

The National Commission for Higher Education Assessment (Conaes) Between Legitimacy and (In) Definition of Quality: Record in Minutes From 2016 to 2020

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#### **ABSTRACT**

This research analyzes how the National Commission for the Evaluation of Higher Education (Conaes), instituted by Law No. 10.861 / 2004, the coordinating and supervisor agency of the national evaluation system, has understood its role and what is its understanding of Quality in Higher Education. With this aim, 28 recording of the meetings held between November / 2016 and July / 2020 were collected, available in the commission's repository, on the website of the Ministry of Education (MEC). The analysis of the minutes was based on the qualitative analysis software MaxQDA. The analysis results from the understanding that Conaes self-defines itself in action, constantly reviewing its performance, caused by internal discussions and changes in demands and complementary legislation, without, however, recognizing the legitimacy and purpose of its role in the coordination of the National System Higher Education Assessment System (Sinaes). The constant review can be considered beneficial, since its role is improved, however, it reveals at the same time, uncertainty, and irrelevance in relation to its practices, discussing, in many meetings, the lack of recognition of the very existence of Conaes. In the set of minutes analyzed, in-depth discussions on what quality is and its meaning in and for Higher Education were not identified, with implications related to evaluation procedures. For Conaes, quality and indicators are synonymous, with no indication of what can be considered a quality institution or course, leaving the score achieved in the evaluations as a criterion.

#### **KEYWORDS**

Higher education. Conaes. Quality of education. Sinaes.

# A Comissão Nacional de Avaliação da Educação Superior (Conaes) Entre Legitimidade e (In) Definição da Qualidade: Registros em Atas de 2016 a 2020

#### **RESUMO**

Esta pesquisa analisa como a Comissão Nacional de Avaliação da Educação Superior (Conaes), instituída pela Lei n.º 10.861/2004, órgão coordenador e supervisor do sistema nacional de avaliação, tem compreendido seu papel e qual seu entendimento acerca da Qualidade na Educação Superior. Para este fim, foram reunidas 28 atas das reuniões realizadas entre novembro/2016 e julho/2020, disponíveis no repositório da comissão, no site do Ministério da Educação (MEC). A análise das atas apoiou-se no *software* de análise qualitativa *MaxQDA*, para codificação e categorização das ocorrências nos textos reunidos. Resulta da análise o entendimento de que a Conaes, autodefine-se em ação, revisando sua atuação constantemente, provocada pelas discussões internas e alterações das demandas e legislação complementar, sem, entretanto, reconhecer a legitimidade e finalidade de seu papel na coordenação do Sistema Nacional de Avaliação da Educação Superior (Sinaes). Pode-se considerar benéfica a constante revisão, vez que seu papel é aprimorado, porém, revela ao mesmo tempo, incerteza e irrelevância em relação às suas práticas, discutindo-se, em muitas reuniões, a falta de reconhecimento da própria existência da Conaes. Não se identificaram, no conjunto de atas analisadas, discussões aprofundadas sobre o que é qualidade e seu significado na e para a Educação Superior, com implicações relacionadas aos procedimentos avaliativos. Para a Conaes, qualidade e indicadores são sinônimos, sem indicações do que se pode considerar instituição ou curso de qualidade, restando como critério a pontuação alcançada nas avaliações.

#### **PALAVRAS-CHAVE**

Educação superior. Conaes. Qualidade da educação. Sinaes.

#### El Comité Nacional de Evaluación de la Educación Univeritaria (Conaes) Entre Legitimidad y (In) Definición de Calidad: Registros en Actas de 2016 a 2020

#### **RESUMEN**

Esta investigación analiza cómo la Comisión Nacional de Evaluación de la Educación Superior (Conaes), instituida por la Ley N ° 10.861 / 2004, órgano coordinador y supervisor del sistema nacional de evaluación, ha entendido su rol y cuál es su entendimiento sobre la Calidad en la Educación Superior. Para ello, se recopilaron 28 actas de las reuniones realizadas entre noviembre / 2016 y julio / 2020, disponibles en el repositorio de la comisión, en la página web del Ministerio de Educación (MEC). El análisis de las actas se basó en el software de análisis cualitativo MaxQDA. El análisis surge del entendimiento de que el Conaes se autodefine en la acción, revisando constantemente su desempeño, sin reconocer, la legitimidad y propósito de su rol en la coordinación del Sistema Nacional de Evaluación de la Educación Superior (Sinaes). La revisión constante puede considerarse beneficiosa, ya que se mejora su rol, sin embargo, revela a la vez, incertidumbre e irrelevancia con relación a sus prácticas, discutiendo, en muchas reuniones, la falta de reconocimiento de la propia existencia del Conaes. En el conjunto de actas analizadas no se identificaron discusiones en profundidad sobre qué es la calidad y su significado en y para la Educación Superior, con implicaciones relacionadas con los procedimientos de evaluación. Para el Conaes, calidad e indicadores son sinónimos, sin indicación de qué se puede considerar una institución o curso de calidad, dejando como criterio el puntaje logrado en las evaluaciones.

#### **PALABRAS CLAVE**

Educación superior. Conaes. Calidad de educación. Sinaes.

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#### Introduction

The creation of Conaes, with a deliberative function and the attribution of instrumentalizing and configuring the assessment practices, is based on Federal Law No. 10.861, of April 14, 2004, which established the National System for Higher Education Assessment (Sinaes). It is "a collegiate body that has the function of articulating with the other bodies of the regulatory structure of Brazilian higher education to foster the assessment system and position it as a management element for the institutions and for the Brazilian higher education system itself" (FRANCISCO; MARBACK NETO, 2016, p. 8).

In this sense, for the mentioned authors, "it is identified that CONAES should be the main instance of Sinaes management, thinking strategically about the assessment and offering subsidies for it to be discussed in the most distinct institutional models" (FRANCISCO; MARBACK NETO, 2016, p. 8).

In the same perspective, Rothen and Barreyro (2009, p. 740, emphasis added), highlight that Conaes, unlike "other similar agencies" operating in other countries

is not independent from the government, it is part of it (it is linked to the Minister's Cabinet) and it is not a quality assurance agency, nor a regulatory agency; it is not an executor of evaluations, nor does it exercise regulation; it is a commission that advises on technical evaluation issues: especially, it issues guidelines (for the instruments to be used and for the selection of evaluators who carry out external evaluations).

Therefore, Conaes, being a government agency, has its attributions established, initially, by article 6 of Federal Law #10.861/2004, which established the National System for Higher Education Evaluation (Sinaes).

Hélio Trindade (2007, p. 108-9), the first president of Conaes, in his inauguration speech said

The Conaes - among other attributions related to the coordination and supervision of Sinaes - will have the great responsibility of to institutionalize the evaluation process, coordinate and supervise it, which will be executed by Inep; to propose and evaluate the dynamics, procedures, and mechanisms of evaluation; to establish guidelines for the organization and designation of evaluation commissions; to analyze reports, elaborate opinions, and forward recommendations to the competent bodies of the MEC; analyzing and issuing conclusive opinions on the evaluation reports consolidated by Inep, forwarding them to the competent organs of MEC; assuring the integration and coherence of the evaluation instruments and practices for the consolidation of Sinaes; promoting the articulation of Sinaes with the State Educational Systems, aiming at establishing common actions and criteria for the evaluation and supervision of higher education.

Considering the governmental character of Conaes and the normative definition of its role, this article aims to understand how the discussions in the collegiate meetings are forwarded, from what is recorded in the analyzed minutes, extracting, from these documents, excerpts and meanings that show how its legal assumptions are executed, in order to identify whether its attributions, competencies and its purpose are recognized and serve as a basis for

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the referrals and discussions about the institutionalization of the assessment and the Quality of Higher Education.

