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**Introducing Problem Based Learning in Moldova:
Toward Enhancing Students (PBLMD)**

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Work Package 6

Commentary on the Framework Plan for Higher Education

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Executive summary

The purpose of this Commentary is to review and evaluate the Moldova Framework Plan for Higher Education (Framework) published on October 29, 2015 in the context of the commitment to University Autonomy expressed in the Moldova Education Code.

This Commentary has been written as part of the European Commission funded project 'Introducing Problem Based Learning in Moldova: Toward Enhancing Students' Competitiveness and Employability (PBLMD)'. The objective of the PBLMD project is, through the introduction of Problem Based Learning (PBL) in 6 new study programs, to improve the quality of learning and teaching, and relevance for the labour market and for disadvantaged groups.

This Commentary was commissioned because the PBLMD project teams have been obstructed in the realisation of their objectives by the restrictive nature of the Framework.

Although it could be argued that the Framework respects the right of the University to design the content of courses, the detailed, prescriptive, bureaucratic nature and content of the Framework, which governs the approval process, effectively constricts the University and acts as an impediment to change and innovation. The defined structure of the academic year in the Framework is potentially constraining, as is the requirement to hold formal examinations at the end of each semester. The Framework circumscribes and prescribes, in mechanistic ways, requirements for the Codification of course units/modules, which are inimical to innovative and changing curriculum development and new pedagogical approaches. The annual workload is stated to be 1800 hours over 30 weeks. In each 5 day week "*a total number of 25-30 hours of auditory contact*" is prescribed, which implies a further 30-35 hours of 'private' work, producing a weekly workload of 60 hours, which prima facie breaches the EU Working Hours Directive!

Overall, the Framework dictates the structure and organisation of programmes and reduces complex academic curriculum to a formulaic approach through indicating the percentage which it is expected will be devoted to each of the intersecting components. While this may be appropriate for Primary and Secondary education it suggests a lack of trust in the ability and the expert knowledge of the academic staff of the Universities to manage and quality assure curriculum planning and development. It undermines the commitment to university autonomy and reduces curriculum planning and development to a bureaucratic exercise in conformity. Above all it distracts from and fails to emphasise that the objective, as indicated in the EHEA QF and the EQF, needs to be outcome rather than input focused.

In practice strict adherence to the Framework will prevent the effective implementation of the outcomes of the PBLMD project. It is recommended that the six University Rectors who have signed commitments with the European Commission to implement the PBLMD project should join the PBLMD project management team in seeking ways to ensure that the project outcomes can be implemented. It may also be the case that the ERASMUS+ office in Moldova having received the Commentary and advice from the project team will wish to remind Rectors and the Ministry of their obligations under the terms of the project grant.

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1. Introduction

The objective of the PBLMD project is, through the introduction of Problem Based Learning (PBL) in 6 new study programs, to improve the quality of learning and teaching, and relevance for the labour market and for disadvantaged groups.

This Commentary was commissioned because the project teams have been obstructed in the realisation of their objectives by the restrictive nature of the Framework Plan for Higher Education published on October 29, 2015 (Annex 1) (henceforth the Framework).

The purpose of this Commentary is to review and evaluate the Framework in the context of the commitment to University Autonomy expressed in the Moldova Education Code. In identifying ways in which the Framework inhibits curriculum change and reform and from which the six programmes might be offered relaxation, it is designed to facilitate the implementation of the PBLMD project and enhance an understanding of University autonomy in practice in Moldova. This review focuses principally on those aspects of the Framework relating to the First Cycle.

When it recognised the incompatibility of aspects of the Framework with the project intended outcomes, the PBLMD project team approached the Ministry of Education, asking for a derogation from the Framework limited to and specifically for the six pilot study programmes that are to be redesigned to employ new methodologies, and forms of learning and teaching, to be implemented from September 2017 (Annex 2). The Ministry of Education declined the request referring back to the Framework suggesting that the Framework would allow the achievement of the project objectives (Annex 3).

