



Reengagement Panel Report

Assessment of Capacity and Approval of QA Procedures

Part 1 Details of provider

1.1 Applicant Provider

Registered Business/Trading Name:	American College Dublin
Address:	1 Merrion Square N, Dublin 2, D02 NH98
Date of Application:	28 November 2019
Date of resubmission of application:	7 December 2020
Date of evaluation:	11 January 2021
Date of (<u>virtual</u>) site visit:	27 May 2020
Date of recommendation to the Programmes and Awards Executive Committee:	16 July 2020 and 4 February 2021



1.2 Profile of provider

American College Dublin (hereafter ACD) is a not-for-profit liberal arts institution. It was initially founded by Lynn University (Boca Raton, Florida) as an off-campus study abroad teaching site in 1993, and was established independently of Lynn University in 1994.

ACD offers QQI programmes in the liberal arts and business domains, and a range of non QQI programmes in creative writing, performing arts and musical theatre. The latter have been accredited in the past by the Accrediting Council for Independent Colleges and Schools (ACICS) and currently with the Middle States Commission on Higher Education (MSCHE).

Of its QQI programmes, the longest running is the BA (Hons) in International Business, at Level 8 on the National Framework of Qualifications (NFQ), which was validated by the National Council for Educational Awards (NCEA) in 1996. An NFQ Level 9 Master of Business in International Business was validated in 2006. A BA (Hons) in Liberal Arts at NFQ Level 8 was established by ACD and validated by the NCEA in 1996. Subsequently, a three year liberal arts degree was developed from this original programme, and approved by HETAC in 2011.

ACD has a total student population of approximately 180, of which approximately 50 students are registered on QQI accredited programmes. However, the College anticipates that the numbers of students enrolled on QQI programmes will increase in the coming years. The student population is fairly evenly divided between students originating from the US, students originating from the EU (predominantly Ireland) and students originating from elsewhere. The College claims high progression and retention rates, and associates this with the small class sizes (maximum 25 students per class) and quality of teaching at the institution.



Part 2 Panel Membership

Name	Role of panel member	Organisation
Dr. Annie Doona	Chairperson	Emeritus President IADT & Independent Consultant
Dr. Catherine Peck	Report Writer	Independent Education Consultant
Dr. Eric Derr	QA Expert	Carlow College
Jan Cairns	QA Expert	TU Dublin
Garry Elbert	Learner Representative	NUI Galway

Part 3 Findings of the Panel

3.1 Summary Findings

At the outset, the panel commends ACD and its representatives on the commitment and dedication of staff and leadership to the students of the College. This was very evident to the panel during meetings conducted at the virtual site visit. The panel also note that ACD's representatives engaged in open, constructive dialogue with the panel members throughout those meetings. Finally, the panel acknowledge ACD's efficient facilitation of the reengagement process leading up to the virtual site visit. This included submission of a self-evaluation and substantial documentation, as well as provision of additional supplementary material requested by the panel.

During the virtual site visit, the panel interacted with members of the leadership team at ACD, as well as staff engaged in teaching, administration and learner support roles. The panel sought to gain further insights into ACD's approach to Quality Assurance (QA), and to explore specific areas in which the panel held concerns that the documentation presented did not represent an appropriate alignment to QQI's Core Statutory Quality Assurance Guidelines.

At the conclusion of the virtual site visit, the panel were of the view that there were numerous areas in which ACD had satisfied the reengagement criteria, and addressed QQI's guidelines pertaining to dimensions of QA. These are indicated throughout this report. However, the panel was not in a position to recommend immediate approval of ACD's draft QA procedures. The panel



held specific concerns in relation to the dimensions of Governance and Management of Quality, a Documented Approach to QA, Programmes of Education and Training and Assessment of Learners. These concerns are outlined in Sections 5.1 – 5.11 of this report and are reflected in *Mandatory Changes* in Section 7.1. Further items of *Specific Advice*, directed toward enhancement of QA, are included in Section 7.2.

The panel was of the view that ACD was capable of implementing the required changes within the allocated period of six months. The panel was confident that ACD had the internal capacity and capability to undertake the required adjustments.

The Panel reconvened on 11 January 2021 and conducted a desk review of the revised Quality Assurance Manual of ACD. The Panel commends ACD for its engagement in this process and for the considered changes it made to its quality assurance framework. Having reviewed the revised submission from ACD, the Panel recommends approval of ACD’s draft quality assurance procedures.

3.2 Recommendation of the panel to Programmes and Awards Executive Committee of QQI

	Tick <u>one</u> as appropriate
Approve American College Dublin draft QA procedures	X
Refuse approval of American College Dublin draft QA procedures with mandatory changes set out in Section 6.1 (If this recommendation is accepted by QQI, the provider may make a revised application within six months of the decision)	
Refuse to approve American College Dublin draft QA procedures	



Part 4 Evaluation of provider capacity

4.1 Legal and compliance requirements:

	Criteria	Yes/No/ Partially	Comments
4.1.1(a)	Criterion: <i>Is the applicant an established Legal Entity who has Education and/or Training as a Principal Function?</i>	Yes	ACD submitted Articles of Association/Certificate of Incorporation and a copy of its application to revenue for Eligible Charity status.
4.1.2(a)	Criterion: <i>Is the legal entity established in the European Union and does it have a substantial presence in Ireland?</i>	Yes	As per the evidence cited in relation to Criterion 4.1.1(a) the provider is a legal entity with a substantial presence in Ireland.
4.1.3(a)	Criterion: <i>Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?</i>	Yes	The provider does not currently have any collaborative provision arrangements in place. ACD provided relevant information pertaining to its accreditation arrangements with the Middle States Commission on Higher Education in the United States.
4.1.4(a)	Criterion: <i>Are any third-party relationships and partnerships compatible with the scope of access sought?</i>	Yes	There is no impact on the scope of access sought by the provider.
4.1.5(a)	Criterion: <i>Are the applicable regulations and legislation complied with in all jurisdictions where it operates?</i>	Yes	The evidence provided in support of ACD's application was indicative of compliance with Irish/EU legislation.
4.1.6(a)	Criterion: <i>Is the applicant in good standing in the qualifications systems and education and training systems in any countries where it operates (or where its parents or subsidiaries operate) or enrolls learners, or where it has arrangements with awarding bodies, quality assurance agencies, qualifications authorities, ministries of education and training, professional bodies and regulators.</i>	Yes	ACD was established as an independent entity in 1994 and has a track record of programme delivery in Ireland, formerly with the NCEA and HETAC, and currently with QQI.

**Findings**

The evidence submitted by ACD was consistent with the provider meeting this Criteria in full. ACD has a track record of certification and operations in the education sector in Ireland.

4.2 Resource, governance and structural requirements:

	Criteria	Yes/No/ Partially	Comments
4.2.1(a)	Criterion: <i>Does the applicant have a sufficient resource base and is it stable and in good financial standing?</i>	Yes	ACD submitted evidence including its 2019 Management Accounts & Financial Projects to 2024, a current Tax Clearance Certificate, and an auditor's letter signed off at June 30 th 2018.
4.2.2(a)	Criterion: <i>Does the applicant have a reasonable business case for sustainable provision?</i>	Yes	ACD offers a range of programmes that meet an evident demand in the sector.
4.2.3(a)	Criterion: <i>Are fit-for-purpose governance, management and decision making structures in place?</i>	Yes	At the time of the virtual site visit the panel was not satisfied that ACD had fit-for-purpose governance structures in place. This is outlined further in Section 5.1 of this report. The panel reconvened and is satisfied that this criterion is now met.
4.2.4(a)	Criterion: <i>Are there arrangements in place for providing required information to QQI?</i>	Yes	ACD has a track record of certification with QQI and its predecessor body, and a delegated responsibility for QA.

Findings

At the time of the virtual site visit, the panel was of the view that ACD had met, in full, sub criteria 4.2.1(a), 4.2.2(a) and 4.2.4(a). There was no indication that ACD's resource base was insufficient, and its provision of QQI programmes in the areas of liberal arts and business make a valuable contribution to higher education provision in Ireland. However, at the close of the virtual site visit, the panel held concerns in relation to sub criterion 4.2.3(a). This is outlined in more detail in Section 5.1 of this report.



The panel reconvened on 11 January 2021 and conducted a desk review of the revised Quality Assurance Manual of ACD. The panel is satisfied that the changes made to ACD's governance structures were sufficient to satisfy this criterion.