For Francisco and Marback Neto (2016, p. 13),

the scientific production on institutional assessment, more specifically since 2004, has dealt little with Conaes as a fundamental and structuring element for the assessment of higher education [...] in Brazil little is produced on Conaes or on the other bodies that deal with the assessment of higher education in their technical, strategic, and operational issues.

It draws attention to the fact that there are few works that have focused on the role that Conaes has been playing in the consolidation of Sinaes, especially if we consider the legally established importance of the Commission. In this sense, it is expected that this article will contribute to the analysis of the records of the minutes of a four-year period (2016 to 2020) of the Commission's activities, filling gaps, highlighting initiatives, unveiling weaknesses that, in a way, can impact the validation of Sinaes.

## How the Collection and Analysis of the Minutes Took Place: the MAXQDA Software as a Support

We analyzed 28 minutes of Conaes meetings - from 131 to 158 - held in the period from 2016 to 2020, as broken down in Table 1, below.

Minutes	Meeting Date	Minutes	Meeting Date	Minutes	Meeting Date	Minute	s Meeting Date
131	28 and 29/11/16	138	31/07/2017	145	17/04/2018	152	19/09/2019
132	12/12/2016	139	28/08/2017	146	22/05/2018	153	17/10/2019
133	20/02/2017	140	25/09/2017	147	19/06/2018	154	21/11/2019
134	27/03/2017	141	30 and 31/10/17	148	07/08/2018	155	12/12/2019
135	24/04/2017	142	27/11/2017	149	28/08/2018	156	04/06/2020
136	29/05/2017	143	06/03/2018	150	23/10/2018	157	25/06/2020
137	19/06/2017	144	20/03/2018	151	15/08/2019	158	23/07/2020

**Table 1.** Minutes of the meetings analyzed and their respective dates

Source: Minutes of the ordinary meetings of Conaes, nos. 131 to 158 - period from 2016 to 2020.

The reading of the minutes was conducted from the definition of two central categories, organizers of the analysis carried out. The first, focusing on the **Role of Conaes**, contemplated the search for complementary words such as function, attributions, responsibilities, commitments, competencies, and purpose. The second deals with **the Quality of higher education**, contemplating the search for aspects related to deliberations about Sinaes, specifically, assessment instruments, assessment criteria, procedures, routines, flows, measures, revision of criteria, concrete measures, - complemented with the treatment registered in the Minutes about the Quality in Higher Education and how Conaes seeks its concretization.

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The collection started with the survey of the minutes specified in the table above, available in the repository of documents of this commission on MEC's website, and, once the documents were downloaded, they were loaded into the software MaxQDA, "an academic software for qualitative data analysis and mixed methods research and is available for Windows and Mac operating systems", according to MAXQDA (2020), whose application is used as a support tool for the qualitative analysis of the data and information written in the documents.

MAxQDA works at the most basic levels, by creating codes, which the program treats as a synonym for category, and then coding the text, that is, marking text excerpts with colors and names related to the concepts sought, enabling export in spreadsheet format.

Nodari *et al* (2014, p. 5) point out that "the coding process with Maxqda is done by the user himself, who can create and organize the categories as he wishes", informing that "the software allows important information to be highlighted with colors, symbols, and even emoticons, which transcend the limits of language"

Considering the categories defined for this research, the following codes were created in the software: Role of the Conaes and Quality.

The minutes underwent a complete reading of their contents, carried out by the program in use, in order to seek the explicit meanings registered in them, having the two main categories as a basis. During the reading, excerpts and speeches related to the institutional role and Quality of Higher Education were sought out, noting the impressions revealed to the researchers in the process.

The MaxQDA software allows, easily, the visualization of all loaded documents and, for Nodari *et al* (2014, p. 9), are positive aspects "the analysis tools, especially regarding the visualization of codes in their original context; the lexical analysis, represented by the search for specific terms or words".

To help the search for these occurrences, the MaxQDA software's lexical search tool was used. This is a search for words or groups of words that is performed on all documents loaded, generating a table with links for direct visualization of the occurrences of these words in these documents. Thus, it was possible to identify all mentions of the word quality, except for those cases in which there was no reference to quality in higher education, such as descriptive passages from representatives, such as the expression "in the quality of", which are, therefore, strange to the desired context.

The MaxQDA software also allows ranking the words in order of occurrence. From the total of 28 minutes analyzed, 36,177 words were identified, as shown in Table 2.

Table 2. Ranking of occurrence of words in CONAES meeting minutes number 131 to 158.

Word	Length	Frequency	%	Ranking	Documents	Documents %
education	8	939	2,60	1	28	100,00
Superior	8	561	1,55	2	28	100,00
evaluation	9	479	1,32	3	28	100,00

Source: Research data, 2020.

Of these, the top 3 in the frequency ranking are: Education, with a total of 939 occurrences; Higher, with a total of 561 occurrences; and Evaluation, totaling 479 occurrences.

Another interesting aspect to note is that the occurrence of these words occurred in 100% of the minutes, that is, in all minutes, each one of these words was mentioned at least once, indicating that the discussions held in the meetings of this committee are centered on Evaluation in Higher Education. This data becomes clearer with the use of another software tool related to the frequency of words present in the documents, the Word Cloud:

Figure 1. Word cloud



Source: Research data, 2020.

The Word Cloud consists of a graphic resource to list and highlight the most frequent terms in a text or set of texts. The words are arranged in a way to create a figure, with its size defined proportionally to the number of occurrences in the analyzed texts, thus highlighting the most present words. In the generated image, the largest words are "Education", present in the center of the image, followed by "Higher" and "Evaluation", which are found in the right and left corners of the image, respectively. It is also worth noting that the set of words in the figure are mostly related to issues concerning higher education management. It also draws attention to the fact that there is no record of the word Quality. Its absence is an indicator of the little relevance that this requirement has been occupying in Conaes' activities.

As for the emphasis on the word Evaluation, one can understand, as Dias Sobrinho (2010, p. 201), for whom the "quick and rapid" changes in the "Quality" are not a problem. 201), for whom the "rapid and important transformations in Higher Education could not have occurred without the central participation of assessment", causing strangeness to the absence of Quality, for its direct relationship with the evaluative processes, because, as he himself reminds, "Before the technical and operational difficulties [of assessment], the underlying philosophical and political issue, very little debated, is that of quality" and goes further by highlighting that "the concept of quality is linked to the philosophical and political issue of the purposes of Higher Education and is not separated from the fundamental issues of society" (DIAS SOBRINHO, 2010, p. 222).

After performing the codifications in the software, that is, the marking of the terms sought in the texts of the Minutes, this information was exported to a shared spreadsheet, for collaboration among the researchers involved in the team analysis.

### Discussion of the Findings: the Role of CONAES and the Quality of Higher Education Recorded in the Minutes

The discussion of the data highlighted the findings, which were organized around the two previously agreed categories.

The excerpts coded as Role of Conaes seek to highlight the function, competence and actions performed by the commission, as well as the perception of its members about its objectives, their impressions about the relationship with other bodies and related subjects.

The total of items listed was subdivided into:

- (a) concrete actions, which include accreditations; analysis of requests; definitions of assessment areas; creation of working groups to discuss specific issues; definition as to the ways of using quality indices in higher education.
- b) Deliberations about the commission's competencies.
- c) The unfamiliarity of other federal agencies regarding Conaes' competences.
- d) The unfamiliarity of the commission itself in relation to its competencies; and
- e) Exaltation of Conaes.