The Framework has to be read in the context of the Education Code dated July 2014. The EUniAM, European Commission funded, project undertook a detailed review of the Code in 2015 and suggested that there appear to be anomalies, inconsistencies and ambiguities in the Code (Annex 4). The EUNIAM project, which was concerned with the reform and development of Higher Education in Moldova, considered how University autonomy might be developed. It raised questions and made a series of recommendations about the understanding and implementation of University autonomy in Moldova (Annex 5). It does not appear that the Ministry of Education has responded to the review or that the recommendations in the EUniAM final project report have been implemented.

2. The autonomy context

2.1 The Framework (First cycle: Bachelor, second cycle: Master, Integrated Studies, third cycle: Doctorate) is designed to establish the basic requirements for the draft of the Learning Plans (programme specifications) in different fields of training/specialties, Master programs, PhD programs.

2.2 Learning plans are to be prepared and submitted to the Ministry for approval every five years and have to conform to the detailed specifications laid out in the Framework.

2.3 The Education Code of the Republic of Moldova (No. 152 dated July 17, 2014) states in **Article 79 University Autonomy**:

- (1) The higher education institutions shall have the status of university autonomy.
- (2) The university autonomy is the right of the university community for organization and self-management, exercising the academic freedoms without any ideological, political or religious interferences, assuming a set of competences and obligations in line with the national strategies and policies for the development of the higher education.
- (3) The university autonomy shall encompass the areas of management, structuring and functioning of the institution, teaching and scientific research activity, administration and financing, and shall be mainly performed through:
 - a) organizing, conducting and improving the educational and scientific research process;
 - b) establishing specialties;
 - c) developing curriculum and analytical programs in line with the state educational standards;
 - d) organizing admission of students, taking into account the specific criteria to the profile of the higher education institution;
 - e) selecting and promoting the teaching, scientific-teaching and scientific staff, as well as the other categories of personnel in the educational institution;
 - f) establishing the assessment criteria for the teaching and scientific activity
 - g) awarding teaching degrees;
 - h) eligibility of all management bodies by secret voting;
 - i) solving social problems of students and staff;
 - j) ensuring order and discipline in the university;
 - k) finding additional sources of income;
 - l) establishing cooperation relationships with various educational and scientific institutions, centre and organizations in the country and abroad.

2.4 Under the definitions section headed 'Basic Notions' the Framework reiterates the statement on autonomy contained in Article 79 of the Code. As the EUniAM commentary suggested the requirement for **state educational standards** might be considered to be in conflict with the principle of curriculum autonomy. Indeed the European University Association which has developed a European 'Tool-scorecard' to measure University Autonomy (EUA – University Autonomy in Europe) states unequivocally in relation to Academic Autonomy that:

- *“The capacity to introduce academic programmes without outside interference and to select the language(s) of instruction enables a university to pursue its specific mission in a flexible way.*
- *A free choice of teaching language may also be important in the context of institutional internationalisation strategies.*
- *The ability to design the content of courses, except for the regulated professions, is a fundamental academic freedom“.*

2.5 It could be argued that the Framework respects the right of the University to design the content of courses, but **the detailed, prescriptive and bureaucratic nature and content of the Framework, which governs the approval process, effectively constricts the University and acts as an impediment to change and innovation.**

3. Contemporary context for HE and need to change and update curriculum

3.1 Universities need to operate in a dynamic knowledge world which has to respond, reflect and critically evaluate constant and rapid changes and incorporate these in their curriculum if they are to prepare graduates adequately for the contemporary economic, social, political and employment world.

3.2 The **Framework** defines State Education Standards as:

*“the **mandatory** conditions for the fulfilment of educational programs for all learning levels and cycles in both public and private institutions, as well as the minimum mandatory requirements to the content of the educational programs, the maximum work volume of the student and of the teaching staff, to the infrastructure and the endowment of the educational institution, to the training level of students and the organization of the educational process. The state educational standards are the basis for the objective quality and level of instruction and qualification of graduates’ evaluation, regardless of the form of studies”*

3.3 The use of the term ‘mandatory’ relating to curriculum content weakens and undermines the concept of academic autonomy.