4.3 Programme development and provision requirements:

	Criteria	Yes/No/ Partially	Comments
4.3.1(a)	Criterion: <i>Does the applicant have experience and a track record in providing education and training programmes?</i>	Yes	ACD has a track record of delivery of programmes of education and training in Ireland.
4.3.2(a)	Criterion: <i>Does the applicant have a fit-for-purpose and stable complement of education and training staff?</i>	Yes	ACD employs an appropriately qualified complement of education and training staff.
4.3.3(a)	Criterion: <i>Does the applicant have the capacity to comply with the standard conditions for validation specified in Section 45(3) of the Qualifications and Quality Assurance (Education and Training) Act (2012) (the Act)?</i>	Yes	The panel is satisfied that the provider's track record of certification, and its approach to the re-engagement process reflects its capacity to co-operate with and assist QQI and provide QQI with information as specified in Section 45(3) of the 2012 Qualifications and Quality Assurance (Education and Training) Act.
4.3.4(a)	Criterion: <i>Does the applicant have the fit-for-purpose premises, facilities and resources to meet the requirements of the provision proposed in place?</i>	Yes	Due to the Covid-19 pandemic, the site visit for this evaluation was conducted virtually, and the panel members did not undertake a site visit to ACD's premises. However, the panel is satisfied that the provider has appropriate facilities and resources in place based on ACD's application and track record of provision.
4.3.5(a)	Criterion: <i>Are there access, transfer and progression</i>	Yes	The panel is satisfied that the arrangements presented are in line with QQI's criteria.



	<i>arrangements that meet QQI's criteria for approval in place?</i>		
4.3.6(a)	Criterion: <i>Are structures and resources to underpin fair and consistent assessment of learners in place?</i>	Yes	At the time of the virtual site visit, the panel was not satisfied that assessment regulations at ACD aligned fully to QQI's requirements. This is outlined more fully in Section 5.6. The panel reconvened on 11 January 2021 and is satisfied that this criterion was met but have added a <i>Condition of QA Approval</i> (see 6.1).
4.3.7(a)	Criterion: <i>Are arrangements for the protection of enrolled learners to meet the statutory obligations in place (where applicable)?</i>	Yes	ACD has arrangements for PEL in place that meet statutory obligations.

Findings

At the time of the virtual site visit, the panel was satisfied that ACD had met the sub criterion pertaining to programme development and provision requirements excepting criterion 4.3.6(a). With regard to assessment of learners, the panel had issued a mandatory change, requiring ACD to align its practices with the guidance provided in QQI's Assessment and Standards (Revised 2013). This is outlined in more detail in Section 5.6 of this report.

The panel reconvened on 11 January 2021 and conducted a desk review of the revised Quality Assurance Manual of ACD. The panel is satisfied that criterion 4.3.6(a) was met and have added a *Condition of QA Approval* related to the alignment of ACD's marking and grading schemes with QQI's Assessment and Standards (Revised 2013) (Section 6.1).

4.4 Overall findings in respect of provider capacity to provide sustainable education and training

At the time of the virtual site visit, the panel was satisfied that ACD had met many of the Criteria in Section 4 pertaining to the College's capacity to provide sustainable education and training. Appropriate evidence was submitted as part of the provider's application. This evidence was indicative of ACD complying with legal requirements, having a sufficient resource base and appropriate staffing.

However, two areas of vulnerability were identified by the panel. Specifically, these were related to the governance, management and decision-making structures of the College, and the structures (e.g. regulations) underpinning the fair and consistent assessment of learners. The panel addressed these issues through *Mandatory Changes*, and indicated it would reconvene after a period of six months to review the implementation of these changes by the provider.



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

The panel reconvened on 11 January 2021 and conducted a desk review of the revised Quality Assurance Manual of ACD. The panel is satisfied that ACD has addressed its mandatory conditions and has identified a *Condition of QA Approval* detailed in Section 6.1 of this report.



Part 5 Evaluation of draft QA Procedures submitted by American College Dublin

The following is the panel's findings following evaluation of American College Dublin quality assurance procedures against QQI's Core Statutory Quality Assurance Guidelines (April 2016). Sections 1-11 of the report follows the structure and referencing of the Core QA Guidelines.

1 GOVERNANCE AND MANAGEMENT OF QUALITY

Panel Findings:

At the time of the virtual site visit, the panel was of the view that further development was needed to this aspect of ACD's QA. QQI's guidelines under this dimension of QA require providers to have governance structures in place that ensure objective oversight and enforce a separation of responsibilities between those tasked with developing material and those tasked with approving it. The draft QA and supporting documentation submitted by ACD prior to the virtual site visit (including clarifications requested by the panel) indicated that the membership of the Academic Committee and Academic Council at ACD was virtually coterminous. During meetings with ACD representatives at the site visit, the panel sought to understand in more detail how both units functioned within the College and what the relationship between them was. These discussions were wide-ranging, including the frequency of attendance at either by the College President, attendance by staff, reporting and learner representation.

ACD representatives informed the panel that the Academic Council meetings were longer and more formal. Unlike the Academic Committee meetings, they did not include student representatives. The Academic Committee was focused on academic operations on a week to week basis, and also responsible for developing programme documents prior to their approval. It was acknowledged by ACD that due to the dual membership of individuals at both levels, members of the Academic Council would already be familiar with materials (for example, programme documents) that came before them for approval, and may have been involved in their development and production. The panel queried whether any of ACD's representatives could recall a case in which the Academic Council had not approved something that came before it. No example of this could be provided. ACD's representatives also stated that within the College, all were considered equally responsible for developing, approving, delivering and ensuring the success of programmes.

Following these discussions, the panel was of the view that in relation to academic governance, the system in place at ACD did not demonstrate sufficient alignment to QQI's core guidelines. Following the virtual site visit, a *Mandatory Change* in Section 7.1 of this report therefore required ACD to establish distinct memberships for its Academic Council and Academic Committee. It was the view of the panel that these may overlap somewhat, but must not be identical. This change was necessary to enable ACD to demonstrate the required "separation of responsibilities between those who produce/develop approve material and those who approve it" (CSQAG p.5). The panel advised that to implement this, it was necessary to clearly delineate the respective roles of the Academic Committee and the Academic Council, with the former undertaking the development and production of material, and the latter approving it. This should be reflected within the Terms of Reference of these units.



The panel further emphasised that while a robust QA system should be balanced, the burden of procedures should not obscure their purpose (see CSQAG p.9). It was the view of the panel that there were a number of minimally disruptive measures ACD could implement that would enable it to demonstrate a separation of responsibilities, and which were appropriate to the scale of the College. Importantly, it was not the role of the panel to prescribe exactly *how* ACD should demonstrate its alignment to the guidelines. However, the panel noted that ACD may wish to give consideration to appointing an appropriately qualified and independent external chair to the Academic Council (which would bring valuable externality to this unit), and to scheduling more frequent meetings of the Academic Council to ensure decision-making and approvals are facilitated in a timely fashion. The panel notes that ACD was previously advised during an institutional review process conducted by another accreditation body that its number of committees should be rationalised, and this feedback informed the current structure. The *Mandatory Change* set by the panel after the virtual site visit in relation to this dimension of QA did not require ACD to establish additional committees within its governance structure. Rather, it required ACD to utilise its current structure in a manner that better facilitated appropriate levels of oversight and academic governance at the College.

During the site visit, the panel also discussed the role the Board of Trustees played, and explored the composition of the board and the process of recruitment for new Board members. A comprehensive set of reports is sent to the Board of Trustees (including financials, administration of academic areas, enrolment, facilities and ICT). The membership of the Board of Trustees is original to 1993, with new members often proposed by existing members, and there is currently no limit to a member's tenure. ACD's President noted that a process of review in relation to Board member appointments had commenced, and there was an expectation of some turnover in the coming years, combined with a more purposeful approach to identifying potential members who may be able to contribute in areas where gaps in expertise exist. Trustees typically meet twice a year in Dublin. The panel noted that the Board of Trustees engages in a self-evaluation process. ACD representatives stated that this process is required by MSCHE, and that external peer review was less common within the US framework. With regard to this, the panel issued an item of *Specific Advice* in Section 7.2 of this report. As a robust QA system incorporates externality, the panel also explored broadly what externality ACD were currently able to benefit from in the absence of external chairs and voices within the academic governance structure. ACD representatives noted that relationships with the MSCHE, the Association of American Colleges and Universities (AACU) and Association of Study Abroad Providers in Ireland offered peer interaction and evaluation to the College. In addition, ACD draws upon the input of its external examiners. The panel acknowledged these valuable relationships, and encouraged ACD to work toward increasing externality in its structures.

QQI's guidelines under this dimension of QA require a system of governance to be in place that considers risk. ACD provided the panel with a copy of the organisation's Risk Register prior to the virtual site visit. During meetings with ACD representatives, the panel sought to better understand how this was maintained and how it had evolved. ACD developed their risk management system relatively recently, following feedback provided to the College during a previous review. ACD representatives outlined examples of how different types of risk were identified and managed in the organisation, for example, in



relation to grading practices and ICT. The panel noted that risk registers were useful living documents, and supported ACD's ongoing active engagement with this approach to risk management.