It was noted, while reading the minutes, the recurrent requests from members for a more proactive posture of the commission, as registered in Minute # 134, in which a member:

emphasized the need for Conaes to have a less reactive and more proactive posture, taking for itself the role of protagonist provided in the Law of Sinaes. He suggested the establishment of subcommittees to discuss the Enade and the general model of Sinaes [...] the President closed the meeting thanking once again the trust placed in him and ensuring that the Conaes will fulfill its competence proactively and in cooperation with the other bodies involved in the assessment of higher education (BRASIL, 2017b, p. 2-4).

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It is also noted complaints about the lack of recognition and fulfillment of the demands of Conaes, in addition to complaints and anguish of members of the commission regarding the lack of visibility in events (Minutes 131, 2016; Minutes 135, 2017; Minutes 153, 2019); suppression or appropriation of its competencies by other bodies (Minute 131, 2016; Minute 137, 2017; Minute 145, 2018; Minute 150, 2018; Minute 153, 2019); non-existence of Conaes in the Organogram of the MEC (Minute 131, 2016; Minute 140, 2017; Minute 144, 2018), in addition to what was considered a lack of compliance with the Internal Rules of this commission (BRAZIL, 2018b).

In the process of implementation of Sinaes, there is a belief of the fundamental role of Conaes so much that Trindade (2007, p. 15), when making a balance of the two years of the new evaluation policy, highlights:

in rendering account of its performance, aims to analyze, in a broad and transparent way, the complex process of institutionalization of Sinaes - by means of coordination and supervision by Conaes and execution by Inep - as well as the evaluation of the HEIs in their institutional diversity within the scope of Sinaes, and Conaes' attributions and its role as a State organ.

The author also affirms that "Conaes, as a State organ, has an irrenounceable historical responsibility in the coordination and supervision of Sinaes. With its consolidation and continuity, the national system of higher education will find in it one of its most solid pillars" (TRINDADE, 2007, p. 91).

However, Franco (2012, p. 14), president of Conaes for four mandates, questions "Both the discussion of content and the execution of the programmed actions brought up the problem of defining roles. How far was the role of Conaes and how was Inep in the scenario?" and understood that "as the Sinaes Law had created Conaes as a coordinating and supervising body of the process, it was understood that it should be the head of the system and Inep the members. Such dichotomy was the creator of much tension."

There is in the cited authors a belief of the importance of Conaes in the implementation and success of Sinaes. If Trindade (2007) emphasizes in his report the relevance and amplitude of Conaes' actions, Franco (2012) admits the tension experienced by the commission and highlights the difficulties experienced in the implementation of the actions that fall to the collegiate, either due to the lack of infrastructure, personnel, a space to act and the recognition of Conaes as a collegiate body for the national coordination and supervision of the instituted higher education assessment policy.

In continuity, Conaes keeps getting further and further away from its role defined in Law, reaching 2020, when Paulo Cardim, president of Conaes for two mandates (2017 and 2018), complained about the absence of the collegiate in the MEC's organizational chart (CARDIM, 2020). This manifestation is recorded in minutes number 131 (2016) without, however, discussing the true role of Conaes, nor the reason why the collegiate lost its relevance in the implementation of Sinaes.

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Analyzing the records in relation to the Concrete Actions of Conaes, it is observed the trivial presentation of guests with the "intention of presenting and discussing points of Enade, in order to review procedures and promote the improvement of the quality of the assessment of Brazilian higher education", being a space to exchange experiences with a view to improving the Quality of Higher Education and in the assessment processes (BRASIL, 2016a, p. 1).

One of the practical roles played by the commission is the analysis of requests for inclusion of areas in the Enade, as recorded in minute 137: "Letter No. 12 of 2017, from the National Network for Teaching and Research in Occupational Therapy (RENETO), institution representing teachers and researchers in the area of occupational therapy, in which it requests the return of the inclusion of the Occupational Therapy area in the Enade" (BRASIL, 2017, p. 1). About the request for the return of the Occupational Therapy course to Enade, the committee issues the opinion, which begins by clarifying the

reason why the course was excluded from the Enade, as it did not meet the requirements established by Conaes, which were: more than two thousand graduating students and more than one hundred courses in operation. He pointed out that at the time of the exclusion, the Occupational Therapy course had around 50 courses in operation and a little over 800 graduating students. Thus, it was defined that the return of the course to ENADE would be conditional on the fulfillment of the criteria/requirements in force when electing the courses of the next cycle of the health area (BRASIL, 2017e, p. 2).

Then, it records the expedition of the "Letter Conaes n.  $^{\circ}$  08, of 2017, forwarded to Inep, in which it requests the assessment and manifestation regarding the request of Reneto" (BRASIL, 2017e, p. 1).

It can be seen in these minutes, how the operation of the committee, which, upon receiving a request, analyzes and forwards it in the form of a letter to Inep, highlighting the deliberative role of the collegiate, without executive function, depending on another body the final approval of its referrals. The requirement of approval and decisions of referrals by another body reveals the precarious and, sometimes, dispensable manifestation of Conaes. Another role, of a more objective nature and observed with regards to the definition of the evaluation areas, annually, for the Enade, deserves to be highlighted, namely:

After the presentation of the proposal and the debate, the following areas of evaluation were approved for the 2018 edition of the Enade, according to the following groups: a) Undergraduate - Administration, Public Administration, Accounting Sciences, Economic Sciences, Social Communication - Journalism, Social Communication - Advertising, Design, Law, Psychology, International Relations, Executive Secretariat, Theology, and Tourism; b) Technological -Technology in Foreign Trade, Technology in Interior Design, Technology in Fashion Design, Technology in Graphic Design, Technology in Gastronomy, Technology in Commercial Management, Technology in Quality Management, Technology in Human Resource Management, Technology in Financial Management, Technology in Public Management, Technology in Logistics, Technology in Marketing, and Technology in Management Processes. It is important to emphasize that the areas of Social Communication - Public Relations and Technology in Tourism Management did not meet any of the established criteria and, therefore, were not included in the list of assessment areas of the Enade 2018 (BRASIL, 2017h, p. 3).

This decision has been reviewed after two committee meetings, when one of the members asks for inclusion, on an extraordinary basis,

for collegiate deliberation, the recommendation to change the evaluation areas that will compose the Enade 2018 exam schedule, approved at the 140th Ordinary Meeting. Thus, the proposal was presented for the inclusion of the area of Social Service, until then evaluated in Year I, together with Agricultural Sciences and Health Sciences, in Year III, together with Applied Social Sciences, Human Sciences and related areas (BRASIL, 2017j, p. 3).

In this context, it was decided to justify this request with the need to

alteration of the referential of the large areas foreseen for each year of the Enade triennial evaluation cycle, in the final phase of studies by Inep, aiming at the redistribution of some areas, as such redistribution will allow each year of the cycle to be destined to an equitable number of areas, avoiding an imbalance in relation to the number of areas evaluated each year. This topic will be regulated by the new Ordinance that will deal with Inep's competence procedures related to the evaluation of higher education institutions, graduation courses, and students' academic performance. After the presentation of the proposal and the debate, the suggested recommendation was approved (BRASIL, 2017j, p. 3-4).

It is possible to note the division of efforts in order to focus on specific issues through the creation of working groups (WGs), as recorded in Minute 151/2019 with the "creation of three Working Groups: Strategic WG, which will discuss the SINAES in its entirety, including the analysis of the normative acts in force, [...] WG Indicators/Enade, [...] and WG Instruments/In loco Evaluation" (BRASIL, 2019a, p. 1-2).

