Quality assurance in higher education is a key factor in the Bologna Process. As stressed in the Berlin Communiqué, in line with the EUA Graz Declaration 2003, “consistent with the principle of institutional autonomy, the primary responsibility for quality assurance in higher education lies with each institution itself”. Consequently, the European Standards and Guidelines adopted in Bergen placed an enormous emphasis on the internal quality assurance systems within higher education institutions. However, the latest TRENDS Reports show that, as a rule, there is still no holistic approach to quality enhancement within the institutions.

In Portugal, higher education institutions are legally required to develop internal quality assurance systems since 2007, but as a result of the national evaluations carried out in 1995-2005 several had already started to imbed a quality culture in their activities. University of Minho was a pioneer in this regard, since it has assessed the quality of teaching in all its graduation programmes in a yearly basis since 1991. This paper presents a case study of the progresses made so far, including the tracking and feedback from graduates and the recent efforts to install and test an overall quality assurance system covering all activities and services.

1. The European Context

The systems for the quality assurance (QA) in higher education play a crucial role in the prosecution of the goals stated in the Bologna Declaration, for their potential contribution towards the mutual recognition of degree awards and periods of study and the subsequent portability of academic and professional qualifications which is so essential to a true and meaningful mobility of the European citizens.

Quality assurance has, therefore, acquired a growing importance as the Bologna Process moved along. It started with a quite “shy” statement in the Bologna Declaration, advocating “promotion of European co-operation in quality assurance with a view to developing comparable criteria and methodologies”\(^1\), followed in the Prague

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\(^1\) Co-author that will be responsible for presenting the paper at the Conference.

Communiqué by a call upon relevant partners to the establishment of a common framework of reference and the dissemination of best practices aiming at the mutual acceptance of evaluation and accreditation/certification mechanisms. The Berlin Communiqué takes a more pro-active approach, establishing some mutually agreed elements to be included into the national systems for quality assurance and calling upon the E4 Group to develop an agreed set of standards, procedures and guidelines on quality assurance. This decision led to the adoption, in the Bergen Communiqué, of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), which constitute the main framework for quality assurance systems all over Europe.

An essential underlying assumption of the ESG is the centrality of internal quality assurance. As stressed in the Berlin Communiqué, “consistent with the principle of institutional autonomy, the primary responsibility for quality assurance in higher education lies with each institution itself and this provides the basis for real accountability of the academic system within the national quality framework”, reflecting a common position from the European Universities, stated in the Graz Declaration issued under the auspices of the European University Association (EUA). The ESG explicitly assume, amongst its basic principles, that “providers of higher education have the primary responsibility for the quality of their provision and its assurance” and “there should be encouragement of a culture of quality within higher education institutions”. Having this in mind, the ESG dedicate a full set of standards to the internal quality assurance of institutions. There is, however, a limitation inherent to the ESG, since they relate only to the three cycles of higher education and “are not intended to cover the area of research or general institutional management”.

The integration of the ESG into the national legal frameworks for higher education that has been occurring in most European countries created a great dynamics in quality assurance, but the latest stocktaking report on the Bologna Process states that, “although the implementation of external quality assurance is proceeding at a rapid pace, development of internal quality assurance systems at HEIs is progressing more slowly, especially because in some countries the internal QA systems are still thought to

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4 The E4 Group includes the European Association for Quality Assurance in Higher Education (ENQA), the European Students Union (ESU), the European University Association (EUA) and the European Association of Institutions in Higher Education (EURASHE).
8 Ibidem, pp. 16-19.
9 Ibidem, p. 12.
amount only to writing a self-assessment report for external review\textsuperscript{10}. The Trends V and Trends 2010 reports refer a growing awareness of higher education institutions in relation to the potential benefits and challenges of effective quality assurance and enhancement activities, visible in the work that has been done to develop internal quality processes in institutions, but few institutions are taking a holistic approach to quality improvement\textsuperscript{11}.

The European higher education institutions still face, therefore, a big challenge to design and implement a systematic approach to internal quality assurance.

