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INITIAL EXPLORATION OF GENERATIVE ARTIFICIAL INTELLIGENCE

THEMATIC ANALYSIS OF QUALITY ASSURANCE

JANUARY 2026

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Contents

Foreword

It is evident that Generative AI has a significant impact on higher education. Ethical, practical and legal issues are emerging rapidly and often overlap. This raises the question of whether, and in what ways, these developments have already reached accreditation processes such as those conducted by NVAO. This thematic analysis explores that question.

In a sense, this report looks back in time. The accreditation reports currently being published concern programmes that were reviewed by panels some time ago, based on documentation that had been prepared well in advance.

In such a rapidly evolving field, this is an important context to bear in mind. That said, this thematic analysis clearly demonstrates how quickly developments in Generative AI are entering higher education.

For the time being, most discussions are focused on assessment. This is understandable at this stage, as public trust in qualifications depends on it. However, assessment alone is clearly not the final word. Reflection on education across all four standards is required: the intended learning outcomes, the design of the teaching and learning environment, assessment and final attainment, and, finally, the achieved learning outcomes. All four are subject to change.

This report shows that panels appear to be confident that institutions are identifying the right issues and are actively addressing them. This does not yet mean that policies are always fully developed or effective, nor could that reasonably be expected at this rapidly evolving stage. Calls for clear frameworks and certainty, which are often heard, are understandable, but we will likely have to live with a degree of uncertainty for some time to come. Higher education is well equipped to do so.

Dr Arnold Jonk, Chair of the NVAO

1 Executive summary

To gain a clearer understanding of how Generative AI is being addressed within Dutch higher education and quality assurance, this initial exploration by NVAO maps how the topic is reflected in review reports. To this end, an initial survey examined the extent to which Generative AI and related terms appear in review reports of programmes for which NVAO took an accreditation decision between 2010 and the end of 2025. Subsequently, the reports from the most recent round of Institutional Quality Assurance Reviews were also examined to determine the extent to which these terms occur. Finally, for programmes for which NVAO took an accreditation decision between 1 November 2024 and 14 August 2025, a more in-depth analysis was conducted to identify the focus of review panels and what emerges from the reports with regard to Generative AI in programmes.

Sharp increase in attention to Generative AI since 2023

Programmes and review panels are increasingly confronted with Generative AI, but the attention given to it in review reports varies considerably in both focus and depth. University programmes in particular have shown a sharp increase in attention to Generative AI since 2023. This trend remains visible even when review groups for programmes with a primary focus on artificial intelligence and data are excluded. However, a more detailed analysis of recent programme reviews shows that attention in the reports is still limited. Generative AI and related terms appear in just over half of the assessments.

Focus on assessment

Review reports for programmes for which an accreditation decision was taken between 1 November 2024 and 14 August 2025 focus on Generative AI primarily in relation to assessment (Standard 3). Programmes mainly address the risks associated with Generative AI, such as fraud and challenges to the validity of written final course products. Panels advise programmes to explore alternative and complementary forms of assessment and to clarify guidelines. Notably, the review reports do not explicitly address the quality of programmes' final works. Moreover, programmes pay little attention to Generative AI in relation to constructive alignment between learning outcomes, teaching and learning activities, and assessment.

Programmes appear to focus primarily on safeguarding the quality of assessment, rather than adopting an integrated approach that encompasses aspects such as learning outcomes, curriculum development, AI literacy and achieved learning outcomes. Panels take a somewhat broader perspective, but the reports still provide insufficient insight into how panels and programmes engage in dialogue about Generative AI during reviews.

Concrete follow-up steps

Panels are not required to engage in discussions on Generative AI or to report on it, and the reports reflect a situation that existed approximately six months earlier. Nevertheless, the review reports indicate the direction of developments based on which NVAO can identify next steps.

1. **Develop concrete institution-wide guidelines** for the use of Generative AI in education and assessment, so that programmes have greater clarity and practical guidance;
2. **As a programme, adopt an explicit and integrated approach** in which the implications of the use of Generative AI for aspects such as learning outcomes, the curriculum, AI literacy among teaching staff, assessment, and achieved learning outcomes are considered deliberately and in a coherent manner;
3. **Make Generative AI a more explicit component of quality assurance procedures,** so that panels and programmes address the topic in a more systematic and transparent manner.

