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THE WORLD FEDERATION FOR MEDICAL EDUCATION

RECOGNITION REPORT ON

Accreditation Organisation of the Netherlands and Flanders (NVAO)

Prepared by the World Federation for Medical Education (WFME) Recognition Team

Composition of the Recognition Team

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The Recognition Team's Findings for the Recognition Criteria

Part I: Background

A. Scope of Authority

- The accrediting agency must be an entity that is authorised and recognised by the government (i.e., either or both of the Ministry of Health and Ministry of Education where the school is located) or by entities that are authorised or recognised by an appropriate professional or scientific association as having the authority to accredit education programmes and schools that award the MD degree or its equivalent.

According to the application, NVAO is the authorised and recognised agency of the government for accreditation of higher education in the Netherlands, the Caribbean islands of Bonaire, St. Eustatius and Saba (special municipalities of the Netherlands), and the Flemish community of Belgium (Flanders). Oversight of higher education is centralised in the Netherlands. Likewise in Belgium, in the Flemish community, the federal organisations have oversight over higher education. NVAO has a “legal mandate” (Application for Recognition, p. 5) in both countries. The NVAO Board communicates with the Ministry on issues related to the implementation of accreditation activities.

There is a treaty on accreditation between the Netherlands and Flanders and NVAO's decisions and procedures are in compliance with the requirements for formal (semi)governmental decisions under administrative law. NVAO Board members are appointed by the Ministers of Education of the Netherlands and Flanders (Application for Recognition, p. 7). The assessment framework complies with the Dutch Higher Education and Research Act (WHW) criteria, the Decree on Higher Education (CHO) in Flanders and the Standards and Guidelines for Quality Assurance in the European Higher Education Area (European Standards and Guidelines - ESG). The NVAO assessment framework outlines the criteria underpinning the quality assurance system of the higher education sector (Application for Recognition, p. 11).

For further evidence of authority and recognition, according to the NVAO website (<https://www.nvao.com/about-nvao/collaborations>), the Board may consult with various government agencies both in the Netherlands and with the Flemish government. “At the Board level, NVAO periodically consults with the Deputy Prime Minister of the Flemish

Government and the Flemish Minister of Education, and with the Dutch Minister of Education, Culture and Science. Twice a year, NVAO participates in the consultations held between both ministers (Committee of Ministers). NVAO also regularly consults with the Dutch and Flemish Ministries of Education.” They also report working with various educational organisations: “NVAO maintains contact with the Dutch and Flemish umbrella organisations, i.e., the Association of Universities in the Netherlands (VSNU), the Flemish Interuniversity Council (VLIR), the Council of Flemish University Colleges (VLHORA), the Netherlands Association of Universities of Applied Sciences, the Netherlands Platform for Recognised Private Training Institutions (NRTTO), the Dutch organisation for international collaboration in higher education (Nuffic), NARIC Flanders, and the student organisations, i.e., the Dutch National Students Association (ISO), the Dutch National Union of Students (LSVb), and the National Union of Students in Flanders (VVS).”

WFME Recognition Team Finding: Compliant

B. Acceptance of the Accreditation Agency by Others

- The accrediting agency’s decisions must be made known and accepted by other organisations, such as professional licensing bodies, governments, educational institutions, employers, etc.

According to information from the NVAO website (<https://www.nvao.com/about-nvao/legislation>) their authority is part of legislation and therefore their decisions must be accepted by other organisations in their country. “As of 1 February 2005, the independent Accreditation Organisation of the Netherlands and Flanders (NVAO) became an international body established by treaty that has the status of a legal entity under Dutch public law. The tasks and work method of NVAO in the Netherlands and in Flanders are set down in legislation. In the Netherlands, the tasks of NVAO are based on the ‘Higher Education and Research Act’ (Wet Hoger Onderwijs en Wetenschappelijk Onderzoek, WHW); in Flanders, the operation of NVAO is established by the ‘Decree on Higher Education’ of 4 April 2003.” (<https://www.nvao.com/about-nvao/legislation>)

The European Association for Quality Assurance in Higher Education (ENQA) reviews European accrediting agencies, such as NVAO, to determine if they are in compliance with the European standards and guidelines. ENQA requires all member agencies to undergo an external cyclical review, at least once every five years. Substantial

compliance with the standards and guidelines for quality assurance in the European Higher Education Area (ESG) is a condition for membership. (ENQA Agency Review 2017, p. 3). In 2012, NVAO was found to be in “substantial compliance” with the ESG (ENQA Agency Review 2017, p. 5). The 2017 ENQA report (review conducted November 2016 - August 2017) found that NVAO was either in “full compliance” or “substantially compliant” with 13 of the 14 standards. It was found to be “partially compliant” with one standard, “complaints and appeals.” (ENQA Agency Review 2017, p. 3).

In addition, NVAO is part of the European Quality Assurance Register for Higher Education (EQAR). EQAR is the register of higher education quality assurance agencies in the European Higher Education Area, listing those that substantially comply with the ESG.

WFME Recognition Team Finding: Compliant

C. Substantive Changes

- The accrediting agency must inform WFME of any substantive changes in the scope of activities of the agency, the procedures for accreditation, or standards for accreditation.

According to the application, there have been no major changes in NVAO’s scope of activities since 2013 (Application for Recognition, p. 10).

At the Executive Board meeting observed by the WFME Recognition Team on 11 October 2017, there was discussion of potential upcoming changes to the levels given to universities or programmes based on the evaluation. During the Board meeting observed on 10 September 2018, the NVAO Executive Board confirmed that the law had changed in July, and that going forward NVAO will no longer provide the levels of “good” or “excellent”. In anticipation of legislative changes, the 2017/2018 accreditation cycle of basic medical programmes was the first set of accreditation decisions to adopt these new regulations. Medical schools will be granted “accredited” (satisfactory) or “not accredited” (not satisfactory) designations.

WFME Recognition Team Finding: Compliant

Part II: Accreditation Standards

A. Existence and Availability of Standards

- The accrediting agency must use predetermined standards for accreditation.
- The standards must be accessible to the medical school undergoing the review, and must be available to the general public.