2. The National Context

The external quality assurance of Portuguese higher education institutions started in 1993 in the scope of a pilot project on quality assurance launched by the Portuguese Rectors Conference (CRUP), covering all degree programmes in four scientific fields and involving all the public universities, with the main objective of quality enhancement of teaching. In 1994 a law was passed by Parliament, establishing an innovative national QA system, which allowed the normative development of the law to be made by protocols agreed with entities representative of the institutions. The pilot project was integrated into the new framework, under the coordination of an Evaluation Council established as an independent body within the Foundation of the Portuguese Universities (FUP), and considered as the first round of evaluations, to cover all public university programmes and to be concluded in 1999. In the year 2000 the evaluation system was extended to all sectors of higher education (universities and polytechnics, public and private, and military higher education) and a new evaluation round was set up for the period 2000-2005, keeping the programme-oriented approach.

The evaluation rounds had a significant impact within the higher education institutions, as stated in the self-evaluation report of the national evaluation system prepared in 2006 as part of an ENQA-coordinated external evaluation. Indeed, one of the strengths identified in the conclusions of the report is:

\begin{quote}
“the good acceptance and enthusiasm by the part of many institutions, which have assumed the participation in the evaluation process as an opportunity to reflect on their organisation and activities and to take up quality culture and quality assurance as strategic elements for their institutional development (and) consequently, the positive movement towards the institutionalisation of internal quality assurance procedures”\textsuperscript{12}.
\end{quote}


This system was discontinued in 2005, due to a political decision to introduce programme accreditation in line with the prevailing trends in Europe. The new law, passed in Parliament in 2007, created an agency for the evaluation and accreditation of higher education (A3ES – Agência de Avaliação e Acreditação do Ensino Superior) whose main task is to perform programme accreditation in relation to the three cycles of studies. Under the new legal framework, each institution is required to develop its own internal quality assurance system under comprehensive terms of reference, which follow closely the ESG but also include the internal assessment and improvement of research and of interaction with society. The national agency announced its intention to establish a voluntary process of institutional audit to start in the academic year 2011/2012, aiming at the certification of the internal QA systems and a corresponding “lighter touch” approach in programme accreditation, which means a good incentive for institutions to invest seriously in their quality systems.

3. Quality Assurance at University of Minho

3.1 The early stages

Since the start of its teachings, in 1975, the University of Minho (UM) has in place a process for the coordination and management of teaching that was not usual at the time. Each degree programme is considered as an “educational project” with its own coordination structures, which include the Degree Committee and the Degree Director. The Degree Committee includes a student (delegate) for each curricular year and an equal number of professors. A Degrees Council (presently, a Pedagogical Council) was also created for each scientific area, to coordinate common aspects of the different programmes (for example, the Engineering Degrees Council, for the whole set of Engineering programmes). This structure proved to be useful to keep track on the quality of teaching and promote improvement.

In June 1991 a formal system for the evaluation of teaching was established by an Order from the Rector, after extensive consultation with the University Academic Council. The system consisted of three main elements:

a) A procedure for the application of a survey to all students, covering all course units of all degree programmes, on a yearly basis. The survey contained three blocks of questions, addressing the quality of the work of each teacher lecturing the course unit, a self-assessment of students’ participation and involvement in the learning processes, and the quality of the organisation of teaching, the support facilities and the overall degree of satisfaction with the programme and with the University. The results from the surveys included not only individual and mean results, but also percentiles. Individual

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13 At the time, the coordination of teaching in Portugal was mainly performed in a fragmented way, at subject level (the Chairs or Cathedras), by the Chair holders, and students had no participation in it.
results concerning the quality of teaching were only sent to the corresponding teacher. Overall results, aggregated by degree programme (global and for each curricular year), Department, School and the whole University, were widely publicised and published as a book.

b) The systematic monitoring of the students’ success in every course unit: at the end of the semester, the course unit’s coordinator filled a (one page) form with statistical data concerning the number of students registered in the unit, students that attended classes regularly, students assessed, pass and failure rates and number of part time students.

c) An internal reflection system, in two complementary dimensions:

• Degree Directors, Departments and Schools were called upon to analyse the results from the surveys and take remedial/improvement actions as deemed necessary;

• in the case of pass rates bellow predefined standards, the course unit coordinator was asked to analyse, as deeply as possible, the reasons for the abnormal non-success and propose measures to improve the efficacy of teaching; a second lower critical value was defined for pass rates, below which the Degree Committee had necessarily to analyse the suggestions from the course unit coordinator and prepare formal recommendations aiming at overcoming the detected problems.