3.4 This is compounded by the requirement that ‘Learning Plans’ are for a **five** year period, a period which is essentially incompatible with the need constantly to revise, update, adapt and change curriculum to respond to new research findings, learner responses, economic, social and political developments and the demands of the labour market. Such changes may even occur during a semester but should be expected on an annual basis.

3.4.1 Article 61 of the Framework effectively discourages and actually forbids curriculum change stating that:

*“For the duration of studies of a student class, from enrolment till graduation, learning plans **cannot** be modified; they are to be accomplished entirely.”*

3.4.2 This is qualified in the subsequent sentence:

*“If labour market demands impose the need to change learning plans during a 5 year period, the new version of the learning plan for a new academic year shall be applied for persons enrolled to studies in the respective academic year, provided that the changes were carried out **as established**, until the end of the previous academic year and at least 3 months before the beginning of the academic year they were posted on the information system of the institution.”*

3.5 The translation may partly obscure the meaning of this sentence, but it surely cannot be in the best interest of learners if new relevant material arising from scientific, social, economic, political change which challenges current understanding and knowledge is not introduced as soon as it is available. This would apply equally to new ‘labour market demands’, where rapid change will be equally imperative.

3.6 Such curriculum development should not require the cumbersome, bureaucratic and time consuming process envisaged in the Framework. Indeed, if the change has to conform to the processes described in the Framework it is doubtful if it could be achieved in less than an academic year or, indeed, if it will be possible to reconcile the expectations of a PBL curriculum with the restrictions of the Framework.

4. Annex 1 and Annex 5 of the Framework

4.1 The level of detail prescribed in the Framework is constricting and perverse. Hence, Annex 1 in the Framework indicates an arbitrary percentage of ‘Mandatory’ and ‘Optional’ courses which seem quite out of place for a University degree.

4.2 It might be expected that to obtain professional recognition in, for example, engineering or medicine or law virtually all courses will be mandatory, whereas in Humanities and Social Sciences much wider discretion may be allowed with the learner leading on the choice of courses, subject to appropriate academic requirements.

4.4 Similarly in Annex 5 of the Framework Universities are required, in the Five year Plan, to indicate a range of detail about internships which are, in practice, most likely to be initiated, negotiated and changed on an annual basis. **The requirement alone, that detail on internships is included in a forward looking Five Year Plan, will inhibit the establishment of internships, which are increasingly regarded by employers as a critical component in the preparation for employment.**

5. Prior learning and experience

5.1 Universities are severely constrained in the accreditation of prior learning by Articles 18 and 19 which limit the credit transfer/recognition (Article18) to a maximum of 30 ECTS credits with no recognition of the need to evaluate the achieved learning outcomes and or experience which may, in an individual case,

represent significantly more than 30 credits. The university is given no discretion and in effect no autonomy.

5.2 Article 19 appears **even more restrictive** requiring that graduates with a first degree starting a new field may be permitted a “*reduction of the duration of the studies [can be conditioned] by the recognition of a certain number of credits accumulated for the first specialty, on the condition that the duration of the studies shall be at least 3 years*”.

5.3 Since in practice the majority of first cycle degrees are three years full-time, this seems to amount to no concession and defeats the objective of encouraging credit recognition and transfer.

6. Workload and structure of the academic year

6.1 The defined structure of the academic year is constraining, as is the requirement to hold examinations at the end of each semester. Both of these may be regarded as norms but in different fields of study and for a range of reasons Universities may wish to have flexibility in the structuring of the year and timing of examinations while respecting the overall duration and workload.

6.2 The Framework partially acknowledges this by stating (Article 20): *The academic calendar, the period of holding the classes and the duration of examination sessions, the duration of the vacations, shall be established by the senate of the higher education institution.*

6.3 This offer of flexibility is severely constrained by the prescriptions in Article 22, which are not expressed as normative and which state that each semester ‘shall be’ 30 ECTS credits and that: “*The structure of the week for the **first cycle – Bachelor** is 5 days with a total number of 25-30 hours of auditory contact*”.