The agency uses predetermined standards for accreditation. The Netherlands standards are accessible in English at:

<https://www.nvao.com/procedures/assessment-framework-accreditation-system-netherlands-2016>.

The Flanders standards are accessible in English at:

<https://www.nvao.com/quality-assurance-systemsflanders/accreditation>.

In addition, the *2009 Framework for Undergraduate Medical Education in the Netherlands* provides “competencies” for undergraduate medical education. This document is available at:

http://www.nfu.nl/img/pdf/09.4072_Brochure_Raamplan_artsopleiding_-_Framework_for_Undergraduate_2009.pdf.

This document provides competencies for both the Bachelor’s and Master’s degrees for individual students; however, it does not include standards for the institution.

WFME Recognition Team Finding: Compliant

B. Type of Standards

- The accreditation agency must use medicine specific standards, or standards possessing similar characteristics.
- The Standards must be a comprehensive set of standards such as the WFME Global Standards or similar Standards, such as the Liaison Committee on Medical Education (LCME) Functions and Structure of a Medical School, or the Australian Medical Council (AMC) Standards for Assessment and Accreditation of Medical Schools.

The “Assessment Framework for the higher education accreditation system of the Netherlands” and the corresponding Framework for Flanders are general higher education standards and are not specific to medicine.

If NVAO approves a university's internal quality assurance system, then the university only needs to adhere to a limited accreditation Framework. The four standards used in the limited programme assessment are quite broad, and not medical specific, but each includes some descriptive text (1-3 sentences) to elaborate briefly on the meaning of the standard. The WFME Recognition Team observed a site visit using the limited programme assessment. According to discussion with NVAO, in the past more standards were used but these have been reduced to four standards to allow schools more freedom to "tell their story". Within these four broad standards, the schools decide what sub-themes they want to describe in their self-study ("critical reflection") within the four main standards.

If a programme is not eligible for the limited accreditation Framework, NVAO uses the Framework for extensive programme assessments which includes 11 standards, each of which also include a brief explanation.

In addition to the "Assessment Framework for the higher education accreditation system of the Netherlands" standards, the *2009 Framework for Undergraduate Medical Education in the Netherlands* is medicine specific and this document includes competencies for both the Bachelor's Degree Programme in Medicine and the Master's Degree Programme in Medicine. According to the application, both the generic NVAO standards and the medical specific competencies are used for accreditation assessments and decisions for medical schools in the Netherlands. The *2009 Framework for Undergraduate Medical Education in the Netherlands* is not used to make accreditation decisions for the schools located in Flanders.

The combined standards and competencies used by NVAO do not include all the standards in the Basic Medical Education WFME Global Standards for Quality Improvement or the WFME Global Standards for Quality Improvement in Medical Education European Specifications. Notably, the WFME standards on: Students (Standard 4); Academic Staff/Faculty (Standard 5); Educational Resources (Standard 6); and Governance and Administration (Standard 8) are not part of the NVAO standards. The NVAO standards are much more general, but they appear to fit into the European approach and the educational Frameworks established in the Netherlands and Flanders.

NVAO uses the CanMEDS 2005 Framework that includes key competencies and enabling competencies for individuals, rather than the standards used by the Royal

College of Physicians and Surgeons that developed the competencies. NVAO provides an explanation of how they developed and decided upon the use of CanMEDS in their *2009 Framework for Undergraduate Medical Education in the Netherlands* document.

WFME Recognition Team Finding: Compliant

C. Appropriateness of Standards

- The accrediting agency must have a system to determine that the standards are sufficiently rigorous and appropriate to ensure the quality of the education or training provided at accredited medical schools.

NVAO uses the ESG and undergoes an international external review by ENQA every five years, the last review being spring 2017. A positive outcome of the external review is a prerequisite for full membership of ENQA and is needed for inclusion in EQAR. NVAO is included in EQAR and is a full member of ENQA. According to the application, national and international authorities regularly review the rigour and effectiveness of NVAO, including its decision-making capacity. (Application for Recognition, p. 15).

NVAO uses the CanMEDS competencies as part of their standards for medical schools, the *2009 Framework for Undergraduate Medical Education in the Netherlands*. The accrediting body for Canadian medical schools, the Committee on Accreditation of Canadian Medical Schools (CACMS) does not use the CanMEDS competencies as standards for accreditation, nor does the Royal College of Physicians and Surgeons of Canada use the CanMEDS competencies for accreditation of Canadian residency programs (<http://www.royalcollege.ca/rcsite/accreditation-pgme-programs/accreditation-residency-programs-e>). The Royal College has general standards for accreditation of Canadian residency programs (<http://www.cmq.org/pdf/agrement/normes-b-agreements-ang-2013.pdf>) and specialty specific ones for individual programs. The Royal College does not use the CanMEDS competencies directly, but requires residency programs to show how they use the CanMEDS framework, define objectives, prepare teachers to fulfil the CanMEDS competencies, and that the content must be appropriate to fulfil the CanMEDS roles, etc. Likewise, CACMS does not use the CanMEDS competencies directly. https://cacms-cafmc.ca/sites/default/files/documents/CACMS_Standards_and_Elements_-_AY_2018-19.pdf). Therefore, NVAO's use of the CanMEDS competencies does not speak directly to the rigour of the NVAO standards, as CanMEDS are not used as accreditation standards by the Royal College or CACMS.

WFME Recognition Team Finding: Compliant

D. Review of Standards

- The accrediting agency must have a system for periodically reviewing and updating the standards to ensure that they are adequate to evaluate the quality of education or training provided by the medical schools under review, and are relevant to the educational or training needs of the students.

According to the application, the generic NVAO accreditation standards are established by law and are periodically reviewed. Fixed elements in this process of review are:

- Consultation with stakeholders on the acceptance of the proposed changes;
- Consultation with the relevant Ministry of Education for drafting / amending frameworks;
- Internal consultation in NVAO Board before decision-making;
- Approval by the Minister of Education or, in Flanders, by Parliament.

