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## Twenty years of the National Higher Education Assessment System – SINAES in Brazil: trajectory, principles, dilemmas and trends

Vinte anos do Sistema Nacional de Avaliação da Educação Superior – SINAES no Brasil: trajetória, princípios, dilemas e tendências

Veinte años del Sistema Nacional de Evaluación de la Educación Superior – SINAES en Brasil: trayectoria, principios, dilemas y tendencias

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**Abstract:** The main objective of this work is to promote a reflection on the twenty years of implementation of the National Higher Education Assessment System - SINAES, with a view to carrying out the historical rescue of its formulation and implementation context, in addition to discussing the evaluation principles, the characteristics, tensions, dilemmas and perspectives for the system. It was found that SINAES incorporated into its structure, over two decades, divergent evaluation visions and principles, which bring the evaluation closer to its objective and regulatory aspects. As trends, we see the weakening of institutional evaluation, in loco external evaluation, and of the system itself, as a basis for regulating the provision of higher education in the country.

**Keywords:** SINAES; evaluation; higher education.

**Resumo:** O objetivo principal desse trabalho é promover uma reflexão a respeito dos vinte anos de implementação do Sistema Nacional de Avaliação da Educação Superior - SINAES, tendo em vista realizar o resgate histórico de seu contexto de formulação e de sua implementação, além de discutir os princípios avaliativos, as características, as tensões, os dilemas e as perspectivas para o sistema. Verificou-se que o SINAES incorporou em sua estrutura, ao longo de duas décadas, visões e princípios avaliativos divergentes, que aproximam mais a avaliação aos seus aspectos objetivos e regulatórios. Como tendências, verificamos o enfraquecimento da avaliação institucional, da avaliação externa *in loco*, e do próprio sistema, como base para a regulação da oferta de educação superior no país.

**Palavras-chave:** SINAES; avaliação; educação superior.

**Resumen:** El principal objetivo de este trabajo es promover una reflexión sobre los veinte años de implementación del Sistema Nacional de Evaluación de la Educación Superior - SINAES, con miras a realizar el rescate histórico de su contexto de formulación e implementación, además de discutir los principios de evaluación. las características, tensiones, dilemas y perspectivas del sistema. Se encontró que el SINAES incorporó a su estructura, a lo largo de dos décadas, visiones y principios de evaluación divergentes, que acercan la evaluación a sus aspectos objetivos y normativos. Como tendencias vemos el debilitamiento de la evaluación institucional, la evaluación externa *in situ* y del propio sistema, como base para regular la oferta de educación superior en el país.

**Palavras clave:** SINAES; evaluación; educación superior.

## 1 Introduction

The National Assessment System for Higher Education (SINAES) in Brazil reflects the impact of a series of discussions on educational evaluation within both the international and national academic spheres, as well as the evaluation experiences of institutions throughout the country's recent history (Dias Sobrinho; Balzan, 2000).

One of the first initiatives in this direction was the PARU (University Reform Evaluation Program), launched in 1983. It was, in essence, a "research project on the state of higher education in the country" (Barreyro; Rothen, 2008, p. 135) aimed at understanding, through systematic investigation, the real conditions of knowledge production and systematization within the national higher education system. To achieve its goals, the program recognized the need for evaluating the system, including both public and private institutions.

In 1993, following the impeachment of President Fernando Collor, university professor Murilo Hingel assumed the Ministry of Education. During his administration, the National Evaluation Commission was established within the Secretariat of Higher Education (SESu), initiated by the National Association of Directors of Federal Institutions of Higher Education (ANDIFES) and supported by the National Union of Teachers (Andes) and other representative higher education entities (Leite, M., 1998; Leite, D., 2005). This commission was created to establish guidelines and facilitate the implementation of institutional evaluation processes in Brazilian universities (Barreyro; Rothen, 2008). Notably, academics such as Héglio Henrique C. Trindade, José Dias Sobrinho, Dilvo I. Ristoff, Isaura Belloni, and Denise Balarine Carvalho Leite, among others, participated in this Commission and its Advisory Committee. These individuals would later play a significant role in the discussions and implementation of SINAES.

