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POLICY PAPER

INSTITUTIONAL ACCREDITATION IN UKRAINE:
Pilot Outcomes and Policy Pathways for National Implementation

**NATIONAL AGENCY
FOR HIGHER EDUCATION QUALITY ASSURANCE**

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Institutional Accreditation in Ukraine: Pilot Outcomes and Policy Pathways for National Implementation

Policy Paper

This policy paper presents the first consolidated outcomes of piloting institutional accreditation in Ukraine, implemented within the framework of the joint project of the Estonian Quality Agency for Education (HAKA) and the National Agency for Higher Education Quality Assurance of Ukraine (NAQA) supported by Estonian Center for International Development (ESTDEV). It provides an analytical review of the Ukrainian policy and legislative framework on institutional accreditation, the methodology of the HAKA-NAQA joint project, three pilot institutional accreditations conducted in 2025, examining their design, implementation, and implications for national quality assurance reform. The analysis draws on accreditation documentation, post-site-visit stakeholder survey results, and the conceptual framework presented at the EQAF-2025 and in the Concept of Modernisation of External Quality Assurance System. Particular attention is given to system-level impact, institutional development effects, and operational challenges under wartime conditions. The findings confirm institutional readiness and alignment with ESG principles, while highlighting institutional accreditation as a quality enhancement instrument. The paper concludes with policy and legislative recommendations to support future nationwide implementation in Ukraine.

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Introduction

This analytical report has been developed within the framework of the joint project "Enhancement of Higher Education Quality in Ukraine"[1] implemented by the Estonian Quality Agency for Education (HAKA) and the National Agency for Higher Education Quality Assurance of Ukraine (NAQA) with the support of Estonian Centre for International Development (ESTDEV), dedicated to piloting institutional accreditation in Ukrainian higher education. The project represents a key component of ongoing cooperation between the two agencies and directly contributes to national policy objectives related to the modernisation of external quality assurance in Ukraine.

The report reflects the first consolidated outcomes of three pilot institutional accreditations conducted in 2025 at the following Ukrainian higher education institutions: Kyiv National Economic University named after Vadym Hetman, Lutsk National Technical University, and the National University of Ostroh Academy. These pilot accreditations were implemented under exceptional conditions, including the ongoing state of war, and were designed as an enhancement-oriented exercise aimed at testing procedures, building institutional and expert capacity, and generating system-level evidence to inform future nationwide implementation of institutional accreditation.

The primary purpose of this report is to provide an analytical review of the pilot process, focusing on its design, implementation, outcomes, and implications at both system and institutional levels. In particular, the report seeks to:
- analyse the effectiveness and feasibility of the institutional accreditation model applied in the pilots;
- assess stakeholder perceptions of the accreditation process based on post-site-visit survey results;
- identify key system-level and institutional-level impacts;
- examine challenges encountered during implementation; and
- formulate evidence-based policy recommendations for the future introduction of institutional accreditation in Ukraine.

The analytical framework of this report builds upon multiple sources of evidence, including the article "Joint Efforts for Quality Enhancement: HAKA–NAQA Partnership to Support Ukrainian Universities through Institutional Accreditation" by Hillar Bauman, Nataliia Stukalo, and Nadiia Kovalchuk[2], presented at the European Quality Assurance Forum (EQAF) 2025. The authors of that article, who are also the joint project team members, have deliberately integrated its analytical insights, system-level reflections, and conceptual framing into this

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[1] NAQA. 2026. Joint Estonian-Ukrainian Project "Enhancement of Higher Education Quality in Ukraine". https://en.naqa.gov.ua/?page_id=4152

[2] Bauman H., Stukalo N., Kovalchuk N. (2025) Joint Efforts for Quality Enhancement: HAKA-NAQA Partnership to Support Ukrainian Universities through Institutional Accreditation. EQAF-2025. 17 Nov 2025. https://www.eua.eu/publications/conference-papers/joint-efforts-for-quality-enhancement-haka-naqa-partnership-to-support-ukrainian-universities-through-institutional-accreditation.html

report, while substantially expanding and deepening the analysis based on additional empirical material.