NVAO's medical specific competencies are reviewed every 10 years. The *Framework for Undergraduate Medical Education* is scheduled to be reviewed in 2019 by a team of experts from all eight University Medical Centres in the country. It is the intention of NVAO to include representatives from Flanders and Saba in this process of renewal of the competencies. According to the application, "This revision requires ministerial approval in the form of a new General Administrative Order" (Application for Recognition, p. 16) to become legal.

WFME Recognition Team Finding: Compliant

Part III: Accreditation Process and Procedures

A. Medical School Self-Study

- The accrediting agency must require medical schools seeking accreditation to prepare an in-depth self-study that addresses compliance with the standards.
- The accreditation agency must provide guidance on completing the self-study.

According to the application, the institution and/or programme must complete a self-study (termed “critical reflection” in the Framework document) as a first step in the accreditation process. The self-study contains a description and evaluation of the programme according to the relevant assessment Framework.

For Erasmus University Rotterdam, the relevant framework is Framework #3 [Limited Programme Assessment (Accreditation)] in the document “Assessment Frameworks for the higher education accreditation system of the Netherlands”. The guidance given to the schools to complete the self-study are described in 3.4.1 (pp. 18-19) of the Assessment Framework. This guidance is brief (three paragraphs) and states some general principles and examples of what should and should not belong in the self-study, and provides a page limit for the self-study (15 pages). The guidance also includes a list of necessary appendices (chapter 8).

For Flemish medical schools, the Framework document is entitled “Programme Accreditation - Flanders 2015-2021: Framework”. The guidance provided to the Flemish schools to complete the self-study is described in 5.1 (Self evaluation report, p. 9). This guidance is brief (three paragraphs) and states some general principles and examples of what should and should not belong in the self-study, and provides a page limit for the self-study (25 pages). Other than the difference in the page limit, the guidance provided by NVAO to the Netherlands medical schools and to the Flemish medical schools is similar.

According to the application and observed during the site visit, the assessments of existing programmes are typically coordinated by agencies commissioned by the institutions themselves, not NVAO. This use of an independent agency to conduct the reviews is considered to enhance the ownership by institutions and create room for more diversity related to the specific nature of programmes. In the Netherlands, all medical schools use the same agency for this purpose, Quality Assurance Netherlands Universities (QANU). According to conversation with leadership at NVAO, medical

schools in the Netherlands are free to choose from a range of independent agencies for this purpose, but the medical schools have all agreed to use QANU. In Flanders, up until 2015, medical schools were reviewed by the agency Vlaamse Universiteiten en Hogescholen Raad (VLUHR-KZ). Currently Flemish schools are permitted to choose any European Quality Assurance Register for Higher Education (EQAR)-registered agency, or an agency recognised by NVAO for this purpose.

According to the application, medical schools are also permitted to organise assessments by themselves, but they only do this in a very limited number of cases. According to conversation with the leadership of NVAO, Saba University School of Medicine (SUSM), located on the Caribbean island of Saba, has chosen to organise its own assessment for its accreditation review by NVAO. (Since 2010, the island of Saba has held the status of “Special Municipality of the Netherlands” and the medical school is therefore accredited by NVAO.)

According to conversation with NVAO leadership and confirmed on the NVAO website, due to the substantial contextual and geographic difference between SUSM and schools in the Netherlands and Flanders, past reviews of SUSM have utilised a more extensive NVAO Framework with 16 standards in Framework 2010 (initial accreditation) and 11 standards in Framework 2014 (reaccreditation), as compared to the current limited Framework with four standards. In addition, an on-site interim review was conducted mid-way through SUSM’s most recent accreditation term. According to the NVAO, published guidance on writing a self-study (such as is provided by QANU to the Netherlands schools) is provided to medical schools such as SUSM that choose to organise their own assessments, beyond the brief description found in the NVAO Framework document, although this additional guidance was not evaluated by the WFME Recognition Team.

In addition to the brief guidance on the self-study provided by NVAO, QANU, the agency hired to conduct the review of Erasmus University Rotterdam, also provided guidance to the school on writing a self-study. A document entitled “Guidelines for Writing a Critical Reflection for a Limited Programme Assessment” is not available on the QANU website, but it is provided at the request of a school seeking its services, and was provided to the WFME Recognition Team. This QANU Guidelines document is approximately 10 pages long and provides information on the purpose, general principles, and structure of a critical reflection. The QANU document describes information the school should include describing how it meets each of the four NVAO standards, and a checklist of necessary appendices (the same checklist as is provided in chapter 8 of the NVAO Netherlands Framework document.)

In the case of Flemish medical schools, the VLUHR-KZ provides a document on its website, “Manual for the external quality assurance in Flemish higher education” that describes the assessment protocol for assessments of Flemish programmes. Chapter 2 of this manual, “Internal Review,” provides guidance for a medical school on how to write their self-study. This guidance section is approximately nine pages long and describes the general structure of a self-study, content, submission guidelines, and what kinds of information to include to demonstrate compliance with the four standards. These VLUHR-KZ guidelines indicate that a self-study should typically be a maximum of 25 pages. Apart from the difference in the page limit provided to the medical schools directing the length of their self-studies, the guidance provided by QANU (to the Netherlands schools) and the VLUHR-KZ (to the Flemish schools) is similar.

WFME Recognition Team Finding: Compliant

B. Site Visit

- The accrediting agency must conduct a site visit (or visits) to a medical school prior to making a decision on accreditation, and must assess elements pertaining to the school’s facilities and resources, students, faculty, curriculum, etc.
- The site visit must include the main campus of the school, and include branch campuses or additional locations of the school and clinical core clerkship rotation sites affiliated with the school, as appropriate.
- The accrediting agency must ensure that sufficient information is collected to determine compliance with the agency’s standards.
- The site visit must be of sufficient duration, and the site visit team of appropriate size and qualifications.
- The accreditation agency must provide guidance on conduct of the site visit.