The outcome of discussions between the National Evaluation Commission and its Advisory Committee with the academic community resulted in a document containing a proposal for Higher Education Institutions (HEI) evaluation. This proposal was divided into two parts: the first focused on theoretical references regarding higher education evaluation, while the second outlined guidance for implementing the evaluation (Barreyro; Rothen, 2008). After being submitted to the Ministry of Education (MEC), the proposal evolved into a national program, the Institutional Evaluation Program of Brazilian Universities (PAIUB). This program, which provided funding for its development, became a reference project for evaluating Brazilian universities (Leite, M., 2008, p. 61) and allowed for the voluntary participation of universities. "This was likely the first encounter of national Higher Education Institutions with a national institutional evaluation procedure" (Leite, D. 2005, p. 21), considering that, up to that point, effective institutional evaluation experiences were limited to isolated cases within individual universities.

However, in November 1995, at the initiative of Paulo Renato de Sousa, then Minister of Education in the Fernando Henrique Cardoso government and former Rector of the University of Campinas (Unicamp), a complementary assessment instrument was conceived within the MEC and the National Institute for Educational Studies and Research Anísio Teixeira (INEP). This instrument was the National Course Exam (ENC), nicknamed "Provão" by society, which was effectively implemented in November 1996. PAIUB continued to be implemented in some public HEIs, but its funding was discontinued, leading to a gradual decline in the program and prompting mobilization from the academic community regarding the implementation of ENC.

Despite diverse criticisms from the academic community of public HEIs, but with strong support from private HEIs and significant media attention, ENC remained the primary instrument driving public policies for higher education until 2004. During this year, a change in government occurred, marking the implementation of the National Assessment System for Higher Education (SINAES).

This study aims to promote reflection on the twenty years of SINAES implementation, aiming to revisit the historical context of its formulation and implementation. Furthermore, the study will discuss the system's evaluative principles, characteristics, tensions, dilemmas and future prospects.

## 2 Context of Discussion and Formulation of the System

In 2002, Luiz Inácio Lula da Silva (Lula), from the Workers' Party, assumed the presidency of Brazil. Alongside the changes accompanying the national political and electoral landscape, higher education evaluation also experienced transformations.

Ristoff and Giolo (2006) report that Proposal No. 12 of the then presidential candidate's political program for that election specifically addressed the need to revise the existing evaluation system of the previous government, which was based on ENC, and to implement a national evaluation system based on PAIUB. "Evaluation was considered one of the key elements to ensure quality in the system and promote university autonomy" (Barreyro, 2004, p. 42). The proposal took into account legal provisions from the 1988 Constitution, specifically Article 209, which links authorization of teaching to quality evaluation by the public authorities; the Law of Guidelines and Bases for National Education (LDB) in its Article 46, which articulates the accreditation of institutions, authorization, and recognition of courses to a regular evaluation process; and the National Education Plan (PNE) of 2001, which, in its Article 4, anticipated the establishment of a National Assessment System.

The same PNE proposed the expansion of the national educational system at all levels, ensuring quality. "It was to guarantee expansion with quality that the need for systematic evaluation was established" (Ristoff; Giolo, 2006, p. 196). Despite this, Barreyro and Rothen (2011) argue that education evaluation did not hold the same centrality in the new government's agenda as it did in the previous administration. This is because, in the context of higher education, evaluation competed with the concern for expanding the Federal Network of education through the implementation of the Federal University Restructuring Program (REUNI), the creation of Federal Institutes of Education, Science, and Technology, the establishment of the Open University of Brazil (UAB); the implementation of affirmative action policies for access and democratization; and the continuation of expansion through private initiative, through the University for All Program (PROUNI) (Barreyro; Rothen, 2014).

Regarding the discussions surrounding the proposal for implementing the new evaluation model, the authors recall that this period was also marked by intense disputes between groups with competing evaluative perspectives: one advocating for an emancipatory perspective on evaluation and the other defending a regulatory perspective. Barreyro (2004) and Barreyro and Rothen (2006) provide detailed accounts of the events during this phase.

As Barreyro clarifies, President Lula appointed Dr. Cristovam Buarque, former Rector of the University of Brasilia (UNB) and former governor of the Federal District, as Minister of Education. In April 2003, Buarque formed a Special Evaluation Commission (CEA) to propose reforms in the evaluation processes, instruments, and policies, and in the regulation of higher education. According to the author, the commission was predominantly composed of academics linked to public universities, some with experience in formulating PAIUB.