The panel reconvened on 11 January 2021 and conducted a desk review of the revised Quality Assurance Manual of ACD. The panel finds that ACD addressed their concerns related to governance and management of quality. In particular, the panel notes that the membership of the Academic Council and Academic Committee are clearly delineated (i.e. different chairs and terms of reference). Furthermore, the panel welcomes the implementation of *Specific Advice 7.2.1* and the intended appointment of an external evaluator to oversee the self-evaluation process.

2 DOCUMENTED APPROACH TO QUALITY ASSURANCE

Panel Findings:

At the time of the virtual site visit, the panel was of the view that further development was needed to this aspect of ACD's QA. Following a review of the draft QA submitted by ACD prior to the virtual site visit, the panel held some concerns that ACD's documentation lacked specificity and detail in relation to governance and also key processes. During the site visit, the panel sought to gain further insight into how QA was managed, documented and embedded at ACD.

The documentation submitted to the panel indicated that responsibility for QA was delegated through a process of electing a member of the Academic Council, and due to inconsistencies across the organisation charts presented it was not initially clear whether the title of QA Officer referred to a role or a position within the organisation. However, discussions with ACD clarified that in practice responsibility for QA resided with the Registrar (listed in this report as the Registrar and QAO) for a number of years. ACD representatives noted that as a small institution it was not possible or necessary to have a separate QAO, and that all staff were expected to take responsibility for some aspects of QA.

QQI requires provider's quality assurance policies and procedures to be informed by QQI's QA guidelines. These must be fully documented and available to staff and the public as required in usable formats (CSQAG p.9). As the panel held some concerns in relation to the alignment of processes to the guidelines and a lack of detail or clarity in some areas of the documentation (for example, in relation to Appeals), the panel explored the lifecycle of a policy at ACD. Specifically, the panel queried how a policy was typically developed, approved and implemented, and requested exemplification of this with reference to a specific policy or policies. ACD representatives outlined to the panel a process in which members of the Academic Committee generated or discussed new policies in response to developments in the College, and in some cases also approved them. However, the Academic Council was considered the owner of all Academic policies at ACD, and was the policy owner. As outlined in Section 5.1 of this report, the functions and responsibilities of these two key units of academic governance must be appropriately differentiated to appropriately support ACD's QA system. The panel also explored whether a policy tracking and control system was utilised, and ACD confirmed that this was not currently in place at ACD. Following these discussions, the panel identified *Mandatory Changes* pertaining to this dimension of QA, listed in Section



7.1 of this report. Moreover, ACD was encouraged to undertake a comprehensive review of the documentation to ensure that all processes were presented with a consistent level of detail and clarity, and to consider implementing a document tracking system that would make managing QA documentation easier for the organisation moving forward.

QQI's guidelines under this dimension of QA also require a provider's QA policies and procedures to include a role for learners and other stakeholders. The panel sought to understand the extent to which staff were able to contribute to the development of policy. ACD's representatives confirmed that any member of staff, part-time or full-time would have their suggestion considered in relation to new policy or an amendment to a policy, citing the open culture of communication within the organisation.

The panel reconvened on 11 January 2021 and conducted a desk review of the revised Quality Assurance Manual of ACD. The panel commends ACD on its revisions and the approach it took in documenting quality assurance processes within its policy framework. To enhance its quality assurance framework further, as an additional *Specific Advice*, the panel recommends that ACD develop templates to support quality assurance initiatives within the provider to allow for greater transparency and continuity (for more details, see Section 5.3).

3 PROGRAMMES OF EDUCATION AND TRAINING

Panel Findings:

At the time of the virtual site visit, the panel was of the view that further development was needed to this aspect of ACD's QA.

During the third session of the virtual site visit, the panel sought to understand the process of programme development and approval from the perspective of the academic staff. Members of the faculty described a process that enabled them to engage in informal, cross-disciplinary and collegial discussions of any new programme ideas generated at the Academic Committee, which may later lead to tabling a proposal for a new programme at the Academic Council and the Senior Management Committee. Academic staff were unclear whether a specific template or format was in place for the presentation of such programme proposals. The panel acknowledged ACD's aim of efficiency within its QA processes, and the panel considered that greater clarity around formal processes would support this. ACD was therefore encouraged to ensure that faculty have ready access to templates that will ensure programme development occurs systematically, in line with the requirements of the NFQ and the guidelines on Access, Transfer and Progression as per QQI's CSQAG (p.10). As discussed in Section 5.1, the relationship between the Academic Committee and Academic Council also required adjustment to ensure that the programme development and approval process at ACD was sufficiently aligned to QQI's guidelines, and *Mandatory Changes* relevant to this issue have been listed in Section 7.1 of this report.



In relation to annual programme review, the panel queried what information was considered by the Academic Committee, and how this information was gathered. ACD representatives confirmed that module leaders work with programme leaders to compile and present annual programme review reports, with programmes also discussed informally. Minor adjustments may be made on an ongoing basis, while major changes to programmes or the content of individual modules are left to annual programme review, and are approved by the Academic Council. The panel was of the view that the documented processes for ACD in this area could be further developed, and that this would be of significant benefit to ACD when approaching future processes of programmatic review and revalidation with QQI. ACD could usefully refer to QQI's *Policies and Criteria for the Validation of Programmes of Education and Training* (2017) and *Programme Review Manual* (2018) to guide this process. This would ensure that all aspects of programme delivery had been considered.

Under this dimension of QA, the panel also explored ACD's approach to Protection of Enrolled Learners. ACD has an insurance policy, rather than identifying similar programmes for transfer. The panel sought to understand this choice. ACD representatives noted that the insurance option was permitted under the legislation, and ACD considered it challenging to identify equivalent programmes offered by other providers that would facilitate transfer. The panel notes that with regard to ACD's business programmes, the options for finding an alternative provider exist, and encourages ACD to consider this significantly more beneficial option for those students.

The panel reconvened on 11 January 2021 and conducted a desk review of the revised Quality Assurance Manual of ACD. The panel finds that ACD addressed their concerns related to programmes of education and training. The panel commends ACD on the revisions it made to more clearly delineate the remit of the Academic Council and the Academic Committee. The panel further notes that ACD made significant changes in the presentation of processes related to programme monitoring and review. However, the panel recommends that ACD take this development further by developing more formal templates within its quality assurance framework (e.g. templates related to programme proposals and annual programme monitoring reports).

4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT

Panel Findings:

The panel is satisfied that ACD has addressed QQI's guidelines in relation to this dimension of QA. QQI's guidelines for staff recruitment require a provider to assure itself as to the competence of its staff and to "take a systematic approach to the fair and transparent recruitment and further professional development of people engaged in programme and service delivery" (CSQAG p.12).

ACD's documentation included information regarding opportunities for Continuing Professional Development (CPD) of staff. During the virtual site visit, the panel had the opportunity to engage with



lecturers on this topic. Specific examples were provided of support provided in relation to time, and also an internally facilitated CPD session scheduled for the following day. However, only three ACD attendees out of seven in the meeting could confirm that they had participated in CPD over the past 12 months. The panel acknowledged that challenges exist in facilitating CPD, for example, ensuring part-time staff can attend, and encouraged ACD to give further consideration to this aspect of QA moving forward.

The panel also explored the issue of gender representation at senior levels of the organisation with ACD's representatives. As numerous Higher Education Institutions (HEIs) in Ireland are actively trying to achieve a better gender balance, and much documentation had been produced in relation to this issue, the panel noted this was a timely and important issue for all providers to reflect upon. ACD representatives acknowledged that despite the existence of an equal opportunities policy, the senior levels of the organisation were visibly male dominated. Notably, of the 15 representatives of ACD that engaged with the panel during the site visit, only two were female (a member of the Board of Trustees and the Business Office Manager). This imbalance was attributed in part to low turnover at ACD. However, ACD's representatives acknowledged that this was an area in which they may need to take a more active approach. The panel firmly supported ACD's intention to work proactively in relation to gender equality, and have included an item of *Specific Advice* in Section 7.2 of this report pertaining to this.

The panel reconvened on 11 January 2021 and conducted a desk review of the revised Quality Assurance Manual of ACD. The panel note that ACD has indicated that it is exploring ways to implement the *Specific Advice* documented in Section 7.2.3. The panel recommends that ACD continue to engage with this *Specific Advice* and strive to be more reflective of all its stakeholders.

**5 TEACHING AND LEARNING*****Panel Findings:***

The panel is satisfied that ACD has addressed QQI's guidelines in relation to this dimension of QA.