In addition to the EQAF article, the report draws extensively on:
- Ukrainian legislative and regulatory documents on higher education;
- documentation produced during the pilot institutional accreditations (HAKA and NAQA regulatory documents and criteria, expert training materials, instruction materials for HEIs, self-assessment reports, expert reports, and procedural materials);
- feedback collected through a post-site-visit survey completed by participants in accreditation interviews, including students, academic and administrative staff, and external stakeholders;
- personal experience of the authors as well as observations and reflections from expert panels, coordinators, and participating institutions.

By combining conceptual reflection with empirical evidence, this report aims to serve both as an analytical account of the pilot experience and as a practical reference for policymakers, quality assurance professionals, and higher education institutions preparing for the future implementation of institutional accreditation in Ukraine.

Institutional Accreditation as Strategic Reform in Ukrainian Higher Education

For Ukraine, the development of institutional accreditation is simultaneously a long-term structural reform objective and an urgent systemic necessity. With more than 500 higher education institutions (HEIs) and approximately 25,000 study programmes, the existing programme-based accreditation model is highly resource-intensive and increasingly unsustainable. The transition towards institutional accreditation has therefore been identified as a strategic solution to enhance efficiency, coherence, and quality culture within the Ukrainian higher education system.

At the same time, the formal introduction of institutional accreditation has been postponed due to the extraordinary circumstances of martial law and the ongoing russian–Ukrainian war. In this context, pilot initiatives and international cooperation play a crucial preparatory role, allowing the system to build capacity, test procedures, and generate evidence of institutional readiness without immediate legal consequences. While nationwide implementation remains deferred, preparatory policy development, conceptual modelling, and pilot experimentation have continued.

At present, external quality assurance in Ukraine is centred exclusively on the accreditation of study programmes. Alongside national procedures, higher education institutions — within the scope of their autonomy and on their own initiative — may undergo institutional accreditation or external institutional evaluation conducted by foreign quality assurance agencies. Such engagements

are typically enhancement-oriented, aimed at strengthening internal quality assurance systems, obtaining international expert feedback, and reinforcing institutional reputation. In parallel, advisory practices such as institutional audits and quality consultancy have been implemented by professional associations, international projects, foundations, and independent experts.

Ukraine's programme accreditation environment is characterised by an extensive cross-border dimension. Currently, 50 agencies hold the legal right to accredit study programmes: the National Agency for Higher Education Quality Assurance and 49 foreign agencies recognised by governmental resolution. Under Ukrainian legislation, foreign agencies exercise accreditation rights equivalent to those of the national body. However, while national programme accreditation procedures are regulated by domestic legislation and formal accreditation regulations, the procedures applied by foreign agencies are governed exclusively by their internal frameworks. They are not directly regulated by Ukrainian law, nor uniformly bound by European-level operational requirements, as EQAR cross-border quality assurance considerations remain largely recommendatory. This regulatory asymmetry has stimulated policy debate regarding the need to strengthen coherence, transparency, and accountability within transnational accreditation activities.

Between 2019 and 2025, Ukraine implemented programme accreditation at systemic scale in alignment with ESG 2015 principles. Over 10,000 study programmes were accredited under the renewed methodology, representing about 30% of all programmes nationally. This large-scale exercise catalysed the development of internal quality assurance systems within universities, strengthened institutional monitoring practices, and fostered sector-wide dialogue on higher education quality. The process also enhanced transparency and public trust in accreditation outcomes while expanding opportunities for institutions to engage with EQAR-registered foreign agencies.

Nevertheless, structural pressures have intensified the need for the next phase of reform. These include rising societal expectations for higher education quality, the continuous growth in accreditation workloads, and the operational limits of a single national agency overseeing programme-level evaluation across a highly diversified system. Stakeholders have increasingly called for complementary external QA instruments capable of assessing institutional governance, quality culture, and strategic management holistically — aligning Ukraine with prevailing European trends in institutional accreditation.

In response, the National Agency has undertaken extensive preparatory work on institutional accreditation and broader system modernisation. This has included international analytical projects, comparative studies of European institutional accreditation approaches, strategic foresight sessions, participation in foreign accreditation procedures as observers and experts, and cooperation with international agencies through bilateral partnerships and multilateral quality assurance platforms. Collectively, these efforts have established the conceptual, procedural, and capacity foundations necessary for institutional accreditation to emerge as a central pillar of Ukraine's future external quality assurance system — one oriented not only toward accountability, but toward institutional development, resilience, and European integration.