After four months of work, during which representatives of the community were heard, a proposal for a National Assessment System for Higher Education (SINAES) was presented, representing a collective effort (INEP, 2009). Dias Sobrinho (2004), president of the CEA, explains that the commission's proposal emphasized the system as an organizing concept for coherence between ideas, practices, and objectives. "Therefore, the concept of a system requires coherence between the theoretical construction, the methods, and the objectives" (Dias Sobrinho, 2004, p. 114).

The author asserts that the educational philosophy of SINAES in the commission's proposal was guided by the principle of integration:

- a) of a conception of Higher Education as a system of social interest,
- b) of evaluation as a participatory practice and ethical endeavor aimed at organizing means to strengthen processes of individual and institutional emancipation in accordance with the requirement of public responsibility,
- c) of articulated instruments for achieving objectives consistent with the philosophical, epistemological, and ethical-political foundations (Dias Sobrinho, 2004, p. 114).

Dias Sobrinho (2004) explains that the guiding principles of SINAES proposed by the CEA were: social responsibility, consisting of the quality of HEI actions considering the collective interest and the needs of the population; recognition of the diversity of the system; respect for institutional diversity; comprehensiveness, concerning the evaluation of all institutional dimensions and structures within the institution; continuity, referring to the permanence of articulated evaluation processes in contrast to isolated procedures; commitment to education, with evaluation as an instrument for questioning educational purposes, i.e., an instrument for generating meaning; and transparency, relating to the first principle of social responsibility and the information of evaluation results to competent regulatory bodies and society, based on institutional reports.

The characteristics of evaluation in this proposal included: participation of all actors within the internal and external community; integration with regulatory processes; technical and ethical rigor; formative effectiveness; social effectiveness, relating to the production of positive effects for the advancement of knowledge and society; flexibility, considering respect for institutional autonomy and diversity; and finally, institutionality, signifying that the primary focus of evaluation is the institution and its specificities (Dias Sobrinho, 2004, p. 117-118).

Concerning the evaluation processes proposed by the CEA for the system, the author explains that the central process would be Institutional Evaluation, supported by other actions and instruments. Institutional Evaluation would be composed of processes of internal evaluation (self-assessment), complemented by external evaluation processes. Support instruments anticipated the assessment of teaching conditions, a registry of HEIs for system improvement, the use of information from the census of higher education, and the application of an integrated, sampled assessment by area of knowledge, known as PAIDEIA, at the beginning and end of the course, replacing ENC but not described in the proposal as an exam.

Regarding the articulation between evaluation and regulation, the proposal envisioned the authorization of a course or HEI as the starting point, triggering institutional evaluation processes to inform subsequent regulatory stages: recognition, accreditation of the institution, renewal of recognition, and re-accreditation (Dias Sobrinho, 2004).

As noted by Barreyro (2004) and Barreyro and Rothen (2006), the CEA proposal immediately faced criticism from former members of the previous government linked to MEC/INEP and the media, prompting a reaction from the then Minister. To address these criticisms, the Minister invited former MEC/INEP members to form a new commission to discuss the CEA proposal. Criticisms focused on the “subjective” aspect of institutional evaluation, the sampling system proposed by the CEA, and in defense of the need for a ranking.

Meanwhile, Barreyro clarifies that the Minister also decided to formulate his own proposal, attempting to reconcile the contributions of the CEA with the criticisms of the other commission, adding a unique element: a set of four measurement indices, adopting a summative, quantitative, and ranking-facilitating evaluative approach.

However, neither proposal achieved full success or reached discussion in Congress. The matter was implemented through Provisional Measure (MP) No. 147 of December 2003, intended to establish the National System for Evaluation and Progress of Higher Education (SINAPES) in place of SINAES. The system would assess institutional capacity, teaching and knowledge production processes, learning processes, and the social responsibility of higher education institutions, as proposed by the Minister, but without the creation of the proposed indices; nor did it mention any type of examination (Barreyro; Rothen, 2014). MP 147 made little use of the CEA proposals; however, its text mandated the creation of a Specific Commission for Evaluation (CPA) within each public or private HEI, following the CEA’s proposal. For Barreyro and Rothen (2014, p. 66), “the provisional measure that established SINAPES did not respect the debate process, going so far as to ignore the proposal presented by the Ministry itself.” With political changes the following year, a new Minister of Education, Tarso Genro, took office, and MP 147 was voted on and transformed into law by the National Congress, recovering part of the CEA’s proposals.

