>
</table>

Table 6.5 Experts of HE Percent of Responses shows the percentage of answers by Experts of HE on 14 questions made. In total there were 21 respondents who answered the questions.
Question 1: What do you think about the verification procedure of diplomas and other documents issued by private colleges? It had 4 answering options: a) Necessary, b) Valuable, c) Not so useful, d) Waste of time. 38% of respondents answered the option a, 19% of respondents answered the option b, 10% of respondents answered the option c, and 33% of respondents answered the option d.

Second question: This verification procedure should also be implemented by MEST and KAA for public universities? It had 4 options: a) I fully agree, b) I agree, c) I strongly disagree, d) Maybe, e) It’s up to MEST decision. 24% answered a, 24% b, 43% c, and 10% d.

Very divided answers among the experts regarding for and against the procedure and the place of verification. Experts showed to be more critical of the procedure and holding an opinion on it. It is understandable that PPHEI cannot show their opinion since they depend on the MEST in various ways. This however, does not apply for most of the experts who also seem to have studied the procedure instead of taking it for granted.

Third question: Do you think that the Administrative Instruction on the Student’s Registration Books of the Institutions of Higher Education in Kosovo should also be implemented by MEST for public universities? (E.g. This Administrative Instruction is being implemented by MEST only for PPHEs). It had 4 answers option: a) Yes, b) No, c) All PPHEs should keep the students’ registration books in their institutions, not at MEST, d) I don’t know. 24% of respondents answered the option a, 5% of respondents answered the option b, 67% of respondents answered the option c, 5% of respondents answered the option d. Experts believed that the PPHEIs should be trusted more than just being strictly controlled by the MEST and KAA.

On the Fourth question: How does the education in general benefit from this verification procedure? It had 4 answering options: a) Assure that legal procedure is respected by private colleges; b) The integrity of information is assured and confirmed, c) Confirm the reputation of the colleges; d) Nothing. 48% of respondents answered the option a, 14% of respondents answered the option b, 29% of respondents answered the option c and 10% of respondents answered the option d. The same as with other regulatory state bodies, experts think that they provide assurances to the quality of services, in particular in the beginning of processes and in countries in transition.
Fifth question: Do you think that stamps of MEST and KAA increase the value of diplomas? It had 4 answering options: a) I fully agree, b) I agree, c) I strongly disagree, d) Maybe, e) It’s up to MEST decision. 33% of respondents answered the option a, 29% of respondents answered the option b, 29% of respondents answered the option c and 10% of respondents answered the option d.

Sixth question: How would you consider the action of the institutions in Kosovo who do not recognize diplomas issued by PPHEs? (There are cases when Kosovo institutions such as municipalities and other public and private institutions, even though diplomas are verified and sealed by MEST and KAA, they again require an additional attestation which confirm the validation of diplomas). It had 3 answering options: a) Fair, b) unfair and unlawful, c) I don’t know. 19% of respondents answered the option a, 81% of respondents answered the option b, and 0% for option c.

Seventh question: Students from the private college should be considered equally with the public students. It had only 2 answering options: a) I fully agree, b) I agree, c) I disagree, d) I don’t know. 76% of respondents answered the option a, 14% of respondents answered the option b. 0% no response, and 0% no response.

On the eighth question: The verification procedure only for PPHEs is violating the Law on Higher Education? (Taking into consideration the Article 2 item 1.2. equality before the Law for all providers of higher education; item 1.3. equal opportunities for all students and academic personnel in the institutions of higher education without discrimination). This question had 4 answering options: a) I fully agree, b) I agree, c) I disagree, d) Maybe, e) I don’t know. 40% of respondents answered the option a, 10% of respondents answered the option b, 25% of respondents answered the option c, 5% of respondents answered the option d.

Ninth question: This verification procedure should be carried out by both MEST and KAA? a) It had 4 answering options: I fully agree, b) It should be done only by MEST, c) It should be done only by KAA; d) Neither MEST nor KAA should verify diplomas. 29% of respondents answered the option a, 24% of respondents answered the option b, 5% of respondents answered the option c, 43% of respondents answered the option d.
Question 10: How would you assess the Kosovo Accreditation Agency in this verification procedure? It had 3 answering options: a) important, b) Formal, c) Not important, d) I have no answer. 10% of respondents answered the option a, 50% of respondents answered the option b and 40% of respondents answered the option c.

On question: Do you think that there should not be any verification procedure for accredited institutions? It had 4 answering options: a) I fully agree, b) I agree, c) It is not fair, d) I have no answer. 0% of respondents answered the option a, 10% of respondents answered the option b, 76% of respondents answered the option c and 14% of respondents answered the option d.

Question 12: Do you think that this verification procedure should be changed? It had 2 answering options: a) Yes, b) No. 95% of respondents answered the option a, and 5% of respondents answered the option b.

Question 13: If yes, what should be done in order to have better verification procedure? It had 3 answering options: a) To be regulated in a proper way; b) Provide more staff at MEST and KAA, c) Provide digital data base. 29% of respondents answered the option a, 24% of respondents answered the option b and 47% of respondents answered the option c.