According to the application, an expert panel conducts a site visit to the medical school as part of the NVAO accreditation process. The WFME Recognition Team observed a site visit to Erasmus University Rotterdam on 12 & 13 October 2017. NVAO has different procedures for the site visit depending on if the programme is seeking accreditation for the first time, or reaccreditation. In the case of an initial accreditation (new programme), the expert panel is supported by a process coordinator who is a staff member of NVAO, and a secretary who is a staff member of NVAO or an independent secretary who is trained and certified by NVAO. In the case of reaccreditation, such as the Erasmus University Rotterdam, the process coordinator and the secretary are

generally provided by an independent assessment agency. For the site visit observed by the WFME Recognition Team, this independent agency was QANU, and both the process coordinator and the secretary were representatives of QANU. While the assessment of Erasmus University Rotterdam was conducted by QANU, the expert panel members of the QANU require NVAO appointment.

According to the application, the QANU expert panel speaks to the Board of the university, the programme managers, faculty, students, graduates, representatives of the various committees, and representatives of the profession. The QANU panel met with “representatives of the profession”, only in the capacity of medical staff who are also representatives of the profession. During the site visit observed by the WFME Recognition Team the QANU panel met with representatives from these other groups (i.e, Board of the university, the programme managers, faculty, students, graduates, representatives of the various committees), outlined in the application.

As part of the QANU panel interviews with the various groups, which each took approximately 45 minutes, the panel discussed and clarified information provided in the self-study. The discussions assisted the panel in determining the programme’s compliance with the accreditation standards.

According to the NVAO Framework documents, in advance of the site visit, the expert panel chooses and reviews a minimum of 15 final student projects in the Netherlands and 10 final projects in Flanders. During the site visit, the panel conducted interviews with the assessors of the programme to gain insight into how these final projects were assessed. According to the accreditation report for Saba University available on the agency website at the time of the site visit in October 2017, students are required to write a paper at the end of the basic science portion of their curriculum, but no papers were available for review since the research course had only recently started. Papers were available in the subsequent review.

According to the application and verified during the site visit, elements of review include:

- The intended learning outcomes
- The achieved learning outcomes
- The curriculum
- The didactical concept based on student-centred learning,
- The availability of an appropriate infrastructure, both in terms of the physical infrastructure as well as in terms of the quality and quantity of faculty
- Quality assurance

- Student assessment / examination

During the site visit, the panel had access to a wide variety of documents that were provided by the institution, including committee meeting minutes, learning materials, and exams. According to the application and Framework documents, the panel may request for any information they deem necessary and speak to any party they deem necessary. During the site visit observed, it appeared the panel closely followed the planned agenda.

According to the Framework documents, the panel sets aside time for open consultation. The medical school and the panel make this open consultation time known to everyone associated with the medical school. During the site visit observed by the WFME Recognition Team, one student and one faculty member came to the open consultation for private discussion with the panel.

According to the application, the accreditation process includes a comprehensive review of the main campus, any branch campus or campuses, and any other additional locations(s) operated by the medical school. During the site visit observed by the WFME Recognition Team, the QANU panel held meetings in a classroom accessible through the main university library. The panel also visited a simulation lab and observed a tutored session with a team of students practicing various team based communication and clinical skills. No additional medical school facilities or resources, such as clinical sites, were directly observed by the QANU panel.

According to the application, site visits “encompass” core clinical clerkships sites affiliated with the medical schools. The expert panel performs a document review of the systems that are in place to control the consistency of the learning experience at all clinical sites. Such a review includes learning infrastructure, adequate ambulatory and clinical patient mix, taught curriculum, student assessment, supervision, faculty qualifications, academic resources, etc. If the findings of the expert panel, based on this “paper review”, are sufficiently confirmed during the site visit to the main campus, the panel can decide that its review suffices to gain full insight into the clinical part of the programme without physically visiting any clinical sites. If, however, the panel encounters discrepancies, the panel can decide to expand its review of clinical sites by means of additional on-site reviews or additional interviews with clinical teaching faculty. Therefore, only if deemed necessary does the panel verify its findings during on-site reviews (site visits) of the clinical sites.

No clinical sites of Erasmus University Rotterdam were deemed to be necessary by the QANU panel to be included in the site visit observed by the WFME Recognition Team. Documented procedures describing site visits to clinical sites (if they are determined to be needed), such as when the clinical site visits would occur, if the entire QANU panel would re-convene to review the site(s), what types of data would be gathered, etc., were not evaluated by the WFME Recognition Team.

According to the application, the site visit generally takes two days. The site visit observed by the WFME Recognition Team took place 12 & 13 October 2017 and consisted of approximately 8.5 hours of internal QANU meetings / perusal of documents (course materials, syllabi, examinations, annual report, committee minutes, etc.) and 8.5 hours of interviews with individuals associated with the medical school. According to the application, the expert panel can choose the level of detail they deem appropriate.

The two-day duration of the site visit observed by the WFME Recognition Team was brief but appeared sufficient for the expert panel to gain an adequate understanding of the programme being assessed (and did not include direct observation of the clinical sites).

According to the application, the composition of any site visit team / expert panel must reflect a wide variety of expertise. NVAO panel composition requirements are consistent with the ESG.

The chair's main role is the overall responsibility for process and outcome. The chair, generally an authority in the professional field, is trained by NVAO. The secretary is responsible for writing the expert panel report. The secretary is typically from the outsourced assessment agency, but is trained and certified by NVAO. The panel members together must represent expertise in terms of content, didactics, assessment, accreditation, international orientation, and student related matters. An institution seeking accreditation for its programme must submit documentation, including panel member CVs to prove that a proposed expert panel covers the required spectrum of expertise. The NVAO Board must approve expert panels prior to the start of the accreditation process. According to the application, a typical expert panel will consist of at least five or six experts including the trained chair, a student member, and two to four content experts. According to the NVAO Framework for the Netherlands, a panel is composed of a minimum of four members and a student (13. Composition of panels, p. 57). According to the NVAO Framework for Flanders, the panel consists of a maximum of four members, including a student (4. Composition of the assessment panel, p. 8).

