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Split, April 5<sup>th</sup> 2024

## **Reaccreditation procedure of University of Split School of Medicine**

In response to the letter of the Agency for science and higher education (Further in the text: ASHE) (CLASS: 602-04/21-04/0025; Reg. No: 355-02-04-24-20) received on March 22, 2024, University of Split, School of Medicine, OIB: 02879747067, Šoltanska 2A, 21 000 Split, (USSM) represented by the Dean Prof. Ante Tonkić, MD, PhD submitted to the Accreditation Council of ASHE this

### **Response to the Report of the Expert Panel**

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## **1. REPRESENTATION OF MEMBERS OF THE MANAGEMENT IN COMMITTEES**

<b>The Report:</b>	<b>Quotation:</b>
On page 9 under 2. Disadvantages of the institution in the Report the Expert Panel states	“Large number of committees, with the vice deans heading many of them, which potentially hampers/limits democracy”.

*Remark:*

**The statements of the Expert Panel are incorrect.** The situation found at the time of the evaluation was that the members of the Management represented in **10 out of 20** Committees, which makes a total of 50 % (**by no means almost in all, as stated in the Report**), that is that they **were appointed Chairs of three Committees** (Committees for Science, Committees for Awards and Recognitions, Committee for Quality Improvement) (**by no means to many as stated in the Report**). **In support of the inaccuracy of the Expert Panel's allegations, the fact that the Expert Panel takes conflicting positions on various points in the Report speaks additionally.** On the page 18. Analysis 1.1. *The higher education institution has established a functional internal quality assurance system*; the position of the Expert Panel is stated:

*“Although the Expert Panel recognizes the importance of including a member of the Management in the Committee...”*

which is the established practice of higher education institutions. This is further stated in Analysis 1.3. *The higher education institution supports academic integrity and freedom, prevents all types of unethical behaviour, intolerance and discrimination* on page 23

*“However, the analysis of the composition of the committees revealed that members of the management are in two of those committees...”*

and completely incorrect on p.41. Reports under Analysis 3.8. *The higher education institution ensures an objective and consistent evaluation and assessment of student achievements* it is stated:

*“The problem is that almost in every School body, some of the school management member is present, which, according to the opinion of some School members compromises democracy of decisions”.*

Indeed, the members of the Management are **now appointed as Chairs of two Committees**, the Committee for Science, and the Committee for Awards and Recognitions, whose Chair is the Dean, which is not an exception among higher education institutions in the

Republic of Croatia. Information about committee members is verifiable and publicly available on the Faculty's website at [link](#).

On the statements of the Expert Panel

*“Although the Expert Panel recognizes the importance of including a member of the Management in the Committee, we advise against appointing him as a Chair of the Committee, to increase the involvement of other internal stakeholders and transparency”*

it should be pointed out that it is a common practice at numerous higher education institutions in the Republic of Croatia that the member of the Management, the Vice Dean, is the Chairman of the Committee for Quality Improvement, while the **Committee for Internal Assessment of the Quality Assurance System** is completely an independent body that assesses the level of development of the quality assurance system, supervises the effectiveness and functioning of the quality assurance system as a whole and **not a single member of the Management has been appointed in its composition**. It is clear that there was a misunderstanding of the powers and structure of the functioning of individual committees and boards of the Faculty, as well as a misinterpretation. Namely, at the meeting with the members of the Expert Panel, it was explained that the increase in the number of members from the current 5 to 7 members had begun, and that the Chair of the Committee for Quality Improvement, who is also the Vice-Dean of the University of Split, School of Medicine, will step down from that position in the next mandate (in a week) due to earlier assumed obligations (not because of any insinuations about a lack of democracy).**It is not known why these clarifications were ignored in the final writing of the Report. Today, the Committee for Quality Improvement has seven members, three members in scientific and teaching positions, two members in associative positions, a student and an external stakeholder.**

Involvement of members of the management in the work of committees **is an established practice in higher education**, moreover, this kind of practice ensures that the rapid implementation, interpretation and understanding of new regulations and decisions is facilitated and that they are implemented *ad hoc*. This practice ensures that the members of the Management are timely, and in real-time, aware of possible challenges and difficulties in the committees' work, so the potential response of the Management to such challenges is more prompt. Furthermore, the expertise and reputation of a member of the Management is often such that he becomes an indispensable member of a particular committee, as is the case, for example, with the Committee for Science and the Committee for Doctorates.

A total of 23 Committees have been appointed at the University of Split, School of Medicine (current situation). We emphasize here that the members of the Management are

not appointed to the Ethics Committee, the Committee for Teaching Supervision, the Committee for Internal Assessment of the Quality Assurance System, as well as the Committee for Protection against Discrimination, Harassment and Sexual Harassment, which by function **they aim to ensure ethics, quality of teaching, internal processes and protection of the rights and dignity of all members of the institution or organization.**

The Panel states:

*“Large number of committees, with the vice deans heading many of them, which potentially hampers/limits democracy”*

and

*“The problem is that almost in every School body, some of the school management member is present, which, according to the opinion of some School members compromises democracy of decisions”.*

We state that in no mandate of any member of the Management, in formal or informal form, was there a complaint about limiting or obstructing democracy. Furthermore, during the visits of the Expert Panel and discussions with the teachers, the composition and appointment of members of the Faculty's committees were not the subject of discussion. Therefore, the claim of impaired democracy can be considered unfounded. **Furthermore, we point out that at no time did the members of the Management make up the majority in any committee, that is, they were represented as one or a few members, and thus one cannot speak of a violation of democracy in the decision-making of committees and other bodies.**

Considering that the changes regarding the composition of the committees were announced to the members of the Expert Panel, we are free to point out the factual situation today. A total of 23 commissions were appointed at the University of Split, School of Medicine. Members of the Management were appointed in 12 of 23 committees which calculated amounts to **52% of the total number**.

The members of the Management were not appointed to the following committees:

- **Ethics Committee**
- Committee for Publishing Activity
- Committee for Clinical Skills
- **Committee for Teaching Supervision**
- Committee for Judicial Opinions
- **Committee for Internal Assessment of The Quality Assurance System**
- Animal Welfare Commission
- Committee for Physical and Health Culture

- Committee for Protection against Discrimination, Harassment and Sexual Harassment
- Library Council
- Committee for Graduation Thesis in the Study of Pharmacy

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Furthermore, given that it was clarified at the meetings with the Expert Panel that the elections of the committees in the new mandate are yet to come, we are also attaching the Decisions on the appointment of members of the Committees for the mandate period 2023-2026. and review of elected Chairs/Committees.

**Comparison of publicly available documents on the chairmanships and memberships of Management of the higher education institutions, and student memberships in committees of higher education institutions in the Republic of Croatia shows that the composition of committees at the University of Split School of Medicine is more than favorable compared to other institutions of higher education.**

*Evidence:*

- D14
- D26

<b>The Report:</b>	<b>Related statements that need to be revised:</b>
<b>Under area I. Internal quality assurance and the social role of the higher education institution page 11. of the Report, the Expert Panel states</b>	<i>“...the management participates in too many committees... Participation of all stakeholders is lacking, whereas the management participates in too many committees...There are not major issues in that field, except the involvement of the management...”</i>
<b>From these statements on the page 12 Recommendations for improvement arise from the reports</b>	<i>“Increase the participation of students and reduce the participation of Management in committees.”</i>
<b>On the page18 Analysis of standard 1.1. The higher education institution has established a functional</b>	<i>“Although the Expert Panel recognizes the importance of including a member of the Management in the Committee, we advise against appointing him as a Chair of the Committee, to increase the involvement of other internal stakeholders and transparency.”</i>

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### **internal quality assurance**

**system** it is stated

Next, on page 20. the Report contains a recommendation for improvement in the standard

#### **1.1. The higher education institution has established a functional internal quality assurance system**

Under Analysis of standard 1.3. **The higher education institution supports academic integrity and freedom, prevents all types of unethical behaviour, intolerance and discrimination** on the page 23 it is stated

Under Recommendations for improving standard 1.3. **The higher education institution supports academic integrity and freedom, prevents all types of unethical behaviour, intolerance and discrimination** on page 25 it is stated

On the page 30 of the Report under the standard **2.4. The HEI uses feedback from students, employers, professional organisations and alumni in the procedures of planning, proposing and approving new programmes, and revising or closing the existing programmes** it is stated

*“Increase the number of members of the Quality Assurance Committee; it is not recommended that a Vice Dean is the head of the Committee; Reduce the participation of the Management members in Committees and Working Groups...”*

*“However, the analysis of the composition of the committees revealed that members of the management are in two of those committees...”* and states *“Although the Panel has learned from the management that they plan to include students as members of those committees, the School of Medicine should also revise the composition of the committees to decrease the involvement of the management.”*

*“Change the composition of the Committees in such a way that the management is present in as small numbers as possible”*

*“The Committee for Quality Improvement is responsible for planning, harmonizing and analysing the evaluation procedures of the entire system of higher education at the School. Given that, the head of the Committee is in the same time the Vice Dean of the School, so it seems that the objectivity of the assessment may be lacking.”*

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On page 41 of the Report under Analysis of standard <b>3.8. The higher education institution ensures an objective and consistent evaluation and assessment of student achievements</b> it is stated	<i>"The problem is that almost in every School body, some of the school management member is present, which, according to the opinion of some School members compromises democracy of decisions."</i>
In the Summary of the Report on the page 68 it is stated	<i>"As the vice deans of the institution are members of many of these committees, this can potentially hamper/limit democracy."</i>

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## **2. INFRASTRUCTURE**

### **The Report:**

On page 9 of the report under point 6. Disadvantages of the institution it is stated

### **Quotation:**

*“Lack of sufficient (university) facilities for clinical work placement, especially in dental medicine.“*

### **Remark:**

This prominently displayed quotation of the Expert Panel has no basis even in the Report itself. Namely, on page 16 of the Report under Analysis *IV. Teaching and institutional capacities* The Expert Panel points out

*„The School has clearly improved its infrastructure and space, since the last review of the School was carried out in 2015. There are now excellent and fully equipped patient- centred services as well as research laboratories.“*

while further under Analysis of standard 1.2. *The higher education institution implements recommendations for quality improvement from previous evaluations* on the page 21 states

*„Space and equipment at the School have been improved since the last re-accreditation, especially equipment at the study programme of Dental Medicine.“*

and it especially points out under the standard 4.4. *The space, equipment and the entire infrastructure (laboratories, IT services, work facilities etc.) are appropriate for the delivery of study programmes, ensuring the achievement of the intended learning outcomes and the implementation of scientific/artistic activity* Analysis on page 46

*“The School has clearly improved its infrastructure and space, since the last review of the School was carried out in 2015. Currently, the School has excellent teaching and research facilities:*

- Dental Academicus is a state-of-the-art centre for dental students to practice their clinical dental skills, and it represents a good start that should be expanded in the future (other clinical facilities are now outside the School, in private dental offices according to agreements with the School);*
- Animal facilities are well established and carry out regular, excellent world-class research;*
- Laboratories are well-equipped and operational. Students are encouraged to carry out research together with the faculty;*
- New clinical skills lab for OSCE has been introduced. Students can practice their clinical skills and carry out clinical examinations in the well-equipped OSCE/clinical skills laboratory“.*

We will especially point out that the mentioned standard is graded as **high level of quality** on page 47 of the Report, while the recommendation for improvement states

*„Continue the great work that is currently being carried out.“*

It is visible from the Self-evaluation report on page 4 under Short history of the School of Medicine in Split

“and the *Dental Academicus* area was put into use for teaching at the study program *Dental Medicine*“.

Further on the page 24 under standard 1.2. *The higher education institution implements recommendations for quality improvement from previous evaluations* it is stated in particular

„In the past period, there was a significant expansion of spatial capacities and equipment, especially in the study of *Dental Medicine*. At the end of 2019, the *Dental Polyclinic* of the under School of Medicine *Dental Academicus* was opened. The *Dental Polyclinic* is an organizational unit of the School of Medicine and is used to teach *Dental Medicine* courses, where students can perform clinical practicals for professional dental courses and dental clinical rounds that replace internships, thereby improving the quality of the teaching process at that study. It is located at the university campus inside the Student Dormitory "Dr. Franjo Tuđman" in which there are six clinics, three offices and one small seminar hall. The value of the investment was around HRK 3 million. Furthermore, in the School building (Building B) a space for conducting preclinical exercises and exercises on phantoms was equipped. Within the framework of the Interreg MADE project and the ESF project Developing, Improving and Implementing Traineeships at School of Medicine in Split, a total of 31 phantoms (Dental Simulation Unit) were acquired and within the framework of the Interreg project Mobile Access Dental Clinic (MADE), whose goal is the prevention of dental caries and improving the oral health of the cross-border population of Croatia, Bosnia and Herzegovina and Montenegro, in which the leading project partner is the School of Medicine in Split, through the public procurement procedure the School purchased a vehicle in which dental equipment was installed, which makes the so-called mobile dental hygiene clinic or "Toothbus". The purpose of the "Toothbus" is that, as part of the project activities, the students of the schools of medicine in Split, Mostar and Podgorica who participate in the implementation of this project at open locations in rural areas and islands perform dental examinations of the local population on the dental chair that is installed in the vehicle. Furthermore, in order to increase the spatial capacity and raise the quality of clinical professional practice, a contract

was signed with a large number of new teaching units (private clinics and surgeries), which significantly increased the capacity to conduct the practical part of the teaching. Also, the capacities of the main teaching base, University Hospital of Split, were increased, which significantly improved the conditions for teaching".

In the Self-evaluation report, it is further stated under the standard 3.3. *The higher education institution ensured student-centered learning* on the page 54

„Clinical courses for students of Dental Medicine are also held at the Dental Polyclinic and private collaborative dental practices with which the School has a cooperation agreement, the *Dental Academicus* Polyclinic of the School of Medicine, and for Pharmacy students in the pharmacies of the Pharmacies of Split-Dalmatia County, the Galen laboratory of the Pharmacies of Split-Dalmatia County in Dugopolje. All teaching units meet the spatial and personnel requirements necessary for quality teaching, and in addition to the School 's internal archives in the teaching bases, their list is also available on the University of Split website. Practical training at clinical courses takes place in smaller groups (maximum 5 – 7 students), which enables the teacher's personalized approach to the student and the optimal acquisition of clinical skills and competencies. Given that practical training at clinical courses is organized through practicals held at the bedside of patients in clinical departments, students have the opportunity to adopt all the procedures and skills listed in the learning outcomes“.

Continuing on the page 78 under the standard 4.4. *The space, equipment and the entire infrastructure (laboratories, IT services, work facilities etc.) are appropriate for the delivery of study programmes, ensuring the achievement of the intended learning outcomes and the implementation of scientific/artistic activity* it is clarified

„Twenty-five highly equipped lecture rooms are used for teaching at the School. In the area of Dental Polyclinic of the School of Medicine *Dental Academicus* 24,9 m<sup>2</sup> seminar room with 15 seats is used for teaching purposes.“

and on the page 79 under the same standard, it was pointed out „At the end of 2019, the Dental Polyclinic of the School of Medicine *Dental Academicus* was opened. The Dental Polyclinic is an organization unit of the School of Medicine and is used to teach Dental Medicine studies, where students can perform clinical practicals for professional dental courses and dental clinical rotations. It is located on the university campus inside the Student Dormitory "Dr. Franjo Tuđman" in which there are six clinics, three offices and one seminar room. The value of the investment was around three million HRK.

The opening of the Dental Polyclinic means a direct improvement of the standards for exercising the right to provide health care for more than 20,000 students of the University of Split.“,

and on the page 80 also under standard 4.4.

„The School has 83 teaching cabinets in six locations (Buildings A, B and C, PAK, 6th floor of Clinical Hospital Center Split, Križine location and Dental Polyclinic the *Dental Academicus* with the total area of 1,588.1 m<sup>2</sup>. The cabinets are fully equipped and all have computer equipment necessary for daily work“.

**As a result of the above, a significant disparity in terms of the evaluation of spatial capacities, especially for clinical teaching of dental medicine, is evident, and it is entirely unclear based on which facts the Expert Panel reached the above conclusion.**

*Evidence:*

- D34

### **3. EMPLOYMENT STRATEGY - UNCLEAR**

<b>The Report:</b>	<b>Quotation:</b>
On page 9, under item 7, Disadvantages of the institution it is stated	<i>"Lack of employment strategy regarding the Professional Chamber analysis."</i>

*Remark:*

On page 9, under item 7, the disadvantages of the higher education institution are stated

*"Lack of employment strategy regarding the Professional Chamber analysis".*

It is not clear what employment strategy is the Expert Panel referring to. Please clarify.

<b>The Report:</b>	<b>Related statements that need to be revised:</b>
In the Summary of the Report on the page 68 it is stated	<i>"Currently, the School does not have a clear employment strategy regarding the Professional Chamber analysis and a lack of gathered information on formal action steps to be taken following the conducted analysis.**</i>

*\*partly also clarified in 4. Written procedures of the quality assurance system*

#### **4. WRITTEN PROCEDURES OF THE QUALITY ASSURANCE SYSTEM**

<b>The Report:</b>	<b>Quotation:</b>
On the page 9 under point 8. Disadvantages of the institution is stated	<i>"Lack of gathered information on formal action steps after conducted analysis"</i>

*Remark:*

**We believe that the imprecise statement of the Expert Panel, that everything takes place in an informal way, is not true.**

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#### **Highlighted citation of the Report**

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On the page 18. in the Report under Analysis of Standard <b>1.1. The higher education institution has established a functional internal quality assurance system</b> stands out	<i>"The Committee meets regularly, but there are plenty of informal arrangements and meetings that are not documented."</i>
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As has been discussed with the members of the Expert Panel on several occasions, the meetings of the Committee for Quality Improvement take place regularly, as can be seen from the publicly available [Work Activity Plans](#), [Reports on the Committee's work](#) and meeting minutes **of the Committee, which were always available to the members of the Expert Panel in written form in the meeting room, but apparently were not taken into consideration.** The Committee's activities are also contained in the minutes of regular sessions of the Faculty Council, where they are reported on. The claim about informal meetings was taken out of context during the discussion with the members of the Expert Panel on the continuous work of the members of the Committee for Quality Improvement on the preparation of documentation and the creation of the Self-evaluation report. The mentioned meetings took place on a daily/weekly basis and were not accompanied by a formal agenda and minutes. We emphasize that the excessive formalization of relations and procedures delays the implementation of measures and the decision-making process, representing an additional administrative burden. **We emphasize that all matters formally referred are consistently documented and responded to formally. In other words, every official inquiry or student request receives an official response.**

**Highlighted citation of the Report**

On page 31 of Report under Analysis of the Standard <b>2.5. The higher education institution ensures that ECTS allocation is adequate</b>	<i>“Examples of correction of ECTS points considering survey results were not documented in writing. Verbal communication with the student is carried out more often than according to the written procedure. The procedure for problem solving is not clear and regulated. (...) Students are not informed about the results of the analyses.”</i>
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The results of the Student evaluation of the teaching load and ECTS credits were implemented through as changes of the study programs in a very formal way, as can be seen from the minutes of the Committee for Quality Improvement and the Teaching Committee. Furthermore, there are clearly documented [measures](#) carried out towards the worst rated teachers. Part of the recommendations that resulted from the evaluation was directly implemented through action plans, and other issues are discussed at the sessions of the Teaching Committee and the Committee for Quality Improvement, as can be seen from the minutes. The description of the procedure after the analysis of evaluation scores is described in detail in the Self-evaluation report where it is stated, for example, under the standard 1.1. *The higher education institution has established a functional internal quality assurance system*

“Based on the results of student evaluation surveys, i.e. reports for a particular academic year, the Committee acts, if necessary, according to a defined form.