And finally, the question 14: There should not be any verification procedure for accredited institutions. It had 3 answering options: a) I strongly agree, b) I agree, c) I strongly disagree d) I don’t know. 43% of respondents answered the option a, 5% of respondents answered the option b and 0% did not answer c.
Table 6.6: Experts of HE Counts of Responses

<table>
<thead>
<tr>
<th>Question</th>
<th>No. of Respondents</th>
<th>A</th>
<th>B</th>
<th>C</th>
<th>D</th>
<th>E</th>
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6.4. Discussion of results from the SEE countries questionnaires

11 questionnaires are sent to the SEE countries in relation to the topic that is a subject of this research. However, only 5 countries responded to the questionnaire such as Austria, Bulgaria, Montenegro, Croatia and Germany.

The questionnaires are composed of 13 questions, thus the questions are formed in two different ways such as ‘yes’ and ‘no’ questions, and the questions should have been answered by inserting text.
Chapter VII
Discussion of Survey Results

7.1. Analysis of results/data

According to the results for the survey made regarding the topic of Verification Procedure for Diplomas issued by PPHEs, the results gained from the students and graduates brought to the conclusion that the majority of students are aware that every diploma and other document should be verified by MEST and KAAA. They consider the verification procedure as necessary and very important. However they like to know more about the verification procedure, since most of them do not know that it is a complex procedure.

Most of the respondents believe that the verification procedure carried out by MEST increases the value of their diplomas and subsequently the employment opportunities. Finally the majority of the respondents answered that the verification procedure should be faster.

Figure 7.1 Questionnaire for students and graduates: “How did you feel about this verification procedure”?

Figure 7.1 shows the percentage of students’ responses how they feel about this verification procedure. From this figure it can be understood that the students need this verification procedure because it is regulated by the state institutions. Thus they have to respect the state policies.

Figure 7.2: Questionnaire for students and graduates: “How could this procedure be improved”?
Figure 7.2 shows the percentage of the students who asked to have their diploma on time. Thus they asked to carry out this procedure faster. From this point of view, it is impossible that the students get their diplomas which are foreseen to be issued within 4 weeks by the Administrative Instruction\(^7\) (see also the Figure 4.2 and 4.3). That is due to various reasons, firstly within PPHEs, and then the multiple procedures which have to go through different institutions such as from PPHEs-MEST–KAA-PPHE.

Based on the responses of the senior officials from PPHEs given to the survey regarding the verification procedure of diplomas, it can be freely concluded that it is valuable and necessary for the majority of the respondents. While the opinion is divided almost in half regarding the implementation procedure since 44% of them consider that the procedure is adequately implemented, while 31% consider that it is not adequately implemented. Most of the respondents believe that this verification procedure increases the value of the colleges but they think that this procedure shall be quicker and more effective.

Figure 7.3: Questionnaire for senior official of PPHEs: “This verification procedure increases the value of the college’s reputation.”

From the Figure 7.3, it is understood that the senior officials of PPHE believe that the verification procedure increases the value of the college’s reputation. That is also said in the interviews conducted with them. Some of them asked to keep the verification procedure of diplomas, because the stamps of MEST and KAA make the PPHEs diplomas more valuable. They confirmed that the stamps of MEST and KAA strengthen the reputation of colleges.

\(^7\) Administrative Instruction 01/2012 on the Appointment of the form and content of diplomas and diploma supplement
Figure 7.4 Senior officials of PPHEs: PPHEs students should be treated equally as the students from public universities

Figure 7.4 shows that the vast majority of the respondents (95%) consider that students from private colleges shall be treated equal with students from public university. Taking into consideration the responses of the senior officials of PPHEs, there is somehow a discrepancy on their opinion and requests, for example, 95% of them asked that students from PPHEs to be equal as the students from public universities. One the other hand, their opinion float on the question if the verification procedure should not exist for accredited institutions. Thus 43% of the respondents do not know whether the verification procedure should not exist for accredited institutions and 24% of them disagree to eliminate it. Thus this opinion corresponds to the Figure 7.3 which implies to keep the verification procedure because it increases the private colleges’ reputation. This was also confirmed by some of the PPHEs officials.

Figure 7.5 Questionnaire for senior officials of PPHEs “What should be done to have better verification procedure?

Figure 7.5 shows that most of the senior officials of PPHEs asked that the procedure should be changed and be digitalized.

While 50% of the respondents consider that through the verification procedure the legal procedures are respected by the private colleges. Most of the respondents believe that the
verification procedure shall be changed and made by MEST and not by KAA for PPHE, and this procedure shall be carried out also for the public university. More than fifty percent of the respondents consider that by this verification procedure the Law on Higher Education is not violated. The respondents also believe that the verification procedure shall be much quicker and be digitalized. Thus they disagree that there should not be a verification procedure.

The third and final questionnaires were sent to the Expert of higher education and MEST senior officials. Based on their responses it can be concluded that the opinion of the respondents is divided almost equally thinking that the verification procedure of diplomas is necessary and a waste of time. The opinion of the respondents is divided in main 2 groups: those who believe that the verification procedure should also be implemented by MEST and KAA for public universities and the group who strongly disagree that this procedure should be implemented by the MEST and KAA for public universities. While most of the respondents believe with this verification procedure legal procedure is assured and respected by private colleges.