6.4 As the annual workload is stated to be 1800 hours over 30 weeks this implies a further 30-35 hours of ‘private’ work which produces a weekly workload of 60 hours, which prima facie **breaches the EU Working Hours Directive!**

6.5 Further-more the requirement for 25-30 hours of ‘*auditory (face to face) contact*’ is not only constraining it could be argued to be excessive for University level learners in all three or four years of their degree who should be expected to take increasingly more responsibility for their learning.

6.6 It is also difficult to align with Problem Based Learning which expects learners to engage in group and personal work with less formal instruction and with the teacher more in the role of facilitator.

6.7 In the final year the ‘face to face’ (*auditory*) contact may be significantly less than 25-30 hours.

6.8 The critical point is that, instead of these detailed load prescriptions the focus should be on the requirement that the learner (student) has to demonstrate at each stage that

she/he has achieved the **learning outcomes**. The route to this may vary considerably from programme to programme and depend on the pedagogical approach adopted.

7. Second cycle/Master programmes: Workload and level descriptors

7.1 This commentary is essentially concerned with the provisions in the Framework for first cycle programmes. However, it should be noted that the statements relating to the degree of Master seem even less appropriate asserting in Article 23 that:

*“The weekly program of **Master** training is 14-20 hours of auditory contact, which on the decision of the institution can be varied and at least 50% of the program must be allocated to practical activities and research”*

7.2 The Framework might perhaps more appropriately reflect on the **EHEA Qualifications Framework** (EHEA QF) level descriptor for the second cycle:

*Qualifications that signify completion of **the second cycle** are awarded to students who:*

- *have demonstrated knowledge and understanding that is founded upon and extends and/or enhances that typically associated with the first cycle, and that provides a basis or*
- *opportunity for originality in developing and/or applying ideas, often within a research context;*
- *can apply their knowledge and understanding, and problem solving abilities in new or unfamiliar environments within broader (or multidisciplinary) contexts related to their field of study;*
- *have the ability to integrate knowledge and handle complexity, and formulate judgments with incomplete or limited information, but that include reflecting on social and ethical responsibilities linked to the application of their knowledge and judgments;*
- *can communicate their conclusions, and the knowledge and rationale underpinning these, to specialist and non-specialist audiences clearly and unambiguously;*
- *have the learning skills to allow them to continue to study in a manner that may be largely self-directed or autonomous.*

and the European Qualifications Framework (EQF) level 7 descriptors which emphasises the level of knowledge, skills and competence which a student is expected to achieve emphasising that the learning outcomes achieved are the essence of the qualification.

8. Structure and organisation of programmes

8.1 **Articles 24 and 25 dictate the structure and organisation of programmes and in the related Annex 1 and Annex 4 of the Framework reduce complex academic curriculum to a formulaic approach through indicating the percentage which it is expected will be devoted to each of the intersecting components:**

- a) *mandatory*;
- b) *optional*;
- c) *on free choice*.

with a coding formula with further impositions on the flexibility and autonomy of the institution and the teachers:

- a) *fundamental component (code-F)*;
- b) *general abilities and competences training (code-G)*;
- c) *socio-humanities component (code-U)*;
- d) *specialty component – basic and secondary, in case of same time instruction of two related domains (code-S)*.

8.2 While this may be appropriate for Primary and Secondary education it suggests a lack of trust in the ability and the expert knowledge of the academic staff of the Universities to manage and quality assure curriculum planning and development.

8.3 It undermines the commitment to university autonomy and reduces curriculum planning and development to a bureaucratic exercise in conformity.

8.4 Above all it distracts from and fails to emphasise that the objective, as indicated in the EHEA QF and the EQF, needs to be outcome rather than input focused.

9. Codification of course units/modules

9.1 The ‘Codification of Course Units/Modules’ Articles 26 – 32 continues to circumscribe and prescribe in mechanistic ways which are inimical to innovative and changing curriculum development and new pedagogical approaches.

9.2 Similar points could be made about Article 34 relating to the second cycle Master programmes and Article 36 which limits the optional component of a second cycle degree to 30%, an arbitrary limit for which there is no justification.