Although initially it was not easy to mobilize the academic community, due to the lack of tradition concerning the evaluation of teaching by students, this system went on quite smoothly for over one decade, with small adjustments in the questionnaires. It proved to be very useful for the self-evaluation of degree programmes in relation to the external evaluations rounds 1995-2000 and 2000-2005, because a lot of data collection and analysis on students and teachers’ performance and students’ satisfaction was already available.

3.2 Main QA mechanisms and procedures

The system was reinforced in 2004 with the establishment of a QA Office, under the coordination of the Pro-Rector for the assessment and quality of teaching, with the objective to plan and coordinate the evaluation procedures and interact with the national evaluation agency. This Office started also to plan, coordinate and interact with a broad set of programmes oriented towards the promotion of pedagogical competences of teachers and the introduction of new teaching and learning methodologies. With the support of this technical structure, it was also possible to update existing questionnaires and devise new ones, aiming at more comprehensive procedures to collect and interpret data on students and teachers’ performance and satisfaction.

Taking as a reference the last academic year, the main mechanisms and procedures for the quality assurance of teaching may be summarised as follows.
3.2.1 Internal feedback

The internal feedback mechanisms include the systematic collection of data from students, teachers and services (particularly, students supporting services) in a variety of ways, including procedures for the application of the following instruments:

- *On-line* annual surveys applied to freshman students, regarding their social-demographic context and their expectations;
- A survey administered to students every semester to enquire about the quality of the learning/teaching processes in each course unit (the responses to the questionnaire are optically read and statistically analysed at different levels (University, School, Department, degree programme and individual teacher), as explained above;
- A similar survey addressed to teachers, covering the same questions;
- Annual surveys to collect the opinion of first cycle students in each degree programme/curricular year concerning organisational and curricular aspects; a survey with similar objectives is also passed to second cycle students;
- *On-line* annual survey to teachers, about their satisfaction with the working conditions and learning environments;
- Annual surveys to incoming and outgoing ERASMUS students, addressing their opinion on the degree programme and the special support facilities concerning students in mobility schemes; a specific survey, also, about a peers’ tutorial project that was established to support the ERASMUS students at UM\(^ {14}\);
- Annual surveys administered by the different University Services, to enquire about the degree of satisfaction of their main users;
- Annual reports prepared by the QA Office on statistical information concerning the success rates at every course unit for all degree programmes, to be sent, together with data on dropout rates and the results from the surveys, to the key decision makers in the different levels within the University.

3.2.2 External feedback

The main source for collecting feedback from the University’s graduates is the *AlumniUM* site, set up with the objective to follow-up the professional careers of the alumni and provide them with information about on-site and distance educational offers, access to an employment pool and other services favouring a permanent relation with the University. Both alumni and enterprises are encouraged to register in the site. Systematic feedback is collected through:

- Annual surveys applied *on-line* to the alumni, to track their professional paths and obtain feedback on the adequacy of the education provided by UM;

\(^{14}\) The project *Padrinho/Madrinha ERASMUS* (ERASMUS “Godfather/Godmother”), in which a student from UM would support an ERASMUS colleague to adapt to the degree programme and the local environment.
Annual surveys directed to employers, to collect their opinion on the skills shown by the graduates from UM.

Other ways to obtain external feedback include, for example, the formal consultation of professional associations, enterprises and public services, as deemed relevant, when a new degree programme is designed and developed, and reports from external advisory committees set up in connection with some Schools or degree programmes.

### 3.2.3 Internal reflection and action for improvement

The feedback data, both external and internal, will only be useful for the improvement of quality if properly worked out, disseminated to and acted upon by the relevant persons and bodies. Internal reflection mechanisms, applied in a consistent way, play therefore a nuclear role in quality enhancement.

To facilitate and promote internal reflection, the relevant data concerning degree programmes and the corresponding course units, both description data and information from feedback, are included in “Degree Files” (Dossiers de Curso) and “Unit Files” (Dossiers de Unidade Curricular), which are yearly updated under the coordination of the Degree Director. It is his responsibility to produce a report on the progress of the learning/teaching process, which is discussed and analysed in the Degree Committee and Degrees Council, issues needing correction are identified and some measures are taken as a result of the assessment.

This system has been helpful in the promotion of quality of teaching, but two areas for its improvement may be identified. On one hand, although the Degree Council issued recommendations on some corrective or improvement measures, a proper action plan was not consistently drawn up and subjected to the approval of the relevant bodies at School and/or University level, which led to somewhat heterogeneous results. Secondly, no follow-up procedure concerning the implementation of the actions for improvement was in place in a comprehensive way.