National Policy and Legislative Framework for Institutional Accreditation in Ukraine

Institutional accreditation is already reflected in the legislative and regulatory framework of Ukraine, with its definition, core principles, governance arrangements, and institutional rights established in primary education laws. The legal basis is anchored in the Law of Ukraine "On Education" (2017, as amended on 3 December 2025) and the Law of Ukraine "On Higher Education" (2014, as amended on 3 December 2025).

Article 46 of the Law "On Education" defines institutional accreditation within the higher education system, establishing its voluntary nature and confirming that the initiative to undergo institutional accreditation rests exclusively with the higher education institution. The article also assigns responsibility for conducting institutional accreditation to the National Agency for Higher Education Quality Assurance (NAQA) and provides for the involvement of national and international experts, as well as recognised international quality assurance agencies, thereby embedding cross-border cooperation within the legal framework.

More detailed provisions are set out in the specialised Law "On Higher Education." Article 25-1 defines the fundamental principles of institutional accreditation, reaffirming its voluntary character and specifying that the application may be submitted by the head or collegial governing body of the higher education institution. The same article establishes the validity period of an institutional accreditation decision as five years.

Importantly, the law also defines the regulatory consequences of successful institutional accreditation. In particular, the evaluation of an institution's internal quality assurance system is taken into account during programme accreditation procedures. Furthermore, institutions holding institutional accreditation may undergo simultaneous accreditation of study programmes at different levels within the same field of study. In addition, Article 30 stipulates that a higher education institution that has successfully completed institutional accreditation may apply for research university status, subject to meeting additional criteria.

The Law "On Higher Education" also delineates governance responsibilities for the development and formal approval of secondary legislation regulating institutional accreditation. NAQA is mandated to develop the Regulation on Institutional Accreditation and related methodological frameworks, while formal approval rests with the central executive authority in education and science — the Ministry of Education and Science of Ukraine. Thus, primary legislation establishes definitions and general parameters, while procedural and organisational arrangements are delegated to the sub-legislative level.

Significant preparatory work has already been undertaken in this area. NAQA has initiated extensive consultations with higher education institutions and quality assurance experts to discuss possible institutional accreditation models and implementation pathways. This work resulted in the development of a Concept for the Modernisation of the External Quality Assurance System[3],

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3 NAQA. 2025. Concept for the Modernisation of the External Quality Assurance System. https://bit.ly/4rCrN9T

which outlines the proposed architecture and operational parameters of institutional accreditation and introduces the future role of independent quality assurance agencies. The implementation of this model will require targeted legislative amendments and the adoption of additional regulatory acts.

The Concept proposes a number of indicative operational parameters for institutional accreditation, including:
- Voluntary participation of institutions;
- Eligibility thresholds, such as 50–70% of study programmes accredited in accordance with ESG standards within each field of study;
- Absence of accreditation refusals within the preceding five years;
- Demonstrable improvement trajectories in programme accreditation outcomes;
- Accreditation validity covering all programmes for five years upon successful institutional accreditation;
- A minimum procedural duration of approximately one year;
- Conduct of the procedure in English;
- Mandatory inclusion of international experts, employers, students, and academic staff in expert panels;
- Extended site visits (approximately one week);
- Evaluation of both institutional systems and selected study programmes;
- Post-accreditation monitoring of internal QA systems and selected programmes through follow-up expert visits.

These parameters reflect an integrated model combining institutional evaluation with programme-level sampling and longitudinal monitoring, thereby ensuring both accountability and enhancement.

At the same time, the full regulatory operationalisation of institutional accreditation remains constrained by the wartime legislative environment. The Law of Ukraine "On Amendments to Certain Laws of Ukraine on Ensuring the Quality of Higher Education" (2023) stipulates, in its Transitional Provisions, that NAQA must develop and submit for approval the Regulation on Institutional Accreditation and the Regulation on Accreditation of Independent Quality Assurance Agencies within six months following the termination or lifting of martial law. This provision effectively postpones formal nationwide implementation while allowing preparatory, pilot, and conceptual work to continue.