From this point of view, it is concluded that as far as private colleges respect the legal provisions set by the MEST and KAA, then why this verification is needed. The vast majority of respondents confirm that the students’ registration books should be kept by PPHE-s. Thus these books should not be required by MEST; instead they should be filled out, updated and kept only at the PPHEs.

The vast majority of the respondents consider that the students shall be treated equally as the students from public universities. Therefore most of them believe that the verification procedure only for PPHE is violation the 2011 Law on Higher Education especially Article 2 item 1.2. Nevertheless, over 50% of the respondents believe that by stamping these diplomas within MEST and KAA the value of these diplomas is increased. However, they consider as unfair and unlawful that some institutions in Kosovo apart from verification by MEST and KAA of the diplomas they request an additional attestation which confirm the validation of diplomas. Again the respondents are divided into almost two equal groups when considering the role of the KAA in the verification procedure, with 50% considering important and 40% considering it only formal.
Figure 7.6 Questionnaire for experts of higher education: “Verification procedure only for PPHEs is violating the 2011 Law on Higher Education

Figure 7.6 shows that most of them believe that the verification procedure only for PPHE is violation the 2011 Law on Higher Education especially Article 2 item 1.2.

Figure 7.7 Questionnaire for experts of higher education: “All PPHEs should keep the Students’ Registration Books in their Institutions, not at MEST.

Figure 7.7 shows that 6% of the experts of higher education confirm that all PPHEs should keep the students’ registration books in their institutions. Actually, the students’ registration books are being kept in hard copies which are identical at both MEST and PPHEs. Therefore, the expert asked that MEST should not keep these books within MEST, instead all PPHEs should keep in their institutions.

Figure 7.8 Questionnaire for experts of higher education: “What should be done to have better verification procedure?

- Provide digital database 47%
- To be regulated in a proper way 29%
- Provide more staff at MEST and KAA 24%
- Don’t know 5%
- Maybe 13%
- Agree 31%
- Fully agree 6%
Figure 7.8 shows the percentage of the experts’ responses on what should be done to have better verification procedure. 47% of responded to have a digitized database. Most of them declared that if the verification procedure is not eliminated, then it would be better to change it by making it digitized.

7.2. Comparison with Regional Practices

The results from the questionnaire are as follows:

Regarding the existence of PPHEs, all five countries have responded that there are PPHEs in their countries, however, the number of the institutions differ from one to another. For example, Austria has 33 universities and 5 university colleges of education. Bulgaria has 14 PPHEs. Croatia has 32 PPHEs. Montenegro 2 universities and 9 independent private faculties. All these countries responded that the Law on Higher Education (LHE) regulates the functioning of the Private Providers of higher Education.

These countries also answered that the LHE specifies that both public and private/ colleges/ institutions are treated equally before the Law. And all students at any institution of higher education may transfer from private to public universities and vice versa, certainly, except that costs of enrolment are different from one to each other.

The accreditation of both public and private institutions of higher education in each of these countries is done by their national accreditation agency, while Montenegro answered that the accreditation is done by the Council for Higher Education as a public body.

The role of the Ministry of Education in each country towards private providers of higher education is different, e.g. in Bulgaria there is no licensing process for private institutions of higher education, and instead the role of the Ministry of Education is only to control them. Conversely, in Croatia there is a licensing process which is carried out by the Ministry of Education. Following Montenegro, there is also a licensing process which is done by the

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81 Croatia: “Act on Quality Assurance in Science and Higher Education” (Official Gazette no. 45/09), „Ordinance on the Content of Licence and Conditions for Issuing Licence for Performing Higher Education Activity, Carrying out a Study Programme and Reaccreditation of Higher Education Institutions” (Official Gazette no. 24/10), „Ordinance on Conditions for Issuing Licence for Scientific Activity, Conditions for Reaccreditation of Scientific Organisations and Content of Licence” (Official Gazette no. 83/10).

82 Montenegro: Law on Higher Education and Rulebook for Licensing of HEIs.
Ministry of Education. Notwithstanding, there is no licensing process done by the Ministry of Education in Austria.83

Concerning the recognition of diplomas among national private and public institutions of higher education, there is no doubt that diplomas are recognized equally for both in private and public institutions.

None of these countries verify diplomas or any other document which are issued by the private providers of higher education, except Bulgaria which confirmed that there is a compulsory sticker that are being ordered by the public/private institutions to Ministry of Education for each degree. In Croatia, “diplomas of private college have the same value as the diplomas of public institutions and do not require any further recognition as long as the institution in question has its valid license issued by the Croatian Ministry of Education, Science, Education and Sports”.

However, there is completely different situation regarding the abovementioned issue with PPHEs in Kosovo. This was recommended by the British Accreditation Council Report of July 2008. This report recommended in order to make secure control of degree and diploma awards issued by PPHEs, since there was no accreditation for four academic years (2004 till 2008) for these institutions84. Therefore, this process continued and also for this reason an Administrative Instruction was issued for verification of diplomas and other documents issued by PPHEs. Nevertheless, according to the applicable Law on Higher Education, the accreditation of the PPHEs started in 2008 and since then there is no need for the verification of diplomas since programs and institutions are now accredited and all accredited institutions are treated equally according to the Law on Higher Education.