For teachers who have been assessed with a low grade (less than 3.0) or got the grade lower than 2.0 for one of the questions, and for whom a gross violation of ethical norms is evident from the students' comments, an interview is organized with the Dean or, in an expanded composition, with the head of research and teaching department (if applicable) and the head of the Committee. Improvement measures are proposed and their implementation, i.e., the outcome, is monitored. **Every academic year, a joint report of the dean is prepared on the conducted interviews and proposed measures for the improvement of the worst-rated teachers. The collective report is published on the Quality website. The summary results of the student evaluation of teaching work were presented at the Faculty Council, published on the Quality website, and discussed at the meetings of the Quality Assurance Committee, the Teaching Committee, with student representatives and the Dean's Collegium in order to determine measures for improvement.**” (p. 14).

For example, the members of the Expert Panel were presented with evidence of the implementation of student feedback regarding the inadequacy of student health care from the results of the analysis of the Overall student evaluation of studies. The aforementioned matter was discussed at the meeting of the Committee for Quality Improvement, and it was agreed to schedule a meeting with the Management of the Split-Dalmatia County Health Center to devise a plan for the provision of healthcare services for international students. For unknown reasons, this matter was overlooked by the Expert Committee, implying a lack of action taken based on the analysis of the data collected from evaluations.

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#### **Highlighted citation of the Report**

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Under item 14 on the page 9 of the Report it is stated *“A lot of informal and undocumented cases of resolving students' problems in writing...”*

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As the Expert Panel recognized, it is true that a significant portion of the management of the School's quality system rests on good relations between teachers and students, as well as the great availability of both teachers and members of Management to students, along with an immeasurable and undocumented number of informal contacts and exchange of experiences.

Furthermore, some of the students' complaints and requests are of an extremely personal and intimate nature (pregnancy, death in the family, serious illnesses, difficult financial conditions, etc.), as explained to the members of the Expert Panel, so no official record is kept of the above, but Faculty members are available to students in need of assistance both informally and through the Student Counseling Center.

In cases where objections require formal processing in accordance with prescribed procedures, we act in accordance with the formal approach. However, for those situations that can be solved simply, we believe that the interpretation of the Expert Panel in the Summary of the Report

*“For instance, there were a lot of informal cases of resolving students' problems which were not documented in writing. The feedback mechanisms that aim at providing feedback to students are not well defined”*

is the product of misinterpretation. **The faculty adheres to its written procedures regarding official evaluations and complaints, but at the same time is extremely open to students.** If a member of the Management or a certain Committee notices a difficulty, such an approach quickly and efficiently resolves all issues that can be easily addressed in this manner. Although

certain situations require adherence to formal procedures, a significant portion can be resolved without such requirements. Excessive formalization of relations and procedures delays the implementation of measures and the decision-making process, representing an additional administrative burden. All matters formally referred are consistently documented and responded to formally. In other words, every official inquiry or student request receives an official response.

**Moreover, we recognize our openness and accessibility to students as a competitive advantage which the students themselves recognize and appreciate.** Accessibility is also acknowledged in the Report of the Expert Panel on page 37 under standard 3.4. *The higher education institution ensures adequate student support* from which it is evident that the students pointed out accessibility as an advantage of the University of Split, School of Medicine at the meeting with the members of the Expert Panel

*"The previously mentioned mentoring programme in two modalities provides students with adequate support during their studies in the form of advice, help and consultation, and the one-student-one-professor system ensures a very personal approach to studying, and students state that they really like this mentoring model".*

The exceptional dedication of the Vice-Dean for the Medical Studies in English was also reported in the media, in an article under the title *As many as 29 foreign students are infected, but they testify to the great concern of the Split academic community: the vice dean brings us medicine, the support is incredible.*

"We already knew that the University of Split, School of Medicine has exceptional professors and an outstanding structure of studies, but after the news about 29 COVID-19 positive students studying at Medical Studies in English, they raised their already high standards even higher. (..) Our Vice-Dean, Professor Joško Božić, personally called every student to check on our condition and to make sure that we were well taken care of. He even personally delivered medical supplies to students because pharmacies do not deliver. He delivered a thermometer and medicines to my colleague. He left us speechless. The support we have from our professors and the Faculty is incredible. (..) Professor Joško Božić, Vice-Dean for the Medical Studies in English, confirmed (..) We were especially concerned about the first-year students who had only been in Split for only a few days; they are 18 and 19 years old, and they just arrived to their studies, so we wanted to ensure everything we could to make this situation easier for them. (...) Prof. Joško Božić did not see anything unusual

in his efforts, he just wanted to praise his colleagues, employees of the Office of Medical Studies in English, Dalibora Behmen and Tina Komar, who sacrificed their time and were in contact with the students and without whom this support action would not have been possible. was possible. He also wanted to emphasize the good cooperation with the Teaching Institute for Public Health and the Split-Dalmatia County Health Center, so he thanked Prof. Anamarija Jurčev Savičević and Prof. Marion Tomičić, as well as Prof. Zoran Đogaš and Dean of the University of Split, School of Medicine Prof. Ante Tonkić. Teamwork, indeed!"

available at [link](#).

Furthermore, feedback from students is collected through a whole series of evaluations, as recognized by the Expert Panel on page 11 of the Report under *I. Internal quality assurance and the social role of the higher education institution*

*"The School conducts many surveys, but there is a lack of evidence of the activities conducted after the analysis of the results".*

The claim about the lack of evidence of activities is not accurate, considering the previously mentioned Work Activity Plans, and Reports of the Committee's work, as well as the minutes of meetings of the Committee for Quality Improvement, the Teaching Committee, and the Faculty Council, which is partially recognized on the page 22 of Report under Analysis of standard 1.2. *The higher education institution implements recommendations for quality improvement from previous evaluations*

*"The results of different student surveys are presented at the sessions of the Faculty Council...".*

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#### **Highlighted citation of the Report**

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On the page 29 under  
Recommendations for improving  
**standard 2.3. The higher  
education institution provides  
evidence of the achievement of  
intended learning outcomes of  
the study programmes it delivers**  
it is stated

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*"Improve the reaction to the results  
of numerous surveys from teachers  
and students; Inform students and  
teachers about the changes made"*

Moreover, **at every session of the Faculty Council, there is a fixed third item on the agenda, Student Issues, where the President of the Student Council or students members of the Faculty Council, are invited to immediately present any current problems** students may encounter. Claims about the non- adoption of student proposals are unfounded, given that concrete examples were presented to the Expert Panel, where comments from evaluations led to changes directly related to those comments. All details are available in the minutes of the Committee for Quality Improvement, the Teaching Committee and the Faculty Council. Part of the adopted recommendations was recognised. Namely, on the page 38 of Report under Analysis of Standard 3.4. *The higher education institution ensures adequate student support* it is stated:

*“The School, in agreement with the Health Centre of the Split-Dalmatia County, provided local doctors from the mentioned area as well as dentists for students who do not have doctors from primary health care”.*

We would like to point out that some examples of changes based on the evaluation results were adopted at the previously mentioned Study Year Councils, which are explained in more detail in the Self-evaluation report. We can specifically point out the adjustment of the duration of the teaching block in accordance with the remarks of the students from the evaluation (Evidence: Minutes of the Study Year Council).

Furthermore, a student is a member of the [Committee for Quality Improvement](#), as well as an external stakeholder, and proposals and changes are regularly discussed at the Teaching Committee, with meetings held with student representatives as needed. The President of the Student Council also serves as a member of the Dean's Board and student representatives are also members of the [Faculty council](#), the main body of the Faculty, in which they participate equally in all decisions, and further communicate the made decisions to student representatives. **All of the above was discussed with the members of the Expert Panel on several occasions, so we believe that the arbitrary claims that students, teachers and external stakeholders were not informed about the results of the surveys are unfounded.** Moreover, in the Self-evaluation report on the page 14 it is emphasized

„The collective report is published on the Quality website. The summary results of the student evaluation of teaching work were presented at the Faculty Council, published on the Quality website, and discussed at the meetings of the Quality Assurance Committee, the Teaching Committee, with student representatives and the Dean's Collegium in order to determine measures for improvement“,

and further on the page 15 of the Self-evaluation report

„A Survey questionnaire on satisfaction with professional practice/clinical rotations is conducted once a year, after finishing the professional part of the studies in the final years. The survey consists of a total of 15 questions that evaluate the organization of the program, the mentor's work, independent work, familiarity with the way of conducting practice, and usefulness in future practice. The results (Appendix 1.1.0.) of the survey are regularly analyzed at the meetings of the Committee, and conclusions and measures are drawn which are implemented in the organization of professional practice/clinical rotations.“

**We believe that the statements of the Expert Panel, such as**

*“Lack of gathered information on formal action steps after conducted analysis; The procedure for problem solving is not clear and regulated (...) Students are not informed about the results of the analyses; Student feedback has to be provided formally and, this has to be, documented; Regularly conduct analysis of data obtained by conducting surveys, based on the analysis plan for improvement, and present the results of improvement to all stakeholders”*

**and the others listed above, have no basis in the factual situation; that is, the proposal:**

*“Establish internal procedures for documentation of quality assurance activities and processes. Ensure participation of all stakeholders in the quality assurance system”.*

**has already been implemented.**

In the [Quality Assurance Handbook of the University of Split School of Medicine](#) these activities are listed

- 4.1.5. Annual reporting to the Faculty Council on the work of the Committee for Quality Improvement;
- 4.1.7. To analyze the implementation of the Faculty's strategy, quality policy and the realization of defined quality standards for Faculty activities; and
- 4.1.8. Adopt activity plans with measures for improvement according to activity analysis 4.1.7.

under standard 4.1. Procedures for ensuring, monitoring and improving the quality assurance system, promoting the development of the public and social role of the University of Split School of Medicine and procedures for ensuring the availability of information (ESG 1.1., ESG 1.7., ESG 1.8. and ESG 1.10.) (p. 17) while under the standard 4.3. Enrollment and advancement of students, student mobility, employability, provision of resources and support to students (ESG 1.4., ESG 1.3. ESG 1.6.) the following activities are emphasized

- 4.3.4. Provide timely feedback to students about the results they achieved in exams or parts of exams orally, in writing or electronically, in accordance with personal data protection regulations;
- 4.3.13. Conduct regular student evaluations of teaching, professors and associates and submit reports to the Faculty Council on the results and measures for improvement (p. 22).

**We emphasize here that the university's evaluation procedures are explained in detail in the tables at the end of the aforementioned [Handbook](#).** That is, it describes the implementation of the procedure, the dynamics of its implementation, reference indicators and the public disclosure of results. For example, the results of conducted evaluations are discussed during meetings of the Committee for Quality Improvement and the Teaching Committee, and reported during Faculty Council sessions. Furthermore, summary reports of the conducted evaluations are published on [web pages](#) of the Committee for Quality Improvement.

Furthermore, all activities are described in detail in the annual report [The Work Activity Plan of the Committee for Quality Improvement](#) which is adopted by the Faculty Council and submitted to the University, and it is publicly available on [web pages](#) of the Committee for Quality Improvement.

In the quality assurance system of the University of Split, School of Medicine (USSM) an **integration of quality standards throughout all strategic documents and actions is visible, demonstrating traceability**. In [Strategy of the School of Medicine in Split for the period 2021-2027](#) strategic objective 4.3.1. Reaching the highest level of quality, organization and responsibility through strategic management in the strategic area of Organization and operations, infrastructure development and the quality assurance system, was elaborated in detail. Among the special objectives include

1. Establishment of an Office for Quality Assurance;
3. Produce annual reports and an activity plan for the improvement of the quality system;
4. Analysis of study success;
5. Balancing the teaching workload of professors and associates;
9. Defining procedures and processes for surveying, providing feedback on survey results, follow-up and other forms of communication with students and other stakeholders;
11. Ensure continuous monitoring of student satisfaction;

of which continuous implementation is planned for the majority (p. 24). The strategic objectives and their specific objectives contained within them are reflected in other documents of the School. For example, in the Report on the Implementation of the Action Plan for 2022.

- **continuous priority of School of Medicine in Split**

7. Defining procedures and processes for surveying, providing feedback on survey results, follow-up and other forms of communication with students and other stakeholders and others

- **continuous priority of School of Medicine in Split**

8. Implementing activities from the Quality Assurance Handbook

including their realization under the strategic objective of Achieving the highest level of quality, organization and responsibility through strategic management under the strategic area of Organization and operations, infrastructure development and quality assurance system (p. 12).

From the Action Plan for 2023 according to [Strategy of the School of Medicine in Split for the period 2021-2027](#) the tasks of the strategic area of Organization and operations, infrastructure development and quality assurance system are visible, for example

3. Adopt the Annual Activity Plan for Quality Improvement for academic year 2022/2023;
4. Prepare a Report on the analysis of study success by the end of the academic year;
5. Update the Rulebook on Quality and the Handbook on the Quality Assurance System in accordance with the new legislative framework (p. 6).

We will point out here what we believe that the notion of the Expert Panel

*“Student feedback has to be provided formally and, this has to be, documented”*

**has been more than accomplished** with regard to the exceptional number of evaluations (documented and through official means) that are carried out, which the Expert Panel also recognized on page 19 of the Standard Report 1.1. *The higher education institution has established a functional internal quality assurance system*

*“The School conducts a list of surveys/questionnaires, mainly for students”.*

**We will point out here that we consider all, or at least most, of elements under standard 1.1. have been achieved and all evidence has been presented as stated in the Standards for the evaluation of quality of universities and university constituents in the procedure of re-accreditation of higher education institutions by ASHE** which will be evident from the upcoming points of this Response. **We request that all the prominent claims contained in the Report be revised in accordance with the clarification.**

Considering the prominent structure of the quality system in this part of the Response, we also request that the following statement be revised

*"Although the University adopted all the necessary formal documents, appointed members of the Quality Improvement Committee and established a quality assurance office, a satisfactory level of quality was still not achieved."*

on page 11 of Report under the area 1.1. *The higher education institution has established a functional internal quality assurance system. It is unclear from what the members of the Expert Panel derived such a conclusion.*

#### 4.1. Response rate of students to evaluations

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##### Highlighted citation of the Report

On page 20 Under the standard **1.1. The higher education institution has established a functional internal quality assurance system** it is stated

*"The participation of students is not as high as it should be and the Committee for Quality Assurance should prepare a plan to increase the participation of students. Although we strongly support conducting surveys on different aspects of study programmes/student/teacher issues, the Panel was not provided with the documentation on the analysis of other surveys, nor plans for improvements and results of those improvements. Changes are being introduced based on the results of the surveys, but informally."*

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In [Reports on the Committee for Quality Improvement's work](#), efforts to increase student response rates in completing student surveys are summarized, as can be read from, for example, the [Report on the work of the Committee for the academic year 2020/2021](#).

"The results of the survey for the evaluation of the entire level of study were reported at the regular session of the FC in November of 2020, and the results of the Survey for student evaluation of the work of professional and administrative services and other aspects of student life were reported at the regular session of the FC in October 2021. The response rate to surveys conducted electronically was significantly lower, and we are not satisfied with the current situation. We plan to improve the response rate by talking to and motivating students, and collaborate with the Student Council to find a solution.

In the future, we will continue to strive for greater student participation in all surveys.",

and in the conducted activities of the Report on the Committee's work, discussions and proposals based on the conducted evaluations. In view of the repeated low response rate of students to the Student Evaluation Survey on Teaching, the Committee for Quality Improvement introduced a measure of SMS reminders for evaluations for student representatives, which was presented to the members of the Faculty Council, and if necessary, the measure will be extended to professors and associates as described on the [link](#).

Evaluations (surveys) exist as such, and all stakeholders are more than welcome to participate actively in the quality assurance system. The Faculty recognises the need to implement measures aimed at increasing student response rate in evaluations, which represents a universal problem at the level of the University, the Republic of Croatia, the EU and beyond, and welcomes any specific proposal of the Expert Panel that would be recognised as constructive and well-intentioned criticism and suggestion. However, the recommendations of the Expert Panel remain general.