This historical contextualization is useful for understanding how the dispute between the evaluative conceptions defended by groups associated with higher education, in a way, were accommodated within the current legislation, resulting, as Barreyro and Rothen (2011, p. 83) argue, in a “hybrid law that aims to reconcile emancipatory evaluation with system regulation,” as it incorporates concepts, principles, and methods derived from PAIUB, ENC, the CEA proposal, the IDES text, and MP 147/03 (Barreyro; Rothen, 2006).

### 3 Context of System Implementation

Therefore, on April 14, 2004, Law No. 10,861 was approved, which establishes:

Art. 1º The National Assessment System for Higher Education - SINAES is hereby established, with the objective of ensuring a national process for assessing higher education institutions, undergraduate courses, and the academic performance of their students, as provided for in Article 9º, VI, VIII, and IX, of Law No. 9,394 of December 20, 1996.  
§ 1º The purposes of SINAES are to improve the quality of higher education, guide the expansion of its offer, permanently increase its institutional effectiveness and academic and social effectiveness, and especially promote the deepening of the social commitments and responsibilities of higher education institutions, through the valorization of their public mission, the promotion of democratic values, respect for difference and diversity, the affirmation of institutional autonomy and identity (Brazil, 2004).

As can be inferred from the reading of Article 1, the system is composed of three interrelated assessment processes: institutional evaluation, course evaluation, and student performance evaluation. The sole paragraph of Article 2 stipulates that evaluation results constitute the basic reference for the processes of regulation and supervision of higher education, including the accreditation and renewal of accreditation of higher education institutions, the authorization, recognition, and renewal of recognition of undergraduate courses, consolidating the evaluation-regulation relationship foreseen in the 1988 Constitution and consolidated in the LDB 9394/96, more specifically in its Article 46.

Concerning institutional evaluation, the law specifies that its objective is to identify the profile and significance of HEI performance, considering 10 dimensions: institutional mission and development plan; policies for teaching, research, postgraduate studies, extension, and their respective forms of operationalization; the institution's social responsibility; communication with society; personnel policies, careers of the teaching staff and technical-administrative staff; institutional organization and management; physical infrastructure; planning and evaluation; student support policies; and financial sustainability (Brazil, 2004).



To evaluate institutional dimensions, the law provides for “diversified procedures and instruments” (Brazil, 2004), including self-assessment and external on-site evaluation. It also establishes a scale of 1 to 5 for generating concepts assigned to the evaluation results of each dimension, as well as for an overall result. For Barreyro and Rothen (2011, p. 83), the permanence of this scale is “a striking characteristic of the dissemination of evaluation results during the Fernando Henrique Cardoso’s government that remains in the SINAES law [...] which would open the possibility of ranking courses and institutions,” which, in fact, will be observed years later with the creation of quality indicators.

Derived from the CEA proposal, the law establishes the National Commission for Assessment of Higher Education (CONAES), a collegiate body linked to the Ministry of Education, composed of representatives from INEP, the Ministry of Education, CAPES (Coordination for the Improvement of Higher Education Personnel), students, faculty, technical administrative personnel associated with HEIs, and members of the community with expertise in evaluation or higher education management selected by the Ministry of Education. This commission, responsible for coordinating and supervising SINAES, is mandated to propose and evaluate the dynamics, procedures, and mechanisms of institutional evaluation, and to establish guidelines for organizing and designating evaluation commissions, analyze reports, prepare opinions, and make recommendations. The law reserves the more operational function of conducting evaluations for INEP.

Also stemming from the CEA proposal, the law mandates that each public or private higher education institution establish a Specific Commission for Evaluation (CPA) to guide institutional self-assessment processes and submit information to INEP. The law guarantees the CPA’s autonomy from other institutional bodies and affirms the participation of all segments within the community (Brazil, 2004).

It is important to emphasize that, from this point forward, most actions related to national higher education evaluation were addressed through MEC and INEP directives, some of which even contradicted the law itself, such as Normative Directive No. 40 of 2007, which rejects the mandatory on-site visit for course evaluation (Barreyro; Rothen, 2014, p. 69).

The regulation of system evaluation procedures is addressed in MEC Directive No. 2,051 of July 9, 2004. The directive ratified that the self-assessment process would be the responsibility of the CPA, guided by the guidelines established by CONAES, issued that same year, and that the deadline for presenting the results of the self-assessment process would be two years, starting from September of that year.