The expert panel that conducted the site visit observed by the WFME Recognition Team appeared to be well qualified and appropriate for the task.

The NVAO Framework documents outline the general agenda, the groups with whom interviews are to be conducted, and documents that are to be reviewed. NVAO also has a code of conduct which outlines the manner in which an expert panel is supposed to carry out its duties. This code of conduct document appears to be comprehensive and appropriate.

WFME Recognition Team Finding: Partially compliant

C. Reports

- A written report of findings must be created based on information provided by the medical school and gathered during the site visit.
- The accrediting agency must provide guidance on structure and content of the report.
- The medical school undergoing the review must have the opportunity to respond to the report prior to deliberation of the accrediting agency.

According to the application, a report is created based on the expert panel's findings after a site visit. The report reflects the objective findings of the expert panel, the panel's considerations and a substantiated judgment on all of the accreditation criteria. This report provides the basis on which the Board of the NVAO makes its accreditation decision. All expert panel reports are published on the NVAO website. Only trained and certified secretaries write reports.

The general requirements for the structure and content of the report are described in the NVAO Framework documents. According to the Framework for the Netherlands, the report comprises approximately 15 pages (3.4.5 Assessment report, p. 20). The report reviewed by the WFME Recognition Team of Erasmus University Rotterdam included two programmes, so therefore was somewhat longer than the recommended 15 pages. According to the VLUHR manual and the NVAO Flanders Framework (5.3, Assessment report, p. 10), the report for Flemish schools comprises approximately 20 pages.

According to the application, after the expert panel report is drafted, it is sent to the institution for review. The institution has the opportunity to identify factual inaccuracies. According to the VLUHR manual, in addition to identifying factual inaccuracies, the

programme may also comment on the content of the report. In the Netherlands, after the institutions suggested edits of factual inaccuracies are discussed by the expert panel, the expert panel finalises its report.

According to the VLUHR manual, (4.3.4 Second feedback round), if the programme is not satisfied with the way in which the panel considered its suggested corrections, it may submit a response to be included as an appendix to the final report. The institution may also file an appeal against the programme report.

WFME Recognition Team Finding: Compliant

D. Qualification and Training of Individuals Associated with the Accrediting Agency

- The accrediting agency must have and implement policies regarding the qualifications, credentials and experience of
 - the individuals who establish the accreditation standards
 - the individuals who participate in the on-site reviews of medical schools
 - the individuals who create the reports detailing the school's compliance with the standards
 - the individuals who make accreditation decisions
- The accrediting agency must have a training process for
 - new members of the accrediting agency
 - individuals who participate in on-site reviews
 - individuals who create reports

According to the application, the composition of the NVAO Board ensures a broad range of expertise and experience in higher education, education management, research, quality assurance, and programmatic review. NVAO Board members are appointed by the joint Ministers of Education of the Netherlands and Flanders for a period of four years.

The current NVAO Board composition reflects some expertise in medical education administration and the medical professional field: two members of the NVAO Board are former senior administrators of universities that also include a Faculty of Medicine and one member has executive experience in the professional field of healthcare.

In addition, approximately 20 NVAO policy advisors (including two individuals responsible for medical education programmes) support the decision-making by the Board. They analyse each accreditation request, including the assessment report, and include the results of this analysis in a short report to inform the decision-making process by the Board.

Qualifications and credentials of individuals who establish and review accreditation standards:

The (generic) NVAO accreditation standards are established by law. The standards are periodically reviewed. Fixed elements in this process of review are:

- Consultation with stakeholders on the acceptance of the proposed changes;
- Consultation with the relevant Ministry of Education for drafting / amending Frameworks;
- Internal consultation in NVAO Board before decision-making;
- Approval by the Minister of Education or, in Flanders, by Parliament.

The medicine specific competencies, the Framework for Undergraduate Medical Education in the Netherlands, is reviewed and updated approximately once every ten years by a team of experts from all eight University Medical Centres in the Netherlands.

Qualifications and credentials of individuals who participate in site visits:

According to the application, the composition of site visit teams reflects a wide variety of expertise. The NVAO panel composition requirements represent the European Standards and Guidelines (ESG). The chair, generally an authority in the professional field, is trained by NVAO. The site visit team members together must represent expertise in terms of content, didactics, assessment, accreditation, international orientation, and student-related matters. Since the assessment of medical schools in the Netherlands is outsourced to QANU, an institution seeking accreditation for its programme must submit documentation to NVAO, including panel member CVs, to demonstrate that a proposed expert panel covers the required spectrum of expertise.

Qualifications and credentials of individuals who create reports:

The secretary is responsible for writing the expert panel report. All secretaries are experienced in quality assurance and in assessment procedures and are trained and certified by NVAO.

Qualifications and credentials of individuals who make accreditation decision:

According to the application, accreditation decisions are “prepared” by NVAO staff members prior to the official decisions made by the NVAO Board. NVAO staff has a

wide experience in the higher education sector, from different disciplinary backgrounds, and include administrative experience, and two staff members in particular deal with educational programmes in medicine and healthcare.

Training of individuals who establish and review accreditation standards:

According to the application, staff members are trained as part of NVAO's internal quality assurance. NVAO develops work plans in the field of internal quality assurance. Quality related meetings for the staff are held regularly throughout the year.

Training of individuals who participate in the medical school site visits:

According to the application, all panel members participating in an NVAO external assessment procedure are trained and/or briefed by the subcontracted agency (QANU). All expert panel chairs and student members participate in specific training programmes. The other panel members are either trained or briefed prior to the assessment procedure. For the training provided by NVAO, a profile for the role and behaviour of a panel chair has been developed. In addition, the roles of other panel members have been clearly defined. Also, the supporting staff members (process coordinator and secretary) are trained to ensure the quality of the assessment work. The WFME Recognition Team confirmed with the QANU team members that they had all participated in training sessions. The WFME Recognition Team also reviewed training agendas which appeared comprehensive and appropriate.

Training of individuals who create reports:

The secretary who is responsible for writing the expert panel report has participated in training sessions. All secretaries use the same format for the assessment reports.