9.3 In marked contrast to the prescriptive detail elsewhere Article 40, relating to Internships, is highly permissive stating that:

*“Students Internships represent one of the **mandatory** forms of training of highly qualified specialists”, the Framework proposes a liberal/laissez faire approach to internships in which “their terms, stages, field/branch, place are to be established by the higher education institution” and “The coordination and evaluation of the Bachelor/Master internship is to be made by the project coordinator The appreciation criteria of the internship are to be stipulated in the internal regulation of the institution”.*

Notwithstanding the assertion that ‘*Internships represent one of the **mandatory** forms of training*’ there is no suggested duration or recommendation for the award of ECTS credits for Internships or how they are to be fully integrated in the curriculum. This flexibility is more in keeping with the commitment to University Autonomy expressed in the Code but is out of keeping with much of the rest of the Framework.

10. Assessment

- 10.1 Section D Article 46 deals with Assessment and distinguishes between 'Current' assessment and 'Final' assessment. 'Current' and 'Final' are not defined under 'Basic notions' but the drafting suggests that 'Current' may relate to 'formative' assessment and 'Final' to 'summative' assessment.
- 10.2 **As with other parts of the Framework the distinctions are limiting and not appropriate.** Some of the components listed under 'Current' might be equally appropriate as part of the 'Final' summative assessment and vice a versa.
- 10.3 **Moreover, in listing forms of assessment, there is a danger that valid forms may be omitted,** for example group or team work does not appear under Article 47 (b) final assessment but may be highly appropriate.
- 10.4 If a form of assessment is not listed it may be considered to be excluded. As, in this particular sub-paragraph 'etc.' is not used, whereas elsewhere in the Framework it is used frequently, this conclusion (i.e. if it is not listed it is not permitted) might appear to be justified.
- 10.5 **Apart from the sense of laziness which the use of 'etc.' conveys it is not appropriate in a formal legal document especially one which is overall prescriptive and detailed.**
- 10.6 The possible ambiguity in the use of the term 'Current' is perhaps partly resolved in para. 50 which states:
- "The quota of current assessment from the final mark to the course unit within higher education cycles is to be established by the higher education institution in their own regulations".*
- 10.7 Although this in part clarifies an understanding of 'Current' it leaves open the important distinction between summative continuous assessment and formative assessment.
- 10.8 **The section on assessment does not convey the important message that assessment is intrinsically linked to the achievement of the intended learning outcomes and needs to be appropriate to the learning outcomes.**
- 10.9 **The reference to marking does not suggest that the criteria for marking need to be clearly articulated.**

11. Learning Plan approval

- 11.1 Article 57 describes the process for the approval of a '*Learning Plan*' for a new degree. It is protracted and involves several layers of approval and seems not to follow a logical pathway – for example the *self-assessment report* is required after approval by the Faculty Board, the Senate and the Institutional Strategic Development Council.

Subsequently in the same paragraph the *self-assessment report* is conflated with the learning plan (see highlighted phrase below).

- 11.2 The Learning Plan process starts at the departmental level. It then has to be approved by the Faculty Board, followed by the Senate and then by the Institutional Strategic Development Council. At this stage – after approval by the Department, the Faculty, the Senate, and the Institutional Strategic Development Council – a *self-assessment report* for further **provisional** authorization has to be submitted to the vice-chancellor for teaching activity, and ‘checked by a committee appointed by the subdivision responsible for quality management’. **This seems to be a perverse approach to quality assurance which should be embedded in the curriculum planning process.**
- 11.3 Notwithstanding the detailed internal process the proposals are subject to two further stages of scrutiny. Six months ‘*before the beginning of the study program, the self-assessment report, **implicitly the learning plan**, is submitted to the Ministry of Education which, after the assessment of the learning plan, advance it to the National Agency for Quality Assurance in Professional Education for an external assessment and **provisional** authorization*’.
- 11.4 The Framework does not attempt to assess the total time which this whole process will take but a simple extrapolation from the six month requirement suggests that the process will need to start early in the previous academic year and could take up to eighteen months
- 11.5 This cumbersome, bureaucratic system does not suggest that the University is autonomous in academic matters, especially as the National Agency only issues ‘provisional’ authorisation.**
- 11.6 Article 61: *Modification of Learning Plans* specifies that: “Once in 5 years, higher education institutions shall review/ update learning plans, according to the development in social and economic sectors”. The details of this paragraph are commented on in the introductory section 3 above.