ACD's QA documentation outlines the approach within the College to teaching and learning, which states that methods are intended to facilitate learners taking ownership of their learning in partnership with academic faculty. Modes of teaching include conventional lectures, tutoring, mentoring, case studies, e-learning, workshops, project supervision, research supervision and learner observation. During the virtual site visit, the panel sought to understand how the College's teaching and learning strategy was understood by staff. Lecturers noted that the small size of ACD facilitated communication between colleagues in this area, and referred to the small class sizes as central to the approach. Staff also discussed the use of Moodle and an increasing integration of technologies (PowerPoint, images, video clips) to augment traditional face to face methods. The panel noted that none of the staff in attendance at the virtual site visit had engaged with the supports and materials made available by the National Forum for Teaching and Learning. The panel strongly encouraged the team at ACD to take advantage of these resources moving forward.

QQI's guidelines in relation to this dimension of QA also pertain to learning off-campus, in practice or work placements, and require providers to ensure that these environments are appropriate (CSQAG p.14). The panel therefore sought to gain insight into how this aspect of the learning experience was managed by the College. Specifically, the panel queried how learners were able to maintain their connection to peers and be supported by the College while on placement, and how any issues that arose for learners on a placement were dealt with. ACD's representatives indicated that the placement programme had thus far enjoyed a high level of success, with regular workshops at the College enabling learners to maintain contact with ACD, and providing an opportunity for issues within specific placements to be identified and addressed. The panel encouraged ACD to continue development of its QA in relation to this aspect of teaching and learning, as this will be examined as part of future programmatic review and revalidation processes.

**6 ASSESSMENT OF LEARNERS*****Panel Findings:***

At the time of the virtual site visit, the panel was of the view that further development was needed to this aspect of ACD's QA.

During the virtual site visit, the panel queried how students at ACD were informed of assessment requirements and schedules. ACD staff confirmed that a dedicated section on every module descriptor provided this information, which was also discussed in the first class of each module as part of a syllabus overview.

Responsibility for the operation and development of assessment procedures rests with the Internal Student Learning Assessment Committee, which reports each semester to the Academic Committee. External Examiners, referred to as External Peer Reviewers at ACD, are appointed to programmes or modules. Guidelines for the appointment and role are provided within the QA manual. Assessment policy statements at ACD reflect QQI's guidelines, and objectives endorsed by the College for this area represent good practice, for example, the in relation to the provision of feedback on assessment that is timely, promotes learning and facilitates improvement. All academic programmes offered by ACD use some elements of continuous assessment. Multiple forms, including practical creative written work, practical performed work, group work and team projects and literature reviews are listed for exemplification in the QA manual.

QQI's guidelines require that assessment regulations and procedures be reviewed and renewed as necessary, including the processes for complaints and appeals. At the time of the virtual site visit, the panel held concerns that the marking schemes outlined in ACD's documentation were not aligned to QQI's regulations. This was explored with ACD's representatives during the site visit, who acknowledged that this would need to be reviewed. The panel further noted that the processes for recheck, review and appeal in relation to assessment did not align to the definitions and requirements of QQI's *Assessment and Standards* (Revised 2013). A *Mandatory Change* was identified in relation to this, and is listed in Section 7.1 of this report.

With regard to the credibility and security of assessment processes, these are supported at ACD by a plagiarism policy that has been approved by the College's external examiners. The panel queried how the system of lecturers imposing penalties for infractions was moderated. ACD representatives noted that a workshop had been facilitated to support uniformity in approach, and referenced the experience of lecturers. The panel encouraged ACD to ensure official and formal guidance is provided to teaching staff, and to closely monitor this aspect of assessment practice moving forward.

The panel reconvened on 11 January 2021 and conducted a desk review of the revised Quality Assurance Manual of ACD. The panel note that ACD reviewed and revised its processes for rechecks, reviews and appeals. Moreover, although ACD amended the language regarding the wording of indicative descriptors



for grading bands, the grading and marking schemes at ACD still do not fully align with QQI's Assessment and Standards (Revised 2013); this is identified as a *Condition of QA Approval* (6.1). Sectoral Convention 2 states that providers 'shall adopt either the percentage grading system or the alphabetic grading system (for all its provision)'. As such, ACD will have to adopt either alphabetic grades and grade point values or the percentage marks and percentage point values (Sectoral Convention 4). It is the view of the Panel that this alignment to QQI's Assessment and Standards (Revised 2013) should be examined further by the first ACD Programme Validation Panel convened following the approval of this report by PAEC. If ACD wishes to continue operating under a mixed grading system, the onus is placed on ACD to provide its rationale to that Panel.

**7 SUPPORT FOR LEARNERS****Panel Findings:**

The panel is satisfied that ACD has addressed QQI's guidelines in relation to this dimension of QA.

Discussions with ACD representatives during the site visit were wide-ranging. For example, the panel explored what library resources were available to ACD's learners. The College has had access to Lynn University's digital library resources and maintains a hard copy library. Moving forward ACD will be using JSTOR as the main database and examples of purchases for the library made on request were provided. Learners for whom English is a second language are supported via an arrangement with a local language school, where extra instruction or additional support can be accessed.

The panel sought to understand how the decision was made to outsource mental health supports for students, and what the process would be for a learner needing to access these. The College engaged the service provider on the basis that it would offer learners in need qualified and professional supports in this area. The service does not exclude ACD staff from providing guidance to learners who are struggling with issues such as workload, but enables them to refer learners to professional supports as appropriate. The availability of the service, which guarantees professional support will be provided by phone within an hour if needed, is actively promoted to ACD learners (learners are able to access seven free sessions). ACD staff also noted that College operates an open door policy, and learners are always welcome to seek assistance in relation to issues that are within the remit of ACD staff to support.

At the site visit, the panel also discussed how prospective or enrolled learners with disabilities are able to access information regarding the forms of accommodation and support that ACD offers. ACD offers learners the opportunity to disclose disabilities at orientation, and then assists them on a case by case basis. ACD representatives outlined standard accommodations made for learners with additional needs at point of assessment, but it was not clear to the panel whether limitations to this existed (for example, if a learner required access to an assistive technology with cost implications), or where this was communicated to prospective learners (for example, if a learner required wheelchair access). The panel also remained unclear on what ongoing learning support was available for learners with additional needs (i.e. not at point of assessment). The panel identified an item of *Specific Advice* in relation to this in Section 7.2 of this report, which is directed toward enhancement of ACD's practices. The panel's recommendation pertaining to this aligns to the supportive, learner centred ethos of ACD.

QQI's guidelines require mechanisms to be in place for learners to make representations to providers about matters of general concern to the learner body (p.17). The panel sought to understand how this worked in practice at ACD. Learners are able to make representations to the College through the student union, the academic committee, town hall meetings or the class representative system. ACD representatives noted that informal feedback is also welcomed. Examples of how learner feedback had impacted programmes at ACD were provided, including the inclusion of guest speakers and field trips in particular programmes, and the inclusion of an internship within a Master's programme. Student



recommendations were also pivotal to the introduction of attendance standards at ACD, which are used as a flag for early intervention to support the retention strategy.

The panel reconvened on 11 January 2021 and conducted a desk review of the revised Quality Assurance Manual of ACD. The panel welcomes the initiatives undertaken by ACD to address *Specific Advice* (7.2.2). The panel notes that ACD engaged with relevant stakeholders in this area and is committed to monitoring and reviewing stakeholder feedback to enhance its quality assurance framework as it relates to the types of supports and accommodations made available to learners.

8 INFORMATION AND DATA MANAGEMENT

Panel Findings:

The panel is satisfied that ACD has addressed QQI's guidelines in relation to this dimension of QA.

During the site visit, the panel discussed practices for data management at ACD. Student records are kept electronically on a Prestige learner management system. ACD representatives noted that strict policies were in place with regard to third parties and access. The College's privacy statement contains information about personal data, IP addresses/cookies and data protection rights. It is published on the website, and directs requests to the College Registrar. The ACD policy with regard to General Data Protection Regulation (GDPR) is also publicly available on the website and includes the ACD student records retention schedule. At the time of the virtual site visit, the policy directed readers to contact the Academic Office to exercise their rights. ACD was encouraged to clarify within the policy where responsibility for Data Protection within the institution resided, and to specify the contact details for the Data Protection Officer within the policy. The panel have included an item of *Specific Advice* in Section 7.2 of this report pertaining to this.

The panel reconvened on 11 January 2021 and conducted a desk review of the revised Quality Assurance Manual of ACD. The panel notes that the contact details for the Data Protection Officer have been clarified in the Quality Assurance Manual of ACD.

9 PUBLIC INFORMATION AND COMMUNICATION

Panel Findings:

The panel is satisfied that ACD has addressed QQI's guidelines in relation to this dimension of QA.