*Evidence:*

- **D6**
- **D8**
- **D17**
- **D18**
- **D19**
- **D20**
- **D21**
- **D22**
- **D23**
- **D24**
- **D25**
- **D30**
- **D31**
- **D33**
- **D34**
- **D35**
- **D41**
- **D42**
- **D43**
- **D44**
- **D45**

<b>The Report:</b>	<b>Related statements that need to be revised:</b>
Under item 14. on the page 9 of Report it is stated	<i>"A lot of informal and undocumented cases of resolving students' problems in writing"</i>
On the page 11 of the Report under <b>I. Internal quality assurance and the social role of the higher education institution</b> The Expert Panel states	<i>"The School conducts many surveys, but there is a lack of evidence of the activities conducted after the analysis of the results."</i>
Furthermore, as a Recommendation for improvement under area <b>I. Internal quality assurance and the social role of the higher education institution</b> on page 12, it is stated	<i>"Establish internal procedures for documentation of quality assurance activities and processes. Ensure participation of all stakeholders in the quality assurance system."</i>
On the page 18 of Report under Analysis of Standard <b>1.1. The higher education institution has established a functional internal quality assurance system</b> stands out	<i>"The Committee meets regularly, but there are plenty of informal arrangements and meetings that are not documented."</i>
On the page 19 under standard <b>1.1. The higher education institution has established a functional internal quality assurance system</b> it is stated	<i>"The participation of students is not as high as it should be and the Committee for Quality Assurance should prepare a plan to increase the participation of students. Although we strongly support conducting surveys on different aspects of study programmes/student/teacher issues, the Panel was not provided with the documentation on the analysis of other surveys, nor plans for improvements and results of those improvements. Changes are being introduced based on the results of the surveys, but informally."</i>
Under Recommendations for improving standards <b>1.1. The higher education institution has established a functional internal quality assurance system</b> on page 21 of the Report it is stated	<i>"Regularly conduct analysis of data obtained by conducting surveys, based on the analysis plan for improvement, and present the results of improvement to all stakeholders."</i>

On the page 22 of the Report under Analysis of Standard <b>1.2. The higher education institution implements recommendations for quality improvement from previous evaluations</b> it is stated	<i>"The results of different student surveys are presented at the sessions of the Faculty Council, but a lot of communication after obtaining feedback takes place informally and it is necessary to conduct analyses after conducting surveys and formalize the procedures for improving quality."</i>
On the page 29. of Report under Analysis of Standard <b>2.3. The higher education institution provides evidence of the achievement of intended learning outcomes of the study programmes it delivers</b> it is stated	<i>"The School is collecting a huge amount of evaluation forms from teachers and students about the learning outcomes, but there are complaints that the reaction of the management on improving and changing the learning outcomes is belated or sometimes missing. There is no sufficient evidence that the results of evaluations by students play some particular role - the management has the mechanisms, but their effectiveness is not perfect."</i>
On the page 29 under Recommendations for improving standards <b>2.3. The higher education institution provides evidence of the achievement of intended learning outcomes of the study programmes it delivers</b> it is stated	<i>"Improve the reaction to the results of numerous surveys from teachers and students; Inform students and teachers about the changes made."</i>
On the page 31 of Report under Analysis of Standard <b>2.5. The higher education institution ensures that ECTS allocation is adequate</b>	<i>"Examples of correction of ECTS points considering survey results were not documented in writing. Verbal communication with the student is carried out more often than according to the written procedure. The procedure for problem solving is not clear and regulated. (...) Students are not informed about the results of the analyses."</i>
On the page 35 of Report under Recommendations for improving standards <b>3.2. The higher education institution gathers and analyses information on student progress and uses it to ensure the</b>	<i>"Student feedback has to be provided formally and, this has to be, documented."</i>

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**continuity and completion of  
study** it is stated

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In the Summary of the Report on the page 69 it is stated

*"There also seem to be issues related to proper evaluation of student feedback. For instance, there were a lot of informal cases of resolving students' problems which were not documented in writing. The feedback mechanisms that aim at providing feedback to students are not well defined."*

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## **5. EMPLOYABILITY**

<b>The Report:</b>	<b>Quotation:</b>
On page 9 under item 9.	<i>“Lack of data on employment of the graduates</i>
Disadvantages of the institution it is stated	<i>(Medicine, Medical Studies in English);”</i>

*Remark:*

Accordingly [Quality Assurance Handbook](#) the following activity is foreseen

- 4.3.9. Define and implement procedures for collecting information on student employability after graduation under 4.3. Enrollment and advancement of students, mobility of students, student mobility, provision of resources and support to students (ESG 1.4., ESG 1.3. ESG 1.6.) (p. 22.).

Furthermore, in [Strategy of the School of Medicine in Split for the period 2021-2027](#) the following is emphasized

4.1.4. Ensuring high employability of students of study programs based on learning outcomes

- 2. Improve the methodology of monitoring the employability of graduates and
- 3. Monitor the needs for practical competencies in the labor market (p. 17).

Furthermore, on page 35 of the Self-evaluation report it is stated

“The employability of students in the field of biomedicine has been confirmed by internal checks (Table 3.7 in the Analytic supplement), and the published Analysis of Research on the Employability of Graduated Students in 2020 by the Agency for Science and Higher Education.”

and further through the standard 3.10. *The higher education institution is committed to the employability of graduates* we will briefly point out

“The employability of students who graduate from the MSE cannot be monitored through the official data of the CES, and therefore special records are kept of all graduates through periodic surveys compiled in the Google Forms application, which are conducted in periods of 6 months and 12 months after graduation (Appendix 3.10.1.).”

Given the above evidence **we will additionally point out the contradictory stance off the Expert Panel** contained in the Report on page 43 in the standard 3.10. *The higher education institution is committed to the employability of graduates* as correctly stated

“*The School analyses the employability of its graduates*”.

In accordance with the above **we must insist that all allegations of non-existence, non-implementation or incomplete data on student employability, should be revised in the Report.**

*Evidence:*

- D1
- D32
- D34

<b>The Report:</b>	<b>Related statements that need to be revised:</b>
Expert Panel on the page 28 of the Report under Analysis <b>2.1. The general objectives of all study programmes are in line with the mission and strategic goals of the higher education institution and the needs of the society</b> states	<i>“Data on graduate employment are partially missing, probably because of the rapid integration of medicine graduates into the global labour market (outside Croatia).”</i>
<b>Under Standard 2.2. The intended learning outcomes at the level of study programmes delivered by the higher education institution are aligned with the level and profile of qualifications gained on</b> page 29 in the Recomendations for improvement, the position of the Expert Panel is emphasized	<i>“It is necessary to analyse the employability of all students after graduation.”</i>
In the Report Summary on the page 69 it is stated	<i>„There is a lack of data on employment of the graduates (Medicine, Medical Studies in English).”</i>

## **6. MEDICAL STUDIES IN ENGLISH (MSE)**

<b>The Report:</b>	<b>Quotation:</b>
On the page 9 of Report under point 13. Disadvantages of the institution	<i>"List of "German" professors is not visible/transparent, as well as selection criteria for recruitment of faculty members in Germany."</i>
The Expert Panel states	

*Remark:*

**This statement is untrue.** As it has been **clarified at the request of, and presented to the Expert Panel**, the criteria for the selection and employment of teaching staff for both the Study of Medicine and Medical Studies in English are **equal and identical to those prescribed in the [Ordinance on Procedure for Appointment to Positions at the School of Medicine in Split](#)** from May 31, 2019, regardless of is it about Croatian or "German" professors, as the Expert Panel calls them. Furthermore, a list of teachers of the University of Split School of Medicine, who teach at a separate location, as well as the so-called "German" professors, has been presented. It is also unclear what the statement *is not visible/transparent* means. Namely, at the request of members of the Expert Panel, decisions on the selection of the so-called "German" professors in the scientific-teaching positions have been presented, as well as an entire documentation for selection into one position. Selected teachers who participate in classes are also visible in the data overview of the Information System of Higher Education Institutions (ISVU) on the publicly available [link](#).

Furthermore, related to these statements the Expert Panel on page 10 Disadvantages of the institution states

*"Completion of "Medicine in English" studies in Germany for 3 years, which is not specified in the official permit issued by the Ministry of Science and Education. In other words, Germany is not listed as a place of teaching in the official permit.*

however, as it was clarified at the meetings, this concerns a single study program with the same curriculum that is carried out simultaneously, with the same exams being held at the same time. The separate location is designated as a teaching base of the University; therefore, we do not believe it should explicitly be listed in the official permit. Prior to launching the program, the Ministry of Science and Education confirmed that Regiomed Kliniken could serve as the teaching base of the University of Split if all conclusions of the agreement signed by the University of Split and Regiomed Kliniken were implemented (attached). Due to the exceptional significance of the project, five Croatian ministers have continuously supported the collaboration between the Faculty of Medicine of the University of Split and Regiomed Kliniken.

They are: Prof. Vedran Mornar, who initially supported the project, Prof. Predrag Šustar (worked with Bavarian colleagues to finalize legal matters necessary for collaboration), Prof. Blaženka Divjak (issued approvals for work), Prof. Milan Kujundžić (provided logistical support from the Ministry of Health and visited Bavaria), and Prof. Radovan Fuchs.

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Additionally, related to the claims on page 9 of the Report under point 9 regarding the Disadvantages of the Institution

*“Lack of quality assurance monitoring on clinical work. This therefore leads to a questioning of the standardised records for student clinical teaching process”*

It is evident that the members of the Expert Panel did not understand that the majority of classes at the satellite campus are taught by professors from Split, as seen from the provided list during the meeting (attached). Additionally, the Expert Panel was provided with reports on the conducted classes for their review. Again, we emphasize that German professors conducting lectures in Coburg are selected from the Faculty of Medicine in Split, and it is not a separate study program but rather the unique Medicine in English program.

*Evidence:*

- D11
- D29
- D38
- D39

<b>The Report:</b>	<b>Related statements that need to be revised:</b>
On the page 9 under Disadvantages of the Institution, point 9 states	<i>“Lack of quality assurance monitoring on clinical work. This therefore leads to a questioning of the standardised records for student clinical teaching process”</i>
On the page 10 under Disadvantages of the Institution, point 17 states	<i>“Conducting the study programme "Medical Studies in English" in Germany for the period of 3 years, which is not listed in the official approval document of the Ministry of Science and Education. That is, Germany was not listed as a site to carry out teaching related activities in the official license.”</i>
On the page 11 of the Report under <b>I. Internal quality assurance and</b>	<i>“List of "German" professors, who teach in Germany, when the students are in Germany for the</i>

<b>the social role of the higher education institution</b> it is stated	<i>last three years is not visible/transparent. In addition, the selection criteria for recruitment of faculty members in Germany (if any) was not provided.”</i>
On page 13 of the Report under area <b>II. Study programmes</b> it is stated	<i>“The only study programme, which is not carried out in Split in total (although it should be, according to the license) is Medical Studies in English, for those students who chose studying the 4th, 5th and 6th year in Germany. The agreement between Regiomed Kliniken (Medical School REGIOMED GmbH) and University of Split was signed after getting the license and after the last reaccreditation of the School, in 2015. Change of the place of delivery of the programme for the half of the study programme content (last 3 years) is inevitably connected to the quality control and quality assurance processes (students, teachers, teaching process, teaching facilities, etc.). According to the Act on Quality Assurance in Higher Education and Science, the initial accreditation procedure should be done when place of studying is changed (as in the case of Medical Studies in English which are carried out in Germany instead of Split).”</i>
On page 14 under Recommendations for improvement it is stated	<i>“The School must attain initial accreditation for the Medical Studies in English, which encompasses three years in Croatia and three years in Germany.”</i>
On the page 69 of the Report is stated in the Summary	<i>“A list of “German” professors, who teach in Germany, when the students are in Germany for the last three years is not visible/transparent. In addition, the selection criteria for the recruitment of faculty members in Germany (if any) was not provided.”</i>

## 6.1. Enrolment procedure

The Report:	Quotation:
Under <b>III. Teaching process and student support</b> on page 13 of the Report it is stated	<p><i>"The School conducts enrolment processes in accordance with active laws and regulations. When evaluating the enrolment process for studying medicine in English, we come across the issue of objectivity, and Expert Panel suggests that the enrolment process should be more transparent with elaborate and structured guidelines for compiling a ranking list as well as an objectively compiled list of interview questions."</i></p>

### Remark:

On the page 45 and 46 of the Self-evaluation report it is stated:

**"Enrollment in the study program Medical Studies in English takes place (..) Each potential applicant (..) which is the minimum duration of education up to the time of application for enrollment of 12 years, which includes a minimum of two years of studying the courses of biology, chemistry, and physics and passing the state graduation exam in the country from which the applicant comes. Furthermore, in addition to meeting the clearly defined formal requirements, each applicant is invited to an interview **conducted by the Admissions Committee of the School according to clearly defined score lists that are an integral part of the selection process of applicants for the study program Medical Studies in English**".**

**In view of the above, we must emphasize that the claims contained in the Expert Panel's Report regarding the lack of transparency in the process are unclear, and we request that they be revised.**

Remarks on the pages 33 and 34 of the Report, Recommendations for improving standard 3.1. *Admission criteria or criteria for the continuation of studies are in line with the requirements of the study programme, clearly defined, published and consistently applied*

*"It is necessary to work out the enrolment process for Medical Studies in English, that is: Set up an accurate point system that will be used to select and grade registered candidates, and to publish the above on the Faculty's website; Develop an objective*

*form for interviewing candidates, so that the entire process is more objective and equally applicable to all candidates”*

are redundant due to the fact that there is a list of structured questions and a corresponding score list/form. **We emphasize here that during the meeting, the members of the Expert Panel did not request to review the list of structured questions or the corresponding scoring sheet outlined in the Self-evaluation report.**

Evaluation forms are not publicly available on the Faculty's website. What is available to applicants is a summary notice of the scoring method *“Candidates can achieve a maximum of 35 points in total (maximum of 10 points awarded in the pre-selection process based on the submitted application and supporting documentation; maximum 25 points awarded in the interview.”* in accordance with the attached evidence from the previous round of admission to the Medical Studies in English (Evidence: Screenshots 1 and 2). From the academic year 2024/2025. registration will be done through the Central Application Office at [link](#) in accordance with the Act on Quality Assurance in Higher Education and Science, Article 44, paragraph 2 (Class: 602-04/24-10/00004; Reg. No: 533-04-24-0005). The University of Split School of Medicine has therefore submitted the amended conditions for enrollment to ASHE, and the enrollment procedure for the study of Medicine in English is harmonized with the enrollment procedure through ASHE. Invitation to enroll in the Medical Studies in English for the academic year 2024/2025. is available at [link](#). **As a result, the recommendations of the Expert Panel have been already fulfilled.**

*Evidence:*

- D13
- D15
- D16
- D27
- D28
- D36

**The Report:**

On page 15 under

Recommendations for improvement,  
it is stated

**Related statements that need to be revised:**

*“Objectify the process of enrolling in Medical Studies in English.”*

On page 33 of the Report, under standard 3.1. **Admission criteria or criteria for the continuation of studies are in line with the requirements of the study programme, clearly defined, published and consistently applied** The Expert Panel states

On page 33 of Report, Recommendations for improving standard 3.1. **Admission criteria or criteria for the continuation of studies are in line with the requirements of the study programme, clearly defined, published and consistently applied** it is stated

*"At the time of writing this report, the invitation to enrol was not available, and from the interviews with the students and the attached self-evaluation report, the Panel members learn that, despite the aforementioned enrolment process for the studies in English, the process of selection of candidates for enrolment is not entirely clear and transparent. Students state that they do not know which scoring system was applied during their application to study programmes in English...To the Expert Panel's knowledge, there is no objective interview form."*

*"It is necessary to work out the enrolment process for Medical Studies in English, that is: Set up an accurate point system that will be used to select and grade registered candidates, and to publish the above on the Faculty's website; Develop an objective form for interviewing candidates, so that the entire process is more objective and equally applicable to all candidates."*

## **7. INVOLVEMENT OF DENTAL MEDICINE REPRESENTATIVES IN THE PREPARATION OF THE SELF-EVALUATION REPORT**

### **The Report:**

### **Quotation:**

On page 10 of the Report under “*Dental member of the Committee for writing self-item 16. Disadvantages of the evaluation report was omitted*” institution

### *Remark:*

**At the request of a member of the Expert Panel, it has been clarified** that the members of the Dental Medicine study were appointed in the working groups for writing the Self-evaluation report. Furthermore, in response to an oral inquiry addressed to the Management, it was clarified that the Vice-Dean for the study of Dental Medicine was consulted for each item related to the study of Dental Medicine. The Vice-Dean was left out of the working group for the creation of the Self-evaluation report, which coordinated the process of combining the texts and documentation prepared by the subgroups, due to his extensive clinical commitments. **The aforementioned Decision was given to the members of the Expert Panel for inspection; hence the prominently displayed statement is untrue.** For an unknown reason, the Expert Panel ignored the presented decision on the appointment of working groups and the oral statement of the Management. The proof is the Decision (Class: 003-08/22-04/00056; Reg. No: 2181-198-01-08-22-0077) which was part of the shared drive with the members of the Expert Panel, in the process of reaccreditation of the University of Split School of Medicine. In the said Decision, it is evident that the representatives of the Dental Medicine study (the Vice-Dean for the Dental Medicine study, two Professors employed at the departments of Dental Medicine and a Dental Medicine student) were involved in the preparation of the Self-evaluation report in several working subgroups.

### *Evidence:*

- **D20**

## **8. IMPLEMENTATION OF RECOMMENDATIONS FROM THE PREVIOUS RE-ACCREDITATION PROCEDURE\***

\*partly also clarified in 9. Non-existing study program - Dental Medicine in English

<b>The Report:</b>	<b>Quotation:</b>
Within Analysis of each assessment recommendations for improvement and quality grade for each assessment area, in the part <b>I. Internal quality assurance and the social role of the higher education institution</b> , on page 11 of the Report, it is stated	<i>"Since the re-accreditation procedure in 2015, the School has adopted a part of the recommendations of the Expert Panel, but the majority, regarding limiting the number of students, lack of teachers and their teaching overload, the need for greater involvement of students and respect of their opinion, and encouragement of international student mobility was not met or addressed sufficiently. Therefore, an efficient system for the implementation of recommendations from the conducted evaluations should be developed. ...the School should increase the number of teachers, especially in the fields of Pharmacy and Dental Medicine, before introduction of new study programmes in English."</i>

*Remark:*

### **We consider that the interpretation by the Expert Panel**

*"Since the re- accreditation procedure in 2015, the School has adopted a part of the recommendations of the Expert Panel, but the majority, regarding limiting the number of students, lack of teachers and their teaching overload, the need for greater involvement of students and respect of their opinion, and encouragement of international student mobility was not met or addressed sufficiently...the School should increase the number of teachers, especially in the fields of Pharmacy and Dental Medicine, before introduction of new study programmes in English."*

**Is unfair and unjustified because it relies on two non-existent study programs (Pharmacy in English and Dental Medicine in English) to justify the failure to meet the recommendation of the Expert Panel from the previous evaluation cycle regarding limiting the number of students and the shortage of teaching staff. The explanation by the Expert Panel continues**

*"However, from the Action Plans for 2022 and 2023, discussions with the Management Board and data on the appointed Working groups for the preparation of the Study programme of Pharmacy and Dental Medicine in English, the Expert Panel learned that there are plans for the introduction of two new study programmes, Pharmacy in English and Dental Medicine in English,*

*which will lead to a significant increase in the number of students at the School. Although the School has made efforts to hire new teachers, there are still limitations in teaching staff in the fields of Pharmacy and Dental Medicine, as well as their overload, according to data from Tables 4.2. and 4.3 of the Analytic Supplement. Therefore, the Expert Panel believes that the School of Medicine should first strengthen the teaching staff in the fields of Pharmacy and Dental Medicine, and then introduce new study programmes...It is necessary to further increase the number of teachers, which will consequently lead to a reduction in the teaching load (provided that the School of Medicine does not increase the quotas for student enrolment and does not introduce new study programmes)".*

In accordance with the recommendations of the external evaluation procedure from 2015, recommendations were implemented regarding the Management of the higher education institution and quality assurance. Considering the existing limitations in resources and teaching staff, it was recommended to limit **enrollment quotas for students, which have been maintained at the existing numbers for study programmes Medicine, Pharmacy, and Dental Medicine programs, contrary to the incorrect conclusion by the Expert Panel**

*"Since the re-accreditation procedure in 2015, the School has adopted a part of the recommendations of the Expert Panel, but the majority, regarding limiting the number of students, (..) was not met or addressed sufficiently".*

Moreover, the following stated in 1.2. *The higher education institution implements recommendations for quality improvement from previous evaluations on page 21*

*"The School was careful in increasing the enrolment quota of students and the number of enrolled students increased only in the study programme of Medical Studies in English (60 to 70)."*

will not affect the total workload of teachers, as the number of seminar and exercise groups will not change. Also, in the Expert Panel Report on page 27, under the section Analysis for standard 2.1., it is stated that

*"(enrolment quotas for study programmes have not been changed in the period covered by last re-accreditation process)".*

The Expert Panel has taken the position that most of the recommendations from the previous reaccreditation cycle have not been adopted, although **the Self-evaluation report clearly demonstrates the opposite; the majority of recommendations have indeed been fully implemented.**

We would like to emphasize here that despite limitations, the USSM has made significant efforts to increase its teaching staff by hiring 18 assistants using its own funds, as well as a large number of teachers, as evidenced in Table 4.2 of the Analytic supplement, with 47 new hires compared to 25 who retired during the evaluated period, indicating a trend of increasing employed teaching staff despite all imposed restrictions. Furthermore, as an example, we mention that in accordance with the [Strategy of the School of Medicine in Split for the period 2021-2027](#), under strategic goals 1. *Teaching*, specific objectives and activities are stated

- Maintain a favorable ratio of the number of students per teacher, until the end of the period (page 14., point 1. section 4.1.1. Ensuring high quality and effective education based on learning outcomes).