### 3.2.4 External reviews

The University has been involved in several external quality assurance exercises, at programme and institutional levels.

Each degree programme went through two external evaluation processes, conducted by the former National Evaluation Council in the context of the evaluation rounds 1995-2000 and 2000-2005. The procedures included the usual 4-phase model of self-evaluation, on-site visit by a panel of external experts, preparation of a draft report on which the University could comment, and publication of the report together with the
University’s response. These exercises, especially in the preparation of the self-evaluation reports, were very useful to promote participation and internal reflection.

At institutional level, the University of Minho has been reviewed for three times by the European University Association, on a voluntary basis, under the Institutional Evaluation Programme (EUA/IEP). The first review took place in 1997 and the second one ten years later, with a follow-up in 2009. The comments of the external review teams help to understand the not always easy, and sometimes casuistic, way that has been followed in the implementation of internal quality assurance mechanisms, but also the progresses achieved. In the 1997 report it can be read:

“The review team has the impression that there is a real interest for the exercise of self-evaluation and external quality assurance, and that ‘quality’ is a permanent concern for all UM actors. During the visit, the team was told that five years ago the scientific staff was very sceptical about evaluation exercises and even refused them. Now, on the basis of previous, discipline based self-evaluations the process is well embedded even in the teaching exercise. At the level of Departments or Schools, we feel that there is no clear policy yet for quality assurance, the Schools are not yet ready for the idea of continuous self-evaluation. (…) However, we must mention that people are better prepared for and conscious about it and to carry out such an exercise is much easier now than it was 5 years ago.”

In the 2007 review, the external report stresses the different processes for quality assurance in place, namely the large scale monitoring of results of academic activities and the annual surveys of student and teacher satisfaction about teaching and learning processes, as well as the Degree Council system, through which the quality of teaching can be assessed, and concludes:

“The Team found that there is a good quality culture prevailing at UM. The Team especially appreciates the way educational programmes are managed through the matrix system by degree-based committees and degree leaders; this structure makes it possible to develop, manage and assess these programmes in co-operation with teachers and students. Such a system may be better than traditional student satisfaction surveys, since it provides an opportunity for immediate reactions.”

### 3.2.5 Quality projects

With the objective to involve the academic community in quality enhancement projects, the University launched, since 2004, an internal scheme to finance some key support infrastructures, such as the Virtual (wireless) Campus, an e-learning platform or virtual laboratories, as well as innovative projects on teaching/learning methodologies, namely the adaptation of degree programmes to the new Bologna concepts. A significant amount of money was allocated to these projects, on a competitive basis.

One other area developed by the QA Office, with impact on the quality of teaching, is the pedagogical training of teachers. A number of training programmes,

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with duration of up to 30 hours, is offered annually. A growing number of teachers are attending these programmes on a voluntary basis.

4. A Comprehensive Internal Quality Assurance System

As confirmed by the external reviews, the University of Minho has already in place most of the usual instruments to monitor the quality of teaching and take appropriate action towards its improvement. In what concerns research activities, the University applies the criteria used by the Foundation for Science and Technology (FCT) to its research units to monitor their evolution. Each research unit has set up an External Advisory Committee, following the FCT rules. The reports from these committees are analysed centrally and remediation meetings are held with each unit to take care of the recommendations that were issued.

As seen above, the European Standards and Guidelines call upon the higher education institutions to adopt a systematic approach to internal quality assurance. Standard 1.1 of the ESG establishes that institutions should have a policy and associated procedures for the assurance of the quality and standards of their programmes and awards, and consequently should develop and implement a strategy for the continuous enhancement of quality, adding that “the strategy, policy and procedures should have a formal status and be publicly available”\(^\text{17}\).

To comply with this standard, the UM needs to develop further three main elements:

- To address the question of defining explicit quality standards for its activities, a matter that has no tradition in the Portuguese Universities;
- To organise its QA instruments as a system, to be well documented and applied in a consistent and holistic way;
- To define procedures for the monitoring and improvement of the QA system itself.