The Instrument for External Evaluation of Higher Education Institutions within the System was only approved in 2006, through MEC Directive No. 300 of January 30, 2006, and was regularly updated in subsequent years. According to Barreyro and Rothen (2014), the instrument for external evaluation of HEIs issued by CONAES prioritized the regulatory effects of evaluation.

Also in 2006, the National Council of Education (CNE) was added as another member of the system, through Decree No. 5,773; and the System Evaluators Bank (BASIS) was created for the training of professors who would form the external evaluation commissions. However, due to delays in the training process and some operational problems, the first external evaluations would only actually take place in 2009 (Barreyro; Rothen, 2014).

Therefore, for Polidori, Marinho-Araújo, and Barreyro (2006), SINAES signaled an advancement in the model for evaluating national higher education, shifting away from a market-driven paradigm that encouraged competition between institutions and the promotion of rankings toward a formative evaluation paradigm. However, although the neoliberal evaluation model for market regulation had been, at least at that time, superseded by a new model based on formative evaluation (Barreyro, 2004), the system presented contradictions, advancements, and setbacks, resulting from the tension between competing evaluative perspectives present in the national landscape and, as previously highlighted, the attempt to reconcile concepts, principles, and methods from different sources.

Some of these inconsistencies are pointed out by Barreyro and Rothen (2006) in their well-known article titled "Contradictory SINAES." The authors argue that, concerning the function of evaluation and its actors: the approved law positions the primary function as control by state agencies, in contrast to the evaluative principle of PAIUB, which aimed for emancipation with the protagonism of the internal community of HEIs; regarding the evaluation agency, they maintain that the main actor from the previous policy, INEP, is preserved, in contrast to the CEA proposal, which assigned greater responsibilities to CONAES; regarding the focus of evaluation, they posit that the CEA proposal centered on institutional evaluation complemented by other instruments and processes, while in the approved law, institutional evaluation competes with course evaluation and ENADE, and that, indeed, "within the framework established by law, each evaluation can be conducted independently, with each assigned a concept on a scale with five levels" (Barreyro; Rothen, 2006, p. 965). This becomes clear, for instance, in the lack of information on how HEI evaluation would articulate with course evaluation. They also argue that the law does not explicitly state the need for a comprehensive analysis of the integrated process results. Additionally, they assert that the law restricts the role of evaluation to guiding the expansion of the supply of higher education, not necessarily to support higher education policies; concerning the exam of academic performance, they believe that ENADE is not exactly

an instrument of institutional evaluation because it is also presented as one of the evaluative axes of the system, alongside institutional evaluation and course evaluation.

In the CEA proposal, the performance exam was intended to be one of the instruments for supporting institutional evaluation. They argue, therefore, that “the assessment of the product ‘education’ persists, despite successive criticisms, which leads us to the ‘conditionalities’ of international lending agencies” (Barreyro; Rothen, 2006, p. 966); and finally, regarding the dissemination of results, they contend that, by reintroducing a concept scale previously used in ENC, the approved law opens space for the resumption of ranking creation by the media, in addition to “recovering the possibility of compartmentalizing evaluation by providing for the separate dissemination of results” (Barreyro; Rothen, 2006, p. 967).

In addition to those pointed out by Barreyro and Rothen (2006), we can point out another incongruity in the SINAES Law, concerning the deepening of social commitments and responsibilities of higher education institutions through the valorization of their public mission, which leads us to question whether every HEI has a public mission and what, for example, would be the public mission, commitments, and social responsibilities of a private HEI.

The law mentions the social significance of the continued commitment to supply in dimension X, Financial Sustainability. In this dimension, therefore, there is a reduction of commitment related only to supply. Thus, it generically assigns a social commitment to all HEIs, but what is the “social commitment” of a private HEI when its ultimate objective is profit? Consequently, there seems to be an attempt to equate the social commitments of public and private HEIs; however, it is known that the ultimate commitment of a private HEI is to generate profit for its owners or maintainers, while the commitment of a public HEI is far more closely aligned with the interests of the community. This confusion or intentional generalization gives the impression that there are no differences in the nature of the two types of HEIs. If there were no difference in terms of social commitment, there would be no problem with suppressing or lacking either type of institution. In the case of a lack of public HEIs, there would be no detriment to social commitment, as private institutions would also assume this commitment. In our view, this does not correspond to social practice. It is a discursive maneuver that points to the interests of business reformers (see Freitas, 2018). One factor that may explain this generalization of social commitment related to supply could be the fact that in the same year, 2004, PROUNI was established, which would become one of the main sources of public financial support for HEIs in the private sector.