2 Introduction

Generative Artificial Intelligence (Generative AI) has the potential to significantly disrupt Dutch higher education and quality assurance. Generative AI is a form of artificial intelligence (AI) that enables users to generate content such as text, images, video and audio. The use of Generative AI may change what programmes aim to educate for and what students are expected to learn, contribute to a richer learning environment, and lead to new forms of education and assessment. In addition, Generative AI can support stakeholders such as teaching staff, programme managers, panels and review agencies in their work processes.

The use of Generative AI also presents challenges for education and quality assurance. How can programmes ensure that they remain aligned with labour market demands? What knowledge and skills do students need? Can these still be assessed and evaluated effectively, and what agreements are made in this regard? What do professionals, such as teaching staff and panel members, need to realise, assess and safeguard this? Educational quality has many interrelated dimensions and aspects, all of which are simultaneously influenced using Generative AI.

The relationship between educational quality and the use of Generative AI are complex and dynamic, meaning that it often only becomes clear in retrospect how developments take concrete shape. Educational institutions are therefore in the process of developing their AI policies. Within the Dutch National Growth Fund programme Npuls, a vision and guidance on GenAI, assessment and examination have been developed together with education professionals, with a strong focus, among other things, on professional development for teaching staff (Beekman et al., 2025; Renkema et al., 2025; Terbeek, 2025). At a European level, the European Association for Quality Assurance in Higher Education (ENQA), the umbrella organisation of quality assurance agencies, has developed guidelines that emphasise human judgement in quality assurance procedures (ENQA, 2025a). However, it is not yet well understood to what extent Generative AI currently plays a role in internal and external quality assurance. Insights derived from ENQA-organised meetings suggest that member quality assurance agencies are still exploring how Generative AI can be applied in the design of internal and external quality assurance systems across their respective countries or regions (ENQA, 2025b).

Research objective and research question

To gain a clearer understanding of how Generative AI is being addressed within Dutch higher education and quality assurance, this initial exploration examines how the topic is reflected in review reports from programme reviews, initial programme accreditation (Toets Nieuwe Opleiding, TNO) and Institutional Quality Assurance Reviews (Instellingstoets Kwaliteitszorg, ITK).

This initial exploration first maps historical developments. For existing and new programmes for which a decision was taken between 2010 and the end of 2025, the study examines the extent to which “Generative Artificial Intelligence” and related terms (including AI) appear in review reports.[1] For Institutional Quality Assurance Reviews (ITK), the study also examines the extent to which these terms appear in recent review reports.

This analysis then focuses specifically on the attention given to Generative AI in programmes for which a decision was taken between 1 November 2024 and 14 August 2025. Institutional Quality Assurance Review (ITK) reports were not included in this part of the analysis. The study examines what programmes report and what panels identify in relation to the standards against which programmes are assessed.

1. In this initial exploration, reports from programme reviews and initial programme accreditation are both referred to using the generic term “review report”.

The study also examines the recommendations that panels make to programmes and the conditions they formulate for accreditation.

The research question is: **To what extent do programmes and panels, according to review reports, pay attention to Generative AI?** The first sub-question focuses on what emerges from the review reports regarding programmes; the second sub-question addresses how panels engage with the topic.

The discussion on the use of Generative AI in higher education is still evolving. This analysis therefore does not apply an explicit normative framework for the use of Generative AI. However, it does take as its starting point that programmes make informed choices about quality assurance related to Generative AI across the programme, and that panels are equipped to assess these choices.

This initial exploration will be repeated periodically and will serve as a basis for further thematic analyses of quality assurance, as well as for concrete follow-up steps to safeguard and enhance educational quality.

3 Long-term developments

To map long-term developments in the use of Generative AI in education and quality assurance, an initial analysis examined the extent to which the term “Generative AI” and related terms, such as AI, appear in programme review reports from 2010 to the end of 2025. As review reports are finalised prior to the decision date and are preceded by a site visit and an underlying self-evaluation, the analysis therefore reflects a situation that existed approximately six months earlier. In some cases, this time lag may extend to up to eighteen months.

Attention to Generative AI in review reports has increased markedly since 2023. The quantitative analysis of review reports for all assessments of new and existing programmes with decision dates from early 2010 to the end of 2025 shows a substantial increase in the frequency with which the term “Generative AI” and related terms such as “AI” and “language models” appear in reports. This increase has been normalised against the total volume of words.

However, a more detailed analysis of review reports from programme assessments with decision dates between 1 November 2024 and 14 August 2025 shows that attention in the reports remains limited. Generative AI and related terms appear in just over half (310) of the 509 programme assessments. As review reports may cover multiple programme assessments, this corresponds to 194 unique reports.