During the virtual site visit, the panel queried where relevant programme award information was made available to prospective and current learners as per QQI's CSQAG (p.19). These should include whether or not a programme leads to an award, the name of the awarding body, the title of the award, whether the award is recognised in the NFQ (and if so award type and NFQ level). These should also include whether the programme is subject to procedures for access, transfer and progression, and what these are, and details of arrangements for Protection of Enrolled Learners. The accuracy of this information is expected to be maintained, and to facilitate honest, transparent comparison. ACD representatives indicated that this information was provided in the College's catalogue, with lesser detail provided on the website. The panel encourage ACD to consider demonstrating alignment to this important guideline by revising the level of detail provided on the website moving forward.

10 OTHER PARTIES INVOLVED IN EDUCATION AND TRAINING (incl. Apprenticeships)

Panel Findings:

The panel is satisfied that ACD has addressed QQI's guidelines in relation to this dimension of QA.

ACD does not engage in the collaborative provision of programmes of education and training. ACD provides information within its QA manual on its accreditation of non QQI programmes with MSCHE, and has guidelines in place for the appointment of external panellists for programmatic review.

11 SELF-EVALUATION, MONITORING AND REVIEW

Panel Findings:

The panel is satisfied that ACD has addressed QQI's guidelines in relation to this dimension of QA.

ACD engages routinely with quality reviews as part of their accreditation with MSCHE as well as with QQI. The College develops key performance indicators that are used to measure performance against the targets identified within the strategic plan. Learner feedback is obtained via routine student surveys, focusing on academic and non-academic supports and services at the College. Additional feedback is gathered on each module, and this informs annual programme review.



Evaluation of draft QA Procedures - Overall panel findings

The panel acknowledge that the small size of the College offers ACD a number of advantages. Not least of these is that leadership and senior management are able to foster an open and relatively informal culture, in which staff at all levels of the organisation feel empowered to voice opinions or make contributions. However, after the virtual site visit, the panel held concerns that a lack of formality undermined ACD's ability to demonstrate its alignment to some dimensions of the core guidelines. For example, the almost identical membership of the Academic Council and Academic Committee undermined ACD's capacity to demonstrate objective oversight in relation to academic decision-making, as demanded by QQI's guidelines for Governance and Management of Quality. This also has implications for ACD's ability to demonstrate alignment to other dimensions of the core guidelines, including a Documented Approach to QA and Self-evaluation, Monitoring & Review.

The panel further recognised the complexity ACD is obliged to manage with regard to its accreditation of programmes across dual systems (some programmes are validated by QQI in Ireland while MSCHE in the US accredits others). ACD representatives noted during the virtual site visit that there are significant discrepancies between these systems, and that US institutions have greater autonomy to validate and accredit programmes internally. However, while this presents a challenge for ACD, it was not a consideration for the panel. For QQI accreditation within Ireland, ACD is obliged to demonstrate that it meets QQI's standards for quality assurance and programme validation. These are detailed in the *Core Statutory Quality Assurance Guidelines* (QQI, 2016), which are in turn aligned to the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG, 2015).

As stated in Section 3.1 of this report, at the conclusion of the virtual site visit the panel was not in a position to immediately recommend approval of ACD's draft QA procedures due to a lack of alignment between practices in specific areas of ACD's QA systems and QQI's guidelines. However, the panel was of the view that ACD was capable of implementing the necessary changes to address this within a period of six months. The panel noted that QQI's programmatic review and revalidation processes will also demand that a clear alignment between practice at ACD and QQI's guidelines is evident, and that in making these adjustments as part of the reengagement process, ACD will be better prepared for those future processes.

The Panel reconvened on 11 January 2021 and conducted a desk review of the revised Quality assurance Manual of ACD. The Panel is satisfied that the mandatory changes detailed in Section 7.1 and the areas of *Special Advice* identified in Section 7.2 were addressed by ACD. The Panel, therefore, recommends approval of ACD's QA procedures. The Panel notes one *Condition of QA Approval* in Section 6.1 of this report and one additional *Specific Advice* identified in Section 7.2.



Part 6 Conditions of QA Approval

6.1 Conditions of QA Approval

- 6.1 The Panel notes that ACD amended the language regarding the wording of indicative descriptors for grading bands. However, the grading and marking schemes at ACD still do not fully align with QQI's Assessment and Standards (Revised 2013). In particular, Sectoral Convention 2 states that providers 'shall adopt either the percentage grading system or the alphabetic grading system (for all its provision)'. It is the view of the Panel that this alignment to QQI's Assessment and Standards (Revised 2013) should be examined further by the first ACD Programme Validation Panel convened following the approval of this report. The onus will be placed on ACD to provide sufficient rationale to that Panel for operating under a mixed grading system.

Part 7 Mandatory Changes to QA Procedures and Specific Advice

The Panel reconvened on 11 January 2021 and conducted a desk review of the revised Quality Assurance Manual of ACD. It is the view of the Panel that the mandatory changes detailed in Section 7.1 have been addressed by ACD; elements of 7.1.4 related to grading and marking schemes are captured above in Section 6.1 and elements of 7.1.2 are captured below in Section 7.2.5.

7.1 Mandatory Changes

- 7.1.1 The coterminous nature of the membership of the Academic Committee and Academic Council is problematic, as one body cannot provide effective oversight of the activities of the other. This must be addressed and differentiated moving forward to ensure an appropriate separation is visible between the oversight and approval function of the Academic Council and the more operationally focused or routine work undertaken by the Academic Committee. This distinction must be clearly reflected in the Terms of Reference for these units of governance.
- 7.1.2 Key processes within the QA system need to be more clearly outlined in ACD's documentation. These must clearly identify steps, stages of approval, roles and responsibilities. One example of where this could be improved is in relation to programme review and monitoring processes, another is new programme development and approvals.
- 7.1.3 The process for learner appeals in relation to decisions made by the College that are not related to assessment (for example, admissions) lacks clarity. For example, it is not clear that the persons involved in the original decision will not be involved in considering the appeal. This process must be revised to ensure that the procedure is clear and that appeals will not be heard by persons involved in making the decision subject to appeal.
- 7.1.4 Areas of practice in relation to assessment at ACD are not appropriately aligned to QQI's *Assessment and Standards* (Revised 2013). This must be addressed in relation to QQI awards. Specifically, ACD needs to review its processes in relation to grading and marking schemes, and in relation to rechecks, reviews and appeals.



7.2 Specific Advice

The Panel reconvened on 11 January 2021 and conducted a desk review of the revised Quality Assurance Manual of ACD. The Panel noted that ACD had indicated that it was in the process of implementing the Panel's specific advice identified following the virtual site visit. When the Panel reconvened, it identified another specific advice to provide greater transparency within ACD's quality assurance framework (see 7.2.5).

7.2.1 ACD is advised that a more robust process could be implemented, involving some level of externality, for evaluating the performance of the Board of Trustees.

7.2.2 ACD is advised that prospective learners with disabilities may not be currently well-informed regarding the types of accommodations or supports that are available. Documenting more specifically what type of accommodations and supports are available (and what limitations on this may exist) would be of value and would allow applicants to make informed decisions and choices. ACD is also encouraged to take into account the feedback of alumni or learners with disabilities regarding services, supports and communications.

7.2.3 ACD is advised that its approach to equity and equality could be enhanced by consideration of best practice across the sector, and engaging with external bodies in this area may prove valuable to the organisation.

7.2.4 ACD is advised that there is a need to clarify within the existing policy where responsibility for Data Protection within the institution resides, and to specify the contact details for the Data Protection Officer within the policy.

7.2.5 ACD is advised to ensure that faculty have ready access to templates that will ensure programme development occurs systematically, in line with the requirements of the NFQ and the guidelines on Access, Transfer and Progression as per QQI's CSQAG (p.10).

Part 8 Proposed Approved Scope of Provision for this provider

NFQ Level(s) – min and max	Award Class(es)	Discipline areas
8 – 9	Major	Liberal Arts & International Business



Part 9 Approval by Chair of the Panel

This report of the panel is approved and submitted to QQI for its decision on the approval of the draft Quality Assurance Procedures of <Provider Name>.

Name:

Date: 18th January 2021

Annexe 1: Documentation provided to the Panel in the course of the Evaluation

Document

Related to

No additional documentation was provided to the panel during the virtual site visit.
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Annexe 2: Provider staff met in the course of the Evaluation

Name	Role/Position
Dr Joseph A. Rooney	President
Dr Rory McEntegart	Vice President and Academic Dean
David Webb	Registrar and QAO
Rowland Crawte	Director of Administration
Dr Maeve Martin	Member of the Board of Trustees
Susanti Fitzgerald-DeVink	Business Office Manager
Dr Piotr Sadowski	Head of Programme – BA in Liberal Arts
Dr Vincent McDonald	Head of Programme - BA in Intl Bus
David Horgan	Head of Programme - MB in Intl Bus
Stephen Chandler	Lecturer in International Business
Dr Michael Doorley	Lecturer in Liberal Arts
Mícheál Ó Raghallaigh	Lecturer in International Business
Dr Peter Rooney	Lecturer in Liberal Arts
James F. O’Connell	Assistant Director of Enrolment Management
Scotty Sarafian	Director of Student Support and Advisement

Appendix: Provider response to the Reengagement Panel Report



Reengagement evaluation

Reengagement panel report:

Institutional Response

Submitted in accordance with the accreditation requirements of

Quality and Qualifications Ireland

January 2021

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Introduction

Over the last two years American College Dublin has been working on a wide-ranging review of its quality assurance procedures, as part of its reengagement process with Quality and Qualifications Ireland (QQI). This process culminated on 27 May 2020 with a virtual site visit conducted by a QQI-appointed panel of external peer reviewers.