In the preparation of the self-evaluation report for the 2007 review, some goals were defined by the initiative of the Rectors Office to be used as a reference to the SWOT analysis carried out across Schools and Services, covering the areas of teaching, research, internationalisation, administration, extension and entrepreneurship, and social services. For example, the goals established for teaching included: failure rate below 15%; less than 5% dropout rate; 90% of the academic staff with Ph. D. qualifications; 100% teaching staff using new learning methodologies, namely e-learning; lifelong learning courses offered at all Schools; recognition of experimental learning in all Schools for students over 23 years old; employment rates of graduates over 90%. Although they represent an important commitment towards quality achievements, it

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cannot be said that they represent a formal and systematic approach to quality standards, due to the casuistic context in which they were defined and also to the fact that they are not connected to proper actions plans.

Aiming at full compliance with the ESG, the University has defined a formal institutional quality policy, building upon the existing QA procedures and mechanisms while addressing the questions raised above, in order to set up an internal quality assurance system (SIGAQ-UM) certifiable by the national agency A3ES. This system is in the final stage of design and formal approval, and will be applied, on a trial basis, in the next academic year (2010/2011).

4.1 The institutional quality policy

The University has assumed an unequivocal commitment towards quality and quality assurance, explicitly foreseen in the Statutes as a fundamental vector for its activities and accomplishment.

The institutional strategy for quality assumes, as a nuclear underlying principle, the shared vision of the University’s mission and objectives by all the academic community, translated into a strategic institutional development plan and its furtherance throughout the whole University. Key elements for the development and implementation of the quality strategy are, therefore:

- The Strategic Programme of UM for the period 2009-2013 adopted by the Board of Trustees (Conselho Geral) under proposal from the Rector;
- An operational plan (Quality Plan) that translates the strategic programme into concrete action plans, both at institutional level and at the level of organisational units and services;
- The definition of formal methodologies and procedures for monitoring, assessment and feedback action for quality enhancement (Plan-Do-Check-Act approach), all dully documented in a Quality Manual.

The quality policy entails, moreover, the consolidation of a quality culture embedded in all the academic community and University’s activities, where continuous assessment is to be seen as a natural element of the institutional life, in a double perspective of quality enhancement and of providing relevant and updated information on the degree of fulfilment of the University’s mission.

4.2 The internal quality assurance system (SIGAQ-UM)

The institutional quality policy is developed and embodied in a formal QA system – the SIGAQ-UM – whose object are the different dimensions of the institutional mission, covering the quality assurance of all activities within the University in a systematic way.
The objectives of SIGAQ-UM are to promote the definition and documentation of the structuring elements for the implementation of the quality policy, namely:

- The institutional strategy and the standards for quality;
- The responsibilities of the different bodies and management levels regarding quality assurance;
- The processes for monitoring, control, reflection and subsequent intervention for quality improvement;
- The ways for the participation of students, teachers, researchers and other staff, as well as external partners;
- The organisation and continuous improvement of the system itself and the methods for the monitoring and review of the quality policy.

The two main documents for the definition of SIGAQ-UM are:

- The Quality Plan, grounded on the Strategic Programme for 2009-2013
- The Quality Manual, as a normative document that describes the organisation and implementation of the system.

4.2.1 The Quality Plan

The Quality Plan addresses, in a comprehensive and dynamic way, the question of the quality standards for the University. Indeed, by fixing strategic objectives, hierarchic operational objectives, the actions to be developed and the corresponding schedule and goals, the Quality Plan establishes the quality standards to be pursued.

As mentioned earlier, the strategic document that underpins the Quality Plan is the Strategic Programme for the 4-years Rector’s mandate. It develops around seven strategic development vectors relating to the key areas of the University’s mission (mission vectors) and to activities which support a harmonious and sustainable development of the University (support vectors), as follows:

- Mission Vectors:
  - Consolidation of research, answering the knowledge challenges;
  - Valorisation of the educational offer and integral education;
  - Deepening interaction with society;
- Support Vectors:
  - Reinforcement of the assessment and quality management systems and promotion of academic ethics;
  - Promotion of management decentralisation;
  - Assuring a financial balance;
  - Assumption of sustainable options and practices.

Each vector is developed into an action plan, which includes, for the different foreseen actions, the definition of the strategies, methodologies and performance
indicators involved in their prosecution and monitoring, the goals to be met, as well as the schedule and the levels of responsibility for their implementation.

The Quality Plan includes, additionally, a set of action plans concerning fifteen *transversal measures*, which aim at improving the organisational environment and the working conditions of students, academic staff and all other staff members, in order to favour their well-being and the individual and team initiative.