Increase across all domains

The increase in attention to Generative AI since 2023 concerns programmes across all domains. To avoid dominant review groups distorting the overall trend, these review groups were excluded as a control; even then, a substantial increase remains visible.

The five review groups in which artificial intelligence is discussed most frequently, relative to report length, are: the university master’s programme *Artificial Intelligence and Engineering Systems* (unique), the university master’s programme *Artificial Intelligence*, the university master’s programme *Data Science and Artificial Intelligence Technology*, the university bachelor’s programme *Applied Data Science & Artificial Intelligence*, and the professional master’s programme *Human-Centered Artificial Intelligence* (unique).

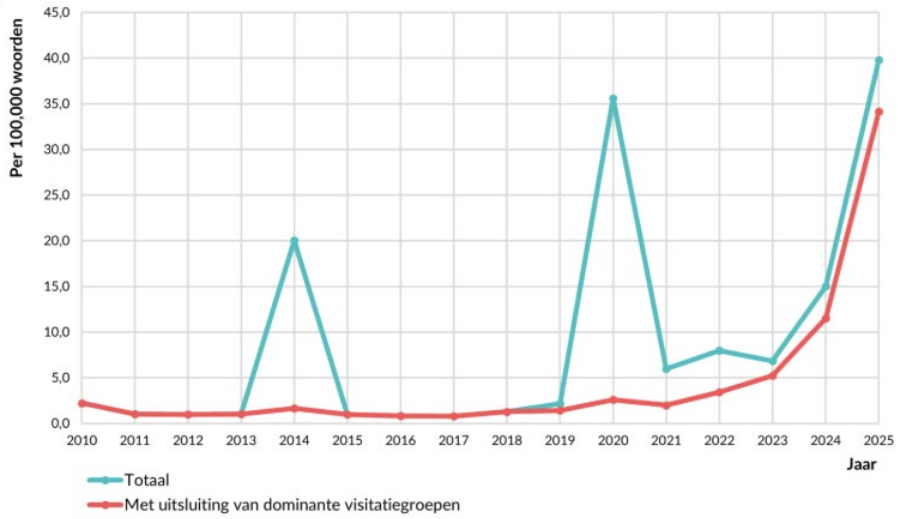

Figure 1: Development of the Frequency of AI-related Terms in Review Reports, Excluding the Five Dominant Review Groups.

Strong recent increase in university education

The quantitative analysis of word usage in review reports since 2010 shows that the increase occurs primarily in university education. In particular, reports for university programmes (both bachelor's and master's) show a sharp rise from 2023 onwards. The increase is less pronounced in professional higher education programmes.

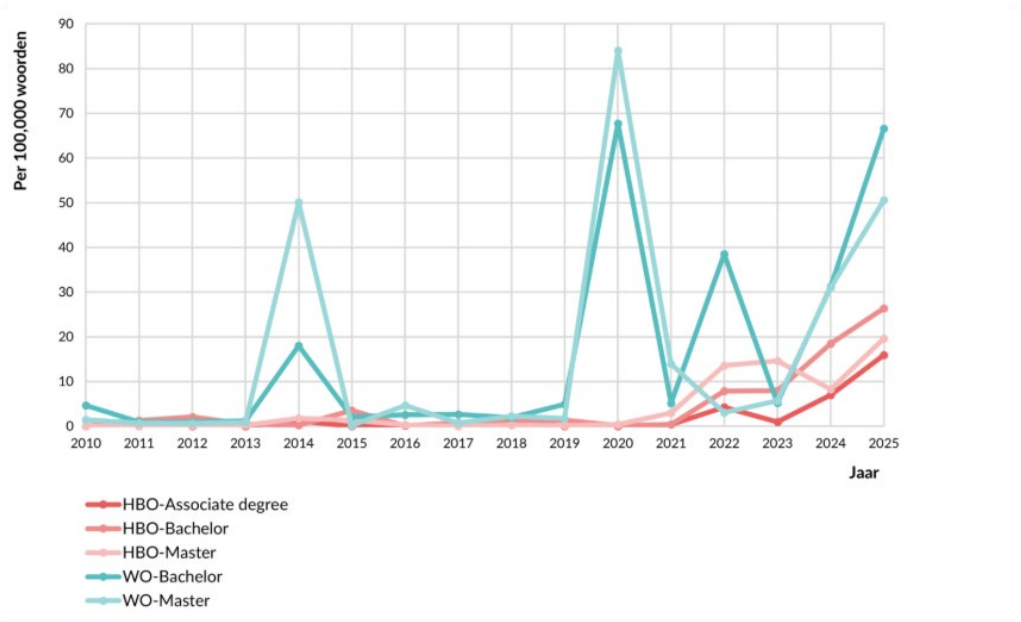

Figure 2: Development of the Frequency of AI-related Terms in Review Reports, by Level.