Another aspect defined by the Commission is related to the form of use and publication of the quality indices of higher education, with subsequent preparation of a draft resolution, forwarded to the Minister of Education, recorded in Minute 152/2019<sup>1</sup>, where it is

concluded that the validity of the IGC is questionable and the recommendation is that Inep refrain from publishing the index. After debates by the Collegiate, with reservations presented by Inep's team and by the representative of SESU, that the CPC and the IGC serve as a basis for public policies, including budget matrices, of the Ministry of Education, the opinion was approved. It was defined that Inep and MEC can use the results in the way that suits them, together or separately, but they will not be released after 2020. And alternatives will be studied and presented by the WG Indicators/Enade. The President will prepare a draft resolution to be forwarded for consideration and approval by the Minister of Education.

The abandonment of the IGC is an indication of the new directions or detours of the Brazilian higher education evaluation policy. As much as the quality indexes have been criticized, their annual publication was accompanied by society, making a diagnosis of the quality offered, remembering that one of the purposes of Sinaes was the "deepening of social

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Higher education quality indexes are the IGC - General Index of Evaluated Courses of the Institution, published annually and built based on a weighted average of the grades of the undergraduate and graduate courses of each institution, and the CPC - Preliminary Course Concept, calculated the year after the Enade, in each area, and considers, besides the students' performance, the teaching staff, the infrastructure, and the didactic and pedagogical resources, among other items.

commitments and responsibilities of higher education institutions", as well as "the improvement of the quality of higher education" (BRASIL, 2014).

The Collegiate seeks in its actions an articulation with the state education systems, aiming to establish common evaluation criteria justifying such effort from the backing of the Sinaes Law:

establishes that CONAES is responsible for coordinating with state education systems, aiming to establish common actions and criteria for the evaluation and supervision of higher education, it could be delegated to State Education Councils, competencies to conduct on-site evaluations. He clarified that this issue needs to be further discussed and studied by the WG Indicators but pointed out that the evaluation costs would be reduced. He proposed that the WG evaluate the possibility of instituting a pilot project, developed with those Councils that are better structured (BRASIL, 2019b, p. 3).

Another action of the commission is to approve accreditations within the scope of the institution called Regional Accreditation of University Courses Mercosur (ARCU-SUR), since it is an "Agreement between the Ministers of Education of Argentina, Brazil, Paraguay, Uruguay, Bolivia and Chile, approved by the Common Market Council of the (Mercosur), through CMC Decision No. 17/08". The objective of the Regional Accreditation System of Undergraduate Courses of MERCOSUR (ARCU-SUR) is to offer "public guarantee, among the countries of the region, of the academic and scientific level of the courses" (ARCU-SUR, 2020).

Homologations, by the presidency of Conaes, of ARCUSUL accreditations: Dentistry Course of the Universidade Estadual Paulista Júlio de Mesquita Filho - UNESP offered in the city of São José dos Campos (SP) and Dentistry Course of the Universidade Estadual de Londrina - UEL offered in the city of Londrina (PR) (BRASIL, 2017f, p. 3).

According to the signed agreement, as portrayed in the decision no. 17/2008 of the Mercosur Common Market Council, accreditation is considered as "the result of the evaluation process by means of which the academic quality of the graduation courses is certified, establishing that they meet the graduate profile and the quality criteria previously approved in the regional scope for each diploma" (MERCOSUR, 2008, p. 3).

The term "accreditation", used in the scope of the MERCOSUR agreement, serves to differentiate the term "accreditation" since it refers to the Brazilian higher education regulation norms, and for the same reasons the term "course recognition" was not used. In this agreement, accreditation acts validate the "academic quality of the titles or diplomas granted by University Institutions, whose undergraduate courses have been accredited according to the ARCU-SUL System, during the period of validity established in the document issued by the respective National Agency" (BRASIL, 2018i).

However, this Mercosur agreement (2008, p. 6) states that "The recognition of the academic quality of the titles or diplomas of university degree that may be granted as a result of what is established here does not grant, in itself, the right to exercise the profession in other countries", reaffirming that, with the accredited diplomas, the professionals, in order to

exercise their profession in Brazil, will submit themselves to the requirements established for each category, taking, when applicable, the specific exams or joining the class bodies.

In Minute 153/2019, another set of accreditations was approved:

in the scope of ARCU-SUL, whose evaluations occurred in 2014, with favorable opinions: 1)Medicine Course of the Pontifical Catholic University of São Paulo - PUC/SP, offered in the city of Sorocaba - SP, for the period of six years, for meeting the criteria defined for the accreditation of the ARCU-SUL System; 2) Medicine Course of the Federal University of Health Sciences Foundation of Porto Alegre - UFCSPA, offered in the city of Porto Alegre - RS, for the period of six years, for meeting the criteria defined for the accreditation of the ARCU-SUL System; 3) Dentistry Course of the Universidade Estadual Paulista Júlio de Mesquita Filho, offered in the city of São José dos Campos - SP, for a period of six years, for fulfilling the criteria defined for the accreditation of ARCU-SUL System; and 4) Dentistry Course of the Universidade Estadual de Campinas, offered in the city of Piracicaba - SP, for a period of six years, for fulfilling the criteria defined for the accreditation of ARCU-SUL System. The accreditations were approved (BRASIL, 2019c, p. 1-2).

In the analysis of the records, with respect to concrete actions, there are actions of forwarding proposals, in most cases, because the commission does not have, as established by Law no. 10.861/2004, the legislative function, and must, therefore, offer suggestions to the competent bodies for the final approval and consolidation of the related guidelines.

Regarding the deliberations about the competences of the commission, it is interesting to note that in Minute 143/2018 an unusual situation arose, demanding deliberation about the competence or not of Conaes in manifesting about what occurred. It concerns the:

case of the Medicine Course of the University Center for the Development of the Alto Vale do Itajaí - UNIDAVI, maintained by the Educational Foundation of the Alto Vale do Itajaí, after the Ministry of Education's decision to remove the course from the e-MEC Registry, as it considered that its insertion had occurred erroneously. However, one of its members argued that the MEC's decision was in disagreement with what is determined by Article 2, §4 of Decree No. 9235, December 15, 2017, which "Provides for the exercise of the functions of regulation, supervision, and evaluation of higher education institutions and graduate and postgraduate higher education courses in the federal education system," by not observing that it was a HEI created by the municipal public power and existing before the date of the enactment of the Constitution of 1988. For Decree 9.235 ensures that these HEIs, maintained and administered by a public law legal entity, even if not free of charge, are linked to the respective state education system. After the collegiate debate, the competence of Conaes to manifest itself about the fact was preliminarily recognized, since the issue would have repercussions on how the evaluation of the institution would be carried out, a topic of interest to Conaes. In merit, it was agreed that the theme would be resumed at the next meeting, after copies were forwarded to all members for a previous study, with a view to later presentation of forwarding (BRASIL, 2018a, p. 1-2).

In a preliminary manner, the competence of Conaes to manifest about the fact exposed is recognized, however, in Minute 144/2018, the discussion was resumed, and in the meeting of March 20, 2018, the collegiate recognized the incompetence of Conaes to manifest about the occurrence, being possible at most the sending of letter requesting the SERES/MEC to

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review the case, since the President manifested and "in the presence of the collegiate, anticipated the conversation on the subject, highlighting that in his understanding the matter is not of Conaes competence, and, especially, considering that the decision now questioned, was taken by Seres/MEC." (BRASIL, 2018b, p. 3).

One can highlight the ignorance and insecurity of the commission itself regarding what its role would be, in the act of retreating from a decision already made, admitting that they had prematurely defined the competence of Conaes on the case, going back in the next meeting.

Also note the ignorance of the commission itself regarding its competencies in meeting No. 136/2017, which thus states:

Proposal to sign a Memorandum of Understanding with the National Council for Quality Assessment of Higher Education of Mozambique. However, the President informed, that after consulting the International Advisory Office of the Minister's Office, that Conaes does not have its own legal personality to sign memorandum of understanding of international character (BRASIL, 2017d, p. 2).