In the Report on the Implementation of the Action Plan for the year 2022, it is emphasized

- Achievement of the first objective: Enrolment quotas remained unchanged; 90 students for Medicine, 30 students for Dental Medicine, 30 students for Pharmacy, and 60 students for Medical Studies in English.

Furthermore, the activity continues in the Action Plan for the year 2023 according to the [Strategy of the School of Medicine in Split for the period 2021-2027](#)

- Task 1. In accordance with the promotion plan to scientific teaching positions, work on fulfilling the staffing needs of each department in accordance with the plan defined by the heads of departments at the beginning of the academic year.

Despite all known current challenges and limitations in hiring within the higher education system during the evaluation period, **the USSM, according to data from the Analytic supplement, meets the teaching coverage on all study programs with more than 50% (ranging from 52 to 90%) of its own staff in scientific-teaching positions. Furthermore, the criteria regarding student-to-teacher ratio are also met for all study programs.** In the academic year 2021/2022, the ratio between the total number of permanently employed teachers (including associates and professors) and the total number of enrolled students was **1:13.27**, confirming that there is a sufficient number of qualified teachers across all study programs (pages 71 and 72 of the Self-evaluation report).

In the Self-evaluation report it is stated

“In the previous re-accreditation cycle, it was concluded that there is an insufficient number of teachers employed with full and cumulative work time selected for research and teaching ranks at the study of Dental Medicine and Pharmacy. **For the purposes of teaching professional courses at the**

**Dental Medicine and Pharmacy study, a large number of teachers with the research and teaching rank and the corresponding scientific field have been employed, and thus the key conditions in the recommendations in the issued Letter of Expectations have been fulfilled. The School complied with all the recommendations with the submitted action plans and changes (Appendix 1.2.3. and Appendix 1.2.4.), which resulted in obtaining a Certificate of Fulfillment of the Conditions for Performing Higher Education Activity related to the study of Pharmacy and Dental Medicine.”(p. 24).**

The School recognizes that this recommendation has not been fully implemented due to the current ban on employment in the higher education system. However, in the Self-evaluation report we emphasize the following

“Due to the lack of support from the relevant Ministry, the School has employed **18 young assistants in the last five years** in order to relieve the teaching workload with the **so-called School's own financial resources**. Furthermore, **the choice of titular research and teaching ranks is encouraged for young doctors who work in the teaching bases of the School and have obtained a PhD in science** in order to facilitate the implementation of teaching for employees with research and teaching ranks and to reduce the teaching workload, which requires significant financial resources from the School to pay for the hours of teaching through external cooperation. Also, due to the extreme workload of the administrative staff, and the impossibility of obtaining consent and coefficients from the competent Ministry of Science and Education, the School has employed 26 administrative employees with own financial resources, in order to enable unhindered further work and development of the School.”(p.25).

**Furthermore, we also highlight that the statements**

*“The School of Medicine conducted an internal assessment of the quality assurance system in 2019, based on which the appropriate Action Plan was drawn up. The School introduced improvements based on the above recommendations, but the recommendations until the completion of writing self-evaluation report were not fully adopted.”*

**are incorrect. Indeed, an internal assessment of the quality assurance system has been conducted, and the corresponding Action Plan has been adopted. From the Report on the Implementation of the Action Plan (Table 1), it is evident that the recommendations from the previous evaluation and Action Plan have been implemented. All [documents](#)**

**are published on the website of the School and are publicly accessible. Furthermore, the Report on the Implementation of the Action Plan was adopted on November 18, 2022, which was before the completion of writing both the Expert Panel Report and the Self-evaluation report.**

**Table 1.** Excerpt from the [Report on the Implementation of the Action Plan according to the recommendations of the Internal assessment of the quality assurance system dated April 17, 2019](#)

Standard	Recommendation	Task	Status and description of activities
<b>1.2. The higher education institution implements recommendations for quality improvement from previous evaluations.</b>	It is recommended to publish Action Plans and Reports on the website of the School	1. Create and publish Action Plans and Reports on the website of the School	1. The task is continuously being executed. Developed Action Plans and Reports are continuously published on the website of the School.
<b>1.1. The higher education institution has established a functional internal quality assurance system.</b>	It is suggested to include an external stakeholder as a member of the Committee. Considering the workload within the quality system, it is proposed to establish a Quality Office that will provide administrative support to the Committee. Revision of documentation defining the Quality Assurance System (QAS) is proposed. We would recommend periodically conducting a SWOT analysis or another technique at both the institutional and activity levels.	1. Propose and appoint an external stakeholder as a member of the Quality Improvement Committee. 2. Make a decision on establishing the Office for quality assurance. 3. Conduct a review of documents and procedures specified by the Quality Assurance System (QAS), with periodic analysis (such as SWOT analysis, etc.) at the institutional level.	1. Completed. An external stakeholder has been appointed to the Committee for Quality Improvement. 2. Completed. The decision to establish the Office for quality assurance has been made. 3. Continuously executed. Documents and procedures are continuously revised based on conducted SWOT analyses.

Standard	Recommendation	Task	Status and description of activities
<b>2.1. The general objectives of all study programmes are in line with the mission and strategic goals of the higher education institution and the needs of the society.</b>	It is recommended to develop a monitoring system for the employability of graduates.	1. Establish a system for monitoring the employability of former students.	1. Completed. A survey on student employability has been developed and is being administered to students upon completion of their studies.
<b>2.5. The higher education institution ensures that ECTS allocation is adequate.</b>	It is recommended to introduce an independent evaluation of student evaluation of teaching workload and ECTS credits, as the current evaluation conducted as part of university evaluation of teaching performance is not sufficient.	1. Devise a procedure (survey or similar tool) for conducting student evaluation of teaching workload and alignment of ECTS credits at the School level.	1. Completed. A student survey on the alignment of ECTS credits and teaching workload has been developed.
<b>3.10. The higher education institution is committed to the employability of graduates.</b>	It is recommended to conduct procedures for gathering information on students' employment opportunities after graduation. It is also recommended to establish an association of the School's alumni to enhance communication with former students and friends of the School.	1. It is recommended to implement procedures for gathering information on students' employment opportunities after graduation. 2. It is recommended to establish an association of the School's alumni to enhance communication with former students and friends of the School.	1. Completed. A survey on student employability has been developed and is being administered to students upon completion of their studies. 2. Completed. The School's Alumni Association has been established.
<b>4.1. The higher education institution ensures adequate</b>	It is recommended to optimize the number of external collaborators.	1. Develop annual staffing plans for each department based on actual needs and workload in coordination	1. Ongoing. The Human Resources Department and the Teaching Committee collaborate with the heads of

Standard	Recommendation	Task	Status and description of activities
teaching capacities.		<p>with the head of the department.</p> <p>2. Optimize teaching workload in accordance with the progression and employment plan of the departments of MEFST.</p> <p>Deadline: Continuous.</p>	<p>departments to develop annual plans according to needs and workload.</p> <p>2. Completed.</p>

All activities resulting from the recommendations of the Agency for Science and Higher Education (ASHE) in the previous re-accreditation procedure, as well as responses to the Letters of Expectations with corresponding Action Plans, are **available on the Committee for Quality Improvement's website** at the provided [link](#) and in Appendix 1.2.5 of the Self-evaluation report. These documents are publicly accessible and verifiable, **rendering the recommendation for improving standards 1.2. The higher education institution implements recommendations for quality improvement from previous evaluations**

*“Therefore, an efficient system for the implementation of recommendations from the conducted evaluations should be developed.”*

**unnecessary.** We consider that the USSM has established a robust and efficient quality assurance system that has ensured the implementation of recommendations from previous external evaluations. Given that some members of the Expert Panel have been involved in the higher education system in Croatia for many years and are well acquainted with the constraints imposed on universities, **the excessive focus on hiring new teaching staff is surprising. Therefore, the comment regarding the overburdening of teaching staff and the failure to implement recommendations from the previous re-accreditation procedure is unjustified.**

## 8.1. Mobility

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### Highlighted citation of the Report

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Implementation of recommendations from the previous re-accreditation procedure

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#### Mobility

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On page 21 of the Report under standard **1.2.** *“International student mobility* **The higher education institution implements** *remained relatively modest, recommendations for quality improvement* *although the School carried out a from previous evaluations* The Expert Panel *number of actions...”*

takes inaccurate stance with statement

and further misinterpreting

*“The main reason for less mobility is the nonrecognition of completed, and possibly passed courses at a foreign university...”*

Under standard **3.6. The higher education institution allows students to gain international experience** on page 40 of the Report, it is claimed

*“The ECTS credit system is harmonized at the level of the Republic of Croatia. Evidence of mobility in the form of recognition of ECTS credits acquired abroad was not part of the presented documentation.”*

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**The remarks regarding the modest student mobility are the opinion of the Expert Panel, and as such are considered unfounded.** Furthermore, the Report contains conflicting assessments and opinions of the members of the Expert Panel in various sections. For example, one approach is taken by the Expert Panel in the following sections of the Report on page 21 in the Report, under standard 1.2. *The higher education institution implements recommendations for quality improvement from previous evaluations*

*“International student mobility remained relatively modest, although the School carried out a number of actions...”*

and under the Analysis of each assessment area, recommendations for improvement and quality grade for each assessment area, under area *I. Internal quality assurance and the social role of the higher education institution*, on page 11,

*“Since the re- accreditation procedure in 2015, the School has adopted a part of the recommendations of the Expert Panel, but the majority - (...) and*

*encouragement of international student mobility was not met or addressed sufficiently”.*

On the other hand, a different opinion is presented on page 40 of the Report, under standard **3.6. The higher education institution allows students to gain international experience**

*“In the observed period, more than a hundred students went through one of the mobility programmes. Students state that the programme is more accessible to students of Dental Medicine and Pharmacy...”*,

on page 10 of the Report under List of Institutional good practices

**“8. Large number of incoming Erasmus students”.**

Furthermore, the **numerical evidence from the Analytic supplement (page 9, Table 36)**, clearly indicates that **149 students from the School participated in outgoing mobility and 261 students in incoming mobility**.

We emphasize that **on page 22 of the Self-evaluation report, it is stated**

**“It was also recommended to increase the international mobility of students, so the School, as part of the drafting of the new Ordinance on Internal Organization and Workplaces, within the Office for Research, Postgraduate Studies and Continuing Medical Education, established an Office for International Relations, which promotes international cooperation through bilateral cooperation agreements and inter-institutional Erasmus+ agreements, performs administrative tasks, and provides support for all forms of outbound and inbound mobility of students, teachers and staff. Furthermore, mobility and international cooperation websites have been set up where all internal and external stakeholders can find all relevant information.**

**In the past period, special attention was paid to the outgoing mobility of students, through the signing of bilateral and multilateral agreements and mobility programs. Including the academic year 2022/2023 the School has a total of 30 signed cooperation agreements with 16 different countries within the ERASMUS+ program. The University of Split is a partner in the Alliance of European University of the Seas (SEA-EU, a network of 9 European universities), which opens up additional opportunities for student mobility.**

Also, the mobility websites in Croatian and English have been updated. **Furthermore, students and staff are regularly informed about all mobility opportunities, as well as newly signed agreements, and informal meetings were organized where experiences from exchanges were shared.**

**Experiences from exchanges are regularly published in the Magazine of the School of Medicine.**

It is important to point out that [the Regulations on International Mobility of the School of Medicine of the University of Split](#) were also adopted.

In the past period, a total of 149 students achieved outgoing mobility, which is a significant increase compared to the previous re-accreditation period, **but it should be borne in mind that the entire mobility experienced a complete halt for a certain period of time due to epidemiological reasons caused by the COVID-19 pandemic.**”

**Additionally, we would like to emphasize that the evaluation period includes three years of the pandemic during which mobility was significantly reduced and hindered globally, as the members of the Expert Panel are well aware.** Additionally, data on mobility in the academic year 2022/2023 were presented to the members of the Expert Panel, even though it was not included in the evaluation. It is evident from the data that **there is a clear trend of significant increase in mobility** for both students (a total of 85 students in outgoing mobility) and staff (a total of 85 staff members). For the purpose of this Response, we present Table 2 as an evidence.

**Table 2. Outgoing mobility of students and teaching and non-teaching staff**

Year	Students	Teaching staff	Non-teaching staff
2018	19	9	6
2019	50	11	6
2020	3	3	5
2021	24	8	-
2022	58	12	4
2023	85	41	44
Total	239	84	65

The statement of the Expert Panel

*“The main reason for less mobility is the nonrecognition of completed, and possibly passed courses at a foreign university”*

is entirely inaccurate. We emphasize that there is no instance where a student's passed course at a foreign university has not been recognized.

The commitment of the School to achieving student mobility is evident through strategic documents and action plans, where in the [Strategy](#) under the strategic area

4.1. Teaching 4.1.6. Increasing the incoming and outgoing mobility of students, it is outlined

- Increase the number of students in the system of incoming and outgoing inter university mobility (page 19)

and within the [Quality Assurance Handbook](#), the activity

- 4.3.1. To increase incoming and outgoing international, national, inter-university, and intra-university mobility of students and teachers as a part of standard 4.3. Enrollment and student progression, student mobility, employability, resource assurance, and student support (ESG 1.4., ESG 1.3. ESG 1.6.) (page 22).

Furthermore, **in the Report on the implementation of the Action Plan for 2022** (Appendix 1.1.4. of Self-evaluation report), the realization of the first goal Increased number of students in mobility programs, which is outlined as a **continuous priority of the School**, is clearly visible within strategic area 1 Teaching activity and strategic objective 6 Increasing inbound and outbound student mobility. Additionally, task 7 within strategic area 2 Students states Increase the number of students in the system of inbound and outbound inter-university mobility with the assistance of the Office for International Cooperation (page 3).

Additionaly, we also emphasize here that standards 3.6. *The higher education institution allows students to gain international experience* and 3.7. *The higher education institution ensures adequate study conditions for foreign students*, according to the Standards for the Evaluation of Quality of Universities and University Constituents in the procedure of re-accreditation of higher education institutions by the Agency for Science and Higher Education, data on student mobility are highlighted as elements of the standard or examples of evidence and graded with the **Satisfactory level of quality** or **High level of quality**. Considering that the response can relate solely to the facts contained in the Report or obvious errors, but given the number of identified inaccuracies contained under the assessment of standard 1.2. and conflicting views in the Report itself, we must insist on a **review of the assessment of the standard 1.2. The higher education institution implements recommendations for quality improvement from previous evaluations** where contentious and inaccurate statements about mobility are included.

## 8.2. Involvement of students in the processes at the School\*

\*Partially explained also within chapter 4. Written procedures of the quality assurance system

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### Highlighted citation of the Report

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Implementation of recommendations from the previous re-accreditation procedure

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Involvement of students in the processes at the School

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On page 22 of the Report, in the part *“As stated earlier in Standard 1.1., Analysis of the standard 1.2. The higher students are currently not included education institution implements in all committees of their interest.” recommendations for quality improvement from previous evaluations,*

it is stated

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At the request of the members of the Expert Panel, **evidence of student involvement in strategic and other plans, as well as reviews of study programs, was provided**, which evidently were not considered when drawing conclusions, as stated

*“Although the School has adopted all required formal documents, appointed the Quality Assurance Committee and established the Office for Quality Assurance, satisfactory level of quality is not met.”*

on page 11 of the Report under area *I. Internal quality assurance and the social role of the higher education institution.*

During the previous re-accreditation procedure (I. cycle), students were represented as members of 3 committees. However, in accordance with the recommendations arising from that evaluation, **this number has now been increased to 8 committees, each of which include a student member.** Given the outlined point, it is unclear why the report states that this recommendation from the previous cycle was not fulfilled and **why the significant increase in student representation in the committees was completely disregarded in the Report.** We also emphasize that students are already involved as members in several additional committees, as explained to the members of the Expert Panel (the working materials for the Faculty Council held one week after the re-accreditation visit were presented), for example, the Ethics Committee, the Committee for Disciplinary Proceedings, and the Committee for International Cooperation, as recognized in the Report

*“Although the Panel has learned from the management that they plan to include students as members of those committees”.*

The members of the Expert Panel were informed that, due to the sensitivity of the topics discussed, a student member was not appointed to the Teaching Committee. Instead, representatives of students from various study programs are invited as needed. **If necessary, a larger number of students are invited to the Committee meetings, depending on the issues of interest, as explained to the members of the Expert Panel.**

Furthermore, **students are present at the so-called "Study Year Councils,"** more details of which can be found in the Self-evaluation report under standard 1.1. *The higher education institution has established a functional internal quality assurance system* on page 15

- “Also, internal analyzes of students' exam passing rate by courses, deadlines, and studies are carried out after the first exam period and before the autumn exam periods and at the end of the academic year. (...) The results are discussed at the meetings of the Quality Assurance Committee, the Teaching Committee and at the meetings of the Study Year Council, as well as at the regular meetings with student representatives.”

and standard 3.8. *The higher education institution ensures an objective and consistent evaluation and assessment of student achievements* on page 66

- “The planning of the course syllabi for the next academic year is done during July after the sessions of the Council of Years, at which the lessons completed and the passing of the first exam periods are analyzed and plans are defined for the course syllabi of the new academic year, the teaching content is supplemented, and action plans are agreed upon in accordance with the reports received”.