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83 Austria: [https://www.aq.ac.at/en/](https://www.aq.ac.at/en/)

84 Supra 72
Chapter VIII

Conclusions and recommendations

Introduction
This capstone project addressed the issue of regulation of verification procedure of diplomas and other documents issued by the Private Providers of Higher Education (PPHEs) in the Republic of Kosovo. Diplomas issued by PPHEs are not considered as valid or recognized in Kosovo without being verified and sealed by MEST and KAA. Conversely, this is not the same for public universities which in this case are privileged by all employing institutions in Kosovo and abroad.

Certainly, this verification procedure has created a problematic situation. Firstly in the legal aspect, it obviously violates the applicable 2011 Law on Higher Education No. 04/L-037\(^{85}\). It discriminates the students from PPHEs comparing with students from the public universities in Kosovo. The Public Universities throughout Kosovo do not apply this verification procedure within MEST and KAA (with exception of individual graduates who apply for further studies abroad, so they need their diploma to be sealed).

Secondly, due to the large number of diplomas and documents submitted by PPHEs to be verified at MEST, this verification procedure has created a complicated administrative and technical procedure which lasts for months. It frustrates many of the graduates who cannot get diplomas within four weeks as foreseen by the respective Admin Instruction\(^{86}\).

Taking into consideration the results from the survey made regarding the topic of the Verification Procedure of Diplomas issued by PPHEs, the respondents from among students and graduates who filled out the questionnaire brought us to the conclusion that majority of them are aware that every diploma and other document should be verified by MEST and KAA before they receive it, and they consider the verification procedure as necessary – however finding it not very efficient and too lengthy. A similar opinion is held by officials of PPHEs who also consider that this verification procedure is necessary and but not very efficient. All of the respondents believe that through the verification procedure, the value of

\(^{85}\) Law on Higher Education No 04/L-037, Article 2 Principles, item 1 Provision of Higher Education in the Republic of Kosovo is based on the following principles, 1.2 “Equality before the Law of all Bearers of Higher Education”,

\(^{86}\) Administrative Instruction No. 02/2012 date 30.03.2012 Form and Content of Diplomas and Supplement diploma of all providers of higher education, Article 2 Term for issuing Diplomas item 1 Diplomas of BA, MA, PHD and all other diplomas that is within higher education should be issued within 4 (four) weeks from the date of graduation, after the requirements for gaining he diploma are met.
diploma is increased. Nevertheless, both graduates and officials from PPHEs would like to have a simpler and faster procedure at MEST and KAA.

Even though this procedure is in complete contradiction with the 2011 Law on Higher Education since according to this Law, all providers of higher education be it from the public or private institutions should be treated equally, this is not happening in this case. What needs to be addressed and considered seriously is the response on the question made to both graduates and officials from the PPHEs who still believe that their diplomas should go through the verification procedure by MEST and KAA even though they believe that they are discriminated comparing to the public providers of higher education, they do not ask or agree that this procedure to be eliminated, but they ask that the same applies for the public universities as well.

Regarding the Administrative Instruction No. 22/2012 on the Students’ Registration Books of the Higher Education Institutions is being implemented by MEST only for PPHEs which are obliged to update two original books for students’ registration books each academic year. Conversely, the public universities are not required by MEST to submit and update the students’ registration books, in this case PPHEs again are discriminated.

Therefore, one solution would be that this AI to be implemented either by both public and private institutions of higher education or be eliminated completely. Thus ‘The Students’ Registration Books’ should neither be submitted to MEST nor updated each academic year. One possible solution would be for MEST to initially set up a standard form for all institutions of higher education regarding the content on students’ registration books; hence the same should be submitted to MEST electronically. Then, MEST should oblige both public and private institutions of higher education to keep a hard copy of the student registrations in their Institution. At the beginning of each academic year those books should be closed with the date and signature of the official in charge from MEST and the official from the respective institution.

Even though the verification procedure is regulated by the Administrative Instruction 11/2013, this is in contradiction with the 2011 Law on Higher Education since this Law treats them equally.
On the other hand, the majority of MEST officials and experts of higher education considers that this verification procedure should be eliminated from MEST and KAA for the accredited programs and institutions, and they claim that all PPHEs should be inspected regularly by MEST. The majority of them asked that students from PPHEs should be treated same as the students from public institutions.

Taking into consideration that the Administrative Instruction No. 22/2012, dated 22.10.2012 on the “Students’ Registration Books of Institutions of Higher Education” is being implemented only for private providers of higher education, the majority of the experts claim that all institutions of higher education (public and private) should keep the students’ registration books in their institutions, not at MEST.

The vast majority of the respondents consider that the diplomas issued by public and private PHE shall be treated equal and therefore most of them believe that the verification procedure only for PPHE is violation the Law on Higher Education especially Article 2 item 1.2. Nevertheless, over 50% of the respondents believe that by stamping these diplomas within MEST and KAA the value of these diplomas is increased.