It was recorded, therefore, that the "Inep is the body that usually signs cooperation agreements on higher education assessment (graduation) with agencies of this type in other countries" (BRASIL, 2017d, p. 2).

Having highlighted these points, it is worth noting an uncertainty regarding the competencies of Conaes, which are often discussed during meetings, are unknown by other bodies and by the commission itself.

There is also the ignorance of other bodies in relation to the competencies of Conaes, observed in the record of Minute 132/2016, when the president of the collegiate on that occasion, when passing the reports, communicates the receipt

of the Letter No. 7946/2016, from the Federal Public Prosecutor's Office, Attorney General's Office in Goiás, of December 01, 2016, in which it requests clarifications regarding the realization of in loco diligences, specifically aiming to obtain information about the actual conditions of supply of undergraduate nursing courses, in distance learning modality, in the State of Goiás. The President clarified that a response was forwarded informing that it is not the competence of Conaes the onsite visits and suggesting the MPF to forward expedient to Inep and Seres (BRASIL, 2016b, p. 1-2).

It is noted that another external body in relation to the area of education, this time the Federal Public Ministry, requested Conaes to conduct a local verification, which is beyond the scope of its competencies, requiring a response indicating to which bodies such request should be forwarded.

Despite the identification of speeches that reveal a certain exaltation of the role of Conaes, this attribution is not clear when reading the minutes, except in relation to more practical issues.

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He then turned the floor over to Secretary [...], who expressed his satisfaction in presiding over the ceremony for the election and inauguration of the President of Conaes (2017 mandate), highlighting its importance in the national scenario of higher education assessment. [...] Finished the first stage of the meeting, the Secretary [...] thanked the receptivity and made himself available for a cooperation work, considering the role of Conaes, not only as a coordinating and supervisory body of Sinaes, but as an integral part of a system that seeks the improvement of its own bases (BRASIL, 2017b, p. 1-2).

In the set of minutes analyzed, there is a demand from the members of the collegiate in relation to their own peers to assume a proactive posture. It can be interpreted as a joint effort to reaffirm the role of Conaes, without, however, being accompanied by resolutions, measures or directions that would consolidate this purpose.

It is recurrent in the minutes the request by the members for a "less reactive and more proactive posture, taking for itself the role of protagonist provided in the Sinaes Law" (BRASIL, 2017b, p. 2). At the close of this same assembly, the President resumed, who "closed the meeting thanking once again the trust placed in him and ensuring that the Conaes will fulfill its competence proactively and in cooperation with the other bodies involved in the evaluation of higher education" (BRASIL, 2017b, p. 4).

It was pointed out, in another moment, the "lack of representativeness of Conaes in the planning and development of Sinaes, for not having an adequate structure for the fulfillment of its legal attributions [in which a] call for the promotion of meta-evaluation of the System arises, after its fourteen years of existence" (BRASIL, 2017i, p. 1-2)

In one of these speeches, it is revealed the recognition that the commission performs only homologatory role, which coincides with the feeling that one has during the reading of the documents, since the commission seems insecure regarding its own competencies, identified in the manifestation of one of the members when agreeing with other participants.

He emphasized that he considers it important to discuss the role of Conaes, from the political standpoint, as well as the fulfillment of its competencies. He acknowledged that Conaes has been performing only a homologation role in the evaluation process. And he emphasized that the collegiate should rethink its way of acting to establish a protagonism in this process. [...] the President closed the meeting thanking once again the trust placed in him and ensuring that Conaes will perform its competence proactively, collaboratively, and in cooperation with the other bodies involved in the assessment of higher education (BRASIL, 2018b, p. 4)

During the reading of the minutes, several speeches related to a concern about the suppression of the competencies of this commission were verified, as well as its insignificant participation in events in the area, when Conaes has not even been mentioned. This is a recurring complaint from commission members who complain about the absence of the commission and, therefore, witnessing the lack of visibility in events related to the evaluation of higher education, an area of its competence.

From the reading, the impression remains that the participation in events does not happen in a natural way, requiring effort from the Commission to be recognized and included, as can be seen in the records of Minute 131/2016, when a member referred to the

VI National Meeting of the Census of Higher Education-ENCES and registered his disagreement with the fact that Conaes, as one of the actors in the assessment process, did not participate in the opening table, because in his understanding there is no way to talk about census of higher education without talking about assessment and, consequently, there is no way to talk about assessment without mentioning Conaes (BRASIL, 2016a, p. 4).

This questioning results in a "Message sent to the Minister of State of Education, regarding the inclusion of Conaes in the invitations sent by the MEC", according to Minute 135/2017, which is a formal request for the MEC to give due prominence to the Commission (BRASIL, 2017c, p. 2).

This request does not seem to have been correctly met, because related questions return in later minutes, explicit in the speech of one of the members, when

asked for the floor to register his justification for not having been present at the round table held at Inep about in loco evaluation instruments, which occurred last October 10, as he had been informed and invited the day before, which prevented the issuing of tickets and other arrangements that would make his participation possible. On the same subject, [the president] registered his total dissatisfaction for the way the Conaes and its representatives were excluded from this sphere of discussion, as he insisted, in advance, through several channels to obtain information about the meeting, without having had a return (BRASIL, 2019c, p. 2).

Thus, it is registered the impression that the Commission does not receive due recognition from other bodies and, to be present in the events, it needs to request its inclusion, often disregarded.

The concern of the commission with the suppression or appropriation of Conaes' competencies by other related bodies is constant, as exposed in Minute 131/2016, in which a member justifies that

could not participate as a debater in the seminar "The Scenario of Higher Education Evaluation in Brazil and the performance of Inep/MEC, held by ABMES, due to health problems. However, he followed the event on TV ABMES and noticed that the debaters did not mention Conaes at any time. Once again, he registered his concern in the suppression of Conaes' competencies (BRASIL, 2016a, p. 4).

One of the committee members, according to Minute No. 137/2017, reports an attempt to change evaluation criteria without the committee's knowledge:

He informed the other members about a meeting between the President of the National Association of Undergraduate Courses in Administration - Angrad and the Secretary of Sesu/MEC, in which Angrad requests Sesu's intervention aiming at presenting to INEP an accreditation model, in the molds of the one used by the Latin American Accrediting Agency - EQUA, of results assessment and not of processes. [...] pondered that the Conaes needs to be attentive, because this matter, if it really

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gets to be analyzed by Inep, needs to be submitted to Conaes, for reviewing evaluation criteria. And one cannot fail to consider that the evaluation is used in several other processes, such as regulation and supervision. [another member] emphasized that the Sesu Secretary, even before submitting to Inep, should forward to Conaes (BRASIL, 137, 2017c, p. 1-2).

In particular, the conduct of class councils is denounced, being the object of debate by the members of the commission, to combat usurpations of CONAES' legal powers:

The conduct of the class councils regarding the certification of their professionals and the impacts they may cause on the assessment, regulatory, and supervision processes also came up. There were several manifestations regarding the class associations, and everyone agreed that there can be no usurpation of CONAES' legal competencies and that any activity of the Councils should be in the sense of complementing the activities of this Commission (ATA 137, 2017, p. 2)

It is worth noting, moreover, a registered appeal "about the effective fulfillment by the MEC of the exclusive competencies of Conaes provided in Law No. 10.861, of 2004, the Sinaes Law that created Conaes, and its Internal Regulations, approved by the MEC Ordinance No. 930, of 18/03/2005". This member cites "texts published in his blog, in which he reports the appropriation by other bodies of Conaes' competencies" (BRASIL, 2018c, p. 4).