The monitoring of the action plans assumes a central role in the institutional quality strategy. In what regards measurability, two types of performance indicators are identified in the Quality Plan:

- *Quantitative indicators*, associated to concrete goals that can be measured;
- *Products*, to be developed within a predefined timetable. – in this case, a 4-level scale is used to assess the stage of development of a product, in order to monitor the progress of its implementation in an objective way.

### 4.2.2 The Quality Manual

The Quality Manual is a formal document that presents the overall conception of the institutional quality policy and its concretisation as an internal quality assurance system.

The Manual addresses and develops the following aspects, conceived in line with the ESG:

- The statutory mission, vision and objectives of UM, as well as the strategy for quality;
- A brief presentation of the University’s organic model;
- The macro-organisation of SIGAQ-UM, in terms of its ambit, objectives, coordination structures and levels of responsibility in the scope of quality and QA;
- The methodologies for the monitoring, assessment and action for quality enhancement, discriminated for each of the different dimensions of the institutional mission (research, teaching and learning, and interaction with society) and also the transversal dimensions of human and material resources and services;
- The interface of SIGAQ-UM with the strategic management of the University;
- The ways for the participation of internal and external stakeholders in the QA system;
- The production and dissemination of information (mechanisms to collect, analyse and use information, and to publicise information relevant to external stakeholders);
- The ways in which the QA system is monitored and revised.

A particular feature that is worth mentioning is the establishment of a set of performance indicators covering the main dimensions of the University work, which, in
their evolution over time (as time series), constitute an Institutional Progress Chart that will allow for a dynamic view of the development of the University.

Considering the complexity of the teaching and learning processes, the Manual gives a special attention to the methodologies for the quality assurance of teaching. It includes, therefore, a particularly detailed specification concerning the strategy for the assessment of teaching, the hierarchic structure used for monitoring, assessment and preparation of improvement action plans, the identification of best practices, the signalling and treatment of (quantitative or qualitative) results bellow predefined goals, and the follow-up of adopted action plans for correction and improvement.

4.2.3 QA supporting structures

The responsibility for the strategic coordination of SIGAQ-UM lies with the QA Follow-up Committee (Comissão de Acompanhamento), as a coordination and advisory body chaired by the Vice-Rector with the QA portfolio and integrating the QA Manager and representatives from every School, from cultural units and services, and from students. It may still include an external consultant. The Committee is also responsible for the meta-evaluation of SIGAQ-UM, that is, for the approval of an annual report on the working of the system and for proposing recommendations for its improvement.

The QA Office (SGAQ – Serviços para a Garantia da Qualidade) is responsible for the functional coordination of the QA system, acting as a logistics support centre for the Committee and the SIGAQ-UM. The Quality Manager acts as Head Officer of SGAQ.

A specific information system, well integrated into the University information system, is being developed to support SIGAQ-UM, especially in what concerns data gathering and analysis, the monitoring of the action plans in the Quality Plan and the on-line preparation of reports. All the surveys, from next academic year onwards, will be prepared and answered on-line and the whole system will be paperless. The diagram in figure 1 gives an idea of the inputs and external outputs of the information system and how it interacts with the QA Office.

5 Conclusion

The University of Minho is investing a lot of effort in the setting up of an internal quality assurance system that addresses the definition and implementation of an institutional quality policy, including the explicit definition of quality standards. The system covers not only the areas set down in the ESG, which mainly concern teaching and learning, but also all the other areas of activity of the University.
A first appraisal of this system was made by the EUA review team in charge of the follow-up exercise that took place in September 2009. In its final report, the team expresses a positive opinion on the foreseen system, leaving at the same time a word of caution that UM will take seriously:

“The outcome is a carefully thought out and elaborated proposal for a quality assurance system, set down in a quality assurance plan and a derived manual. (…) The Team was able to ascertain that the seven standards described in the ESG are covered by the UM plan. (…) The Team commends UM for the meticulously conceived and thoughtfully elaborated quality assurance plan. Because it is very detailed and covers many angles and players, UM must make sure that once the plan is implemented, all members in the lines of command contribute on an ongoing basis to quality monitoring, performance and follow-up actions. It is important that there are no holes in the intricate system.”

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18 Institutional Follow-up Evaluation Report by EUA, October 2009.