Training of individuals who make accreditation decisions:

According to the application, NVAO staff members who prepare the accreditation decisions are professionals in higher education and regularly trained by NVAO. The application also states that a program of peer-to-peer coaching has been developed to support the comparative discussion of approaches and responses to dilemmas faced by process coordinators.

WFME Recognition Team Finding: Compliant

E. Accreditation Decisions

- The accrediting agency must have documented processes and procedures that ensure accreditation decisions are based on compliance with the standards.
- The accrediting agency must conduct a decision-making meeting where a report based on an on-site review is adequately discussed and debated.
- The accrediting agency must define a quorum to conduct business.
- The accrediting agency must make a fair accreditation decision based on the information included in the report.
- The accrediting agency must use information on the performance of recent graduates of the medical school in making accreditation decisions.

According to the application, the following table depicts a general outline of the process of accreditation. The decision making process observed by the WFME Recognition Team predominantly followed this table:

Application	Institution submits a request for accreditation based on an assessment report.
Analysis by NVAO	Formal compliance: is the application correct and complete? Content: is the report convincing and compliant with the framework?
Draft-decision	NVAO policy officer and Board member prepare an analysis report and a draft decision.
Decision by NVAO Board	Positive: - accreditation after finalisation by General Board. Postponed: - NVAO asks for additional information or consults the panel. In case of a negative assessment report the programme is asked to submit an improvement plan.
Resuming decision	After receipt of additional information or insights from the panel: - NVAO decides positively → accreditation - (eventually) NVAO demands additional assessment (verification)
Decision on improvement period	NVAO accepts improvement plan with positive advice of an expert panel and grants an improvement period of up to two years in the Netherlands or three years in Flanders.
Decision making	- NVAO Executive Board discusses the report and consults with panel chair when additional information is needed, and takes preliminary decision. - General Board of NVAO decides on acceptance of the report and decision. Before taking a final decision, the draft decision is sent to the institution for reaction or complaint/appeal.*

* In NL, appeal is possible after the final decision, in FL after a draft decision.

According to the application, NVAO uses standardised forms for documents in making decisions. NVAO's legal advisors verify all decisions for legal correctness. The Board meetings observed by the WFME Recognition Team on 11 October 2017 and on 10 September 2018 were meetings of the NVAO Executive Board. According to discussion with the Executive Board members, the General Board has granted the Executive Board the authority to make the final decisions, and the General Board would only become involved in cases of appeal of a decision.

According to the application and discussion with NVAO staff, NVAO clusters the applications to allow a comparative consideration across schools in the decision making process.

NVAO has internal quality assurance procedures to ensure conformity with the standards. The expert panel reports, including the panel's findings and considerations, and all NVAO decisions are published online.

The General Board is authorised to make decisions by simple majority when a minimum of 2/3 of the number of appointed Members of the Board is present, as stipulated in the Administrative Regulations under revision (Article 2.3.4 and 2.3.2). The Executive Board is permitted to make decisions when at least one Dutch and one Flemish Board member is present (Article 3.1.3). A quorum was present at the Executive Board meetings observed by the WFME Recognition Team.

According to the application, examination pass rates and programme attrition rates are generally reported in the self-study as part of the accreditation process, as these data provide insight to the effectiveness of the programme. Furthermore, interviews with graduates and available data on graduates' employment and satisfaction with the programme are part of the accreditation procedure.

WFME Recognition Team Finding: Compliant

F. Activities Subsequent to Accreditation Decisions

- The accrediting agency must have procedures for allowing a medical school that does not meet standards to come into compliance.
- The accrediting agency must monitor medical schools throughout the duration of an accreditation period.
- The accrediting agency must have and implement a policy regarding the reporting of any substantive changes made, or anticipated to be made, to the educational programme or other aspects of an accredited medical school.
- The accrediting agency must require medical schools to be re-evaluated periodically after a positive accreditation decision.

According to the application the following table summarises the judgements used in the Dutch and Flemish Frameworks. (See section I. C. on Substantive Changes for information on how these judgments will change in the future.)

Framework	The Netherlands	Flanders
Initial accreditation	Standards: insufficient, partially sufficient, sufficient. Overall judgement: insufficient, conditionally positive, positive (limited and extensive framework)*	Standards and overall judgement: binary scale (insufficient, sufficient)
Existing programmes	Standards and overall judgement: Insufficient*, sufficient, good, excellent (limited and extensive framework)**	Standards and overall judgement: binary scale (insufficient, sufficient)

* When a panel is convinced the deficiencies can be remedied, NVAO can grant an improvement period.

** The framework for new and existing Associate Degrees (NL) uses a binary judgement (insufficient, sufficient).

If a new programme in the Netherlands is granted a conditional decision during the initial accreditation, the programme is granted two years to meet the conditions set in the assessment. Failing to meet the conditions leads to the immediate loss of accreditation.

According to the application, if the assessment of a currently accredited programme demonstrates that the programme no longer meets the standards, NVAO may renew the programme's accreditation and grant an improvement period with conditions set for further renewing accreditation. In the situation of granting an improvement period, the duration of the accreditation is extended for up to two years in the Netherlands or three years in Flanders, which allows the programme to implement measures to improve the weaknesses or deficiencies indicated by the panel. These improvement measures stipulated by NVAO are assessed after the improvement period to determine whether the changes have been made.

If NVAO grants conditional accreditation to a currently accredited programme, the school needs to submit a plan for improvement within three months. The conditional accreditation is subject to approval of this improvement plan by the expert panel and the Board of NVAO. After a relatively short period, e.g. one year, the expert panel will revisit the school to establish to what extent issues have been addressed. If all required improvements have been successfully implemented, the school can regain its regular accreditation status. Past performance, however, is considered in future accreditations. In the decision-making meetings observed by the WFME Recognition Team, all medical schools on the agenda had been granted accreditation; therefore, there was no discussion of conditional accreditation status or improvement plans.

According to the application, when the panel concludes that the institution did not follow up on the required improvements, accreditation is terminated and the institution is no

longer allowed to issue degrees upon completion of the no longer accredited programme.