Franco (2012) also points out other inconsistencies, beginning with what he attributes to a certain haste in drafting the bill, regarding the definition of competencies for the Federal System and the State Systems of the Federal District. Indeed, the law addresses only HEIs of the federal system and the private sector and does not mention HEIs from these spheres or postgraduate studies, which also constitute higher education. It also highlights the confusion regarding the relevance of the ten dimensions in course evaluation, as it establishes the evaluation of teaching conditions, the profile of the faculty, physical facilities, and didactic-pedagogical organization.

Regarding the initial implementation of the law, Franco (2012), who served as president of CONAES on four occasions, believes that the main novelty at the time was to implement institutional evaluation. Therefore, the initial actions of the implementers were focused on mobilizing and training CPAs and conducting institutional self-assessment processes. Meanwhile, the author informs that INEP initially focused on implementing ENADE, based on its experience with ENC and the formulation of external and course evaluation instruments, as well as, subsequently, the construction and formation of BASIS. However, he observes that at the end of the first three years, of concrete evaluative results, only the application of ENADE was available, due to the various operational challenges of the system, such as: delays in analyzing self-assessment reports sent by CPAs to CONAES, indecision in the external evaluation procedure, and a large backlog of course authorization processes. "At the end of this first three-year period, SINAES and CONAES were starting to show their true colors. But what we had were still many processes and few results" (Franco, 2012, p. 18).

The complexity in articulating the evaluations that make up the system, operational challenges, and changes in the technical staff of INEP/MEC created a margin for the construction of indicators and indices that became integrated into the system analysis, bringing evaluation in this context closer to its objective-measurement perspective, and undoubtedly inaugurated another cycle that could be added to the one presented by Polidori (2009), which we can suggest as: Fifth cycle (2008 to present) - characterized by a departure from the emancipatory evaluation perspective, the strengthening of ENADE, and the valorization of quality indicators.

## 4 The Era of Indicators and the Departure from the Emancipatory Evaluation Perspective

Beginning in 2008, during Lula's second term, following the international trend of constructing indicators for monitoring public policies, in which the Basic Education Development Index (IDEB) had already been created for basic education; and in accordance with the specifications of Decree No. 5,773/2006, which defined the functions of evaluation, regulation, and supervision (Barreyro; Rothen, 2014), within the context of higher education, the Preliminary Course Concept (CPC) and the General Course Index (IGC) were created. Notably, these indicators, created through administrative instruments such as directives, are not stipulated in the SINAES Law.

Franco (2012) clarifies that CPC, the first of the quality indicators for higher education to emerge, was proposed by INEP with the aim of providing the "desired agility" to course evaluation processes, through a procedure deemed more practical, faster in delivering results, and clearer for society, which inevitably translates into the form of rankings.

CPC, as initially proposed, relied primarily (almost 90%) on results and information from ENADE (Polidori, 2009; Barreyro; Rothen, 2014), leading to a series of discussions and criticisms of the proposed new methodology. One of the implications of CPC for evaluation was the reduction of the need for on-site evaluation for courses achieving level 3 or higher on the scale, restricting it only to those achieving levels 1 or 2, i.e., only to those courses considered poor or very poor.

Polidori (2009) observes that the directive establishing IGC anticipates its use as a guiding reference for institutional evaluation commissions. The index is mistakenly confused by the media, including on official INEP pages, as institutional evaluation, as it is presented as the indicator that assesses the institution and its quality. It is essential to emphasize that the concept resulting from institutional evaluation is the Institutional Concept (CI) and that IGC is merely a quality indicator, primarily of courses and teaching conditions, which contributes to this concept and is highly valued by HEIs in their advertising when they achieve a satisfactory level on the scale.

Currently, "IGC is a weighted average involving the continuous grades of Preliminary Course Concepts (NCPC) of undergraduate courses and the CAPES Concepts of *stricto sensu* postgraduate program courses of HEIs" (INEP, 2020b, p. 1). This metric serves as a benchmark for comparing the evolution or regression of an institution's teaching quality. The index is considered in the accreditation and re-accreditation processes of HEIs and also serves as a criterion for creating public policies and for HEI participation in government programs. Depending on IGC performance, an institution may face sanctions ranging from a reduction in students per course to even non-re-accreditation of the HEI.