Attention to assessment and assessment policy

The words that most frequently appear in review reports since 2010 in connection with "Generative AI" and related terms are "assessment", "assessment policy", and "examination board" By contrast, terms such as "responsible" and "AI literacy" occur considerably less often in the context of Generative AI. For the 13 Institutional Quality Assurance Reviews (ITK) for which the Netherlands-Flemish Accreditation Organisation (NVAO) took a decision in 2025, words such as "central" and "policy" also appear alongside references to assessment. This may indicate the development of centralised policies on assessment and the use of Generative AI.

4 Developments in recent review reports

The study examined in more detail how recent review reports address Generative AI across the various standards of the accreditation framework, and what specific advice panels provide in this regard.

For 310 of the 509 new and existing programmes for which a decision was taken between 1 November 2024 and 14 August 2025, “Generative AI” and related terms such as “AI” or “Generative AI” appear in the programme review report. As review reports may cover multiple programmes, this corresponds to 194 reports. Based on these 194 reports, this chapter outlines an overall picture of the attention given to Generative AI and related terms. Subsequently, for each standard, the analysis examines in more detail the attention paid specifically to Generative AI as a subset of artificial intelligence.

The review reports provide only limited insight into the extent to which Generative AI was discussed. It is also often unclear whether the information considered by the panel originated from the documentation submitted by the programme. Where Generative AI was discussed during the panel’s dialogue with the programme, the review reports usually do not indicate who initiated the topic or whether the information emerged in response to questions posed by the panel.

4.1 General overview

Attention to Generative AI and related terms primarily concerns assessment. In nearly three quarters of the 310 programme assessments that explicitly address Generative AI or related terms, this attention appears under Standard 3 of the accreditation framework. Considerably less attention is paid to Generative AI under the other standards. Moreover, none of the programme assessments report on Generative AI across all standards.

Location in the report (per programme)	Programmes	%	Fragments
Standard 1: Intended Learning Outcomes	44	14	64
Standard 2: Teaching and Learning Environment	103	33	167
Standard 3: Assessment	222	72	451
Standard 4: Achieved Learning Outcomes	15	5	15
Summary	85	27	92
Recommendations	54	17	59

Table 1: Attention to Generative AI in Programme Review Reports with Decision Dates from 1 November 2024 to 14 August 2025.

The strong focus on Generative AI in assessment (Standard 3 of the accreditation framework) is visible across the full range of programme levels and sectors. Programmes in the legal domain devote substantial attention to this issue. With regard to the teaching and learning environment (Standard 2 of the accreditation framework), however, technical universities devote relatively more attention to Generative AI. In reports on programmes in the engineering and technology sector, Generative AI receives even more attention within the teaching and learning environment than in assessment.

Panels are predominantly encouraging and appreciative in the way they report on Generative AI. No conditions have been imposed, and negative judgements or comments are absent. Instead, panels seek to guide programmes through suggestions, recommendations and advice, or by encouraging developments that are already underway. However, fewer than half of these contributions are reflected in the formal recommendations of the review report.

The occasional criticism expressed by panels is directed more at a cautious or wait-and-see attitude among stakeholders, such as teaching staff and examination boards, than at the choices made regarding Generative AI. In this context, programmes and stakeholders are primarily encouraged to involve relevant parties more actively or, for example, to develop alternative assessment methods.

4.2 Standard 1: Intended learning outcomes

Panels report only minimally on adjustments to intended learning outcomes in relation to Generative AI. Only in a small number of review reports do developments in Generative AI appear to have influenced the learning outcomes formulated by the programme. These are not necessarily programmes in which Generative AI is central, but rather programmes in which technological developments are important for the evolution of the profession, such as the university master's programme *Geographical Information Science*

In some cases, programmes do recognise the importance of knowledge about Generative AI for the future profession or acknowledge the added value of AI as a research skill. However, this does not translate into adjustments to the learning outcomes or a revised professional profile.