Parallel to legislative developments, strategic policy planning has advanced. In 2024, Ukraine adopted the National Action Plan on External Quality Assurance in Higher Education for 2024–2026, which identifies the implementation of institutional accreditation as a key objective. This includes the development of a national model, regulatory frameworks, and pilot procedures. The priority is further reinforced in the Strategy of NAQA to 2026, where modernisation of the external quality assurance system — specifically through institutional accreditation — is defined as a strategic goal.

Taken together, these legislative, regulatory, and strategic instruments create a coherent national policy mandate for the gradual introduction of institutional accreditation. While wartime conditions delay formal implementation, the legal

foundations, conceptual models, and pilot initiatives already in place ensure that Ukraine is institutionally and regulatorily prepared for system-wide deployment once conditions permit.

Genesis and Strategic Value of the HAKA–NAQA Partnership

Within the framework of long-term cooperation between the Estonian Quality Agency for Education (HAKA) and NAQA, formalised through a Memorandum of Cooperation signed in 2023, a joint project dedicated to piloting institutional accreditation was launched in early 2024. The project was supported by ESTDEV – the Estonian Centre for International Development Cooperation.

From NAQA's perspective, collaboration with an EQAR-registered agency with extensive experience in institutional accreditation offered both technical expertise and European credibility. For HAKA, the partnership represented an opportunity to support a system under crisis conditions while contributing to capacity building and policy development in the European Higher Education Area (EHEA).

The partnership was explicitly enhancement-oriented and system-focused. The pilots were not conceived as isolated institutional exercises but as a controlled rehearsal for future nationwide implementation.

Development of the Institutional Accreditation Model

During the initial phase of the project, HAKA and NAQA jointly developed an institutional accreditation model tailored to the Ukrainian context. Given that HAKA already operated ESG-compliant institutional accreditation regulations, the partners agreed to use the Estonian model applied between 2012 and 2018 as a baseline, refining it to reflect Ukrainian legislation, governance structures, and wartime realities.

The model evaluates institutions across four core areas:
1. Organisational management and performance;
2. Teaching and learning;
3. Research, development and/or other creative activity;
4. Service to society.

These areas were further divided into sub-areas to allow for structured, evidence-based analysis. Particular attention was paid to enhancement orientation, qualitative judgment, and the integration of societal engagement — an aspect repeatedly highlighted by stakeholders as especially relevant in the Ukrainian context.

Selection of Pilot Universities

Within the frames of the project it was announced an open call for participation in the pilot institutional accreditations. Selection criteria included: Demonstrated experience in successful programme accreditation by NAQA; Medium institutional size (up to 100 study programmes and approximately 12,000 students); Regional diversity; Institutional motivation, articulated through a formal motivation letter; English-language proficiency of key staff (as the procedure was conducted in English).

Fourteen universities submitted applications. Following evaluation, three institutions were selected:
- Kyiv National Economic University named after Vadym Hetman (KNEU);
- Lutsk National Technical University (LNTU);
- National University of Ostroh Academy (NUOA).

Each institution was assigned two accreditation coordinators — one from HAKA and one from NAQA — to ensure procedural consistency and continuous support.

Capacity Building and Preparatory Phase

In October 2024, HAKA and NAQA jointly conducted self-assessment training for the three pilot universities in a hybrid format. The training was delivered on site at each institution and structured as an intensive two-day programme combining methodological input with practical exercises focused on criteria interpretation and self-assessment report preparation.

To support institutional readiness, Self-Evaluation Guidelines were developed specifically for participating higher education institutions. These guidelines provided a detailed description of the self-evaluation process, methodological expectations, evidence requirements, and alignment with institutional accreditation criteria. The document served as a primary reference point for institutional working groups preparing Self-Assessment Reports (SARs).

Given that institutional accreditation represents a new external quality assurance instrument in Ukraine, targeted capacity-building was considered essential. Three institutional training sessions were conducted:
- Kyiv National Economic University – 11 participants;
- Lutsk National Technical University – 15 participants;
- National University of Ostroh Academy – 17 participants.