However, they consider as unfair and unlawful that some institution in Kosovo apart from verification by MEST and KAA of the diplomas they request an additional attestation which confirm the validation of diplomas. Again the respondents are divided into almost two equal groups when considering the role of the KAA in the verification procedure, with 50 % considering important and 40 % considering it only formal.

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**Recommendations**

There is undoubtedly a need to regulate the verification procedure of diplomas issued by private institutions of higher education in Kosovo.

**The project’s recommendations are as follows:**

- **The top priority** recommendation is the elimination of entire verification procedure for accredited programs of PPHEs;
- **The secondary recommendation** is the creation of a system with a digital database for the student registration at the PPHEIs;

1. **Elimination of entire verification procedure for accredited programs of PPHEs:**

The best possible solution would be to eliminate the verification procedure at MEST and KAA for the accredited programs and institutions. This is based on the following factual elements:

   **a)** The principles of the 2011 Law on Higher Education stipulate that “all institutions of higher education are equal before the Law”. Furthermore there should be “equal opportunities for all students and personnel in the institutions of higher education without any discrimination”.

   **b)** According to the applicable 2011 Law on Higher Education, the Kosovo Accreditation Agency i) guarantees and ensures that the institutions of higher education in Kosovo and their programs meet the quality standards internationally recognized, ii) the accreditation process ensures the Kosovo society that the quality of teaching and learning are comparable with the international standards, iii) and the accreditation is transparent and trustful that is internationally comparable, iv) ensures that the standards and the quality in the institutions of higher education meet the standards and expectations of the European Network Association for Quality Assurance in Higher Education (ENQA)\(^8^8\).

The Administrative Instruction No. 11/2013 dated 04.03.2013 on the Verification of Diplomas and other documents issued by PPHEs target only diplomas of private institutions.

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\(^8^8\) 2011 Law on Higher Education in Kosovo No. 04/L-037 date 31.08.2011. Available at: [http://www.masdht.gov.net/advCms/documents/02_Ligjet_per_arsimin_e_larte_anglisht.pdf](http://www.masdht.gov.net/advCms/documents/02_Ligjet_per_arsimin_e_larte_anglisht.pdf)
This can be considered discrimination for PPHEs students, since diplomas from the public universities are not verified at MEST or KAA.

Considering the above-mentioned steps that KAA undertakes in order to accredit one program, and taking into consideration the role of the KAA to ensure international standards and quality teaching, if these are respected there should not be need for further verification of diplomas and documents issued by PPHEs.

For the abovementioned reasons and that the 2011 Law on Higher Education should be respected by the state institutions, there should not be verification procedure for PPHEs diplomas and other documents. Moreover, the AI No. 11/2013 on the Verification of PPHEs diplomas should be amended and should in line with the 2011 Law on Higher Education.

**Some important recommendations in relation to the elimination of verification procedure for diplomas:**

a) Minister of MEST may issue a decision which would inform all institutions in Kosovo (This decision for the elimination of the verification procedure will announce all institutions about the recognition of accredited programs and institutions and these diplomas which are issued by PPHEs);

b) The verification of diplomas should be made at random;

c) The PPHEs should be inspected regularly by MEST inspectors and officials in charge. They should report their findings;

d) The students’ registration books should be kept only by PPHEs, not within MEST. At the beginning of each academic year, the MEST official in charge should close the books with signature and the date foreseen with AI on Students’ Registration Books;

e) The students’ registration books should be filled out at the beginning of each academic year according to the alphabetic students’ names and the same form and content should be sent at MEST electronically;

f) Only students who intend to further study abroad may request from MEST and KAA to certify their diploma.

g) Diplomas with Stamp 2 should also be recognized by all Kosovo institutions. This is based on the article 4 item 4.7 of the Law No. 2002/3 on the Higher Education in Kosovo which states that “Until the establishment of KAA, all function of this Agency will be carried out by the Ministry”.
h) Diplomas with Stamp 3 refer to the students who attended their studies in an unlicensed program before 2008. It is recommended that MEST organizes a special exam for them in order to validate their diplomas.

i) Diplomas awarded by international institutions which operate in Kosovo with accreditation from KAA and a license from MEST should be recognized without a verification procedure.

If MEST and KAA decide not to eliminate this verification procedure for a certain reason, then it is recommended a secondary option of recommendation such as:

2. Creation of a system with a digital database;

If MEST and KAA will not eliminate this verification procedure for diplomas issued by PPHEs for any reason, then it is recommended to create a digitized database system for all PPHEs and public universities. This system would have a direct linkage between a) public universities and MEST-KAA, b) PPHEs and MEST-KAA. This system would update constantly students’ data from all providers of higher education. This is meant to be organized in the form where MEST would have a leading role (See Figure 7.7) in order to create, manage and update this database, while KAA would constantly have access in this database in order to follow the updates and other information. This digital system would include all students’ data, registration, transfers, graduation, programs etc.

Figure 7.9 Creation of database for all providers of higher education

Taking into consideration the results from the questionnaires for senior officials of PPHEs and expert of higher education, where 42% of senior officials from PPHEs and 47% of experts of higher education suggest that a database should be created by MEST. In this way, all students will be treated equally.