These are meetings held at the end of each academic year to discuss the entire academic year, subjects, pass rates, schedules and shifts, teaching issues, and plans for the next academic year.

At the request of the Expert Panel member, **evidence of student involvement in the development of strategic and other documents of student interest was provided** (Working Group for the Proposal of the Rulebook on Students' Copyrights, Ordinance on Student Demonstrators, Rulebook on International Mobility of the USSM, Regulations on Professional Practice for students of Medicine, Medical Studies in English and Dental Medicine, Regulations on Student Sections) **and the revision of study programs** (Decision on the Appointment of Members of the Working Group for Major Changes to the Dental Medicine Study Program) **in the form of decisions on the appointment of members that were evidently not taken into account.** Furthermore, **a student is involved as a member**

**of the commission for drafting the School Statute**, which is the fundamental legal document determining the fundamental principles, purpose, structure, organization, and functioning of the faculty. It represents the overarching document encompassing rules and regulations by which the faculty is managed and defines the rights, obligations, and responsibilities of all relevant stakeholders within the faculty environment, including the administration, teaching staff, students, and administrative staff (Decision, Class: 003-08/23-04/000, Reg. No: 2181-198-02-01-23-0101). Moreover, students have been appointed as members of various working groups for the preparation of the Self-evaluation report (Decision, Class: 003-08/22-04/00056; Reg. No: 2181-198-01-08-22-0077).

We add here that in accordance with the [Strategy](#)

the second objective listed under 4.1.2. Encouraging excellence in students, student activities, the work of student associations, and support for student life and standards

- “Improve the system of student involvement in work groups for the evaluation of study programs and the educational process” (page 15), as part of 4.1. Teaching

and the first goal listed under 4.3.2. Improvement of the organization and infrastructure of the School, as part of 4.3.2. Organization and operations, infrastructure development and quality assurance system

- “Increase the inclusion of students in the work of the School's bodies” (page 25) with the envisaged continuous implementation

**the importance of greater student involvement in the processes at the School is clearly stated as it has been recognized and integrated into current strategic documents.** This is then reflected in specific objectives of Action Plans and Reports on their implementation, as seen, for example, in the Report on the Implementation of the Action Plan for 2022 (Appendix 1.1.4. within Self-evaluation report), where a specific objective is included

- “To improve the system of student involvement in working bodies for the evaluation of study programs and the educational process.”,

and where the implementation states that **the Regulations are in the final stage of preparation** (page 4). Furthermore a specific objective

- “Increase student involvement in the School's committees.

where it is stated that one **student actively participates in a large number of School's committees**, and new members are regularly updated each academic year (page 13). We note that the aforementioned [Regulations on the procedure for Adopting, Improving and Evaluating the Study Programs of the School of Medicine in Split](#) was adopted on February 22, 2023, and clearly states in Article 5, paragraph 4, the involvement of students in the process of adopting, improving, and evaluating study programs.

Members of the Expert Panel were informed about the intention to further involve students in the work of committees. For example, a student is now a member of the Ethics Committee and the Committee for Disciplinary Proceedings. However, despite this, the Expert Panel considered this essential to mention in the Report

*“Furthermore, students are not members of the Ethics Committee and the Committee for Disciplinary Procedures.”*

(page 23, Analysis 1.3. *The higher education institution supports academic integrity and freedom, prevents all types of unethical behaviour, intolerance and discrimination*). Furthermore, it is entirely unclear where the conclusion under analysis section for standard 1.1. *The higher education institution has established a functional internal quality assurance system* on page 18 of the Report

*“Although it was recommended in the last reaccreditation cycle (2015), students are still not included as members in some committees connected to their topics, for example: the Teaching Committee, the Ethics Committee, the Committee for Disciplinary Proceedings, the Committee for Doctorates. Since plans to increase involvement of students exist, the School of Medicine should conduct an analysis and increase the involvement of students in the processes at the School”*

originates from. **We emphasize that in the previous evaluation of the School, committees that are explicitly mentioned in this Report, such as the "Teaching Committee," "Ethics Committee," "the Committee for Disciplinary Proceedings," and "Committee for Doctorates," were not highlighted as explicitly as they are mentioned in this Report. Specifically, the recommendation from the previous evaluation was expressed as a general recommendation for increased student involvement without explicitly specifying which committees should be included.**

At the time of evaluation, students were represented as members in 8 committees, including the:

- Committee for Publishing Activities
- Committee for Quality Improvement
- Committee for Teaching Supervision
- Committee for Awards and Recognitions
- Committee for Internal Assessment of the Quality Assurance System
- Committee for Physical and Health Education
- Committee for Protection against Discrimination, Harassment, and Sexual Harassment
- Library Council

**We will point out that the claim regarding the necessity for a student to be a member of the Committee for Doctorates is entirely inappropriate considering that the primary task of that committee is to assess the merit of doctoral dissertation topic proposals, as well as the appointment of expert committees. Such practice is not common nor observed at other higher education institutions.**

**We strongly disagree with the statements of the Expert Panel that students are not sufficiently represented in the School's Committees.** We would like to point out that at the time, students are represented in the following committees: the Ethics Committee, the Committee for Publishing Activities, the Committee for Quality Improvement, the Committee for Teaching Supervision, the Committee for Awards and Recognitions, the Committee for Disciplinary Procedures, the Committee for Internal Assessment of the Quality Assurance System, the Committee for Physical and Health Education, the Committee for Protection against Discrimination, Harassment, and Sexual Harassment, the Committee for International Cooperation, and the Library Council, which constitutes **11 out of 23 committees**. We emphasize that the representation of students in the committees of the School, at the time of evaluation and especially now, is higher than in several other comparable higher education institutions. Considering all the evidence provided, we request a revision of the statements made by the Expert Panel.

<b>The Report:</b>	<b>Related statements that need to be revised:</b>
Implementation of recommendations from the previous re-accreditation procedure	
Involvement of students in the processes at the School	
In the part Recommendations for <i>“Increase the participation of students and reduce the improvement of the area I. Internal participation of Management in committees.”</i> <b>quality assurance and the social role of the higher education institution</b> on page 12 of the Report it is stated	
In the part Analysis of standard <b>1.1. The higher education institution has established a functional internal quality assurance system</b> on page 18 of the Report, it is stated	<i>“Although it was recommended in the last reaccreditation cycle (2015), students are still not included as members in some committees connected to their topics, for example: the Teaching Committee, the Ethics Committee, the Committee for Disciplinary Procedures, the PhD Thesis Committee. Since plans to increase involvement of students exist, the School of</i>

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*Medicine should conduct an analysis and increase the involvement of students in the processes at the School."*

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In the part Recommendations for improvement of standard **1.1. The interest.** "Ensure student participation in all committees of their

**higher education institution has established a functional internal quality assurance system** on page 20 of the Report, it is stated

On page 22 of the Report, in the part Analysis of standard **1.2. The higher education institution implements recommendations for quality improvement from previous evaluations**, it is stated

On page 23 of the Report, in the part Recommendations for improvement of standard **1.2. The higher education institution implements recommendations for quality improvement from previous evaluations**, it is stated

In the part Analysis of standard **1.3. The higher education institution supports academic integrity and freedom, prevents all types of unethical behaviour, intolerance and discrimination** on page 24 It is stated

In the part Recommendations for improvement of standard **1.3. The higher education institution supports academic integrity and freedom, prevents all types of unethical behaviour, intolerance and**

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**discrimination** on page 24 of the Report,

it is stated

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Considering the evidence presented in the Self-evaluation report, as well as the statements contained on page 21 of the Expert Panel's Report

*"In the academic year 2014/2015, the procedure of re-accreditation of the institution was carried out (visit of the Expert Panel in March 2015). Based on the Expert Panel's report from April 2015 a letter of expectation was issued with regard to the study programme of Pharmacy, and a certificate was issued upon fulfillment of the conditions for performing part of the activity. The second re-accreditation procedure (conducted in the academic year 2016/2017, the visit of the Expert Panel in December 2016) concerned the re-accreditation of the postgraduate doctoral study programmes of Biology of Neoplasms, Clinical Evidence-Based Medicine and Translational Research in Biomedicine - TRIBE. In the report of the Expert Panel in 2015, a number of recommendations for quality improvements were made. The School of Medicine has fulfilled part of the recommendations. The reform of two doctoral study programmes, Biology of Neoplasms and Clinical Evidence-Based Medicine was carried out, which were restructured and their quality significantly improved, thus meeting the recommendations from the process of re- accreditation of doctoral studies"*

**it is evident that the majority of recommendations from the previous re-accreditation procedure have been adopted.**

The conclusion of the Expert Panel in standard 1.2. regarding the fulfillment of recommendations from the previous re-accreditation procedure **is not based on the facts**. We believe that almost all recommendations from the previous re-accreditation procedure have been implemented. Considering that the response can only pertain to factual inaccuracies contained in the Report or obvious errors, given the number of identified inaccuracies under the assessment of standard 1.2. and conflicting views within the Report itself, we must **insist on a review of the assessment for standard 1.2. The higher education institution implements recommendations for quality improvement from previous evaluations. With the implementation of recommendations from the previous re-accreditation procedure, the deficiencies outlined in the four Letters of Expectation (Integrated Undergraduate and Graduate Studies in Dental Medicine and Pharmacy, as well as two Letters of Expectation for the doctoral programs Evidence-Based Clinical Medicine and Tumor Biology) have been addressed. Therefore, it is not appropriate to assess the mentioned standard with the minimal quality.** The [documents](#) related to the

previous evaluation are publicly available. We believe that all elements within standard 1.2. have been met and all evidence has been presented, as stated in the Standards for the Evaluation of the Quality of Universities and University Constituent Units in the Process of Reaccreditation of Higher Education Institutions by the Agency for Science and Higher Education.

*Evidence*

- D2
- D3
- D17
- D18
- D19
- D20
- D21
- D22
- D23
- D24
- D25
- D26
- D30
- D31
- D34
- D37

**The Report:**

**Related statements that need to be revised:**

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Implementation of recommendations from the previous re-accreditation procedure

On page 18 of the Report in the part *“Although it was recommended in the last Analysis of standard 1.1. The higher reaccreditation cycle (2015), students are still not education institution has established a functional internal quality assurance system, it is stated* *included as members in some committees connected to their topics, for example: the Teaching Committee, the Ethics Committee, the Committee for Disciplinary Procedures, the PhD Thesis Committee. Since plans to increase involvement of students exist, the School of*

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*Medicine should conduct an analysis and increase the involvement of students in the processes at the School."*

On page 21 of the Report in the part Analysis of standard **1.2. The higher education institution implements recommendations for quality improvement from previous evaluations**, it is stated

*"However, from the Action Plans for 2022 and 2023, discussions with the Management Board and data on the appointed Working groups for the preparation of the Study programme of Pharmacy and Dental Medicine in English, the Expert Panel learned that there are plans for the introduction of two new study programmes, Pharmacy in English and Dental Medicine in English, which will lead to a significant increase in the number of students at the School. Although the School has made efforts to hire new teachers, there are still limitations in teaching staff in the fields of Pharmacy and Dental Medicine, as well as their overload, according to data from Tables 4.2. and 4.3 of the Analytic Supplement. Therefore, the Expert Panel believes that the School of Medicine should first strengthen the teaching staff in the fields of Pharmacy and Dental Medicine, and then introduce new study programmes....It is necessary to further increase the number of teachers, which will consequently lead to a reduction in the teaching load (provided that the School of Medicine does not increase the quotas for student enrolment and does not introduce new study programmes)."*

On page 21 of the Report in the part Analysis of standard **1.2. The higher education institution implements recommendations for quality improvement from previous evaluations**, it is stated

*"Therefore, the Expert Panel believes that the School of Medicine should first strengthen the teaching staff in the fields of Pharmacy and Dental Medicine, and then introduce new study programmes."*

On page 22 of the Report in the part Analysis of standard, **1.2. The higher education institution implements recommendations for quality**

*„...until the completion of writing Self-evaluation report were not fully adopted. In conclusion, since most of the recurring recommendations from the external re-accreditation procedure in 2015 were not adopted, the*

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<b>improvement from previous evaluations</b> , it is stated	<i>School should develop an effective system based on which it will analyse recommendations for improvements and carry out appropriate activities."</i>
<b>In the part Recommendations for improvement of standard 1.2. The higher education institution implements recommendations for quality improvement from previous evaluations</b> , it is stated	<i>"Develop an efficient system for the implementation of the recommendations from the conducted evaluations."</i>
<b>On page 68 of the Report, in the Summary</b> , it is stated	<i>"Since reaccreditation procedure in 2015, the School has adopted a part of the recommendations of the Expert Panel, but the majority, regarding limiting the number of students, lack of teachers and their teaching overload, the need for greater involvement of students and respect of their opinion, and encouragement of international student mobility was not met or addressed sufficiently. Therefore, an efficient system for the implementation of recommendations from the conducted evaluations should be developed."</i>

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#### Mobility

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<b>On page 21 of the Report within the standard 1.2. The higher education institution implements recommendations for quality improvement from previous evaluations</b> The Expert Panel takes inaccurate stance with statement and further misinterpreting	<i>"International student mobility remained relatively modest, although the School carried out a number of actions..."</i>
	<i>"The main reason for less mobility is the nonrecognition of completed, and possibly passed courses at a foreign university..."</i>
<b>Furthermore, under the standard 3.6. The higher education institution allows students to gain international</b>	<i>"The ECTS credit system is harmonized at the level of the Republic of Croatia. Evidence of mobility in the form of recognition of ECTS credits acquired abroad was not part of the presented documentation."</i>

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**experience** on page 40 of the Report, it  
is stated

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Involvement of students in the processes at the School

Furthermore, in area **I. Internal quality assurance and the social role of the higher education institution** on page 11, the Expert Panel elaborates its states

*"U tome području nema većih nedostataka, osim prevelike uključenosti članova Uprave i slabe zastupljenosti studenata u raznim povjerenstvima, što je također već navedeno ranije u tekstu."*

From these statements on page 12 of the Report, recommendations for improvement emerge

*"Increase the participation of students and reduce the participation of Management in committees."*

In the part Analysis of standard **1.1. The higher education institution has established a functional internal quality assurance system** on page 18 of the Report, it is stated

*"Although it was recommended in the last reaccreditation cycle (2015), students are still not included as members in some committees connected to their topics, for example: the Teaching Committee, the Ethics Committee, the Committee for Disciplinary Procedures, the PhD Thesis Committee. Since plans to increase involvement of students exist, the School of Medicine should conduct an analysis and increase the involvement of students in the processes at the School."*

In the part Recommendations for improvement of standard **1.1. The higher education institution has established a functional internal quality assurance system** on page 20 of the Report, it is stated

*"Ensure student participation in all committees of their interest."*

On page 22 of the Report, in the part Analysis of the standard **1.2. The higher education institution implements recommendations for quality improvement from previous evaluations**, it is stated

*"As stated earlier in Standard 1.1., students are currently not included in all committees of their interest."*

On page 23 of the Report, in the part Recommendations for improvement of standard **1.2. The higher education**

*"Students should be members of all committees of their interest, such as the Ethics Committee, the Teaching*

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**institution** implements *Committee, the Disciplinary Procedures Committee, PhD recommendations for quality Thesis Committee."*  
**improvement from previous evaluations**, it is stated

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In the part Analysis of standard **1.3. The higher education institution supports academic integrity and freedom, prevents all types of unethical behaviour, intolerance and discrimination** on page 24, it is stated

*"Although the Panel has learned from the management that they plan to include students as members of those committees, the School of Medicine should also revise the composition of the committees to decrease the involvement of the management."*

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In the part Recommendations for improvement of standard **1.3. The higher education institution supports academic integrity and freedom, prevents all types of unethical behaviour, intolerance and discrimination** on page 24 of the Report, it is stated

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#### Quality

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On page 11 of the Report in the part **I. Internal quality assurance and the social role of the higher education institution**, it is stated

*"Although the School has adopted all required formal documents, appointed the Quality Assurance Committee and established the Office for Quality Assurance, satisfactory level of quality is not met."*

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In the part Recommendations for improvement of area **I. Internal quality assurance and the social role of the higher education institution** on page 12 of the Report, it is stated

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## **9. NON-EXISTENT STUDY PROGRAM-DENTAL MEDICINE IN ENGLISH**

**The Report:**

On page 13. of the Report under II. **Study programmes** the Expert Panel states

*“Surveys are an important source of information, but students, professional organizations and employers are not always quite well informed about the activities that include procedures of planning, proposing, and approving new programmes or revising/closing the existing ones, as well as about the results of surveys.”*

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**Remark:**

The non-existent study program of Dental Medicine in English is often mentioned in the Report of the Expert Panel, especially under the area I. and II. On page 21 of the Report, under the standard 1.2. *The higher education institution implements recommendations for quality improvement from previous evaluations* additionally it is stated

*“However, from the Action Plans for 2022 and 2023, discussions with the Management Board and data on the appointed Working groups for the preparation of the Study programme of Pharmacy and Dental Medicine in English, the Expert Panel learned that there are plans for the introduction of two new study programmes, Pharmacy in English and Dental Medicine in English, which will lead to a significant increase in the number of students at the School”.*

It is true that the plan for launching the mentioned study programme exists in some future projection, however, it is only in the initial phase and the Working Groups have only just been appointed, as explained to the members of the Expert Panel at the meetings. Of course, the plan is to conduct a detailed feasibility study and SWOT analysis before introducing new study programs and initiating their accreditation, as pointed out to the members of the Expert Panel. Member of the Expert Panel has repeatedly debated the justification for launching the Dental Medicine in English at numerous meetings with various stakeholders, despite the clarification that the Working Groups have just been appointed and that decisions on the potential launch of the study programs will be made in the future in accordance with the [Regulations on the procedure for Adopting, Improving and Evaluating the Study Programs of the School of Medicine in Split](#). The principles of developing and adopting a new study program are clearly outlined in the regulations in Article 3, which include

- Paragraph d. compliance with national priorities and and healthcare sector needs;

- Paragraph e. grounding in needs analysis and through consultation with stakeholders in higher education;

and that the SWOT analysis and feasibility study are yet to be conducted. From the Report of the Expert Panel itself, it is clear at what stage the preparations of the new study programs are

*„...the Expert Panel learned that there are plans for the introduction of two new study programmes...”.*

Therefore, the nonexistent study program was unjustly used to grade the standard as the minimum level of quality. Furthermore, the very fact that the Expert Panel points out in the summary on the page 14 of the Report under *II. Study programmes*, recommendations for improvement

*“In the case of the introduction of new study programmes (e.g., Dental medicine in English which is put as a priority in Action Plan for 2022/23), perform a high-quality SWOT analysis and consultations with professional stakeholders (Chambers) prior to the decision”*

implies that the evaluation of this topic and the standards within the topic was **unfairly evaluated through a non-existent study program.**

Furthermore, despite the fact that the members of the Management repeatedly emphasized that the launch of Dental Medicine studies in English is **still in its early stages (with only a Working Group appointed)**, the Expert Panel uses this issue to justify inaccurate statements in other standards through the Report. Thus, the non-existent study Dental Medicine in English is also used to justify the grade minimum quality of standard 2.4. *The HEI uses feedback from students, employers, professional organisations and alumni in the procedures of planning, proposing and approving new programmes, and revising or closing the existing programmes* where it is stated

*“The stated priority in the Action Plan for 2022/2023 was preparing a new study programme of Dental Medicine in English, and launching it. External stakeholders and professional organization are not sufficiently involved. There is a possibility of a wrong assessment of the study programme's needs, given the already existing lacking of full-time teaching employees”.*

Also, through recommendations for improving standards 2.4. *The HEI uses feedback from students, employers, professional organisations and alumni in the procedures of planning, proposing and approving new programmes, and revising or closing the existing programmes* on page 30 of the Report it is stated

*„Define specific procedures and criteria for proposing new, revising or cancelling existing study programmes as soon as possible“*

while in the Self-evaluation report under the standard 2.4. The HEI uses feedback from students, employers, professional organisations and alumni in the procedures of planning, proposing and approving new programmes, and revising or closing the existing programmes on page 40 in the first section clearly stated

**„All changes in the study programs at the School since the last re-accreditation in 2015 were carried out in cooperation with course leaders and students, and with taking into account the labor market needs. Changes and amendments to individual study programs were carried out in accordance with the [Regulations on the procedure for Adopting, Improving and Evaluating the Study Programs of the School of Medicine in Split](#)“.**

We emphasize that the [Regulations on the procedure for Adopting, Improving and Evaluating the Study Programs of the School of Medicine in Split](#) were made available to the members of the Expert Panel. The insistence, persistence and fixation on the non-existent study program were clearly evident even during the meeting with the heads of scientific research projects. At that meeting, the member of the Expert Panel posed the only question to those present about their opinion on the need to establish the Dental Medicine study program in English.