The training curriculum was designed to ensure practical preparedness for institutional accreditation in line with ESG 2015 principles. Beyond introducing European standards, the sessions focused on integrating institutional accreditation into internal quality assurance systems and governance processes.

The first day addressed conceptual and methodological foundations. Participants were introduced to the principles, objectives, and structure of institutional accreditation, alongside an overview of the joint HAKA–NAQA project. Particular

attention was given to Estonian institutional accreditation experience as a reference model, illustrating how ESG standards are operationalised within institutional evaluation. Group work sessions enabled participants to analyse evaluation areas and apply criteria to their institutional contexts.

The second day focused on procedural application. Sessions examined the full accreditation cycle — from self-evaluation drafting to panel review and decision-making. Institutions received methodological guidance on preparing analytical, evidence-based SARs rather than descriptive reports. The submission deadline for self-assessment reports was set for 15 March 2025. All institutions submitted reports on time. While overall compliance with requirements was high, HAKA and NAQA coordinators requested clarifications and minor technical revisions, reflecting the pilot and developmental nature of the exercise.

A defining feature of the preparatory phase was the synergy between Ukrainian system knowledge (NAQA) and European institutional accreditation expertise (HAKA). As a follow-up recommendation, participating universities were encouraged to institutionalise internal staff training on external evaluation processes and ESG-aligned internal quality assurance development.

Expert Panels, Expert Training, and Site Visits under Wartime Conditions

Expert panels were established according to jointly agreed principles designed to ensure international credibility and national contextual expertise. Each panel consisted of six members: three Estonian and three Ukrainian experts. Due to their prior experience with institutional accreditation, Estonian representatives served as panel chairs and secretaries. Each panel also included one student member and one external stakeholder representative.

To ensure methodological alignment, HAKA and NAQA organised joint expert training sessions in March–April 2025. An initial general training introduced the institutional accreditation concept, assessment areas, evaluation methodology, and procedural stages. Particular emphasis was placed on Ukrainian higher education legislation, governance structures, and system specificities, ensuring that international experts could interpret institutional evidence within its national context.

The practice-oriented component addressed expert responsibilities, confidentiality requirements, division of tasks, interview methodology, and site visit preparation. Report writing and organisational coordination modules were identified by participants as particularly valuable.

Subsequently, panel-specific training meetings were held for each accreditation team. These sessions focused on institutional documentation, self-assessment reports, and context-specific lines of inquiry. Coordinators also facilitated working meetings to monitor preparation progress and address procedural questions.

All methodological resources were hosted within a dedicated course materials developed for the project. Materials included interview guidance, question formulation

techniques, note-taking methodologies, consensus-building tools, report-writing principles, and SMART-based recommendation drafting. Legislative reference materials were also provided to ensure regulatory accuracy in expert judgments.

Three hybrid site visits were conducted between May and early June 2025. Ukrainian experts participated on site, while Estonian experts joined remotely. Each visit lasted three days. Despite air-raid alerts and security disruptions, all interviews were completed according to schedule, with several sessions conducted in bomb shelters.

Post-process reflection identified several developmental challenges. While expert selection criteria were clearly defined, experience levels varied, affecting confidence in qualitative institutional analysis. Panel interaction and task distribution required further structuring. Additionally, while Ukrainian experts demonstrated strong familiarity with quality culture concepts, deeper training is needed in analysing institutional strategy, governance performance, and system-level effectiveness — competencies central to institutional accreditation.

Accreditation Decisions and Dissemination of Results

Final expert reports were completed in July 2025 and published on the HAKA website. On 29 August 2025, the HAKA Council adopted decisions to accredit all three universities for seven years.

The results were presented publicly at the Ukrainian Quality Assurance Forum UQAF-2025 held in Lutsk on 17–18 September 2025, attended by approximately 1000 participants. Accreditation certificates were formally awarded during the forum.

Feedback seminars were subsequently organised at each university in November 2025, allowing experts, agencies, and institutions to reflect on recommendations and early improvement actions.

A study visit of NAQA representatives, Ukrainian experts, and university representatives to Estonia took place in January 2026, further strengthening mutual learning and system-level reflection.

The follow-up webinars to share experience of Ukrainian and Estonian universities were conducted in February 2026.