Several programmes are advised by their professional advisory board or by the panel to continue monitoring recent developments in Generative AI and to translate these into a substantive revision of the intended learning outcomes. One panel advises formulating learning outcomes in such a way that "*knowledge becomes visible in action, thereby giving greater weight to practice in assessment and, in doing so, reducing the risks associated with AI*". Panels indicate that they trust programmes to follow up on these recommendations

4.3 Standard 2: Teaching and learning environment

Of the 310 procedures that pay attention to Generative AI, 103 relate to the teaching and learning environment. These mainly concern general advice from panels to further develop policy or to pay attention to guidelines, and to a lesser extent aspects such as AI literacy among teaching staff or the integration of AI into the curriculum.

Guidelines and policy

Only a small number of review reports mention that programmes have AI policies and guidelines for the use of Generative AI. Some programmes indicate that they find it challenging to keep pace with developments; panels occasionally advise programmes to address this or to continue existing initiatives, and they encourage programmes that are taking a leading role in this area. However, in the majority of review reports, no attention is paid to AI policy or usage guidelines. It therefore remains unclear to what extent this issue features in the considerations of programmes and panels.

Central institutional stakeholders generally take the lead in developing policies related to Generative AI. This ranges from formulating an AI vision to establishing a framework with concrete guidelines. Review reports also refer to the establishment of "AI hubs" or "AI labs" to enable a more proactive response to developments in education, assessment, and policy. Teaching and Learning Centres are sometimes also involved in these developments, for example in relation to the professional development of teaching staff.

The extent to which programmes translate institutional policy into their own context varies. There is often a need for top-down direction or a desire to develop a more joint strategy with other faculties and programmes. In some cases, however, programmes experience limited ownership and tend to view this primarily as a responsibility at institutional level.

Programmes also take the initiative themselves in developing guidelines. The examination board is usually involved in drafting these guidelines, but alumni or representatives from the professional field are also sometimes consulted. Programmes regularly appoint an AI officer or collaborate with other programmes within their domain when developing guidelines. In addition, panels often advise students in discussions on Generative AI.

Most reports do not clearly specify what policies and guidelines on Generative AI cover. Assessment policy is mentioned relatively frequently, and aspects such as ethics or privacy are sometimes also referred to. However, in most review reports this is not specified, and it remains unclear, for example, whether the policies and guidelines concern the responsible use of Generative AI by students, its use by teaching staff, or the design of education.

Programmes communicate their AI policies to students through various channels, such as publication on the institutional website, information sessions, or a dedicated section in a course or thesis guide. Nevertheless, both students and teaching staff indicate during panel discussions that they are not always well informed about the existence and content of these guidelines. In addition, assessment policies often remain unclear about the extent to which the use of Generative AI is permitted and how this affects assessment, which may lead to stress among students. Panels advise programmes to provide greater clarity on these issues.

Integration into education

Review reports indicate that programmes sometimes actively address the integration of Generative AI into the curriculum. They explicitly create space within the curriculum for education on technological developments and the implications of AI for the profession or a changing industry. In a small number of cases, the curriculum also addresses Generative AI as a research tool.

Panels often advise programmes to devote greater attention to the integration of Generative AI into the curriculum but usually do not specify in the report what they mean by this. They value programmes that adapt to emerging technologies, yet the feedback sometimes appears to remain limited to clarifying how Generative AI may be used within the programme and how assessment policy is organised in this context.

Review reports predominantly reflect an appreciative approach on the part of panels. Programmes that experiment with AI as a tool for providing feedback and coaching to students often receive positive recognition from panels. Some panels challenge programmes not to view Generative AI solely as a risk to assessment quality, but also as an opportunity to offer new forms of education.

"This may include, among other things, online simulations, automated feedback systems and AI-based assessment platforms. These tools can provide students with immediate and personalised feedback, improve the efficiency of evaluations, and contribute to a more standardised and objective assessment process".

AI literacy

Panels observe significant differences in AI literacy and expertise among teaching staff. One programme requires teaching staff to complete an AI literacy course in order to strengthen the expertise of the teaching team. For a number of programmes, it is noted that they develop optional courses themselves, or that provision is available through institution-wide bodies such as an Academic Services Centre or a Teaching and Learning Centre. The focus of these initiatives is often on assessment and on recognising AI-generated work, and to a lesser extent on the use of Generative AI in education.