The panel held five sessions with various members of the ACD staff and faculty over the course of the day. At the conclusion of the day, the panel apprised the College's team of its main findings in an exit interview, and followed this up with a written preliminary report, to which the College was given an opportunity to respond, and which was endorsed formally by QQI's Programme Accreditation Committee on 16 July 2020. Although the panel was unable to recommend full approval of the state of ACD's current QA procedures, it expressed confidence that the changes required for satisfactory implementation over the next six months lay within the institution's capacity. The panel's main criticisms were distilled into four mandatory changes that the College must implement, and four recommendations that the College should consider for adoption within its QA practice.

From August 2020 the College set about addressing the mandatory and recommended changes. These efforts were largely involved a substantial and complete revision of the institution's QA procedures and their documentation in the Quality Assurance Manual. The College paid particular attention to the items singled out in the four mandatory changes, though it also followed the panel's general admonition that the QA policies should be expressed with greater clarity. As a result the QA Manual's sections were recast so as to be divided into sub-sections of context, policy, responsibility and process and, within those headings, lists of relevant material, all of which was carefully reconsidered and revised as necessary. Though the document grew to be some forty pages longer than the previous version, it also gained significantly in clarity and accessibility. The process was worthwhile, resulting in a QA document and processes that are much clearer than before the exercise, both in their description and operation.

In December the College sent the panel its response, detailing the changes it had made to its quality assurance regime. The panel considered the response on 11 January 2021, and the report was made available to the College shortly thereafter.

The College was pleased with the panel's final report (Reengagement Panel Report – RPR), and particularly with the overarching finding that it 'commends ACD for its engagement in this process and for the considered changes it made to its quality assurance framework. Having reviewed the revised submission from ACD, the Panel recommends approval of ACD's draft quality assurance procedures.' (RPR, p. 4, 22)

This response sets out the College's responses to the panel's report; it addresses the College's views on the panel's findings in relation to the four changes to its QA system mandated in the report of July 2020, comments on progress it has made in relation to the specific advice points made by the panel, and it offers some general observations on other matters mentioned in the RPR.

Mandatory changes to QA procedures and specific advice

A). Mandatory changes to QA procedures

- 1. The coterminous nature of the membership of the Academic Committee and Academic Council is problematic, as one body cannot provide effective oversight of the activities of the other. This must be addressed and differentiated moving forward to ensure an appropriate separation is visible between the oversight and approval function of the Academic Council and the more operationally focused or routine work undertaken by the Academic Committee. This distinction must be clearly reflected in the Terms of Reference for these units of governance.**

The College has undertaken a review of the functions and composition of the Academic Council and Academic Committee; although it has found in the past the arrangements for the two bodies to be workable and institutionally effective, the review found that a differentiation in authorisation and oversight of process as required by the report would be a useful refinement, and would not be administratively burdensome. The review was carried out by the Reengagement Steering Committee, an ad hoc sub-committee appointed by the Academic Council for the purpose of overseeing ACD's QOI reengagement exercise. The Steering Committee polled all members of the administration and teaching staff on the proposed changes to the bodies. Following a review of the findings, it was proposed that the Academic Council be reconstituted so that the chair is the Vice President and Academic Dean, who, along with the Director of Administration, the Business Office Manager, Director of Student Life and Advisement, and Director of Admissions, would only sit on the Academic Council and not on the Academic Committee, they would attend its meetings only if invited for a specific purpose by the chair of the Academic Committee and with the consent of its membership, and they would attend without voting rights. The Academic Committee would be chaired by the Registrar, and its membership would be made of the programme heads, the faculty and a selection of student representatives. This proposal was put to the Academic Committee at its September end of year review, and it was agreed to implement the new arrangements as of the beginning of the new academic year on 14 September, with the new procedures set out in the 2020-21 Quality Assurance Manual.

Implementation. The revised arrangements were drafted by the Quality Assurance Officer and presented to the September meeting of the Academic Council; they were approved in a pilot form, effective 14 September 2020, and the two governance

bodies began meeting under their revised terms of reference. The arrangements were written up in their final form after they had been tested and inserted into the second edition of the 2020-21 QAM in December 2020. The efficacy of the new arrangements will be reviewed by the Academic Council in the QAO's end-of-year review in August-September 2021.

Timeframe. Effective 14 September 2020; second revision of QAM, December 2020.

Documentation. Quality Assurance Manual, 2020-21

- Section 1.2.3 Academic Council, pp. 15-17
- Section 1.2.4 Academic Committee, pp. 17-19
- Section 1.2.8 Organizational chart, pp. 23-4

Reengagement Panel Report response. The College was pleased to note the panel's finding 'that ACD addressed their concerns related to governance and management of quality. In particular, the panel notes that the membership of the Academic Council and Academic Committee are clearly delineated'. (RPR, p. 10) The division of responsibilities between supervisory bodies so as to avoid duplication of oversight and approval is a matter which the College will continue to address, not only with the two bodies cited by the panel, but with all branches of its institutional governance.

2. Key processes within the QA system need to be more clearly outlined in ACD's documentation. These must clearly identify steps, stages of approval, roles and responsibilities. One example of where this could be improved is in relation to programme review and monitoring processes, another is new programme development and approvals.

The QA Officer has led an extensive revision of the QAM since the second half of July, working with the members of the Reengagement Steering Committee and other staff and faculty. Although the substance of the processes in the QAM has been relatively unchanged, the document has been amended comprehensively so as to meet the panel's requirement for greater clarity in documenting the processes within the QA system. The approach has been reduce the amount of prose descriptions of process, steps, stages of approval, roles and responsibilities, and to render these in numerically and alphabetical sequenced and segregated compartments of activity and oversight. Each sub-section has been revised so that it is divided into four main items: context, policy, responsibility, process. Lists relevant to each of these areas of QA are then provided. In the course of these revisions, the QAO and those with whom he worked discovered some substantive ambiguities and anomalies also, and so the process of revision not only resulted in a document that not only has an enhanced descriptive clarity of procedure and accountability, but also has some improvements in substance.

Implementation. The first version of the revised QAM was presented by the Quality Assurance Officer to the September meeting of the Academic Council; the document was provisionally approved, with some further suggestions for improvements, which were incorporated into a second edition, approved by the Academic Council and published in December 2020. The revised QAM will be reviewed as part of the annual QA review in August-September 2021.

Timeframe. 14 September – December 2020.

Documentation: Quality Assurance Manual, 2020-21

- The entire QAM has been revised throughout to make key processes clearer; the examples cited in the peer review report are highlighted in the QAM:
- Section 3.1.1 New modules and major modifications to existing ones, pp. 33-5
- Section 3.1.2 New programmes and major modifications to existing ones, pp. 35-7
- Section 3.2.6 Monitoring and action on learner progression and completion rates, pp. 45-6
- Section 3.3 Programme monitoring and review, pp. 46-8
- Section 3.3.1 External programmatic evaluation, pp. 48-9

Reengagement Panel Report response. Addressing this mandatory change occupied much of the institution's time during the second half of 2020. It was therefore gratified to note the panel's finding that it 'commends ACD on its revisions and the approach it took in documenting quality assurance processes within its policy framework.' (RPR, p. 13) The College has found that the comprehensive review, restructuring and re-writing of its QAM to take account of the panel's criticism to be valuable, resulting in QA policies that are clearer and more accessible than heretofore.

- 3. The process for learner appeals in relation to decisions made by the College that are not related to assessment (for example, admissions) lacks clarity. For example, it is not clear that the persons involved in the original decision will not be involved in considering the appeal. This process must be revised to ensure that the procedure is clear and that appeals will not be heard by persons involved in making the decision subject to appeal.**

The College has undertaken a review and revision of its processes related to learner appeals of decisions not related to assessment. The two chief areas not related to assessment are admissions appeals and student non-academic discipline and grievances. The Quality Assurance Officer elicited proposals on these matters for revisions to the relevant sections of the QA Manual, and presented the proposed revisions to the end-of-year Academic Council.

Implementation. The QA Officer collected suggestions from a representative sample of the College community on amendments to the appeals procedures for admissions decisions and disciplinary and learner non-academic discipline and grievance decisions. He presented the findings of this research and a proposed amendment to the relevant procedures in the end-of-year QA review by the Academic Council. Following discussion and amendment of these procedures in the QA documentation, the new procedures were approved and implemented from the commencement of the new academic year in September 2020.