REFERENCE MATERIALS
Journals:


Reports and Strategy:


Laws and Administrative Instructions

1. Administrative Instruction No. 22/2012 on the Student’s Registration Books of PPHEs;

2. Administrative Instruction No. 11/2013 on the Verification of diplomas and other documents issued by the PPHEs;

3. Administrative Instruction No. 25/2012 Licensing of PPHEs in Kosovo;

4. Administrative Instruction No. 22/2012 Students’ Registration Books of the Institutions of Higher Education

5. Administrative Instruction 03/2013 dated 16.01.2013 on Accreditation of Institutions of Higher Education in the Republic of Kosovo;

6. Administrative Instruction 01/2012 dated on 05.03.2012 on the appointment of form and content of diplomas and diploma supplement of the Institutions of higher Education in the republic of Kosovo.
7. Law on Higher Education 04/L-037 on Higher Education in the Republic of Kosovo dated 29.08.2011;
8. UNMIK Regulation 2003/14 dated 12 May 2003 on the Announcement of the Law approved by the Kosovo Assembly on Higher Education in Kosovo

Other relevant documents, institution, projects and decisions:

1. All Decisions on accreditation of the programs and Institutions issued by the KAA;
2. All Decisions for Licensing of Private Providers of Higher Education issued by the MEST;
3. British Accreditation Project 2008
5. Higher Education in Kosovo 2002-2009;
6. Student Graduate Books of PPHEs;

Web pages:
7. www.masht.gov.net;
11. http://www.eua.be/eua-work-and-policy-area/building-the-european-higher-
education-area/bologna-basics.aspx

Dictionaries

Appendix I

Questionnaire for students and graduates of Private Providers of Higher Education
| A1 | Are you aware of the verification procedure of diplomas and other documents? | a) Yes  
b) No  
c) Only a little |
|----|------------------------------------------------------------------|-------------------------|
| A2 | Have you been informed by the college/PPHE that every document should be verified by MEST and KAA? | a) Yes  
b) No  
c) I have heard from colleagues |
| A3 | Would you like to know more about the verification procedure? | a) Yes  
b) No  
c) Not sure |
| A4 | Every diploma and other documents will not be valid without being verified at MEST and KAA? How important is this for you? | a) It is important  
b) It is bureaucratic  
c) Not relevant  
d) Waste of time |
| A5 | Did you know that diploma verification have to go through a complex verification procedure? | a) Yes  
b) No  
c) Only little |
| A6 | What is your opinion about the fact that MEST / KAA need to first verify and seal your diploma certificate? | a) Happy to get diploma stamped by MEST and KAA  
b) Perceived as normal procedure  
c) You were shocked (because you think you will lose any term for job or further studies)  
d) Very bureaucratic |

**Questions only for graduates:**

<p>| A7 | Did you have your diploma certificate | a) Yes |</p>
<table>
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<th>verified by MEST / KAA?</th>
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</table>
| A8 | How did you feel this verification procedure? | a) Very important  
|   | b) Quite important  
|   | c) Not relevant  
|   | d) Waste of time  |
| A9 | If not, do you know that you have to have your diploma verified before you receive it from your institution? | a) Yes,  
|   | b) No  
|   | c) I have heard but I am not sure  |
| A10 | What is your view on this procedure? | a) Necessary  
|   | b) Not necessary  
|   | c) Bureaucratic  
|   | d) Waste of time  |
| B11 | How effective is it? | a) Very effective  
|   | b) Quite effective  
|   | c) Somewhat effective  
|   | d) Ineffective  
|   | e) Useless  |
| B12 | Do you believe that this verification procedure and MEST and KAA stamps increase the diploma value? | a) Strongly agree  
|   | b) Agree  
|   | c) Neutral  
|   | d) Disagree  
|   | e) Strongly disagree  |
| B13 | How does this verification procedure affect your employment opportunities? | a) Very much  
|   | b) Only a little  
|   | c) Not at all  
|   | d) Depend on MEST influence policies  |
| B14 | How could this procedure be improved? | a) Having faster processing  
|   | b) Simplifying the process  
|   | c) Verify only Diploma, not other documents  
|   | a) Eliminate the whole procedure from MEST and KAA  |
| B15 | If there is anything you would like to add – please use this space: |   |