12. PBLMD project implementation

The PBLMD project teams are encountering serious obstacles in developing and introducing the six new innovative programmes of study. These obstacles may in part stem from a highly conservative academic environment which is resistant to change, but they are given substance by the argument that the Education Code and the Framework for Higher Education will not permit the proposed programme development in the time period allotted for the project. It should be apparent from the Commentary above that the Framework is restrictive and inimical to rapid change and innovation.

The project management team has written to the Minister to request a small number of circumscribed derogations from the Framework. The Minister has rejected their request arguing that the Framework must be respected and that it allows and provides a procedure for change. Extracts from the correspondence are given below.

Extract from the letter to the Minister, January 2017

The letter (Appendix 2) requested that the Minister:

1. *Waive restrictions on curriculum content change and development*
2. *Waive restrictions on determining curriculum structure so that programmes may be developed on a modular basis*
3. *Waive restrictions on allocating ECTS credits in relation to the modular structure most appropriate for the programme and not restricted by the current Framework, and not be limited in the number of projects overall or in a semester. NB: In planning the curriculum the teams will pay close attention to the ECTS Guide 2015 in relation to student workload*
4. *Waive restrictions on allocation of hours to teaching and learning, allowing hours for semester project supervision to be counted as direct contact*

Extract from the reply from the Minister, February 2017

With reference to the framework plan, we reiterate below a few important articles that come to demonstrate that higher education institutions benefit from university autonomy and academic freedom, allowing them to make decisions on changes in their educational plans. Thus,

*Art. 45. In higher education (cycles I, II and Integrated Studies), the number of credits distributed to each course unit/module, the established number for theoretical, practical laboratory, individual activities etc. as well as the number of course units/modules in a semester is planned by the **department responsible of the respective study program**, depending on the type of the study program, the educational output, the specific, the complexity of the course unit/module.*

The distribution of the course units, the distribution of the number of hours per years of study and semesters, taking into account the interdisciplinary bonds, is done by faculties.

Art. 61. Modification of Study Plans

Once in 5 years, higher education institutions will review/update study plans, taking into account the development in social and economic sectors.

The study plan can be modified/improved only if it is implemented the following academic year. For the duration of studies of a student class, from enrolment till graduation, study plans cannot be modified; they are to be accomplished entirely.

If the labor market demands the need to introduce changes in the study plans within a 5 year period, the new version of the learning plan for a new academic year shall be applied for persons enrolled to studies in the respective academic year, provided that the changes were carried out as established until the end of the previous academic year and made public at

least 3 months before the beginning of the academic year via the information system of the institution.

The modifications in the learning plans are carried out by the departments responsible of the respective study programs and are approved by the Faculty Board.

*The review/ update of study plans are validated by the **University Senates** and it is presented once in 5 years for the coordination to the Ministry of Education, as well as to the relevant ministries/ professional associations which cooperate with higher education institutions). An extract from the minutes of the Senate meeting, where the modifications were approved, shall be attached to the copy of a study plan for the first and second cycle, and integrated studies.*

In the Annex there are presented the comments to the articles referred to in accordance with the legislation in force. In conclusion we inform that the educational plans with the expected *changes* in the PBLMD project, after approval by the Senate, will be presented to the Ministry of Education for coordination to ensure the piloting process.

Comment

The reply from the Minister refers to Articles 45 and 61. However, these Articles have to be read in the context of the Framework as a whole as described in the Commentary above. The Framework simply does not accommodate expeditious and innovative change in curriculum but places hurdles in the way and ensures that the whole process is time consuming. Articles in the Framework which appear to offer some flexibility and institutional autonomy are countered by Articles which impose further constraints.

In practice strict adherence to the Framework will prevent the effective implementation of the outcomes of the PBLMD project.