Some programmes take a leading role within their institution and ensure that their staff participate in specific project groups. One programme makes teaching staff with relevant expertise available to other programmes. Another programme reports that the faculty is experimenting with *"active learning approaches in lectures [...] under the inspiring leadership of a recently appointed professor who is also chair of the university-wide working group on Educational Innovation and AI."*

4.4 Standard 3: Assessment

Programmes and panels share the view that the emergence and development of Generative AI pose risks to the quality of assessment and evaluation. In particular, written final products are seen as vulnerable to fraud, as well as to the risk that it may no longer be possible to reliably assess whether students have achieved the intended learning outcomes.

A number of programmes note that courses sometimes rely heavily on written final products. To safeguard the quality of assessment, programmes therefore initiate various forms of alternative or complementary assessment, such as criterion-referenced interviews. In a small number of cases, the link with learning outcomes (constructive alignment) is made explicit. One institution has also developed policy *"to regulate the use of AI in assessment. This includes five levels, ranging from no use of AI to full use of AI under human supervision."*

Some programmes place the emphasis on conservative measures, such as prohibiting the use of Generative AI or increasing the frequency of invigilated, on-site assessments. Examination boards are expanded with so-called "fraud panels" with a specific focus on remote examinations. Examiners are also trained to better recognise the misuse of AI. At the same time, many programmes are adapting to developments in Generative AI. Programmes often permit the responsible use of AI, and in some cases this use is even explicitly encouraged.

Panels pay close attention to risks related to assessment and regularly advise programmes to explore alternatives if no steps have yet been taken. Although the use of Generative AI is mainly associated with risks in relation to written final products, risks related to theses are not explicitly identified by panels in the review reports. In a small number of cases, it is suggested that the thesis rubric be adjusted and that the emphasis be shifted from the written work to the final defence or research skills.

Panels occasionally discuss the use of Generative AI with students and report that students perceive few risks to assessment quality or the learning process.

4.5 Standard 4: Achieved learning outcomes

Generative AI is barely discussed in relation to achieved learning outcomes. Only a small number of passages describe how alumni feel well prepared for the future professional field as a result of the integration of Generative AI into education.

Panels also do not explicitly address the implications of Generative AI for the assessment of final works under Standard 4.

5 Conclusion, considerations and next steps

The use of Generative AI simultaneously affects the safeguarding and enhancement of quality in higher education in multiple ways. To gain a clearer understanding of Generative AI in Dutch higher education and quality assurance, NVAO examined how panels address its use in review reports and what emerges from these reports regarding education. To this end, the analysis first considered the extent to which the term “Generative AI” and related terms such as “AI” appear in programme review reports between 2010 and the end of 2025 and in recent Institutional Quality Assurance Reviews (ITK). Subsequently, review reports for programme assessments with a decision date between 1 November 2024 and 14 August 2025 were analysed in more detail, with a specific focus on Generative AI in the narrow sense, as a subset of artificial intelligence

5.1 Conclusion

Text analysis of review reports for all procedures from 2010 to the end of 2025 shows that attention to Generative AI and related concepts across programmes has increased substantially, particularly since 2023. The increase in attention to Generative AI is most evident in university programmes, and less so in professional higher education programmes. However, a more detailed analysis of review reports for programmes with decision dates between 1 November 2024 and 14 August 2025 shows that this increase remains relatively limited and is largely focused on assessment.

Focus on assessment in programmes

With regard to where programmes focus their attention, it can be concluded that for programmes with an accreditation decision between 1 November 2024 and 14 August 2025, the primary approach was aimed at limiting risks in safeguarding educational quality. Programmes’ attention was directed mainly at Standard 3 of the accreditation framework, with a focus on ensuring the quality of assessment, followed by Standard 2, the teaching and learning environment. In the area of assessment, alongside restrictive approaches that discourage or prohibit use and emphasise fraud detection, attention is also paid to complementary and alternative assessment methods. Programmes do not explicitly address risks related to safeguarding the quality of theses or final works.

Even under Standard 2 of the accreditation framework, programmes’ attention is primarily focused on assessment quality. Between 2024 and 2025, programmes began translating institution-level guidelines into their own context. In doing so, the focus was mainly on safeguarding assessment quality, and less on aspects such as the integration of Generative AI into the curriculum or the AI literacy of teaching staff and students. Attention to Generative AI appears to be only weakly integrated. Under standard 1, Generative AI received little attention, particularly with regard to learning outcomes and its relationship to the professional field.

Broader perspective among panels

Review reports show that panels pay attention to similar aspects as the programmes they are advising NVAO on, such as risks related to assessment. Their recommendations often focus on further developing guidelines, integrating AI into the curriculum, or exploring alternative assessment methods.