Continuing, to observe how recurrent, the subject is, Minute No. 150 has:

Denouncement of an alternate of a Councilor of the Council of Architecture and Urbanism of Brazil, about the implementation by the referred Council of a project of accreditation of courses in the scope of its operation, contradicting the Law of Sinaes, in what refers to its competence. [...] deliberation of the Collegiate what would be the understanding of Conaes, and actions, regarding the complaint on the implementation by the Council of Architecture and Urbanism of a project of accreditation of courses within the scope of its operation. Considering that the complaint had already been forwarded to the Secretariat of Regulation and Supervision of Higher Education (Seres/ MEC), those present understood that an eventual implementation of examination by CAU/BR does not reach and does not compromise the competences of MEC and its bodies regarding the attributions and exercise of the functions of regulation, supervision and evaluation of Higher Education (BRASIL, 2018h, p. 3).

The non-compliance with the Sinaes law, in the sense of attempts to change assessment procedures without the presence of Conaes, culminated in great debate at the meeting 153, due to the pronouncement of the current Minister of Education Abraham Weintraub:

that during the 21st National Forum of Brazilian Private Higher Education, defended greater freedom, with responsibility, for free initiative higher education institutions, proposing self-regulation of the sector, with minimal state intervention. Prof. [...] informed those present that he once again demanded the fulfillment of the Sinaes Law and the legal recognition of the competencies of Conaes. Expressing that no change in the assessment can occur without the Commission participating in the process (BRASIL, 2019c, p. 3).

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The evolution of the facts and their records allows us to see the recurrence of denunciations of attempts of appropriation by other organs of Conaes' competencies, especially class councils, including the pronouncement of the current Minister of Education at the time. The impression remains that Conaes constantly suffers these kinds of attacks, which go against the Sinaes law, and that it needs to be always vigilant about its competencies, guaranteed by law. However, there is no evidence of a more forceful attitude from the commission, besides making requests about the fulfillment of the provisions of the law that gave it origin and grants it attributions.

Another issue that highlights the little visibility given by the MEC to Conaes, not only in events, but in relation to its entire role in the search for quality in higher education, is the issue of the Ministry's own organizational chart, as settled in several minutes, including when the President of the Collegiate "emphasized his dissatisfaction after entering the MEC portal and finding that the Ministry's organizational chart makes no reference to Conaes." (BRASIL, 2016a, p. 4). This suggests that Conaes was not even considered in the hierarchical structure of the MEC. Thus, a request was forwarded and, unmet, there was reiteration "to the Office of the Minister of State of Education, for inclusion of Conaes in the organizational chart of the MEC" (BRASIL, 2017h, p. 2). The actions of the collegiate presented success and, after three other meetings, in the meeting of No. 144 (2018) the response of the MEC was registered:

Following the other reports, [...] made the Collegiate aware of the receipt of Letter No. 292/2018, from the Office of the Minister/MEC, dated March 8, 2018, on the inclusion of Conaes in the organizational chart of the MEC. [...] emphasized that the fulfillment of this demand aims to give the recognition, political and legal, that Conaes should have according to the Sinaes Law (BRASIL, 2018b, p. 3).

The attitude of the commission regarding this achievement causes strangeness, since after requesting and insisting for the inclusion of the commission in the MEC organizational chart, thus giving visibility and political and legal recognition to its actions, members of the commission consider the issue irrelevant, as can be read in Minute 144/2018, the record that follows:

asked for the floor to state his position regarding the demand for the inclusion of Conaes in the organization chart of the MEC. For [...] this issue is irrelevant, as he understands that Conaes should be guided by a deeper discussion of its role, from its original conception to the present day, considering the rethinking of the system and the meta-evaluation that is being conducted by the OECD, which will present an external and impartial view. In the sequence [another member] expressed his agreement with [...] regarding the formality of inclusion of Conaes in the organizational chart, considering it irrelevant (BRASIL, 2018b, p. 3).

From the readings still related to the organization chart of the institution, the impression remains that Conaes does not have due recognition, ignored by the MEC itself in its organizational and hierarchical structure. After insistence by the commission, there is an advance in relation to this recognition, but at the same time it is considered irrelevant by some members. In this sense, we can also identify a lack of unity in the commission's decisions, revealing conflicting views about the most appropriate way to ensure autonomy and recognition vis-à-vis other bodies.

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Associated with the issue of visibility in the organizational chart of the Ministry of Education, the commission seeks greater articulation with nearby bodies, through "contacts and negotiations made with the leaders of Sesu, Seres and Inep for greater articulation with Conaes" (BRASIL, 2017C, p. 2). The intention is maintained, as we read in the manifestation of members of the commission, also in a later meeting,

in the sense of highlighting that in addition to the Lord Minister's recognition of the competencies of Conaes, that it is necessary to develop an articulated work with the main interrelated bodies, that is, those that Conaes has a greater interaction in the performance of its attributions, namely Seres and Inep (BRASIL, 2018c, p. 4).

Due to the scarce recognition that Conaes itself admits, the commission seeks articulation with interrelated bodies, linked to the national higher education assessment process, as evidenced by the excerpts highlighted in the minutes and cited above.

One of the topics addressed with greater emphasis in meetings held by the commission deals with the reformulation of Enade and Sinaes, as recorded in a long excerpt in Minute 135/2017.

Following the agenda, the members deliberated on the constitution of special committees to conduct studies related to ENADE 2018 and the general model of Sinaes. [...] asked for the floor to express his position on the subject. He stated that he believes that the entire higher education evaluation system, not only Enade, needs to be reviewed, including the current "provisional concepts" and the on-site verification system, which in his view is too complex, too expensive, and innocuous. But that these changes cannot be made in a hurry. [Prof. [...] expressed his agreement with [...]'s comments.] He pointed out that he understands that there is no more time to rethink the Enade 2017, but that the work should be developed to suggest changes for the year 2018. He supposed that there would be enough time to propose, test, and finally translate it into practical measures for reformulating the exam, but stressed that the Commission should focus on Sinaes as a whole, and the study of Enade is a consequence of the Commission. It was decided to create a Special Commission to study Sinaes as a whole (BRASIL, 2017c, p. 2-3).

It is pointed out in the sense that "it is up to Conaes the responsibility for the initiative to carry out the evaluation of Sinaes, of its results and, eventually, to propose changes or alternatives." (BRASIL, 2017d, p. 3). However, everything must be structured and consolidated in a document to "be presented and discussed in broad meetings, with the participation of members of Conaes, the Ministry of Education, researchers, and people involved with public and private higher education in Brazil." (BRASIL, 2017d, p. 3) It is interesting to note that the initiative in carrying out this reformulation is defended by the members, with broad democratic participation from other bodies and stakeholders. This stance can be considered pertinent if one considers the nature of the item to be reformulated, its enormous complexity, and the number of those involved.

Also, in this aspect the role of Conaes that should be to "propose and evaluate the dynamics, procedures and mechanisms of institutional assessment, courses and student performance" the commission has a secondary role and even disposable, given its little representativeness (BRASIL, 2004).

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At a certain moment, one of the members of the committee brings to the debate what may be considered a lack of compliance with the Internal Regulations, when he points out that

the collegiate need to comply with the Internal Regulations regarding the following working instruments: a) Indication - propositional act, signed by one or more members, containing a justified suggestion to conduct a study on any matter of interest to Conaes; b) Opinion - act by which the Collegiate pronounces on a matter of its competence; and c) Resolution - act arising from an opinion, intended to establish rules to be observed on a matter of Conaes competence (BRASIL, 2018b, p. 3-4).

This member "stressed that Conaes does not use any of the instruments and suggested that they should be adopted immediately in the fulfillment of its competencies" (BRASIL, 2018b, p. 4). In response, the president "agreed with the points made and proposed to present a work plan, in compliance with the internal regulations, which, according to him, may encounter obstacles due to the lack of funds, infrastructure, and support, which CONAES does not have today" (BRASIL, 2018b, p. 4).