Timeframe. 14 September 2020.

Documentation: Quality Assurance Manual, 2020-21

- Section 3.2 Learner admission, progression and recognition, sub-section 3.2 (D) v.1-4, p. 38
- Section 3.2.5 Fraudulent applications, sub-section 3.25 (D) ii-iii, pp. 44-5
- Section 7.6.1 Grievances, sub-sections 7.6.1 (C) iv-v, 7.6.1 (D) iii-iv, pp. 95-6
- Section 7.6.2 Bullying and harassment, sub-sections 7.6.2 (C) iii, 7.6.2 (D) iii, pp. 98, 100
- Section 7.6.3 General disciplinary procedures, sub-sections 7.6.3 (C) iv, 7.6.3 (D) xiii, pp. 101-102
- Academic appeals are also highlighted for reference:
 - Section 6.7.3 Re-checks, reviews and appeals, pp. 78-80
 - Section 6.8.2 Disciplinary procedures (plagiarism), sub-section 6.8.2 (D) ii, p. 85
 - Section 6.8.5 Appeals procedure, p. 88

Reengagement Panel Report response. The panel found that ‘ACD reviewed and revised its processes for rechecks, reviews and appeals.’ (RPR, p. 17) This process has been useful, allowing the College to reconsider and refresh its policies in this area so as to make them clearer and to ensure that there are appropriate lines of demarcation to ensure that appeals are not heard by those responsible for the original appealed decision.

4. Areas of practice in relation to assessment at ACD are not appropriately aligned to QQI’s *Assessment and Standards (Revised 2013)*. This must be addressed in relation to QQI awards. Specifically, ACD needs to review its processes in relation to grading and marking schemes, and in relation to rechecks, reviews and appeals.

The College has followed the QQI (and before that HETAC and NCEA) assessment and standards protocols as closely as possible since its first grant of accreditation in 1996. Nevertheless, there was an anomaly with a fragment of the wording of the indicative descriptors for grading bands (not with the grading bands themselves), which the panel helpfully pointed out and which the College addressed immediately. The College also used the opportunity to review its entire assessment and standards regime, focussing particularly on clarifying the processes surrounding rechecks, reviews and appeals, in order to ensure and express with confidence that there are no further anomalies that might inadvertently have crept in.

Implementation. The academic dean and registrar led a comprehensive review of the assessment and standards regime in order to ensure that its past and present substantial alignment replicated the QQI assessment and standards document in all its details (indeed much of the language and substance are now copied directly from the QQI document). All revisions resulting from this review were put to the end-of-year review of the College’s QA procedures and, following discussion, inserted into the first edition of the 2020-21 QAM, for implementation at the commencement of 2020-21 academic year.

Timeframe. 14 September 2020.

Documentation: Quality Assurance Manual, 2020-21

- Appendices, Section 13.4 Marking scheme and grade descriptors, pp. 125-7
- Appendices, Section 13.8 Grading scheme for all programmes, pp. 136-7

Reengagement Panel Report response. The panel did find that although ‘ACD amended the language regarding the wording of indicative descriptors for grading bands, the grading and marking schemes at ACD still do not fully align with QQI’s Assessment and Standards (Revised 2013)’. (RPR, pp. 17-18). The reason for this is that the College has always maintained a dual alphabetic / percentage grading format, as this more readily allows it to provide grades that are comprehensible to its American students, who comprise approximately a third of its population. This matter was not raised as an issue of concern until the presentation of the final report. The report notes that ‘Sectoral Convention 2 states that providers “shall adopt either the percentage grading system or the alphabetic grading system (for all its provision)”. It is the view of the Panel that this alignment to QQI’s Assessment and Standards (Revised 2013) should be examined further by the first ACD Programme Validation Panel convened following the approval of this report. The onus will be placed on ACD to provide sufficient rationale to that Panel for operating under a mixed grading system.’ (RPR, p. 23) The College accepts this additional condition of approval and undertakes to address it as a specific matter noted for attention and resolution in the terms of reference for its QQI programmatic review, due to be completed in 2021.

B). Specific advice

The panel noted in its final considerations in the RPR one further item of specific advice, which the College will address as follows:

- 1. To enhance its quality assurance framework further, as an additional Specific Advice, the panel recommends that ACD develop templates to support quality assurance initiatives within the provider to allow for greater transparency and continuity.’ (RPR, p 13)**

The College has a number of templates in operation within its quality assurance regime. Nevertheless, it accepts that increasing the number of these is useful for the purpose of providing transparent and clear structures through which stakeholders in the system operate. The College will develop the number and scope of these templates over the coming months.

Implementation. As part of the 2020-21 quality assurance annual review, the quality assurance officer will audit the templates currently in office and initiate a process for developing and increasing these and doing so further in future annual reviews.

Timeframe. During the remainder of the 2020-21 academic year, and on an ongoing basis thereafter.

The panel also identified four specific advice points in its report of July 2020 and in the RPR, and these have been addressed in the following terms:

1. ACD is advised that a more robust process could be implemented, involving some level of externality, for evaluating the performance of the Board of Trustees.

The board is a self-perpetuating and self-regulating body; although the board members are not remunerated and, as a registered non-profit charity in both Ireland and the US, the board is subject to external oversight by the US IRS and MSCHE, a further external evaluation may be an additional help to the board in conducting its affairs effectively and, providing it does not create an administrative burden, may be something which the board views favourably. The current board evaluation procedure is a self-evaluation by the trustees of their performance as a board and recommendations for future activity; it was considered useful, and not especially onerous in terms of time or money, to have the annual process overseen by an external individual, who would prepare a brief report for the board to consider.

Implementation. The board will consider the appointment of an independent external person with suitable experience to oversee the self-evaluation process as a trial for a year, with the procedure to be evaluated thereafter on the matter of continuing it or otherwise.

Timeframe. Following the appointment of a suitable external evaluator, the process will be introduced on a trial basis for the 2020-21 academic year.

2. ACD is advised that prospective learners with disabilities may not be currently well-informed regarding the types of accommodations or supports that are available. Documenting more specifically what type of accommodations and supports are available (and what limitations on this may exist) would be of value and would allow applicants to make informed decisions and choices. ACD is also encouraged to take into account the feedback of alumni or learners with disabilities regarding services, supports and communications.

The College tries to make its information for the external community as clear as possible, so it was valuable to have an external perspective on the information provided to learners with disabilities. The College has consulted with its community of students and alumni, staff and faculty to review and seek to specify more precisely the types of accommodations and supports that are available and the limitations that there are on them. It has also surveyed its community on enhancements that might usefully be made to the communication and substance of these accommodations and supports.

Implementation. The College undertook a review and revision of this information in the summer for the commencement of the new academic year in September 2020. The College community has been surveyed in the course of the current semester regarding revisions to the accommodations and supports offered and how the communication and the range and implementation of them might be improved,

and these will be incorporated into further enhancements of policy and practice in these areas in 2021.

Timeframe. August 2020 to September 2021

- 3. ACD is advised that its approach to equity and equality could be enhanced by consideration of best practice across the sector, and engaging with external bodies in this area may prove valuable to the organisation.**

The College found the discussions and suggestions on this topic, and particularly regarding gender representation in the organization, to be valuable. As noted in the discussions and materials provided to the panel on this question, it is not practicable for a small institution such as ACD to have a prescribed gender balance requirement, and as a non-state institution there is no legal requirement for one. In its twenty-seven years of existence ACD has not had a legal case of any description brought against on any matter related to gender discrimination. The institution's on-site head of operations from 1993 to 2007 was a woman, as was the Director of Administrative Services from 1993 to 2018. The current Business Office Manager and the Director of Performing Arts are both women. Among the institution's teaching staff, approximately 40% are women. Nevertheless, and quite apart from any matter of compulsion, the College recognizes the panel's implicit point that the upper management levels of the institution is largely male at present and that this represents a missed opportunity for the institution in terms both of a reasonable reflection of broader societal values and in the quality of its leadership, especially in view of the overwhelming research on this matter which demonstrates the very considerable positives which females and an approximate gender balance bring to organizational leadership and behaviour.

Implementation. The College will henceforth include as an item for explicit consideration in its management hiring and promotion protocols the promotion of a reasonable level of gender balance inasmuch as is it possible to do so in each individual case.

Timeframe. Ongoing.

- 4. ACD is advised that there is a need to clarify within the existing policy where responsibility for Data Protection within the institution resides, and to specify the contact details for the Data Protection Officer within the policy.**

The College's data protection policies and procedures are overseen by the GDPR Officer. At the end-of-year review of the QA Manual, the contact details for this office were added to the data information policy.