We emphasize here in particular how the Medicine and Pharmacy study program have been aligned with market needs through complex projects of harmonizing qualification frameworks and setting occupational standards involving external stakeholders. However, the aforementioned was overlooked in the assessment of standard 2.4. while on the page 9 under item 2. The advantages of higher education and in the Summary of the Report at page 69, it is clearly stated

*“Study programmes of Medicine and Pharmacy aligned with the Croatian Qualification Framework”,*

and

*“In addition to the study programmes of Medicine and Pharmacy being aligned with the Croatian Qualification Framework, there are several positive aspects that were seen since the last accreditation in 2015. These include:...”*

Similarly, this is mentioned under the Advantages of the Higher Education Institution on page 9 of the Report. In the Methodology for creating occupational standards and sets of competences, it is clearly described "Following the above, competencies and key tasks need

to be defined in collaboration with employers as the main stakeholders in the labor market." Furthermore, it states, "The composition of the expert group should include individuals familiar with the activities and requirements of developing occupational standards and who can provide the best information about the occupation or group of occupations, as well as the key tasks performed by the occupation and the key knowledge, skills, and competencies required to perform these tasks. Among them, there should be: (a) workers in the occupation, primarily experienced workers in the occupation; (b) employers, primarily employers from the sector in which the occupation is predominantly employed or representatives of those employers who have a good understanding of the tasks performed by the worker in the occupation, (...); (c) representatives of professional chambers or associations." and for example "The next task in this step is to conduct guided surveys and structured interviews with employers and employees. They are conducted by trained, informed, and well-prepared leaders and assistants. It is suggested that guided surveys and structured interviews be conducted separately at this stage" (p. 7, p. 61, and p. 78).

**It is evident that employers, alumni, and professional associations were involved in shaping the qualification and occupation standards according to which the majority of integrated undergraduate and graduate programs conducted at the Faculty of were are harmonized.** We emphasize that the Self-evaluation report on page 17 states

„The employer surveys include employers who have employed people with qualifications obtained at the School, managers of professional practice, that is, persons who are with employers who represent the teaching units of the School, in charge of monitoring students. For this purpose, a survey is being carried out, the aim of which is to determine the satisfaction of employers regarding the competences for performing the key tasks of graduated students, which they need for independent work. Periodic internal evaluation of study programs is part of the internal system for ensuring and improving the quality of education.“

**which was unjustifiably overlooked in the writing of the Report.**

Furthermore, Strategy of the School of Medicine in Split for the period 2021-2027 contains

4.1.1. Ensuring high-quality and efficient education based on learning outcomes

- objective 6 "Involvement of employers' representatives in the teaching process through continuous implementation (p. 14),

and under 4.1.2. Encouraging excellence in students, student activities, work of student associations and support for student life and standards

- objective 2. "Improve the system of student involvement in working bodies for the evaluation of study programs and educational process" (p. 15),

and under 4.1.3. Modernization of existing study programs

- "Harmonizing the learning outcomes of study programs with the current Croatian qualification framework" as the 1st goal (p. 16)
- "Defining the needs for integrated undergraduate and graduate studies in accordance with the expected needs of the labor market or systematically determining the enrollment quota" as the 8th goal (p. 17)

in area 4.1. Teaching activities that are carried out as feedback from external stakeholders and former students in cooperation with the Alumni Association.

Further, in [The Strategy](#) as

objective 4 under 4.3.4. Strengthening the School's public role in area 4.3. Organization and business operations, infrastructure development and quality assurance system it is stated

- "Including external stakeholders in bodies for the evaluation of study programs and the educational processes" (p. 28).

[The Strategy](#) is reflected in Action Plans and Reports on their implementation, so we can emphasize that in the Report on the Implementation of the Action Plan for 2022 in

Teaching activities under the **continuous priority of the Faculty of Inclusion of employers' representatives in the teaching process** stated

- "From student to entrepreneur - How to have a successful career in HealthTech" and connecting USSM with the NetHub entrepreneurial accelerator in healthcare 10 students actively participated in the work of startup teams and presented entrepreneurial ideas in cooperation with others; Students had the opportunity to meet the founder Ena Melvan, winner of the second generation of the StartIT Academy organized by the ICT County, and her startup Metabelly" (p. 3).

Furthermore, the **realization of objective 4 Including external stakeholders in the bodies for the evaluation of study programs and the educational processes** in Strengthening the public function of the Faculty, as

- Conducted cooperation with employees and employers in healthcare and pharmacy during the enhancement of study programs Medicine, Medical Studies in English and Pharmacy in accordance with the Croatian qualification framework (p. 17).

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**Highlighted citation of the Report**

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On page 14 of the Report under **II. Study programmes**, recommendations for improvements the Expert Panel states

*"Precisely determine the procedures for proposing a new study programme, revision and cancellation of existing programmes."*

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The recommendation of the Expert Panel does not stand considering that the procedure for proposing, revising and discontinuing study programs has already been defined in the [Regulations on the procedure for Adopting, Improving and Evaluating the Study Programs of the School of Medicine in Split](#) (outlined in the Self-evaluation report under standard 2.4.).

Further, we explain here that statements on page 13 under *II. Study programs*, Analysis *"The university carries out various procedures for evaluating the quality of teaching and checking the achievement of learning outcomes...Surveys are an important source of information, but students, professional organizations and employers are not always well informed about activities that include procedures for planning, proposing and adopting new or revising/cancelling existing study programs, as well as the results of polls".*

do not stand because in accordance with the Article 5 of the [Regulations on the procedure for the adoption, improvement and evaluation of the School's study programs](#) it is emphasised

*"(3) The program committee of the study program, appointed by the Faculty Council at the proposal of the Dean's Board, prepares a report on the study program according to the prescribed form of the Agency for Science and Higher Education, which contains a feasibility study of the study program, in accordance with the network's strategic document. (4) The Program Committee consists of faculty members from the scientific field of the study program being developed and who will participate in its implementation, employers, students, and in the developmental and consultative process, alumni, scientists, researchers, experts, social partners, and other stakeholders in higher education are involved".*

Moreover in [Strategy of the School of Medicine in Split for the period 2021-2027](#) the strategic objective 4.3.1. Reaching the highest level of quality, organization and responsibility through strategic management in the strategic area of Organization and operation, infrastructure

development and the quality assurance system is elaborated in detail. Among its specific objectives, the following is outlined

- 9. Defined procedures and procedures for surveying, providing feedback on survey results, follow-up and other forms of communication with students and other stakeholders.

<b>The Report:</b>	<b>Related statements that need to be revised:</b>
On page 14 of the Report under <b>II.</b>  <b>Study programmes</b> , recommendations for improvement the Expert panel states	<i>“Precisely determine the procedures for proposing a new study programme, revision and cancellation of existing programmes.”</i>
On page 14 of the Report under <b>II.</b>  <b>Study programmes</b> , recommendations for improvement the Expert panel states	<i>“In the case of the introduction of new study programmes (e.g., Dental medicine in English which is put as a priority in Action Plan for 2022/23), perform a high-quality SWOT analysis and consultations with professional stakeholders (Chambers) prior to the decision.”</i>
On page 21 of the Report, under <b>standard 1.2. The higher education institution implements recommendations for quality improvement from previous evaluations</b> additionally it is stated	<i>“However, from the Action Plans for 2022 and 2023, discussions with the Management Board and data on the appointed Working groups for the preparation of the Study programme of Pharmacy and Dental Medicine in English, the Expert Panel learned that there are plans for the introduction of two new study programmes, Pharmacy in English and Dental Medicine in English which will lead to a significant increase in the number of students at the School.”</i>
On page 30 of the Report under <b>standard 2.4. The HEI uses feedback from students, employers, professional organisations and alumni in the procedures of planning, proposing and approving new programmes, and revising or closing the existing programmes</b> it is stated	<i>“Numerous surveys are used to collect data on the quality of existing programmes, but there is no evidence that there is involvement of students and external stakeholders (employees, professional organizations, and alumni) in the steps after analysing the results, as well as in procedures of planning, proposing and approving new programmes, or revising/closing existing programmes. (...) The stated priority in the Action Plan</i>

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*for 2022/2023 was preparing a new study programme of Dental Medicine in English, and launching it. External stakeholders and professional organization are not sufficiently involved. There is a possibility of a wrong assessment of the study programme's needs, given the already existing lacking of full-time teaching employees."*

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On page 30 of the Report under Recomendations for improvement of standard **2.4. The HEI uses feedback from students, employers, professional organisations and alumni in the procedures of planning, proposing and approving new programmes, and revising or closing the existing programmes** it is stated

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*"Define specific procedures and criteria for proposing new, revising or cancelling existing study programmes as soon as possible; Include objective needs assessment methods in the case of introducing new programmes"*

## **10. ANALYSIS OF WORKLOAD**

**The Report:**

Under **II. Study programmes**, on page 10 of the Report Recomendations for improvement

**Quotation:**

*„Conduct a detailed analysis of the actual workload of students and teachers.”*

*Remark:*

The mentioned analysis, specifically the workload analysis, is conducted annually for faculty members, which can be tracked through the Strategic Goals, Action Plans, and Reports on Action Plans. For students, it is carried out periodically through surveys (evaluations), following the [Quality Assurance Handbook](#), as explained to the members of the Expert Panel. It is stated in the Self-evaluation report under standard 1.2. *The higher education institution implements recommendations for quality improvement from previous evaluations* on page 25

“Responsible planning of the personnel policy of school management includes regular meetings with the heads of departments who keep a record of the personnel needs of their department.”

and under standard 4.1. *The higher education institution ensures adequate teaching capacities* on page 72

“The head of each department is responsible for planning and monitoring the workload of their teachers. New employments must be justified with an increased teaching workload, and be aligned with the School’s strategic determinants.”

Every year in September, the Heads of Departments submit Tables of workload for professors and associates, as well as a proposal for the Advancement and Employment Plan of Faculty Members and Associates. These are discussed at regular annual meetings with the Chair of the Human Resources Committee and the Vice Dean for Teaching and Student Affairs, based on which the Proposal for the Annual Staff Employment Plan is prepared and presented for adoption at the Faculty Council. Additionally, the Faculty conducts an annual analysis of the total teaching workload of faculty members and associates, which serves as a basis for subsequent compensation for work that exceeds the standard teaching load. Furthermore, evaluations are conducted through the [Teacher Evaluation Questionnaire](#) to assess various aspects of faculty life and work at the Faculty, including the conditions under which they operate, which also includes evaluating the distribution of working hours.

Furthermore, in accordance with the [Quality Assurance Handbook](#) under the standard of Quality assurance of faculty members and associates, administrative and support staff, learning resources (ESG 1.5., ESG 1.6.) the following are pointed out

- 4.4.3. Structuring job positions at the Faculty based on existing teaching workload according to approved study programs;
- 4.4.4. Monitor, record and analyze the workload of faculty members and associates for each academic year and the work of support services, administrative and support staff and
- 4.4.5. Develop an annual plan for the employment and advancement of faculty members and associates as well as administrative and support staff.

Here we will point out that [Strategy of the School of Medicine in Split for the period 2021-2027](#) contains under strategic goal 1. *Educational activities* specific objectives

- Maintain a favorable student-to-teacher ratio by the end of the period (p. 15, point 1. under 4.1.1. Ensuring high-quality and effective education based on learning outcomes)
- Optimization of the teaching workload of faculty members and associates; indicator: **Analysis of the teaching workload of faculty members and associates**; deadline: the end of the calendar year for the previous academic year (p. 15, point 2 under 4.1.1. Ensuring high-quality and effective education based on learning outcomes)
- Ensure continuous monitoring of student satisfaction, continuously (p. 14, point 5 under 4.1.1. Ensuring high-quality and effective education based on learning outcomes)

and specific objective is outlined under strategic goal 3. *Organization and business operations, infrastructure development and quality assurance system*

- Implement activities from the Quality Assurance Handbook for continuous implementation (p. 24, point 10 under 4.3.1. Reaching the highest level of quality, organization and responsibility through strategic management).

Furthermore, in the Action Plan for 2023 according to the [Strategy of the School of Medicine in Split for the period 2021-2027](#) (Appendix 1. 1. 5. of the Self-evaluation report) the tasks of the strategic area 1 Educational activities, 1. Work on the realization of staffing requirements in accordance with the plan for promotions to scientific-teaching positions is stated.

According to the Report on the implementation of the action plan for 2022 (Annex 1.1.4. of the Self-evaluation report), it is evident that under

- objective 1 in strategic area 1 enrollment quotas remained the same;
- objective 2 in the strategic area 1 analysis of the teaching workload of faculty members and associates for the previous academic year by the end of the calendar year is conducted
- objective 8 in strategic area 3 activities from the Handbook are continuously implemented.

Furthermore, according to [Quality Assurance Handbook](#), it is outlined under standard 4.3. Enrollment and advancement of students, student mobility, employability, provision of resources and support for students (ESG 1.4., ESG 1.3. ESG 1.6.) (p. 22), activity

- 4.3.13. Regularly conduct student evaluations of teaching, professors, and associates and submit reports to the Faculty Council on results and measures for improvement,

and under standard 4.4. Quality assurance of teaching, collaborative, administrative and support staff, learning resources (ESG 1.5, ESG 1.6) (p. 25) activity

- 4.4.4. Monitor, record and analyze the workload of faculty members and associates for each academic year, as well as the work of support services, administrative and support staff.

**Considering the above, we believe that the recommendation under area II. Study programs, on page 14 of the Report, Recommendations for improvement**

*“Conduct a detailed analysis of the actual workload of students and teachers.”*  
**is continuously implemented.**

*Evidence:*

- D4
- D9
- D10
- D12
- D30
- D31

## **11. RESPONSE RATE OF STUDENTS TO EVALUATIONS**

<b>The Report:</b>	<b>Quotation:</b>
Through recommendations for improvement under <b>III. Teaching process and student support</b> on the page 15 of the Report it is stated	<i>“Increase turnout on questionnaires about satisfaction and student suggestions.”</i>

*Remark:*

Evaluations are voluntary and anonymous and excessive incentive measures can lead to biased results and should not be resorted to except as a last resort. Also, we point out that according to the statements of the Expert Panel

*“At the end of the semester and the study year, many surveys and questionnaires about satisfaction with teaching, learning processes and teachers are available to students. As mentioned earlier however, the turnout for surveys and questionnaires dropped significantly”*

give the impression that there is a low response rate from students to all evaluations, that is, that the Expert Panel misinterpreted that the response rates during the entire period covered by the reaccreditation procedure and for all evaluations conducted by the Faculty were low. Namely, a low response was recorded only on the Student Evaluation Survey on Teaching and the Survey for student evaluation of the work of professional and administrative services and other aspects of student life, while for other evaluations it remained at 50 to 70% (whereas, for example, it was 100% for Survey on Student Evaluation of Professional Practice (clinical rotations)).

The low response rate from students in these evaluations is present across all faculties of the University of Split. was presented with average grades from the pre-online evaluation era (introduction of online evaluations decreased the response rate) and it was pointed out that the overall average grades did not change despite the low response rate from students. Efforts to increase student response rates are summarized in the [Reports of the Committee for Quality Improvement's work](#), as can be inferred, for example, from [the Report of the Committee for the academic year 2020/2021](#)

"The results of the survey for the evaluation of the entire level of study were reported at the regular session of the FC in November of 2020, and the results of the Survey for student evaluation of the work of professional and administrative services and other aspects of student life were reported at the regular session of the FC in October 2021. The response rate to surveys

conducted electronically was significantly lower, and we are not satisfied with the current situation. We plan to improve the response rate by talking to and motivating students, and collaborate with the Student Council to find a solution. In the future, we will continue to strive for greater student participation in all surveys".

Furthermore, in the minutes of Committee for Quality Improvement discussions and proposals based on evaluations are evident. In view of the repeated low response of students to the evaluation of teaching work, the Committee for Quality Improvement introduced the measure of SMS reminders on evaluations for student representatives, which was also presented to members of the Faculty Council, and if necessary, the measure will be extended to professors and associates as described on the [link](#). All measures introduced in order to increase the response to evaluations are contained in the minutes of the regular sessions of the Faculty Council.