Analysis of Post-Site-Visit Survey Results

Survey Scope and Respondent Profile

Following the site visits, participants in interviews were invited to complete a feedback survey. A total of 141 responses were received: 33 from the National University of Ostroh Academy, 52 from Kyiv National Economic University, and 56 from Lutsk National Technical University. Respondents represented students, academic and administrative staff, and external stakeholders.

Overall Assessment of the Accreditation Process

Across key dimensions — expert preparedness, relevance of questions, time management, interview atmosphere, opportunity to express views, and suitability of online participation — feedback was predominantly positive. Respondents consistently highlighted the professionalism of expert panels, constructive dialogue, and respectful conduct. Numerous open-ended responses indicated that no significant improvements were required. At the same time, recurring critical comments provide valuable analytical insight. They point to structural issues related to role alignment, time allocation, language and interpretation, and the limitations of hybrid formats.

Key Analytical Findings

Respondents perceived expert panels as well prepared and knowledgeable, reinforcing procedural trust. However, several comments indicate that preparedness should also encompass contextual sensitivity, particularly regarding wartime realities.

The most significant challenge identified concerns the mismatch between focus group composition and the questions posed. When participants were asked about areas outside their responsibilities, the quality and depth of evidence suffered. Time constraints were another recurring theme. While schedules were generally respected, limited time — especially in interpreted interviews — restricted equitable participation. The interview climate was largely described as open and constructive, though isolated reports of interruptions or dominant behaviour highlight the importance of consistent moderation standards. Online participation was recognised as necessary and convenient under current conditions, but respondents emphasised that in-person engagement remains preferable when feasible, particularly for assessing physical infrastructure.

System-Level Impact of the Pilot Institutional Accreditation

From a national perspective, the HAKA–NAQA pilot institutional accreditation has generated several system-level outcomes that are directly relevant for the future implementation of institutional accreditation in Ukraine.

First, the pilot provides empirical evidence of institutional readiness. The evaluations demonstrated that Ukrainian higher education institutions already possess functioning internal quality assurance systems, governance mechanisms, and strategic planning processes that are broadly aligned with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015)*. The absence of fundamental compliance gaps indicates that institutional accreditation can be introduced without requiring radical restructuring of existing QA architectures.

Second, the pilot validated the relevance and transferability of HAKA's institutional accreditation standards to the Ukrainian context. Only limited contextual

adjustments were required, primarily related to national legislation and the exceptional conditions of martial law. This high level of compatibility confirms the structural alignment of Ukraine's external quality assurance system with the wider EHEA and strengthens confidence among national and international stakeholders regarding the credibility of future institutional accreditation decisions.

Third, the project had a capacity-building effect at agency and expert level. NAQA staff and Ukrainian experts gained hands-on experience in institutional-level evaluation, including qualitative judgment, synthesis across functional areas, and enhancement-oriented reporting. This experience is particularly significant given that institutional accreditation requires a conceptual shift from programme-level compliance checking to holistic institutional analysis.

Fourth, the pilot strengthened stakeholder legitimacy and trust. The systematic involvement of students, academic and administrative staff, and external stakeholders (including employers and partners) enhanced the transparency and inclusiveness of the process. Survey feedback confirms that participants perceived the process as professional, respectful, and meaningful, which is critical for national acceptance of a new accreditation model.

Finally, the pilot contributed to the international reputation and resilience narrative of Ukrainian higher education. At a time when war poses risks to visibility, credibility, and international cooperation, the successful implementation of a joint accreditation process with an EQAR-registered agency sends a strong signal of continuity, quality, and European integration.

Institutional-Level Impact: Evidence from Participating Universities

At the institutional level, the pilot accreditation functioned not merely as an evaluative exercise but as a developmental intervention with tangible effects on governance, quality culture, and strategic thinking.

The self-assessment process required universities to conduct a systematic, institution-wide review of policies, processes, and outcomes across four core areas: governance, teaching and learning, research and creative activity, and service to society. This comprehensive scope encouraged institutions to move beyond fragmented or programme-centred quality practices and to reflect on institutional coherence and long-term sustainability.