**Appendix II**

*Questionnaire for senior officials of PPIHEs*
<p>| | | |</p>
<table>
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</table>
| 1. | What do you think about the verification procedure of diplomas and other documents issued by PPHEs? | a) Necessary  
 b) Valuable  
 c) Not so useful  
 d) Waste of time |
| 2. | This procedure is being adequately implemented. | a) I fully agree  
 b) I agree  
 c) Disagree  
 d) Strongly disagree |
| 3. | The procedure is quick and efficient. | a) Quick and efficient  
 b) It is not quick  
 c) Tends to be slow  
 d) It’s too slow and time consuming |
| 4. | This verification procedure increases the value of the colleges’ reputation. | a) Very much  
 b) Quite a lot  
 c) Only a little  
 d) Somewhat  
 e) No |
| 5. | How does education in general benefit from this verification procedure? | a) Assure that legal procedure is respected by private colleges;  
 b) The integrity of information is assured and confirmed  
 c) Confirm the reputation of the colleges  
 d) Nothing |
| 6. | Students from the private colleges should be considered equal with the students of public institutions. | a) I fully Agree  
 b) I agree  
 c) I disagree  
 d) I strongly disagree  
 e) No answer |
| 7. | This verification procedure is violating the Law on Higher Education. | a) I fully Agree  
 b) I agree  
 c) I disagree  
 d) I strongly disagree  
 e) No answer |
| 8. | This verification procedure should be carried out by MEST and KAA for | a) I fully agree  
 b) I agree |
<table>
<thead>
<tr>
<th>Question</th>
<th>Response Options</th>
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<tbody>
<tr>
<td>the Public Universities too.</td>
<td>c) I strongly disagree</td>
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<td></td>
<td>d) Maybe</td>
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<td></td>
<td>e) It’s up to MEST and KAA decision</td>
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<td>9. This verification procedure should be carried out only by KAA.</td>
<td>a) I strongly agree</td>
</tr>
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<td></td>
<td>b) I agree</td>
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<td></td>
<td>c) I disagree</td>
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<td></td>
<td>d) It’s not fair</td>
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<td></td>
<td>e) I don’t know</td>
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<td>10. Do you think that this verification procedure should be changed??</td>
<td>a) I agree</td>
</tr>
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<td></td>
<td>b) I disagree</td>
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<td></td>
<td>c) It’s up to MEST decision</td>
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<tr>
<td></td>
<td>d) I don’t know</td>
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<tr>
<td>11. This verification procedure should be carried out only by MEST.</td>
<td>a) I agree</td>
</tr>
<tr>
<td></td>
<td>b) I strongly disagree</td>
</tr>
<tr>
<td></td>
<td>c) It should be done by both MEST and KAA</td>
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<td></td>
<td>d) Neither MEST nor KAA should verify diplomas</td>
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<tr>
<td>12. What should be done to have better verification procedure?</td>
<td>a) Speeding up the process</td>
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<td></td>
<td>b) Provide more staff at MEST and KAA</td>
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<td></td>
<td>c) Provide digital data base</td>
</tr>
<tr>
<td>13. There should not be any verification procedure for accredited</td>
<td>a) I strongly agree</td>
</tr>
<tr>
<td>institutions.</td>
<td>b) I agree</td>
</tr>
<tr>
<td></td>
<td>c) I strongly disagree</td>
</tr>
<tr>
<td></td>
<td>d) I don’t know</td>
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Appendix III

Questionnaire for Experts of Higher Education / MEST senior officials
1. What do you think about the verification procedure of diplomas and other documents issued by private colleges?
   - e) Necessary
   - f) Valuable
   - g) Not so useful
   - h) Waste of time

2. This verification procedure should also be implemented by MEST and KAA for public universities?
   - a) I fully agree
   - b) I agree
   - c) I strongly disagree
   - d) Maybe
   - e) It’s up to MEST decision

3. Do you think that the Administrative Instruction on the Student’s Registration Books of the Institutions of Higher Education in Kosovo should also be implemented by MEST for public universities?
   - a) Yes
   - b) No
   - c) All PPHEs should keep the students’ registration books in their institutions, not at MEST
   - d) I don’t know

   (e.g. This Administrative Instruction is being implemented by MEST only for PPHEs)

4. How does the education in general will benefit from this verification procedure?
   - e) Assure that legal procedure is respected by private colleges;
   - f) The integrity of information is assured and confirmed
   - g) Confirm the reputation of the colleges
   - h) Nothing

5. Do you think that stamps of MEST and KAA increase the value of diplomas?
   - a) I fully agree
   - b) I agree
   - c) I strongly disagree
   - d) Maybe
   - e) It’s up to MEST decision

6. How would you consider the action of the institutions in Kosovo who do not recognize diplomas issued by PPHEs?
   - a) Fair
   - b) Unfair and unlawful
   - c) I don’t know

   (There are cases when Kosovo institutions such as municipalities and other public and private institutions, even though diplomas are verified and sealed by MEST and KAA, they again require an additional attestation which confirm the validation of diplomas).

7. Students from the private college should be considered equally with the
   - a) I fully agree
   - b) I agree
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| public students. | c) I disagree  
d) I don’t know |   |
| 8. The verification procedure only for PPHEs is violating the Law on Higher Education? | a) I fully agree  
b) I agree  
c) I disagree  
d) Maybe  
e) I don’t know | (Taking into consideration the Article 2 item 1.2. equality before the Law for all providers of higher education; item 1.3. equal opportunities for all students and academic personnel in the institutions of higher education without discrimination). |
| 9. This verification procedure should be carried out by both MEST and KAA? | e) I fully agree  
f) It should be done only by MEST  
g) It should be done only by KAA  
h) Neither MEST nor KAA should verify diplomas |   |
| 10. How would you assess the Kosovo Accreditation Agency in this verification procedure? | a) Important  
b) Formal  
c) Not important  
d) I have no answer |   |
| 11. Do you think that there should not be any verification procedure for accredited institutions? | a) I fully agree  
b) I agree  
c) It’s not fair  
d) I have no answer |   |
| 12. Do you think that this verification procedure should be changed? | a) Yes  
b) No |   |
| 13. If yes, what should be done in order to have better verification procedure? | a) To be regulated in a proper way  
b) Provide more staff at MEST and KAA  
c) Provide digital data base |   |
| 14. There should not be any verification procedure for accredited institutions. | e) I strongly agree  
f) I agree  
g) I strongly disagree  
h) I don’t know |   |