The Faculty recognizes the need to implement measures aimed at increasing the response rate for evaluations and welcomes any concrete proposal from the Expert Panel that would be recognized as a constructive and well-intentioned criticism and suggestion, however the Expert Panel's recommendations remain general.

*Evidence:*

- **D34**
- **D41**
- **D42**
- 

**The Report:**

**Related statements that need to be revised:**

On the page 35 of the report under <b>3.2. The higher education institution gathers and analyses information on student progress and uses it to ensure the continuity and completion of study</b> it is stated	<i>"As the policy of the University is that solving surveys and questionnaires is optional, the Faculty does not have adequate means of motivating students to solve the mentioned questionnaires and surveys."</i>
On the page 36 of the Report under <b>3.3. The higher education institution ensured student-centered learning</b> it is stated	<i>"At the end of the semester and the study year, many surveys and questionnaires about satisfaction with teaching, learning processes and teachers are available to students. As mentioned earlier however, the turnout</i>

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*for surveys and questionnaires dropped significantly. Evidence of the adoption of student proposals and appeals is not available, and from the conversations with the teaching staff, the Expert Panel learned that student proposals are adopted within the framework of legal and other possibilities of the Faculty.”\**

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\*partly also clarified in 16. Complaints

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## 12. COMPATIBILITY OF ECTS POINTS

The Report:	Quotation:
On the page 15 under <b>Analysis III.</b>	<i>“...the School should strive to harmonize the ECTS credit system with the institutions with which they have signed contracts on international cooperation.”</i>
<b>Teaching process and student support</b> , it is stated	

*Remark:*

On the page 15 under *Analysis III. Teaching process and student support*, it is stated  
*“...the School should strive to harmonize the ECTS credit system with the institutions with which they have signed contracts on international cooperation”*

and the page 15 of the Report under Recommendations for improvement

*“Harmonize of the ECTS credit system with international institutions to facilitate student mobility”*

Further on page 41 of the Report under Recommendations for improvement of the standard  
*3.6. The higher education institution allows students to gain international experience* it is stated

*“Harmonize the ECTS credit system with other institutions in Europe to ensure opportunities for gaining international academic experience that will be recognised in Croatia without the need of taking additional exams”*,

and on the page 31 of the Report under Recommendations for improvement of the standard

*2.5. The higher education institution ensures that ECTS allocation is adequate*

*“It is necessary to analyse thoroughly the workload in the study programmes; School of Medicine should adjust either the contents of courses or the ECTS credits to the real situation”.*

Respecting the general idea of the Expert Panel to facilitate student mobility, we consider the proposal unfounded because it is inapplicable and unenforceable considering the diversity of universities with which the University of Split School of Medicine cooperates, as well as other higher education institutions in Europe and the world. Furthermore, as was explained to the members of the Expert Panel, we will point out here once again that **the ECTS credit system has been completely revised and changed at the level of the Republic of Croatia as part of changes in the study programs**. For example, the alignment of some study programs with the Croatian Qualifications Framework, as mentioned earlier, has been recognized by the Expert Committee in certain parts of the Report. We emphasize, as the Expert Panel also recognized under standard *3.6. The higher education institution allows students to gain international experience* on page 41 of the Report

*“The ECTS credit system is harmonized at the level of the Republic of Croatia.”*

and on page 9 under 2. Advantages of the institution and in the summary of the Report on page 68 as it clearly states

*“Study programmes of Medicine and Pharmacy aligned with the Croatian Qualification Framework”,*

and

*“In addition to the study programmes of Medicine and Pharmacy being aligned with the Croatian Qualification Framework, there are several positive aspects that were seen since the last accreditation in 2015. These include:...”*

The statement under the standard 3.6. *The higher education institution allows students to gain international experience* on page 40 of the Report

*“Evidence of mobility in the form of recognition of ECTS credits acquired abroad was not part of the presented documentation.”*

**is incorrect.** Evidence concerning mobility in the form of recognition of ECTS credits acquired abroad was presented by the Faculty Management to the Expert Panel.

Regarding the statements of the Expert Panel under Analysis of standard 2.5. *The higher education institution ensures that ECTS allocation is adequate* on page 31 of the Report

*“The student workload is not always realistically estimated, and such corrections must be made. Examples of correction of ECTS points considering survey results were not documented in writing. Verbal communication with the student is carried out more often than according to the written procedure. The procedure for problem solving is not clear and regulated. ECTS credits are not always awarded in accordance with the objective workload. Students are not informed about the results of the analyses.”*

we would like to point out that examples of changes in the number of ECTS points based on evaluation results have been documented, and the results of these evaluations were presented at the previously mentioned Study-Years Councils, as well as the Committee for Quality Improvement and the Teaching Committee.

Regarding the statement

*“Verbal communication with the student is carried out more often than according to the written procedure.”*

we emphasize openness towards students as an advantage and that all communication takes place in accordance with the Quality Assurance Handbook. **Equally, the evaluation of the Expert Panel about more frequent communication through informal (verbal) means**

**compared to formal ones is not based on exact scientifically based evidence, but is a reflection of the subjective perception of the evaluator.**

In addition, we will point out that the analysis of student workload is done through several planned evaluations, as can be seen, for example, through the 1st task of the strategic area 3 Study programs of the Action Plan for 2023 according to the [Strategy of the School of Medicine in Split for the period 2021-2027](#). To conduct an analysis of student and teacher satisfaction at the end of the academic year after harmonizing the learning outcomes of the study programs with the current Croatian qualification framework.

The [Strategy](#) emphasizes Ensure continuous monitoring of student satisfaction as the fifth objective of 4.1.1. Ensuring high-quality and effective education based on learning outcomes. In the Report on the implementation of the action plan for the year 2022, under the 1st strategic area, Teaching activity and the 3rd strategic objective, Modernization of existing study programs, the objective Harmonizing the learning outcomes of study programs with the current Croatian qualification framework is outlined. Furthermore, on page 12 in the strategic area Organization and business operations, infrastructure development and quality assurance system under strategic objective 1 Achieving the highest level of quality, organization and responsibility through strategic management and objective 7 Defined procedures and procedures for surveys, providing feedback on survey results, follow-up and other forms of communication with students and other stakeholders, where it is clearly visible under the implementation that surveys are successfully conducted, and the results of the same are adequately presented to the relevant stakeholders. Mentioned is in accordance with the [Quality Assurance Handbook](#), where under standard 4.3. Enrollment and advancement of students, mobility of students, employability, provision of resources and support to students (ESG 1.4., ESG 1.3. ESG 1.6.) (p. 22), there is stated activity 4.3.13. Regularly conduct Student evaluation Survey on Teaching and submit reports to the Faculty Council on results and suggest recommendations for improvement. [Quality Assurance Handbook](#) also describes 6.3.5. The procedure for periodic internal evaluation of study programs and 6.3.10. Overall student evaluation of studies.

*Evidence:*

- **D7**
- **D31**
- **D40**
- **D42**

The Report:	Related statements that need to be revised:
On page 15 of the Report under Reccommendations for improvements it is stated	<i>"Harmonize of the ECTS credit system with international institutions to facilitate student mobility."</i>
On page 31 under Analysis of standard <b>2.5. The higher education institution ensures that ECTS allocation is adequate</b> it is stated	<i>"The student workload is not always realistically estimated, and such corrections must be made. Examples of correction of ECTS points considering survey results were not documented in writing. Verbal communication with the student is carried out more often than according to the written procedure. The procedure for problem solving is not clear and regulated. ECTS credits are not always awarded in accordance with the objective workload. Students are not informed about the results of the analyses."</i>
On page 31 of the Report under Reccommendations for improvement of standard <b>2.5. The higher education institution ensures that ECTS allocation is adequate</b> it is stated	<i>"It is necessary to analyse thoroughly the workload in the study programmes; School of Medicine should adjust either the contents of courses or the ECTS credits to the real situation."</i>
Furthermore, under standard <b>3.6. The higher education institution allows students to gain international experience</b> on page 40 of the Report it is stated	<i>"The ECTS credit system is harmonized at the level of the Republic of Croatia. Evidence of mobility in the form of recognition of ECTS credits acquired abroad was not part of the presented documentation."</i>
On page 40 of the Report under Reccommendations for improvement of standard <b>3.6. The higher education institution allows students to gain international experience</b> it is stated	<i>"Harmonize the ECTS credit system with other institutions in Europe to ensure opportunities for gaining international academic experience that will be recognised in Croatia without the need of taking additional exams."</i>

### 13. NUMBER OF ADMINISTRATIVE STAFF MEMBERS

The Report:	Quotation:
On page 19 under <b>1.1. The higher education institution has established a functional internal quality assurance system</b> it is stated	<i>"The School employs 43 administrative staff, which seems a lot compared to the 222 employees involved in the teaching process and research. We recommend conducting an analysis of the internal organization of the School and reducing the number of departments, since some of them conduct classes in a very small number of courses, with the goal of reducing the administrative burden on teaching and non-teaching staff."</i>

*Remark:*

The members of the Expert Panel, in making this observation, failed to take into account the large number of external collaborators (a total of 534 external collaborators) engaged in the teaching process, as well as the number of students (a total of 1358 students) and scientific research projects (a total of 87 projects), as stated in the Self-evaluation report and Analytic supplement. Furthermore, the number of departments does not in any way affect the administrative workload of non-teaching staff because they are not directly involved in the work of the Departments. Additionally, the number of Departments minimally affects the administrative workload of teachers. It is unclear from what basis the Expert Panel concluded that the figure of 43 administrative employees is too high considering the number of employees, students and study programs. **The number of administrative staff at the USSM is comparable, and often even lower, compared to other universities that have a similar number of scientific-teaching staff, students and study programs.** It is important to emphasize that from 2011 until the writing of this Response, the USSM did not receive new coefficients for the employment of administrative staff. In order to ensure uninterrupted work, the Faculty was forced to employ 26 administrative staff using its own funds, therefore we cannot agree with the statement of the Expert Panel. All employees are employed in accordance with the [Ordinance on internal organization and organization of workplaces](#), the so-called systematization. The creation of it was preceded by a detailed analysis of all processes and workloads, which implied there is a further need for an additional increase in the number of administrative employees, but due to financial restrictions and restrictions imposed by the competent Ministry, it is currently not possible to realise the employment of new staff. Additionally, we emphasize that at the meetings of the Management with the Expert Panel, it was clarified that the number of administrative employees will not increase with the

establishment of new research and teaching departments. Namely, the research and teaching departments of the University of Split School of Medicine do not have assigned administrative staff. For easier understanding, we will summarize the structure of the employed administrative staff in tabular form (Table 3).

**Table 3.** Number of employed administrative staff at the University of Split School of Medicine by service/function

DEPARTMENT/FUNCTION	No. of employees
Department of legal affairs	1
Department of personnel affairs	2
Procurement department	2
Department of general affairs	6
Department of financial and accounting affairs	6
Department of information and communication technologies	3
Department of technical affairs	2
Department for integrated studies in English	2
<b>Department for science, postgraduate studies and international cooperation, manager</b>	1
• Research Office	1
• Office for international affairs	1
• Office for lifelong education and professional practice	1
• Office for postgraduate studies	2
<b>Department for integrated studies and students, manager</b>	1
• Office for the study of Medicine	3
• Office for the study of Dental Medicine	1
• Office for the study of Pharmacy	1
• Teaching Office	2
<b>Deanery</b>	
• Dean's secretary	1
• Secretary of the School	1
Central Medical Library	2
Office for Quality Assurance	1

*Evidence:*

- **D34**

<b>The Report:</b>	<b>Related statements that need to be revised:</b>
Furthermore, through recommendations for improvement on the page 20 it is stated	<i>“Simplify the internal structure of the school by merging some departments, with the aim of reducing the administrative burden on teaching and non-teaching staff.”</i>

## 14. CRITERIA FOR ADVANCEMENT

The Report:	Quotation:
On page 22 of the Report under standard <b>1.2. The higher education institution implements recommendations for quality improvement from previous evaluations</b> the Expert Panel takes a position	<i>"The School has revised the Ordinance on the conditions and procedure of appointments to ranks in 2019 and introduced into the Ordinance as additional conditions publishing scientific papers in journals with impact factors (JCR) &gt; 1.0 or in journals classified in Q1/Q2 (WoS). However, we believe that the quality criteria are quite modest and it would be advisable to set stronger criteria."</i>

*Remark:*

**We believe that the stance of the Expert Panel is not justified.** Moreover, a large portion of comparable higher education institutions do not have prescribed mandatory additional conditions, which are publicly available and verifiable, and apply the minimum conditions for advancement to a higher title/position prescribed by the Rectors' Council. The additional conditions prescribed by the University of Split School of Medicine are contained in the [Ordinance on Procedure for Appointment to Positions at the School of Medicine in Split](#). **It is evident in the Ordinance that the outlined requirement stated by the Expert Panel is not the only one.** Additional conditions for the advancement of the University of Split School of Medicine are comparable to other biomedical-oriented faculties in the Republic of Croatia (Table 4).

**Table 4.** Additional requirements of the Faculty for advancement in scientific and teaching positions at the University of Split School of Medicine (excerpt from the [Ordinance on Procedure for Appointment to Positions at the School of Medicine in Split](#))

Assistant professor

- (1) *that in the period of five years prior to the date of initiating the advancement process, the applicant participated in teaching at a higher education institution in the total scope of at least 90 standard hours*
- (2) *additional research papers in WoS according to Journal Citation Report (JCR):*
  - a) *two papers published in journals that are represented in Q1 or Q2*  
*or*
  - b) *1 paper in Q1 as the first author*  
*or*
  - c) *two papers as the first author in journals that have a response factor (JCR) greater than 1.0*
- (3) *completed medical education skills course (for the first election)*

(4) one of the following two conditions must be met:

- a) participation in classes from at least one subject of postgraduate studies or a postgraduate course of permanent medical education of the first category or
- b) supervisor of at least two diploma theses

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Associate professor

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(1) two papers in journals with an impact factor (JCR) greater than 1.0, which were published after the previous election to the scientific-teaching position

(2) it is necessary to fulfill at least four (4) of the following eight (8) additional conditions:

- a) participating in the teaching of the optional subject,
- b) participating in the teaching of the post-graduate course of permanent medical education of the first category,
- c) participating in teaching at postgraduate studies,
- d) that the applicant is the head and/or co-head of the subject at the postgraduate study,
- e) that the applicant is the head and/or co-head of the permanent medical education course I. or II. categories,
- f) that a dissertation or Master of Science was defended under his/her mentorship,
- g) active participation in the realization of scientific projects,
- h) mentorship of a total of 5 graduate theses

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Full professor

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(1) two papers in journals that have a impact factor (JCR) greater than 1.0 that were published after the previous election to the scientific-teaching position

(2) leadership or co-leadership of courses at doctoral programs or leadership or co-leadership of postgraduate courses of permanent education in health of the first category

(3) management or collaboration on a scientific research project or management of a professional project, which is financed by funds outside the University of Split School of Medicine or the teaching bases of the Faculty

(4) mentoring the defense of a doctoral dissertation or co-mentoring two defended doctoral dissertations

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Reelection

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(1) publish at least three papers published in journals that are represented in the bibliographic database Web of Science, published after the last election

(2) be the mentor of at least one graduate thesis after the last election

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Full professor (permanent position)

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(1) one article in Q1 according to Journal Citation Reports (hereinafter: JCR) in which the applicant is the first, main or corresponding author or

(2) two articles in Q2 per JCR in which the applicant is the first, main or corresponding author

or

- (3) *the applicant is the first, main or corresponding author in one review article from his field, IF > 1.0 according to JCR*  
or
- (4) *the applicant is a mentor for four dissertations*  
or
- (5) *the applicant has more than 1000 citations*

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Moreover, on page 45 of the Report in the part Analysis of the standard 4.2. Teacher recruitment, advancement and re-appointment is based on objective and transparent procedures which include the evaluation of excellence, **The Expert Panel states the opposite position compared to the previously noted one**

*“There are objective and transparent procedures, which the School has put in place to ensure to ensure the selection of excellent teachers. When appointing and evaluating teachers as potential faculty members, the School considers their previous activities (e.g. basic qualifications and/or pedagogical expertise, teaching experience, research activity including publications record and funding acquired, evaluation from students, etc.). The School has comprehensive methods for the selection of the best candidates for each position and, in addition to the prescribed national minimum conditions for each position, it has prescribed competitive criteria ensuring the selection of excellent candidates”.*

<b>The Report:</b>	<b>Related statements that need to be revised:</b>
On page 23 of the Report in the part Recommendations for improvement of standard 1.2. The higher education institution recommendations for improvement from evaluations it is stated	<i>“Revise the Ordinance on the conditions and procedure of appointments to ranks, in such a way as to tighten the criteria of scientific excellence and the quality conditions of published scientific papers.”</i>

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## 15. CHANGES TO THE STUDY OF DENTAL MEDICINE

The Report:	Quotation:
On page 30 under recommendations for improvement of the standard <b>2.3.</b> <b>The higher education institution provides evidence of the achievement of intended learning outcomes of the study programmes it delivers</b> it is incorrectly stated	<i>"Make major changes and additions to the study of Dental Medicine, especially as no changes have been made to the dental study programme from the beginning of the programme."</i>

### Remark:

It is clear from the Report itself that the claim on the page 29 of the Report under Recommendations for improving standard 2.3. ***The higher education institution provides evidence of the achievement of intended learning outcomes of the study programmes it delivers***

*"Make major changes and additions to the study of Dental Medicine, especially as no changes have been made to the dental study programme from the beginning of the programme"*

**is incorrect. We request that the allegation about the absence of changes in the study of Dental Medicine be revised in the Report.** As proof, we point to the conflicting statements on page 27 of the Report under Analysis of Standard 2.1. *The general objectives of all study programmes are in line with the mission and strategic goals of the higher education institution and the needs of the society*

*"Three programmes (Medicine, Medicine in English and Pharmacy) went through the process of both, lesser changes (a few times) and bigger changes (once), but Dental Medicine (from 2010) underwent **only through the lesser changes.**"*

and on page 31. Of the Report under standard 2.4. *The HEI uses feedback from students, employers, professional organisations and alumni in the procedures of planning, proposing and approving new programmes, and revising or closing the existing programmes where it is stated*

*"Changes and additions to the study programmes since the last reaccreditation in 2015 included four integrated university undergraduate and graduate study programmes, in the form of minor changes and one major change and addition each, except for Dental Medicine, **which had only minor changes and additions**".*

Furthermore, the members of the Expert Panel were provided with the Decision on the appointment of a working group for major changes in the study of Dental Medicine, from which it is evident that the University of Split School of Medicine recognizes the need for changes to the aforementioned study program.