The subject was resumed in the following meeting.

As the first item on the agenda dealt with the discussion and deliberation of the norms and models for Conaes acts, a topic raised by Professor [...] at the last meeting, the President proposed to the Collegiate the approval of the following models of acts, in line with what is established in the Internal Rules of the Commission: 1) Conaes Resolution; 2) Conaes Opinion; 3) Summary of Opinion, homologated by the Minister, for publication in the DOU; 4) Conaes Indication and 5) Ordinance of the competence of the President of Conaes (BRASIL, 2018c, p. 3).

This is therefore a positive feature observed. The committee always takes up unfinished business from previous meetings. The continuity is important because many issues require more than one meeting for resolution, in which new elements are added, such as the forwarding of this issue, in which the "Professor [...] also suggested that the President should bring to the attention of the Minister the acts approved by the Collegiate, because in this way the Conaes will be safeguarding the fulfillment of its competencies" (BRASIL, 2018c, p. 4).

Such discussions show that Conaes is a body that defines itself during its operation, reviewing its performance frequently. Positively, one can consider this constant review beneficial since the role of the commission is enhanced. On the negative side, however, it reveals the commission's uncertainty about its practices, as well as little or no relevance to the definitions, attributions, and directions concerning the National System for Higher Education Assessment.

#### **Quality in Higher Education, According to Conaes**

Besides the discussion of the role of Conaes, it remains to be understood how the commission addresses the issue of Quality in Higher Education. The first aspect that stands out is the fact that in the set of minutes studied, the word "Quality" is not directly mentioned.

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In the minutes number 135, 139, 145, 154, and 157 there is no mention of the quality of higher education, the central objective of Sinaes. However, as mentioned above, the words "Evaluation, Education and Higher Education" appear in all the minutes analyzed. In this sense, it can be inferred that Conaes considers "Evaluation" a synonym for quality, a characteristic already identified in other works that address the Sinaes theme, as highlighted by Pimenta (2013, p. 12) when he states:

MEC's own Assessment Instruments have been used as a quality benchmark, since they [...] provide quality indicators for the course or institution and graduate the indicators into concepts, defining the minimum standard of quality as concept 3 on a scale of 1 to 5.

Conaes continuously brings "guests with the intention of presenting and debating points of the Enade, with a view to reviewing procedures and promoting the improvement of the quality of the assessment of Brazilian higher education" (BRASIL, 2016a, p. 1). It was identified, in these minutes, reports of participation in events and congresses whose focus is the improvement of quality in Higher Education.

Regarding CRUB's event, he reported that new perspectives and possibilities for the input in the evaluation of Higher Education were discussed, with a broad debate about indicators of quality in Higher Education. Regarding Conave, Prof. [...] clarified that he participated in a roundtable with the presence of the lecturer Prof. [...] from (USP), who presented aspects of the indicator developed by him called 'Basic Education Opportunity Index'. The index was created to mobilize public managers around the challenges imposed to improve the quality of educational opportunities, as it brings together several other indicators of educational inputs and results per territorial unit. (BRASIL, 2016a, p. 3-4).

Also in Minute 131/2016, p. 4) the ongoing studies were recorded dealing with:

Quality Indicators for Higher Education prepared by the Study Group on Indicators for Higher Education (GEIES). At first, it was clarified that the GEIES brought together experts from various fields of expertise to advance reflections on the analysis of Higher Education, with the purpose of strengthening assessment versus regulation, providing indicators that give more support to the management of institutions and courses in search of quality improvement. Indicators related to students, institutions, and methodological aspects were suggested. Next, the Inep technician presented a summary of the studies on indicators conducted in the period 2013-2016, as well as the recommendations of the technical team of the General Coordination of Control and Quality of Higher Education of DAES/INEP (BRASIL, 2016a, p. 3-4).

There is another Minute that deserves to be highlighted, which focuses on

'Reform and Improvement of Higher Education Evaluation in Brazil: reflections from an internship abroad' and provoked a debate on some controversial points, since the creation of the exam, such as its pertinence, its purpose, the quality and safety of the exams and the calculation of the Enade concept and IDD, highlighting the CLA exam as an example that could be thought of (BRASIL, 2016a, p. 5).

In Minute 131/2016 it is identified the recognition that ENADE can be considered as "an ally for the planning and execution of public policies aiming at the improvement of the

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academic quality of higher education, highlighting the need to understand its methodological characteristics in order to draw conclusions" (BRASIL, 2016a, p. 3-4).

In the meeting of number 132/2016, the reformulation of assessment instruments for distance education was addressed, whose goal is that "the instruments can in fact measure the quality of courses and/or HEIs and effectively serve the regulation and supervision, respecting quality standards and with a more accurate look to the indicators" (BRASIL, 2016b, p. 3).

It is verified in the reading of the minutes the mention of quality indicators and changes in the methodology of calculation of these indicators, as is the case of the "Enade Concept, which is a quality indicator that evaluates the undergraduate course from the performance of students" (BRASIL, 2017a, p. 4), noting that the word Quality is preceded by the term Indicator. Therefore, the way the commission evaluates the quality of higher education has been based solely on indicators, without further conceptual reflections or values.

As stated by Haas and Pimenta (2014, p. 193) that "With the Sinaes, the issue of the quality of higher education becomes the centrality or purpose of the assessment" and considering the interpretation made by Dias Sobrinho (2008, p. 819) that "Quality is, then, conformity to standards previously established by experts and members of bodies that define the criteria and standards through which the academic sectors are controlled and measures are taken" and goes further, when saying that:

As a general trend, it is observed that when evaluation and the concept of quality are determined by external experts and government authorities, in general, they are limited to control, measure, certify and regulate, to the detriment of participatory and formative processes of reflection and debate of the academic and scientific community, with prejudice, therefore, to the exercise of university autonomy (DIAS SOBRINHO, 2008, p. 819).

It is possible to notice a concern regarding the return on the investment made, in order

to

To know if the current model of the system has, in fact, contributed to improving the quality of higher education over the years, and if any improvements that may have existed justify the large human, institutional, and resource investments that the system has required (BRASIL, 201d, p. 3).

However, these discussions always end up returning to the Review of "quality indicators: IDD, CPC and IGC; and of the concepts Enade, CC and CI" and "to the quality indicators and the methodology of their calculations, especially the questioning about the weightings and statistical transformations to which the original data are submitted for the production of the preliminary concepts." (BRASIL, 2017e, p. 2).

Turning, therefore, to the research of Haas and Pimenta (2014, p. 193) there is how to admit that quality is transverse of indicators and instruments, when they state:

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The Federal Constitution, the Ordinary Laws, the Decrees and Ordinances, since 1988, the Sinaes Law of 2004, and all the Instruments arising from it, created to support the accreditation and reaccreditation processes of higher education institutions and courses, define, in themselves, the minimum quality standards and, therefore, define the concept of quality in higher education and the respective valid indicators for the accreditation of the course or institution.

When the International Seminar that addressed Evaluation took place, there was an "Invitation from Inep for the President of Conaes to participate as a debater at the Roundtable "Perspectives on the quality indicators of Brazilian Higher Education", during the International Seminar: Evaluation of Higher Education: characteristics and perspectives" (BRASIL, 2017h, p. 2). At the following meeting, roundtable participations were evaluated, and the fourth table "dealt with the role of Enade and Indicators in the Induction of Quality in Higher Education" (BRASIL, 2017i, p. 1).