According to information provided by NVAO leadership during the site visit, medical schools in the Netherlands have always been granted full accreditation, and no formal improvement periods have been needed. It is unknown to the WFME Recognition Team if this is also true for medical schools in Flanders.

According to the application, when a programme has received a positive accreditation decision, it is not actively monitored by NVAO while the accreditation is valid. If complaints and grievances arise, they are to be addressed within the university in first instance. While NVAO does not decide on individual complaints, NVAO can act on signals and complaints from students.

If during the accreditation process issues come up that need to be addressed, but are not urgent and/or of severe nature (e.g. the quality of education is satisfactory but minor elements needs to be improved), and if the experts have trust in the programme's ability and willingness to improve, the expert panel can recommend the Board of NVAO to make accreditation subject to interim review.

According to the application, universities are required to report substantive changes to NVAO. Substantive changes include major curricular revision as well as other considerable changes such as relocation of the programme. Given the periodical reaccreditation, and considering that curricular revisions are multiple year processes, this new accreditation generally coincides with the already scheduled renewal of the accreditation.

A positive accreditation status has a maximum validity of six years in the Netherlands and eight years in Flanders. Reaccreditation therefore takes place at a maximum interval of six years (eight years in Flanders). Full accreditation duration is only issued if NVAO is completely satisfied with the outcome of the accreditation process. If deemed necessary, the Board of NVAO issues accreditation for a shorter period than six (or eight) years.

WFME Recognition Team Finding: Compliant

G. Complaints

- The accrediting agency must have procedures to investigate complaints from students, graduates, or other individuals regarding accredited medical schools.

According to the application, NVAO does not process complaints from individuals and is not a mediator. However, NVAO may receive notifications of potential quality issues in the higher education sector in Flanders and in the Netherlands. A notification is incorporated into the dossier of the programme or university, in order to be dealt with in the next accreditation procedure, if necessary. If an accreditation procedure is already under way at the time of receipt, such a notification may be taken into account in the assessment, and possibly prompt further examination. If no accreditation procedure is under way, NVAO will deal with the notification as necessary. Potential actions depend on the urgency and the number of complaints. In general, complaints are handled by the individual universities. The procedures for complaints are stated on the NVAO website: <https://www.nvao.com/students/complaints-higher-education>.

According to discussion with NVAO, in recent years (prior to 2017) the agency did not receive any complaints concerning medical programmes. In 2017, NVAO received two complaints:

- A complaint concerning a student's assessment. This complaint was forwarded to the panel and was discussed with the medical school in assessment of the programme. (See section III. B. Site Visit) During the site visit observed by the WFME Recognition Team, one student and one faculty member came to the open consultation for private discussion with the panel.
- A complaint concerning a questionnaire used in a student survey. The complainant was informed of the difference between internal quality assurance of a program and the importance of student evaluations in it, and the external quality assurance and the role of NVAO. Upon this explanation, the matter was closed.

For further information: <https://www.nvao.com/students/complaints-higher-education>

WFME Recognition Team Finding: Compliant

Part IV: Resources

A. Controls against Conflicts of Interest

- The accrediting agency must ensure that individuals involved in the accreditation process or decision for a specific medical school have no conflicts of interest that would potentially inhibit them from making objective decisions.

According to the application and the *NVAO Assessment Framework for the Higher Education Accreditation System of the Netherlands 2016*, there are appropriate policies and procedures in place to ensure there are no conflicts of interest of any individual involved in accreditation activities.

Members of NVAO's Executive and General Boards are appointed for four years by the Committee of Ministers. In order to guarantee the independence of Board and staff members, members of both categories cannot participate in the decision making on or applications from institutions or programmes they have been associated with in any form during the previous five years. If there is a specific application where this independence cannot be guaranteed, the member of the Board will withdraw from the decision-making process for the programme concerned.

The panel members are also independent of the programme. For at least five years, they may not have had any direct nor indirect ties with the institution or programme that would lead to a conflict of interest. Prior to the assessment, the panel members sign a declaration of independence.

According to the NVAO Code of Conduct, "By signing the declaration of independence and confidentiality the expert or secretary certifies

- To not maintaining any (family) connections or ties of a personal nature or as a researcher / teacher, professional or consultant with the institution under review, which could affect a fully independent judgement regarding the quality of the program in either a positive or a negative sense;
- To not having maintained such connections or ties with the institution during the past five years;
- To observing strict confidentiality with regard to all that has come and will come to his/her notice in connection with the assessment, insofar as such confidentiality can reasonably be claimed by the programme, the institution

- or NVAO;
- To being acquainted with the NVAO code of conduct.”

According to the application, NVAO also has an internal Integrity Code which provides a frame of reference for safeguarding integrity and the professional, ethical conduct of NVAO staff and Boards in all of NVAO’s procedures and activities. The code covers the internal conduct and attitudes towards external stakeholders and ‘clients’. The code is principle based, and provides general principles of proper and ethical good conduct. NVAO holds regular sessions to discuss cases where integrity may have been at stake and thus ensures that the code is a ‘living’ document.” (NVAO Application, p. 33).

The WFME Recognition Team reviewed the controls against conflicts of interest documents which appear appropriate. All NVAO staff and QANU site visit panel members confirmed that they abide by these policies and procedures.

WFME Recognition Team Finding: Compliant

B. Controls against Inconsistent application of Standards and Procedures

- The accrediting agency must make certain that the standards and procedures for accreditation of medical schools are applied consistently to all schools that seek accreditation.

According to the Assessment Framework for the Higher Education Accreditation System of the Netherlands 2016, NVAO assess consistency while reviewing the advisory report as follows: “NVAO forms an opinion about the advisory report, thereby considering consistency, panel approach, procedural requirements, substantiation and weighting in order to ascertain that the panel recommendations have been substantiated in a thorough, proper, and verifiable manner, and that the panel has reached its judgement in a consistent manner. NVAO may invite the panel chair (and possibly other panel members) to provide an explanation. NVAO informs the institution about these consultations and may invite the institution to attend. Institutions may also express to NVAO their need for an explanation.” (p. 13, Assessment Framework for the Higher Education Accreditation System of the Netherlands 2016, NVAO online version).