**Appendix IV**

**Questionnaires for Experts of Higher Education in the SEE countries**
1. Are there any private providers of higher education (PPHE) (universities or colleges) in your country?
   a) Yes
   b) No

2. How many PPHE are there in your country?
   (Please write the number)

3. Which Laws regulate the private sector of higher education in your country?
   (Please write the names of the Regulations/Laws)

4. What institution/s accredits PPHE-s?
   a) Accreditation Agency?
   b) Other (please write the name of institution)

5. What is the role of the Ministry of Education in your country towards PPHE?
   a) Licensing
   b) Accreditation
   c) None

6. If the Ministry is involved in any of above, please explain what is the legal framework for licensing or accreditation
   (Please explain briefly)

7. Does the Ministry of Education or Accreditation Agency verify and validate diplomas issued by PPHE?
   a) Yes
   b) No
   c) In specific cases

8. If yes, does the Ministry of Education have a regulation which provides for the verification procedure of diplomas of PPHEs?
   a) By Law (Please write the name of Law)
   b) Administrative Instruction (Please write the name and the number)
   c) Regulation (Please write the name)
   d) Decision (Please write the name)

9. If no, how are diplomas of private colleges recognized at home and abroad, please explain?
   (Please explain briefly)

10. Use this space, if you have anything to add:

---

**Appendix V**

**Glossary**

**Accreditation**

“A formal acknowledgement that an Institution of higher education and its programs fulfils internationally recognized quality standards”
and that its qualifications confer on holders, in accordance with applicable law, a number of rights, e.g. access to a further stage of education, to specific occupations, to the use of a title.99

**Bologna process**

“The Bologna Process aims to facilitate mobility by providing common tools (such as a European Credit Transfer and accumulation System – ECTS and the Diploma Supplement) to ensure that periods of study abroad are recognised. These tools are used to promote transparency in the emerging European Higher Education Area by allowing degree programmes and qualifications awarded in one country to be understood in another.”90

**European Higher Education Area**

“European Area of Higher Education - has the meaning set forth in the Declaration of the European Ministers of Higher Education in Bologna (1999)”91

**Credits**

“A credit is an agreed upon quantified means of expressing the level of learning based on the achievement of learning outcomes and their associated workloads”92.

**Criteria**

“Checkpoints or benchmarks determining the attainment of certain objectives and/or standards. Criteria describe to a certain degree of detail the characteristics of the requirements and conditions to be met (quantitative and qualitative) basis on which an evaluative conclusion is drawn”93.

**ECTS**

“The European Credit Transfer and Accumulation System (ECTS) - assigns credits to course components based on the student workload required to achieve the objectives of the particular course of study”94.

**Evaluation**

“The general process of a systematic and critical analysis leading to judgments and recommendations regarding the quality of higher education institution or program. An evaluation is carried out through internal or external procedures”95.

**Institution**

It may refer to public and private providers of higher education or/and other institutions of the government, municipalities, schools, private companies.

**Licensing**

“The process by which a governmental agency grants official permission … to programs, based on the evaluation of appropriate plans, to operate before obtaining accredited status; to institutions to perform specified functions”96.

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89 2011 Law on Higher Education No.04/L-037 in The Republic of Kosovo
93 Ibid
94 Supra 87
95 Supra 90
96 Ibid
Program
“A course of study leading to a qualification or diploma given by a provider of a higher education”.97

Private provider
“Any institution established whether for profit or unprofitable by any person, group of persons or organization other than the Government of the Republic of Kosovo or any other sovereign State. When a private provider is established and operates under the principle of unprofitably, it may take the form of a Non-Governmental Organization and enjoy the benefits and relevant obligations of an NGO in accordance with the legislation in power”98.

Provider
“Any institution or other authorized body for offering of educational services in the higher education level”99.

Public provider
“Provider created by the Government of Republic of Kosovo”100

Quality Assurance
“An all-embracing term referring of an ongoing, continuous process of evaluating (assessing, monitoring, guaranteeing, maintaining, and improving)”101

Qualification
“Any higher education award (degree, diploma, or other type of formal Certification) issued by a competent, registered authority attesting to the successful completion of a course program”102.

Recognition
“Formal acknowledgment of i) individual academic or professional qualifications; ii) programs of a higher education institution; iii) quality assurance agencies, by a competent recognition authority that acknowledges certain standards and values with respect to special purposes that indicate the consequences of recognition.”103

Validation
“The process by which a program is judged to have met the requirements for an award by a relevant institution with degree-awarding powers (institutional self-evaluation) or by a relevant examining board (validation by an outside examining body)”104.

Verification
“Check or confirm the truth or accuracy of something”105.

97 Supra 87
98 Ibid
99 Ibid
100 Ibid
101 Supra 90
102 Ibid
103 Ibid
104 Ibid