Furthermore, for statements on page 30 of the Report under standard 2.4. *The HEI uses feedback from students, employers, professional organisations and alumni in the procedures of planning, proposing and approving new programmes, and revising or closing the existing programmes*

*“Numerous surveys are used to collect data on the quality of existing programmes, but there is no evidence that there is involvement of students and external stakeholders (employees, professional organizations, and alumni) in the steps after analysing the results, as well as in procedures of planning, proposing and approving new programmes, or revising/closing existing programmes.”*

we refer to the exact statement contained in the Report on page 9 under point 2. Advantages of the institution

*“Study programmes of Medicine and Pharmacy aligned with the Croatian Qualification Framework”*

as stated on page 39 of the Self-evaluation report

**“In order to further improve learning outcomes, the School of Medicine in Split participated in two EU projects to improve existing study programs within the framework of the Croatian Qualifications Framework with the aim of developing occupational and qualification standards and modernizing study programs based on learning outcomes and in accordance with the needs of the labor market, and in accordance with guidelines of the Croatian Qualifications Framework (Appendix 2.2.1.).”**

Regarding the statement under standard 2.2. *The intended learning outcomes at the level of study programmes delivered by the higher education institution are aligned with the level and profile of qualifications gained on p. 28.*

*“The School participated in two EU projects for the improvement of study programmes within the Croatian Qualification Framework, and the last major changes and additions were made in 2022 to the study programmes Medicine, Medicine in English and Pharmacy precisely with the intention of harmonizing*

*and improving the study programmes with qualification standards. Such major changes and additions were absent in the study of Dental Medicine.“*

**we emphasise that there was no qualification standard established for Dental Medicine, so no Dental Medicine study program in the Republic of Croatia can be harmonized accordingly. We request that the statements of the Expert Panel to be revised.**

Additionally, we point out that it is clear that a student member was appointed as part of the Working Group for the preparation of the Elaborate for the study of Dental Medicine in English and the Working Group for major changes in the Dental Medicine study, which was also provided to the members of the Expert Panel.

*Evidence:*

- D18
- D19
- D34

<b>The Report:</b>	<b>Related statements that need to be revised:</b>
On page 30 of the Report under the standard <b>2.4. The HEI uses feedback from students, employers, professional organisations and alumni in the procedures of planning, proposing and approving new programmes, and revising or closing the existing programmes</b> it is stated	<i>“Changes and additions to the study programmes since the last reaccreditation in 2015 included four integrated university undergraduate and graduate study programmes, in the form of minor changes and one major change and addition each, except for Dental Medicine, which had only minor changes and additions. Numerous surveys are used to collect data on the quality of existing programmes, but there is no evidence that there is involvement of students and external stakeholders (employees, professional organizations, and alumni) in the steps after analysing the results, as well as in procedures of planning, proposing and approving new programmes, or revising/closing existing programmes.”</i>

## 16. COMPLAINTS

The Report:	Quotation:
Under standard <b>3.8. The higher education institution ensures an objective and consistent evaluation and assessment of student achievements</b> in the Analysis section on page 41 the Expert Panel reports	<i>"The Panel did not see any written complaints about any of the received grades, and subsequently, written final decision, as well as reply to the complaint."</i>

### Remark:

In accordance with the planned activity 4.3.6. Carry out the procedures for appealing exam results (in accordance with the [Regulations on studies and the study system of the School](#)), which is outlined in the [Quality Assurance Handbook](#) on page 22 under standard 4.3. Enrollment and advancement of students, student mobility, employability, provision of resources and support for students (ESG 1.4., ESG 1.3. ESG 1.6.), **we emphasize that in the evaluated period there were NO written complaints from students regarding achieved grades, so they could not have been even presented to the members of the Expert Panel, as explained to them orally during the visit.** Pursuant to Article 32 of the [Regulations on studies and the study system of the School](#), a student who believes they have been unfairly graded on an exam may submit an objection complaint regarding the grade within 24 hours of the official notification of the grade. Pursuant to Article 33, a student who is dissatisfied with a passing grade on the exam, without questioning the correctness of the grade or the fairness of the teacher, has the right to request a retake of the exam in the next scheduled exam period verbally from the teacher or in writing by submission to the official address of the faculty within 48 hours of the official notification of the grade.

Part of the procedures is described on page 25 of the Self-evaluation report under standard 1.3. *The higher education institution supports academic integrity and freedom, prevents all types of unethical behaviour, intolerance and discrimination*, and here we additionally point out that the procedure for internal reporting of irregularities is defined in accordance with the special [Ordinance](#) and that the procedure for anonymous communication, i.e. submitting a complaint, is also defined and available on the [link](#).

It is not clear on what basis the statements of the Expert Panel under Standard Analysis 2.5. *The higher education institution ensures that ECTS allocation is adequate* no page 32 of the Report are made

*"The problem solving procedure is not clearly regulated".*

**We hereby request correction of this statement in the Report in such a way that it is unambiguous, to be clear that there were no such objections in the evaluated period.**

## **17. TEACHING CAPACITIES**

We believe that in concluding the grade of the standard 4.1. *The higher education institution ensures adequate teaching capacities not all efforts made by the Faculty to ensure adequate teaching staff capacities have been duly considered.*

It is worth noting that the USSM has made significant efforts to increase its teaching staff capacities by employing **18 assistants** using its own funds, as well as a larger number of professors, as evidenced in Table 4.2 of the Analytical supplement, **with 47 newly employed compared to 25 who retired during the evaluation period, indicating a trend of increased teaching staff despite all imposed restrictions.**

Despite all known difficulties and limitations in hiring within the higher education system during the evaluation period, **according to data from the Analytical supplement, the USSM meets the coverage of teaching across all study programs with more than 50% (ranging from 52 to 90%) of its own staff in scientific-teaching positions, thereby fulfilling the criteria for student-to-teacher ratio for all study programs.** In the academic year 2021/2022, the ratio between the total number of permanently employed teaching staff (including associate and academic positions) and the total number of enrolled students is **1:13.27**, confirming that there is a sufficient number of qualified teachers across all study programs (pages 71 and 72 of the Self-evaluation report).

In the Self-evaluation report it is stated

“In the previous re-accreditation cycle, it was concluded that there is an insufficient number of teachers employed with full and cumulative work time selected for research and teaching ranks at the study of Dental Medicine and Pharmacy. **For the purposes of teaching professional courses at the Dental Medicine and Pharmacy study, a large number of teachers with the research and teaching rank and the corresponding scientific field have been employed**, and thus the key conditions in the recommendations in the issued Letter of Expectations have been fulfilled. **The School complied with all the recommendations with the submitted action plans and changes (Appendix 1.2.3. and Appendix 1.2.4.), which resulted in obtaining a Certificate of Fulfillment of the Conditions for Performing Higher Education Activity related to the study of Pharmacy and Dental Medicine.**”

**(str 24.)**

The Faculty acknowledges that this recommendation has not been fully implemented due to the current ban on hiring in the higher education system. However, we would like to outline the following:

“Due to the lack of support from the relevant Ministry, the School has employed 18 young assistants in the last five years in order to relieve the teaching workload with the so-called School's own financial resources. Furthermore, the choice of titular research and teaching ranks is encouraged for young doctors who work in the teaching bases of the School and have obtained a PhD in science in order to facilitate the implementation of teaching for employees with research and teaching ranks and to reduce the teaching workload, which requires significant financial resources from the School to pay for the hours of teaching through external cooperation. Also, due to the extreme workload of the administrative staff, and the impossibility of obtaining consent and coefficients from the competent Ministry of Science and Education, the School has employed 26 administrative employees with own financial resources, in order to enable unhindered further work and development of the School.” (str. 25.)

**In the Report**, specifically on page 44, under the standard *4.1. The higher education institution ensures adequate teaching capacities the Expert Panel itself recognizes and acknowledges*

**“Currently, in Croatia the recruitment of new teachers is restricted. Similarly, resource allocation to the higher educational institutions to carry out their academic and research activities is not optimal... As outlined above, despite being overloaded with teaching, the teachers ensure appropriate distribution of teaching activities, conduct excellent scientific activities, are involved in professional and personal development and carry out administrative duties. To overcome shortages of full-time teaching staff, several part-time faculty members are now employed by the School to complement the workload of full-time faculty”**

however the standard is graded minimum level of quality.

We will emphasize here that despite limitations, the USSM has made significant efforts to increase its teaching staff and has employed 18 assistants using its own resources, as well as a larger number of professors, as evidenced in Table 4.2 of the Analytical supplement. There were 47 new hires compared to 25 who retired during the evaluation period, indicating a trend of increasing employed professors and associates despite all imposed restrictions.

*Evidence:*

- **D2**
- **D3**
- **D34**

## **18. CONCLUDING THE GRADE OF AREA I.**

### **The Report:**

On page 57 under Quality assessment summary - the following is read Quality level assessment by areas: Area: *I. Internal quality assurance and the social role of the higher education institution*: minimum level of quality (grade also stated on page 12 of the Report). On page 58 under Quality grade by standard: *I. Internal quality assurance and the social role of the higher education institution* the following information is provided:

1.1. *The higher education institution has established a functional internal quality assurance system* (key standard, marked in green) - minimum level of quality (grade also stated on page 21 of the Report)

1.2. *The higher education institution implements recommendations for quality improvement from previous evaluations* - minimum level of quality (grade also stated on page 24 of the Report)

1.3. *The higher education institution supports academic integrity and freedom, prevents all types of unethical behaviour, intolerance and discrimination* - satisfactory level of quality (grade also stated on page 25 of the Report)

1.4. *The higher education institution ensures the availability of information on important aspects of its activities (teaching, scientific/artistic and social)* - high level of quality (grade also stated on page 26 of the Report)

1.5. *The higher education institution understands and encourages the development of its social role* - satisfactory level of quality (grade also stated on page 27 of the Report)

1.6. *Lifelong learning programmes delivered by the higher education institution are aligned with the strategic goals and the mission of the higher education institution, and social needs* - satisfactory level of quality (grade also stated on page 28 of the Report)

### **Remark:**

Overall in *Area I. Internal quality assurance and the social role of the higher education institution* that the Expert Panel graded with minimum level of quality, one standard is graded with a high level of quality, three standards with a satisfactory level of quality, and two standards (including one crucial) with a minimum level of quality. **It is evident that the methodology for reaching the final grade of the theme from individual standard assessments was incorrectly applied.** Considering the remarks outlined in this Response to the Report, a revision of the assigned grades per standards and the correction of the final grade for Area I. is necessary.

*Evidence:*

- **D5**

## **19. PROPOSED CORRECTIONS**

Given that, in accordance with the Standards for the evaluation of quality of Universities and University constituents in the procedure of reaccreditation of Higher Education Institutions by the Agency for Science and Higher Education, it cannot be claimed that essential elements or evidence were missing in the assessment of individual areas and standards during the reaccreditation process of the University of Split School of Medicine, several corrections are proposed to rectify the deficiencies identified in the Report of the Expert Panel:

1. Considering the **evident shortcomings** of the Expert Panel in the assessment of standards 1.1. *The higher education institution has established a functional internal quality assurance system* and 1.2. *The higher education institution implements recommendations for quality improvement from previous evaluations* a **revision of the grades of these standards is requested, along with the correction of the grade of Area I.** Internal quality assurance and the social role of the higher education institution: minimum level of quality.
2. Overall under *Area I. Internal quality assurance and the social role of the higher education institution* evaluated by the Expert Commission as a minimum level of quality, one standard was rated as a high level of quality, three standards as a satisfactory level of quality, and two standards (one of which is key) as a minimum level of quality. We believe it is necessary to consider the remarks outlined in this Response to the Report and to conduct a review of the assigned grades per standard and adjust the final assessment of Area I. **We emphasized that such a method of concluding the grade of Area I. Internal quality assurance and the social role of the higher education institution is questionable.** Namely, an analysis of all previous evaluations of higher education institutions in the II. cycle has proved that this method of concluding the overall grade of Area I. based on the grades of individual standards is an **exception**.
3. It has been established that during the assessment of individual standards, the Expert Panel disregarded and completely ignored the methodology for the revision and adoption of new study programs for the Medicine, Medicine in English, and Pharmacy studies, which, as the Expert Panel acknowledges, are aligned with the Croatian Qualifications Framework. Furthermore, the Expert Panel based its assessment of several standards, namely 1.2. *The higher education institution implements recommendations for quality improvement from previous evaluations*, and 2.4. *Procedures for planning, proposing, and accepting new or revising or discontinuing existing programs, including feedback from students, employers, professional associations, and alumni*, on the non-existent study program Dental Medicine in

English, despite clarification from the Faculty's Management to a member of the Expert Panel, that this study is merely conceptually conceived and a SWOT analysis and feasibility study are yet to be conducted in accordance with the [Regulations on the procedure for Adopting, Improving and Evaluating the Study Programs of the School of Medicine in Split](#). **We insist on a review of the grades of these standards.**

4. **All recommendations** resulting from the assessment of the aforementioned standards under points 1. i 3. **need to be revised** in all parts of the Report where they are mentioned, as outlined in the Response.
5. **All other recommendations based on identified deficiencies, incorrect interpretations by the Expert Panel, and clearly established factual inaccuracies need to be revised in all sections of the Report where they are mentioned, as outlined in the Response.**

Considering that the Response can only relate to factual inaccuracies contained in the Report or obvious errors, given the number of identified inaccuracies under the assessment of individual standards and the analysis of previous evaluations, the conclusion regarding the grade of Area I is indeed unusual. Furthermore, considering the assessment from the previous accreditation cycle and the emphasises **impressive quality management**, as well as the elements outlined in the Standards for the evaluation of quality of Universities and University constituents in the procedure of reaccreditation of Higher Education Institutions by the Agency for Science and Higher Education, we believe that the grades of standards 1.1. and 1.2. do not correspond to the factual situation, as evidenced by the Self-evaluation report, attached evidence, and detailed explanation in the Response.

## **20. SUMMARY LIST OF EVIDENCE (Croatian only)**

D1 Analytical Supplement (Table 3.7.)

D2 Analytical Supplement (Table 4.2.)

D3 Analysis of Study Implementation Conditions

D4 Survey on Teaching Conditions

D5 AZVO, Procedure for Reaccreditation of Higher Education Institutions (Class: 602-04/18-04/0025; Ref. No.: 355-02-04-19-0004)

D6 Article Slobodna Dalmacija

D7 Proof of Mobility in the Form of ECTS Credit Recognition

D8 Formal Recorded Student Requests (Example)

D9 Annual Progress/Employment Plan (Example)

D10 Annual Workload and Departmental Plan (Example)

D11 Fulfillment of the Bavarian Higher Education Act by Establishing Authorization for Conducting Higher Education Programs and Administration of Higher Education Examinations in Bavaria, Confirmation by the German Ministry

D12 Excerpt from Summary Table of Teaching Workload

D13 Excerpt of New Admission Requirements - Form for Submission of Admission Requirements for MSE (SPU)

D14 Report on the Election of Presidents of Standing Committees for the 2023-2026 Mandate Period

D15 Notice to Higher Education Institutions regarding Article 44(2) of the Quality Assurance in Higher Education and Science Act

D16 Interview Form for Admission to MSE

D17 Decision on the Appointment of the Committee for Drafting the New Statute of the University of Split School of Medicine (Class: 003-08/23-04/0008; Ref. No.: 2181-198-02-01-23-0101)

D18 Decision on the Appointment of the Working Group for the Elaboration of the Dental Medicine Study Program in English (Class: 003-08/22-04/0005; Ref. No.: 2181-198-02-01-22-01-01)

D19 Decision on the Appointment of the Working Group for Major Changes to the Dental Medicine Study Program (Class: 030-02/22-02/0001; Ref. No.: 2181-198-01-01-22-0033)

D20 Decision on the Appointment of Working Groups for the Preparation of the Self-Assessment Document for Five Subgroups (Class: 003-08/22-04/00056; Ref. No.: 2181-198-01-08-22-0077) representatives of the Dental Medicine study program indicated in yellow

D21 Decision on the Appointment of the Working Group for Drafting the Student Copyright Regulations (Class: 003-05/23-03/0003; Ref. No.: 2181-198-01-08-23-0001)

D22 Decision on the Appointment of the Working Group for Drafting the Demonstrator Regulations (Class: 003-05/22-03/0001; Ref. No.: 2181-198-01-08-22-0208)

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D23 Decision on the Appointment of the Working Group for Drafting the International Mobility Regulations of the University of Split School of Medicine (Class: 003-05/22-03/0001; Ref. No.: 21818-198-01-08-22-0209)

D24 Decision on the Appointment of the Working Group for Drafting the Regulations on Professional Practice of Students in Integrated Undergraduate and Graduate Studies in Medicine, Medicine in English, and Dental Medicine (Class: 003-05/22-03/0001; Ref. No.: 2181-198-01-08-22-0207)

D25 Decision on the Appointment of the Working Group for Drafting the Regulations on Student Sections (Class: 0003-08/23-04/0008; Ref. No.: 2181-198-04-04-23-0244)

D26 Decisions on the Appointment of Committee Members and Boards for the 2023-2026 Mandate Period

D27 List of Structured Questions for MSE

D28 Procedure for Candidate Selection MSE

D29 Confirmation from the Ministry of Science and Education

D30 Appendix 1.1.4. Self-evaluation Report - Report on the Implementation of the Action Plan for 2022

D31 Appendix 1.1.5. Self-evaluation Report - Action Plan for 2023 according to the Development Strategy of the University of Split School of Medicine for the Period 2021-2027

D32 Appendix 3.10.1. Self-evaluation Report

D33 Examples of Changes after Student Evaluation (zip file)

D34 Self-Evaluation Report

D35 Evidence of Changes after Evaluation

D36 Screenshots MSE1 and MSE2 Enrolment

D37 Standards for Evaluating the Quality of Universities and University Constituents in the Reaccreditation Process of Higher Education Institutions by AZVO

D38 Structure of MEFST Teachers Participating in Teaching in Coburg

D39 Agreement between the University of Split, School of Medicine in Split, and Regiomed Kliniken

D40 Evaluation of ECTS Credits

D41 Minutes of Faculty Council Meetings

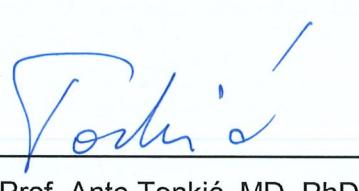
D42 Minutes of Quality Improvement Committee Meetings

D43 Minutes of Teaching Committee Meetings

D44 Minutes of Year Council Meetings

D45 Minutes of Meeting (Health Center)



  
Prof. Ante Tonkić, MD, PhD

The Dean of The University of Split School of Medicine