However, panels adopt a somewhat more integrated and encouraging perspective on the relationship between Generative AI and programmes than programmes themselves. Panels devote more attention to the impact of Generative AI on changing learning outcomes or on the relationship with the professional field. Even amongst panels, attention to *constructive alignment* or to the impact of Generative AI on learning outcomes remains limited. The tone adopted by panels is generally positive and encouraging, but not very concrete. Panels sometimes suggest

that greater attention should be paid to Generative AI in education, but they offer few specific recommendations.

5.2 Considerations and next steps

As review reports and the underlying self-evaluations are generally produced approximately six months prior to the decision date, the analysis of review reports primarily reflects the increased attention to Generative AI in 2024. The evidential value of this initial exploration is limited, as panels are not required to devote specific attention to the use of Generative AI in their judgements, nor to report on it even when they have questioned programmes on the topic. At most, the observed trends are indicative of the fact that discussions on Generative AI are more prominent at universities than at universities of applied sciences.

The analysis does, however, indicate that programmes' attention is focused on risks related to assessment, fraud detection, and the translation of guidelines and institutional policy into practice. This may be explained by the fact that programmes are primarily concerned with safeguarding the quality of the qualifications they award. The Education Inspectorate (Inspectie) recently drew the attention of examination boards to increased risks associated with the use of Generative AI for the validity and reliability of assessments, as well as to fraud that is difficult to detect and substantiate (Inspectie, 2025). In this respect, it is striking that neither panels nor programmes appear to pay explicit attention to risks and strategies related to the assessment of final works. From the review reports, it cannot be determined whether programmes and their examination boards have control over this issue or whether they have discussed it with the panel.

Develop institution-wide guidelines for the use of AI in education and assessment

The analysis shows that programmes sometimes do not experience a sense of ownership when it comes to further elaborating guidelines for assessment and the use of Generative AI. Teaching staff and students are not always aware of existing guidelines and experience a lack of clarity. The advice of the Education Inspectorate (Inspectie, 2025) to institutional boards to provide greater clarity for examination boards is, in this respect, equally relevant for other stakeholders within programmes. Concrete institution-wide guidelines provide programmes with practical points of reference for adapting their education and assessment in practice, while retaining the flexibility to deviate from these guidelines with clear justification.

As a programme, take a critical, explicit and integrated approach to Generative AI

To improve the quality of assessment and strengthen the safeguarding of educational quality, it is important to look beyond policing and to develop alternative and complementary forms of assessment that align with the learning process and place constructive alignment between learning outcomes, teaching and assessment at the centre (Beekman et al., 2025; Corbin et al., 2025; Hodges & Kirschner, 2024). In this respect, Generative AI does not so much constitute a new challenge for educational *assessment* (Corbin et al., 2025), but rather reinforces the importance of coherence in the safeguarding and enhancement of educational quality

Review reports indicate that attention to complementary and alternative forms of assessment among programmes is increasing, but there appears to be no explicit focus on coherence with aspects such as the development of learning outcomes, strengthening the AI literacy of teaching staff, and achieved learning outcomes. NVAO calls on programmes to give explicit and integrated attention to the significance of Generative AI for the design and redesign of education and assessment, and for its implementation in practice. This requires deliberate and critical choices regarding the use of Generative AI and begins with a dialogue on what Generative AI means for the programme (Guest et al., 2025).

Explicit attention to Generative AI in quality assurance

Review reports suggest that panels adopt a broader perspective on the coherence between different aspects than programmes themselves. However, the perspective of panels is limited, as they have a dual mandate: to assess whether programmes safeguard quality across all standards, and to encourage further programme development. Panels are not required to engage in discussions with programmes about the use of Generative AI, nor are they required to report on it. NVAO is therefore considering to what extent quality assurance procedures can give more explicit attention to the significance of Generative AI for educational quality, and what support panels may need in this regard.