Implementation. The QA Officer proposed the provision of this information as a part of the end-of-year QA review and it was inserted into the 2020-21 first edition of the QA Manual in September (QAM, sections 8.4 and 8.5).

Timeframe. September 2020.

Comments on other matters noted in the report

There are matters other than the mandatory changes and specific advice noted in the RPR, and the College thought it would be helpful briefly to comment on these.

The panel also notes that ACD's representatives engaged in open, constructive dialogue with the panel members throughout those meetings. RPR, p. 3

The College found the interactions with the panel before, during and after the site visit to be pleasant and helpful; this included managing at fairly short notice the unusual circumstances of a virtual site visit, brought about by the onset of the covid-19 pandemic and the state-mandated closure of Ireland's education and training institutions. The interactions with the panel and QQI staff following the site visit have also been professional and courteous, assisting greatly in allowing the institution to proceed through the reengagement process in a smooth and useful manner.

ACD representatives confirmed that module leaders work with programme leaders to compile and present annual programme review reports, with programmes also discussed informally. Minor adjustments may be made on an ongoing basis, while major changes to programmes or the content of individual modules are left to annual programme review, and are approved by the Academic Council. The panel was of the view that the documented processes for ACD in this area could be further developed... RPR, p. 14

The College produces extensive statistical data, review and programme enhancement documentation in generating its Annual Internal Programmatic Review (AIPR). This is one area in which the College was disadvantaged by the virtual nature of the site visit: while it had to hand hard copies of the AIPR from the last ten years, it was unable physically to present these to the panel for consideration because the panel members were not in attendance at the College. The template for the AIPR is provided in the QA Manual at appendix 13.2. The AIPR template notwithstanding, the College acknowledges the specific advice point made in the RPR regarding the enhanced use of templates in supporting and documenting its quality processes, and will be increasing their application in the present and subsequent academic years.

ACD representatives noted that the insurance option was permitted under the [protection for enrolled learner] legislation, and ACD considered it challenging to identify equivalent programmes offered by other providers that would facilitate transfer. The panel notes that with regard to ACD's business programmes, the options for finding an alternative provider exist, and encourages ACD to consider this significantly more beneficial option for those students. RPR, p. 14

ACD has PEL arrangements in place through a private insurer provider approved by QQI. The College has investigated matching possibilities with similar programmes offered by other providers, though not with any success. It has, nevertheless, taken the panel's suggestion into account and is in the process of reviewing again the possibility of establishing PEL relationships with suitable providers.

The panel noted that none of the staff in attendance at the virtual site visit had engaged with the supports and materials made available by the National Forum for Teaching and Learning. The panel strongly encourages the team at ACD to take advantage of these resources moving forward. RPR, p. 16

The College thanks the panel for this suggestion; it has started initial enquiries on engaging with the resources of the National Forum for Teaching and Learning and will explore the possibilities of working with this body further in the future.

The panel queried how the system of lecturers imposing penalties for [plagiarism] infractions was moderated. ACD representatives noted that a workshop had been facilitated to support uniformity in approach, and referenced the experience of lecturers. The panel encourages ACD to ensure official and formal guidance is provided to teaching staff, and to closely monitor this aspect of assessment practice moving forward. RPR, p. 17

This is a useful suggestion; the College had provided guidance on these matters in the Faculty Handbook (which the panel did not have sight of). This was further bolstered by additional directions inserted into the revised version of the QAM (sub-section 6.8.2 (D)), submitted to the panel in the December 2020 response; these guidances will be reviewed and updated to ensure that they are sufficient for their purposes.

The accuracy of this [programme] information [on the website] is expected to be maintained, and to facilitate honest, transparent comparison. ACD representatives indicated that this information was provided in the College's catalogue, with lesser detail provided on the website. The panel encourage ACD to consider demonstrating alignment to this important guideline by revising the level of detail provided on the website moving forward. RPR, p. 21

The College feels that it provides the required programme information on its website; it has, nevertheless, taken the panel's suggestion on board and has reviewed and revised the provision of information on its website to ensure that it meets the letter and spirit of the core guidelines, and will continue to do so in future.

The panel acknowledge that the small size of the College offers ACD a number of advantages. Not least of these is that leadership and senior management are able to foster an open and relatively informal culture, in which staff at all levels of the organisation feel empowered to voice opinions or make contributions. However, the panel hold concerns that a lack of formality undermines ACD's ability to demonstrate its alignment to some dimensions of the core guidelines. RPR, p. 22

The College is anxious to resist any inference in this passage that it operates its administrative procedures in an informal or less than rigorous manner. Certainly, the College does its best to allow to flourish the intimacy of institutional practice for which it is well known and which is only possible in a small operation. Nevertheless, ACD takes its administrative practice extremely seriously, seeking always to make it as efficient and robust as possible, and, as the range of activities and documentation it produces in the performance of its QA obligations demonstrate, it devotes a great deal of time and energy to operating a rigorous and effective system.

The panel also recognizes the complexity ACD is obliged to manage with regard to its accreditation of programmes across dual systems (some programmes are validated by QQI in Ireland while MSCHE in the US accredits others). ACD representatives noted during the virtual site visit that there are significant discrepancies between these systems, and that US institutions have greater autonomy to validate and accredit programmes internally.

However, while this presents a challenge for ACD, this is not a consideration for the panel. For QQI accreditation within Ireland, ACD is obliged to demonstrate that it meets QQI's standards for quality assurance and programme validation. RPR, p. 22

This passage strikes the College as a little wrong-headed in its emphasis. Though the outside observer might discern complexity and difficulty in the matter of having two accreditation systems, this is not something which has been an issue for the College (it is not, incidentally, seen as a challenge by its American accreditor, which has always regarded having two accreditation regimes as a strength). As an informational matter, the College noted in its reengagement application document that its non-QQI programmes are 'conducted under the institution's accreditation with MSCHE and have no connection whatsoever with QQI (although, as a matter of administrative convenience, the institution's quality assurance policies in Ireland and abroad are aligned so that they conform in all relevant areas with the obligations of QQI's quality guidelines)'. (Application form, p. 5) In terms of externality, ACD's MSCHE accreditation was mentioned elsewhere as offering a useful international benchmark and perspective for the College. (Application form, p. 65) Far from complexity, the College sees its dual accreditation as bringing great benefits in achieving a continuous cycle of improvement. As the application form notes in one further passage:

The fact of having two highly-regarded accreditation agencies assessing the institution is beneficial, not only because the accreditation cycles are such that the College is constantly in a process of preparing for and going through external assessment, but also because the two agencies, though complementary, offer contrasting approaches to assessing postsecondary institutions, which means ACD never settles into one set process of external peer evaluation, but must regularly review itself from different perspectives. Effectively, the institution is required to prepare a self-evaluation document and host a site visit every two to three years in order to maintain compliance with its accreditation requirements in Ireland and the USA. Given that the self-evaluation document takes 18 to 24 months to prepare, and typically results in a year of follow-up actions to achieve the optimal enhancements arising out of the self-evaluation process, and that preparations for the next self-evaluation exercise preparations immediately begin after this, the College is involved in a perpetual cycle of structured self-evaluation, improvement and enhancement. (Application form, p 80)

ACD is fully aware that its MSCHE accreditation has nothing to do with its QQI accreditation and that its American accreditation and accreditation activities do not offer any evidence relevant to the purpose of maintaining its Irish accreditation. The passage might suggest that ACD has sought special dispensations from its QQI obligations in the reengagement process because of its MSCHE accreditation. No dispensation of any sort has ever been sought or in any sense implied. Aside from providing an additional and useful point of international accreditation comparison, ACD has always been of the view that its American accreditation is entirely separate from its QQI accreditation and has no relevance to the maintenance of its accrediting relationship with QQI.

Concluding remarks

The reengagement exercise has been a useful process for American College Dublin. On the one hand, the reengagement exercise has offered a measure of reassurance to the College that its QA policies and procedures are functioning at a high level of efficiency and effectiveness. On the other hand, the opportunity of the comprehensive internal and external review of the College's QA regime has revealed some areas where it can benefit from an enhancement of its activities. A number of mandatory changes, specific advices and recommendations have emerged in the course of the exercise, and addressing them has already benefitted and enhanced the ongoing development of the QA system at ACD, and will continue to do so.

The College has found the reengagement project to be a valuable undertaking. Nevertheless, there is a general recognition that the exercise does not represent a terminal point of achievement for the institution, but rather a milestone in an ongoing cycle of improvement, development and quality enhancement. The process will only be properly served if the findings of this effort are embedded into an ongoing culture and ongoing procedures of self-criticism and continuous improvement; American College Dublin commits itself to the letter and spirit of this undertaking and in such a frame of mind is pleased not only to complete the formal requirements of reengagement but also to set itself to continue the processes of enhancement to which it has contributed into the future.