Another highlight in the discussions regarding quality deals with the "Meta-evaluation in the scope of the National System for Evaluation of Higher Education (Sinaes), with special attention to the Quality Indicators, pointing out what is expected of these in new proposals for measuring the quality of Brazilian Higher Education. The discussions about quality always take place around "Quality Indicators as subsidiaries to the processes of regulation and supervision of the Federal and State Systems of Higher Education" (BRASIL, 2017i, p. 2).

An indirect mention of quality was made at meeting No. 142, in which one of the members:

It also requested the attention of Conaes to the movement that is insurging, called 'Permanent Forum on Higher Education in the Vision of the Federal Councils of Regulated Professions', composed of several Class Councils, warning about the proliferation of distance higher education courses and the consequent poor professional training (BRASIL, 2017j, p. 4).

When the reappointment of Prof. Paulo Cardim to the presidency of Conaes, he "stated his commitment to contribute to the full implementation of the National System for Higher Education Assessment (Sinaes) due to the importance of the system in ensuring the quality of higher education provided in the country" (BRASIL, 2018b, p. 2).

In the effort to understand if evaluative indicators can diagnose the quality of higher education, Morosini *et al* (2016, p. 15) highlight that:

There is no doubt that the concept of quality is impacted by the regulation arising from educational policies and the representation of society, with special emphasis on what is manifested in the media. However, it should be noted that academic culture is also an important factor in determining understandings of quality in higher education.

In addition to national efforts in search of quality higher education, fundamentally anchored in the assessment instruments that are referenced by Conaes, there is concomitantly the concern to establish a quality capable of meeting international criteria, because, as Hizume (2019, p. 45) reminds us,

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In the context of internationalization of higher education, the implications of the definition of relevance and quality are projected beyond the national territory and involve not only the claims of a particular society, but of an entire conjecture articulated between actors and public opinion in the international arena.

The commission's work is aimed at adapting the system to international evaluation standards. The passage related to the visit of the OECD team to prepare a report on the Brazilian evaluation system is noteworthy:

The objective of the OECD work was based on evaluating the effectiveness and efficiency of the national system of undergraduate and graduate evaluation, considering: a) its contribution to the establishment of minimum quality standards; b) the differentiation of the instruments for evaluation of the quality of higher education providers; and c) the promotion of the elevation of the quality of education offered, as well as to indicate measures for the improvement of the existing system, aiming at its greater efficiency and effectiveness. In this context, topics were addressed, and recommendations were exposed, on a preliminary basis, as well as open the debate for discussion and presentation of contributions aiming at the consolidation of the final report (BRASIL, 2018g, p. 1).

From the analysis and understanding of the Minutes, it is possible to recognize that the commission defines the **Quality of higher education** and from the "quality indicators subsidize public policies and the processes of supervision and regulation" (BRASIL, 2018h, p. 4). Throughout the minutes, there are discussions about the changes of these indicators, which are often idealized "together with MEC bodies and representative entities of Higher Education, including with suggestions from Conaes, after the constitution of a Management and Advisory Group" (BRASIL, 2019a, p. 3). It also addresses the disclosure or not of indicators, as when "the Conaes decided that from 2020, the CPC and the IGC will not be disclosed by Inep, but only the indicators that constitute it, as well as other indicators or inputs that come to be studied or developed" (BRASIL, 2019b, p. 1).

The meetings also discuss "methodologies for calculating the Quality Indicators of Higher Education", proposing "suggestions for improving the Quality Indicators of Higher Education" (BRASIL, 2020a, p. 3-4).

In the last minutes analyzed, it is noted the reflection brought by a member, that

The main purpose of Enade is to evaluate the educational process of undergraduate courses based on student performance and that its results generate quality indicators of higher education used in public policies for supervision, regulation, funding, and induction of the quality of higher education (BRASIL, 2020c, p. 3).

In reading this set of minutes, it was not possible to identify in-depth discussions about what quality is, what the meaning of quality in higher education is, and the implications of establishing quality indicators.

It can be inferred, therefore, that for Conaes quality is synonymous with indicators, statistical data, without a practical definition of what quality is and what attributes or characteristics must be displayed by an institution or course to be considered quality, besides obtaining high statistical scores on the assessment indicators.

#### **Final Considerations**

Through the reading of the minutes of meetings supported using qualitative data analysis software, we sought to rescue the role of Conaes and the conception of Quality in Higher Education that permeates its directions.

In relation to the role of the commission, the reading and analysis of the minutes allowed us to understand that Conaes does not have an identity or even clarity concerning its attributions, competencies, and purpose. There is, recurrently, an effort in the assemblies, on the part of the collegiate, to define its identity once the ponderings of the members about the commission's attributions are constant, in a continuous process of improvement or even of struggle to find an acting space that justifies its existence and maintenance.

Even if the constant review of actions developed by the commission is considered positive, this same search indicates that there is an uncertainty of Conaes itself in relation to its role and, consequently, makes it unfeasible to fulfill its responsibilities established by Law number 10.861/2004, which seems to indicate that it is necessary for the collegiate to approach this theme - competence - in a more efficient, objective, and effective way, defining the scope of actions of what was initially designed as a fundamental body for the construction, deployment, and implementation of a Brazilian higher education assessment policy.

In this process of comings and goings, it was noted that the commission has taken steps backwards in relation to issues defined in previous meetings, uncertainty about the competencies of both the commission itself and other bodies, and concern about the suppression of its competencies by other bodies. The commission also needs to remain vigilant so that it is called to participate in events related to its area of activity, since it is registered in several minutes the need to request its inclusion in these events, since the invitation does not occur in a natural way, evidencing the little expression of the commission in the definition of actions and measures related to the evaluation of higher education.

In some minutes it was evident the denunciations of attempts to alter the assessment mechanisms, without the due participation of Conaes, contrary to the Sinaes Law. In relation to these themes, a recurring complaint from its members is registered, an insistence that the commission needs to be more incisive, proactive, and not only reactive, in the execution of its attributions, which by following the minutes has not produced any positive result, remaining more like internal complaints from a group without a technical or political action capable of changing or even valuing the actions of higher education evaluation.

The commission, through the set of minutes, has been careful not to leave unfinished business from one meeting, without continuity in the next meeting. It was noticed, therefore, continuity in subjects that require more than one meeting to exhaust the discussions on the theme.

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Concerning the discussions about Quality in Higher Education held by Conaes, it was found in the analyzed minutes the recurring presence of the expression "quality indicators", as well as discussions about changes in the methodology of calculation of these indicators, with the common use of the word Indicators instead of Quality, which ratifies, based on the analysis performed, that the way the commission evaluates the quality of higher education is solely based on indicators.

It was also observed the uneasiness of the commission in relation to the lack of infrastructure, professional support team, institutional subsidy, or financial resources that the Brazilian Education Evaluation System demands. Such questioning, to verify if the current model contributes to the improvement of the quality of higher education, "starts from the premise that today the system is large, complex and expensive" (BRASIL, 2017d, p. 3). It is worth noting that this questioning did not develop into an in-depth discussion of the investment/return relationship in the form of increased quality in higher education and, quickly, the discussions return to the review of "quality indicators."

In the analyzed minutes there is no in-depth discussion about the concept of quality and its implications in Higher Education, with the discussions being restricted to quality indicators, statistical data, and mass evaluations. It was not possible to identify, by reading the minutes, definitions of the concept of quality, attributes, actions, and characteristics of certain institutions considered determinant for the Higher Education offered to be of higher or lower quality. In this sense, it is important to emphasize the importance of Conaes resuming discussions about the concept of Quality, considering the purpose of Sinaes.

From the analysis performed, it is possible to question the very existence of Conaes, since there is little evidence that its performance makes it a deliberative instance with the authority to instrumentalize and configure the assessment practices, as well as the contributions of the Commission in the organization of higher education with quality as a goal were not detected.

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