According to NVAO documents, the agency ensures that the various panels that review different schools are consistent. “For reasons of independence, specific expertise, and availability of panel members, the composition may differ from one programme to the

next. However, the various compositions must “overlap” sufficiently in order to ensure consistency in the comparative assessment.” (p. 24 footnote, Assessment Framework for the Higher Education Accreditation System of the Netherlands 2016).

WFME Recognition Team Finding: Compliant

C. Administrative and Fiscal Responsibilities

- The accrediting agency must have sufficient administrative and fiscal capability and independence to carry out its accreditation activities with regards to its scope of responsibility.

According to the application, the NVAO office has a staff of approximately 43 FTE. The organisation’s administrative capacity appears appropriate.

NVAO finances appear to be on a sound basis, given the government support and government determined inspection fees. The income and expenditure are in balance. Government income is around 70% of the total, perhaps leading to mild concerns about the exact degree of independence the organisation can maintain. Political forces may dictate the global sum granted each year but as long as local decisions drive the expenditure, it appears appropriate.

WFME Recognition Team Finding: Compliant

D. Due Process

- The accrediting agency must notify medical schools in writing of any adverse accreditation actions or decisions and describe the basis for such action.
- The accrediting agency must have an appeal process for adverse actions, including policies to ensure that individuals involved in the appeal process have no conflicts of interest that would potentially inhibit them from making objective decisions.

According to the application, prior to making a final decision concerning an application for (initial) accreditation, NVAO informs the institution about its ‘intended decision’. By law, the institution has two weeks to reply to the intended decision and to submit textual

corrections, factual inaccuracies or other responses to the decision. When the institution has no major remarks or complaints, NVAO makes its final decision.

NVAO decisions are open to appeal. The period for lodging internal appeals is six weeks. In principle, the processing of the appeal involves a hearing. The NVAO General Board makes its decision within twelve weeks after receiving the appeal. A decision after appeal may be postponed for no more than six weeks. Such postponement is communicated in writing.

In the Netherlands, the appeals procedure is subject to the General Administrative Law Act (AWB) and the Appeals Procedure Regulations AWB. NVAO decisions after appeal are open to external appeals with the Administrative Jurisdiction Department of the Council of State. The period for lodging external appeals is six weeks. Pending the internal or external appeal procedure, the competent administrative court may be requested to make provisional arrangements if urgency, due to the interests involved, is required. Further information regarding appeal can be found at: <https://www.nvao.com/quality-assurance-systems-the-netherlands/appeal>

Because of differences in the national judicial context, the appeal process for Flanders differs slightly, but it has a similar stepwise approach: in internal appeal, potentially followed by an appeal with the Council of State. In all cases, an appeal cannot lead to a formal change of NVAO's decision. A successful appeal reverts the case back to NVAO and then most often leads to a new assessment procedure." (*Application for Recognition*, p. 36).

NVAO appeals policies and procedures appear appropriate. The WFME Recognition Team did not observe any procedures related to appeals.

WFME Recognition Team Finding: Compliant

E. Maintenance of Records

- The accrediting agency must maintain full records of accreditation review documentation, including self-studies, on-site evaluation team reports, the medical school's responses to on-site reports, periodic review reports, decisions, and any other pertinent correspondence and materials.
- The accrediting agency must have implemented record-keeping policies, including policies related to data security.

According to the application, regulations apply to the care and management of all archival matter received or created in the execution of the statutory tasks, responsibility for which has been vested with NVAO. This includes the archival matter that pertains to working processes associated with policy development, policy evaluation, and accountability. The regulations detail the policy, responsibilities and implementation, and include some final provisions. Article 8 of the NVAO record-keeping regulations makes special reference to matters of data security. These policies and procedures appear appropriate for safeguarding information.

WFME Recognition Team Finding: Compliant

F. Availability and Dissemination of Information

- The accrediting agency must make available to medical schools and to the public information on the types of accreditation granted and the procedures medical schools must follow in applying for accreditation.
- The accrediting agency must ensure that medical schools undergoing review and pertinent licensing or authorising agencies are notified of accreditation decisions.
- There must be a publicly available directory of accredited medical schools and accreditation decisions.

According to the application, all policies, procedures, and decisions can be found on the agency website. In Dutch the website can be accessed via <https://www.nvao.net/> In English, the website can be accessed via <https://www.nvao.com/>

Information regarding accreditation policies and procedures in the Netherlands in Dutch can be found at: <https://www.nvao.net/beoordelingsprocedures/nederland>

Information regarding accreditation policies and procedures in Flanders in Dutch can be found at: <https://www.nvao.net/beoordelingsprocedures/vlaanderen>

In English, the information regarding policies and procedures in the Netherlands can be found at: <https://www.nvao.com/quality-assurance-systems/netherlands>

In English, the information regarding policies and procedures in Flanders can be found at: <https://www.nvao.com/quality-assurance-systems/flanders>

NVAO publishes all assessment reports and decisions on accreditation of new and existing programs, institutional audits or reviews and all other NVAO procedures and their outcome on its website.

The NVAO homepage contains a search field through which all accreditation information can be found. Entering “medicine” or its Dutch equivalent “geneeskunde” in the search box and pressing the “find programme(s)” generates a list of all accredited programmes in medicine in the Netherlands and/or Flanders. By clicking on any programme, detailed information can be found at a glance such as the accreditation status, accreditation expiry, etc. Expert panel reports as well as all formal NVAO accreditation decisions are also included.

In addition, all accredited programs are registered in a central government registry of higher education: the CROHO in the Netherlands and the Higher Education Register in Flanders. These registers are accessible online for the public. The Dutch CROHO can be accessed through <https://apps.duo.nl/MCROHO/pages/zoeken.jsf> (Dutch only) and the Flemish Higher Education Register through <http://www.hogeronderwijsregister.be/home> (Dutch and English).

WFME Recognition Team Finding: Compliant