References

Beekman, K., Draaijer, S., Beckers, J., Schagen, E., & Hofman, I. (2025). *Visie op toetsing en examinering in het tijdperk van AI: Naar een AI-bewuste toetspraktijk. Npuls.* https://npuls.nl/kennisbank/visie-op-toetsing-examinering-en-ai-handreikingen

ENQA (2025a) *Guidelines for the Responsible Use of AI in External QA.* https://www.enqa.eu/publications/ENQA-guidelines-for-the-responsible-use-of-AI-in-external quality-assurance/

ENQA (2025b) *ENQA Workshop Report: Responsible Use of Artificial Intelligence in Quality Assurance. 11-12 june 2025.* https://www.enqa.eu/publications/enqa-guidelines-for-the-responsible-use-of-ai-in-external-qa/https://www.enqa.eu/publications/ENQA-guidelines-for-the-responsible-use-of-AI-in-external quality-assurance/

Guest, O., Suarez, M., Müller, B., van Meerkerk, E., Oude Groote Beverborg, A., de Haan, R., Reyes Elizondo, A., Blokpoel, M., Scharfenberg, N., Kleinherenbrink, A., Camerino, I., Woensdregt, M., Monett, D., Brown, J., Avraamidou, L., Alenda-Demoutiez, J., Hermans, F., & van Rooij, I. (2025). *Against the Uncritical Adoption of 'AI' Technologies in Academia.* https://doi.org/10.5281/zenodo.17065099

Hodges, C. B., & Kirschner, P. A. (2024). Innovation of instructional design and assessment in the age of generative artificial intelligence. *TechTrends*, *68*(1), 195–199. https://doi.org/10.1007/s11528-023-00926-x

Inspectie voor het Onderwijs (2025). *Verder vooruit: Examencommissies in een veranderend hoger onderwijs.* https://www.onderwijsinspectie.nl/documenten/2025/12/01/rapport-examencommissies-hoger-onderwijs

Renkema, M., van den Boom-Muilenburg, E., Friso-van den Bos, I., Theelen, H., Wopereis, I., & Schildkamp, K. (2025). *AI-GO! Een raamwerk voor AI-geletterdheid in het onderwijs.* Npuls. https://npuls.nl/kennisbank/ai-go-een-raamwerk-voor-ai-geletterdheid-in-het-onderwijs

Terbeek, L. (2025). *De AI Maturity in Education Scan* (AIMES). Vrije Universiteit Amsterdam. https://vu.nl/nl/onderwijs/meer-over/de-ai-maturityin-education-scan-aimes

List of abbreviations

Abbreviation	Definition
ABO	Accreditation of existing programmes
AI	Artificial intelligence
ENQA	European Association for Quality Assurance in Higher Education
Generative Artificial Intelligence	Generative AI
ITK	Institutional Quality Assurance Review
NVAO	Accreditation organisation of the Netherlands and Flanders
TNO	Initial programme accreditation

Appendix: Research design

The research question concerning the extent to which programmes and panels, according to review reports, pay attention to Generative AI was addressed by first conducting a quantitative content analysis of all review reports for assessments (of new and existing programmes) with a decision date between 1 January 2010 and the end of 2025, as well as of the reports from Institutional Quality Assurance Reviews (ITKs) for which a decision was taken in 2025. This analysis was combined with a qualitative content analysis of review reports with a decision date between 1 November 2024 and 14 August 2025.

Quantitative content analysis

Using the Python programming language, a quantitative content analysis was conducted of the use of the term “artificial intelligence” and related terms over time in all review reports associated with accreditation decisions taken between 1 January 2010 and the end of 2025. This concerned a total of 7,154 review reports from all programme assessments conducted, primarily relating to initial programme accreditation (TNO) procedures and the accreditation of existing programmes (ABO). The reports may be written in either Dutch or English.

The analysis examined the frequency with which the terms *AI*, *artificial intelligence*, *artificiële intelligentie*, *Generative AI*, *generatieve AI*, *kunstmatige intelligentie*, *language models*, *machine learning*, *generative artificial intelligence*, *generatieve artificiële intelligentie* and *GenAI* appear in these reports. The quantitative content analysis thus provides a picture of artificial intelligence in a broad sense. Subsequently, the context of these terms was examined by analysing which words most frequently occur in their close proximity.

To gain further insight into developments at institutional level, an additional analysis was conducted in the same manner on reports from Institutional Quality Assurance Reviews (ITKs) for which a decision was taken in 2025. This concerned 13 reports.

Qualitative content analysis

In 310 of the 509 programme assessments (ABOs and TNOs) for which a decision was taken between 1 November 2024 and 14 August 2025, “Generative AI” and related terms appear. As reports often relate to multiple programmes, this corresponds to 194 reports. These reports were analysed in more detail to examine how programmes and panels address Generative AI in the narrow sense, as a subset of artificial intelligence. As this is an initial exploration, the coding was relatively open, focusing on the ways in which programmes and panels pay attention to Generative AI, while specifically examining the different standards, recommendations and conditions, and the coherence between these aspects.

Colophon

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