Participating universities reported several concrete impacts:
- Strategic reflection and planning: The accreditation process served as a catalyst for reassessing institutional missions, priorities, and development trajectories. In at least one case, the outcomes of self-assessment and expert recommendations directly informed the preparation of a new multi-year strategic development plan.
- Strengthening internal quality assurance systems: Preparing the self-evaluation reports required mapping responsibilities, consolidating data sources, and clarifying internal QA procedures. This resulted in improved

internal monitoring, clearer documentation, and greater transparency across organisational levels.

- Capacity building and institutional learning: Engagement with international and national experts exposed institutional teams to new QA concepts, qualitative evaluation approaches, and European good practices. This learning extended beyond QA units to academic leadership and administrative staff.
- Enhanced quality culture and internal communication: The involvement of diverse stakeholder groups fostered shared ownership of quality processes and improved understanding of how individual roles contribute to institutional performance.
- Reputation and stakeholder confidence: Successful accreditation outcomes strengthened internal motivation and external trust. For universities operating under crisis conditions, this recognition had symbolic as well as practical value.

Overall, institutional feedback confirms that when institutional accreditation is framed as enhancement-oriented rather than punitive, it can act as a powerful driver of organisational development.

Challenges Identified During the Pilot Implementation

While the pilot was implemented successfully and within planned timelines, both agencies and institutions identified a number of challenges that are analytically important for future national rollout.

Systemic and Procedural Challenges

The most significant overarching constraint was the state of war. Air-raid alerts, security risks, and physical exhaustion affected both experts and institutional staff. Although mitigation measures were effective, the experience highlights that institutional accreditation under crisis conditions requires additional flexibility, contingency planning, and human-resource sensitivity.

The hybrid site visit format, while necessary, was widely acknowledged as suboptimal. Technical issues (internet stability, sound quality) occasionally disrupted interviews, and remote participation limited experts' ability to fully assess physical infrastructure and learning environments. While hybrid formats ensure continuity, they should not become the default once security conditions allow in-person engagement.

The language of the procedure posed another challenge. Conducting the entire process in English required extensive translation of documentation and interpretation during interviews. In some cases, this affected the depth and fluency of discussions and created additional time pressure. This issue has direct implications for national language policy in institutional accreditation.

Finally, the conceptual shift from quantitative description to qualitative analysis proved demanding for both universities and Ukrainian experts. Institutional accreditation requires analytical synthesis across areas and evidence-based

judgment, which differs substantially from traditional programme-level accreditation practices.

Institutional Challenges

From the institutional perspective, several operational challenges emerged:
- Data management and reporting capacity: Collecting, verifying, and systematising large volumes of data placed a considerable workload on institutional teams, revealing the need for more integrated data systems and dashboards.
- Internal engagement and awareness: As institutional accreditation is not yet legally mandatory, additional effort was required to explain its strategic relevance and secure staff engagement.
- Hybrid format limitations: Remote participation constrained experts' understanding of facilities and campus life, reinforcing the need for physical visits where possible.

Importantly, institutions also reported that confronting these challenges generated positive long-term effects, including investments in digital QA tools, improved English-language capacity, and stronger internal coordination.

Cross-Border Quality Assurance as a Model for System Development and Quality Enhancement

The HAKA–NAQA pilot also demonstrates the strategic value of cross-border quality assurance as a mechanism for system development and quality enhancement, rather than quality control, particularly in contexts of crisis and rapid change. This case illustrates how international cooperation between quality assurance agencies can support the introduction of new QA instruments — such as institutional accreditation — in a manner that prioritises learning, reflection, and continuous improvement over compliance checking. By combining an ESG-compliant institutional accreditation model with in-depth knowledge of national legislation, governance traditions, and wartime realities, the joint HAKA–NAQA approach avoided both mechanical policy transfer and punitive evaluation logics. Instead, it enabled a genuinely enhancement-oriented process grounded in self-reflection, peer dialogue, and evidence-informed recommendations. The use of mixed international–national expert panels, joint training activities, and collaborative procedural oversight reinforced trust in the process and encouraged institutions to engage openly with strengths and areas for development. As a result, institutional accreditation functioned as a developmental tool that strengthened internal quality culture and institutional resilience, while simultaneously reinforcing Ukraine's integration into the European Higher Education Area. This experience provides a transferable model of how cross-border quality assurance can act as a catalyst for sustainable reform, capacity building, and shared quality ownership, rather than as an instrument of external control.