Articles 41 and 61, to which the Minister refers, have to be juxtaposed with the restrictions imposed by the requirement to adhere to the State Educational Standards which impose mandatory conditions; the extended process for the approval of changes in Learning Plans described above (Articles 61 and 57); the arbitrary percentage of 'Mandatory' and 'Optional' courses set out in Annex 1 of the Framework; Article 22 *stipulating 25-30 hours of auditory (face to face) contact* which is not appropriate for Problem Based Learning in all years of study and even less so for the degree of Master which prescribes *14-20 hours of auditory contact and at least 50% of the program allocated to practical activities and research*; Articles 24-32 which reduce curriculum to a formula; Articles 34 and 36 which relate to Masters programmes and in Article 36 limit optional course to 30%; Articles 46-49 which determine and could be argued to limit forms of assessment and finally Article 57 which sets out the lengthy process for approval of Learning Plans.

In the light of the Minister's categorical rejection of the project Directors' request it is difficult to see a way forward. However, the project teams may wish to consider, in the light of the commentary above, whether it may be possible to present precise examples of what they wish to introduce in their PBL curriculum and how the Framework is preventing this work.

In view of the difficulties which the project is facing, as indicated in this commentary, the six University Rectors who have signed commitments with the European Commission to implement the project should join the project management team in seeking ways to ensure that the project outcomes can be implemented. It may also be the case that the Erasmus + office in Moldova will wish to remind Rectors and the Ministry of their obligations under the terms of the project grant.

13. Recommendations

The project teams, Rectors, Ministry of Education and Erasmus+ office are invited to consider the recommendations below which indicate specific and limited actions to enable the project to deliver the six new programmes.

13.1 Learning plans

The requirements for Learning Plans for the six new programmes be relaxed in the following ways:

- The relevant Faculty Board and the Senate at each PBLMD project University should be allowed by the Ministry to quality assure and approve the introduction of the six new programmes within a maximum time period of three months for scrutiny and approval e.g., by the end of April 2018.
- Each project team should submit its detailed new PBL based programme proposal together with a self-assessment report by end of January 2018.
- The Ministry should waive the requirement for further submission to the Ministry and the National Quality Assurance Agency but the Senate of the University should forward the approved proposals to both bodies for information.
- The new PBL based programmes should be introduced for students starting in September 2018.

13.2 Content and structure of programmes

- In reviewing the six proposals the Faculty Boards and the Senates of the respective Universities should not require adherence to the Framework requirements relating to Mandatory and optional course units/modules.
- The requirement to code all course units/modules on the basis of the formula specified in the Framework should be waived
- While expecting the programmes to respect the broad structure of the academic year Faculty Boards and Senate should allow deviations justified by the requirements of individual programmes. Each programme will provide details for the structure and organisation of the programme to enable the Faculty Board and the Senate to evaluate the need for a deviation.

- Each programme submission should specify the formal contact and workload expectations on the understanding that the Framework requirement for a defined number of '*auditory(contact) hours*' each week should be waived for the six programmes.

13.3 Assessment

- The assessment prescriptions of the Framework should be waived for the six programmes, subject to the review of fully documented assessment arrangements proposed for each of the six programmes in the context of their relevance to the achievement of the intended learning outcomes and the EHEA QF and EQF level descriptors.

13.4 Internships

- The six programmes should make every effort to include and integrate assessed work placements (internships) and award ECTS credits for these placements.
- Subject to reporting the placements to the Faculty Board and the Senate the programmes should be permitted to negotiate and award placements on a regular non-time limited basis.

13.5 Monitoring and review

- Each programme should submit its proposals for on-going monitoring, annual review and report. These should include student and staff evaluation and the basic data to be collected to support the monitoring and review.
- In the light of the monitoring and review the programmes should be allowed and encouraged, subject to report to their Faculty Board and Senate, to amend and develop the curriculum for current and new students.
- The time requirements and procedures specified for the amendment of Learning Plans should be waived.

Appendix 1: Framework Plan for Higher Education

Appendix 2: Derogation letter to the Ministry of Education

Appendix 3: Ministry of Education response to the derogation letter

Appendix 4: EUniAM Commentary of Education Code

Appendix 5: EUniAM recommendations for restructuring HE in Moldova