Analytical Synthesis: Lessons for Future Implementation

Taken together, the system-level and institutional-level impacts of the pilot institutional accreditations, combined with the operational challenges identified, provide a robust analytical basis for future policy and procedural development. The evidence generated through the HAKA–NAQA project confirms both the feasibility and the strategic value of institutional accreditation for the Ukrainian higher education system. At the same time, it highlights critical design considerations that should inform nationwide implementation once legal and security conditions permit.

National-Level Recommendations

At the national level, institutional accreditation should be introduced through a phased, evidence-based approach that builds on pilot experience and existing institutional capacity. The findings of this project confirm that Ukrainian higher education institutions are structurally and operationally ready to undergo institutional accreditation in alignment with ESG principles. However, scaling the model across a large and diverse system will require careful calibration of legislative frameworks, resource allocation, and implementation timelines.

National policy should ensure that institutional accreditation remains enhancement-oriented while maintaining public accountability. This includes embedding institutional accreditation within the broader architecture of external quality assurance, clarifying its relationship to programme accreditation, and establishing coherent recognition rules for cross-border quality assurance activities. Legislative and regulatory development should also address language policy, the role of international experts, and the long-term integration of independent quality assurance agencies.

Agency-Level Recommendations (NAQA and Partner QA Bodies)

At the level of quality assurance agencies, the pilot revealed several procedural priorities essential for system scaling. First, stakeholder selection processes should be standardised through clear role-to-question mapping to ensure that interview evidence is both relevant and analytically robust. Second, structured participant briefings should be introduced to clarify expectations, confidentiality parameters, and evidence requirements, thereby improving interview efficiency and data quality.

Modality frameworks should also be formalised. While hybrid visits proved viable under wartime conditions, future procedures should define when in-person, hybrid, or online formats are appropriate. Language policy requires similar clarification to balance international participation with inclusivity for national stakeholders.

In addition, visit-length norms and scheduling models should be recalibrated to ensure equitable participation, particularly where interpretation is required. Continuous expert training, calibration exercises, and joint international–national panel preparation will be critical to ensuring consistency of judgments as institutional accreditation expands.

Institutional-Level Recommendations (Higher Education Institutions)

For universities, the pilot demonstrates that institutional accreditation should be approached not as a compliance exercise but as a strategic development instrument. Institutions that derived the greatest value from the process were those that embedded self-assessment within broader governance reflection and strategic planning cycles.

To maximise developmental impact, universities should strengthen internal quality assurance coordination, invest in integrated data management systems, and ensure evidence readiness across functional areas. Institutional preparation should include stakeholder engagement strategies that foster open dialogue and psychological safety during interviews. Particular attention should be paid to supporting students and external partners in articulating their perspectives within quality assurance processes.

Post-accreditation follow-up mechanisms are equally important. Institutions should formalise internal action plans based on expert recommendations, integrate findings into strategic development frameworks, and establish monitoring mechanisms to ensure sustained improvement rather than episodic reform.

Cross-Border Quality Assurance as an Enhancement Model

An overarching lesson of the pilot concerns the value of cross-border institutional accreditation as a quality enhancement mechanism rather than a quality control instrument. The HAKA–NAQA cooperation demonstrates that international partnership, mixed expert panels, and peer-learning methodologies strengthen institutional reflection, trust, and system legitimacy. Such approaches avoid punitive evaluation logics and instead foster shared ownership of quality development. Future implementation in Ukraine should preserve this enhancement-oriented philosophy to ensure stakeholder confidence, institutional resilience, and alignment with ESG values.

Concluding Synthesis

These lessons collectively provide a strong empirical foundation for informed policy decision-making on the nationwide introduction of institutional accreditation. The pilot confirms alignment with European standards, institutional readiness, and high levels of stakeholder engagement. It also demonstrates that quality assurance, when designed as a developmental and cooperative endeavour, can function as a mechanism of resilience, learning, and international solidarity — even under conditions of war.

The HAKA–NAQA project therefore constitutes not only a successful pilot exercise but also a strategic proof of concept for the future evolution of Ukraine's external quality assurance system.