The establishment of quality indicators as a guide for system regulation in Lula's second term had implications for higher education evaluation: the "revival of the quantitative trend and the return of rankings" (Barreyro; Rothen, 2014, p. 70). For institutional evaluation within SINAES, it meant shifting the centrality of this axis to a peripheral position in relation to student performance evaluation (Dias Sobrinho, 2008), given that, as Polidori (2009, p. 448) highlights, "these indicators, CPC and IGC, seek to concentrate, in a single moment, information from a single 'pillar' of SINAES, ENADE, information about courses and the HEI." Denise Leite (2008, p. 834) shares this view, considering that "with this measure, SINAES would be affected in its conception. As a consequence, CPAs would lose their importance in conducting the evaluation processes."

For Dias Sobrinho (2008), INEP/MEC interventions in the system based on indicators break with the formative evaluation paradigm that was being implemented and revive stances, axioms, and approaches characteristic of the technical-bureaucratic paradigm, putting into practice "notions of quality and models of evaluation and quality assurance anchored in neoliberal doctrines and practices" (p. 820). Therefore, quality indicators within SINAES, which are constituted through external evaluation, have the potential to "stifle practices of dialogue and questioning inherent to participatory institutional evaluation that make institutions public spaces for debates and reflections" (Dias Sobrinho, 2008, p. 823), and erode the principles and values of formative-emancipatory evaluation that underpin the original proposal for SINAES.

Given the awareness of the insufficiency of indicators to adequately address the reality of national higher education, Fernandes, Griboski, and Meneghel (2017) report the creation in 2013, by initiative of INEP/DAES (Directorate of Assessment of Higher Education), of the Higher Education Indicator Study Group (GEIES), which brought together specialists in educational indicators, statistical tools, mechanisms for accessing and managing educational databases, as well as systems and policies for higher education assessment, with the purpose of debating the expansion of the number of indicators in Brazilian higher education. The proposals focused on creating a system of higher education indicator databases and reviewing indicator subsidies, such as improving the Student Questionnaire, refining the IDD (Indicators of Social Development), and revising IGC. It is unclear which proposals were effectively put into practice, but as a result, the authors inform that a model proposed by the group was adopted for the 2014 IGC. The fact is that, even though they are regularly revised, quality indicators of a quantitative perspective that support regulatory processes have come to stay in the system and impact the evaluative processes of national HEIs.

Verhine (2015), reflecting on the fifteen years of SINAES, considers that the adjustments made to the system, through the use of indicators not stipulated in the SINAES Law, were the best possible arrangement to ensure the system's credibility and guarantee its contribution to regulating higher education, given the large backlog of processes and the impossibility of conducting on-site visits for all the thousands of ongoing courses and even more being created, which were essential for the system's viability. However, for this author, the regulation-evaluation relationship, although complementary, constitutes a continuous tension within the system, in a way that the objectivity and ease of reading elements of the regulation field weaken the aspects of formative evaluation and its instruments.

Ribeiro (2015, p. 143) agrees with this understanding, arguing that the system has not fully institutionalized evaluation, as it "is organized to simultaneously address two distinct purposes: institutional improvement and development on the one hand, and regulation on the other." For Ribeiro, the greatest challenge of SINAES is precisely to harmoniously combine the two evaluation models, regulatory and formative, not necessarily mutually exclusive, but with distinct theoretical-methodological nuances.

Further, due to this ongoing tension between regulation and evaluation and the system's operational challenges, the topic of higher education regulation and evaluation once again emerged as a national issue in 2012, during the administration of President Dilma Rousseff, with Bill 4,372/2012, under discussion in the Federal Chamber, proposing the creation of the National Institute for Supervision and Evaluation of Higher Education (INSAES). The purpose, according to Verhine (2015), was for higher education evaluation and the subsequent regulatory and supervisory processes to be carried out within the same body, in order to strengthen the regulation-evaluation relationship within the system and streamline regulatory processes, considering that the regulation and evaluation of Brazilian higher education are the functions of distinct government bodies.

Lopes (2019) conducted research on the INSAES proposal. For this author, the proposal to create this institute aligns with the state reform proposal initiated in the 1990s, finding similarities with a regulatory agency format, and is situated in a context where the market-education relationship seeks to establish a new regulatory framework, highlighting the role of parliamentarians and representative entities associated with the private-commercial sector in disputes within congressional committees.

Despite the approval of a request for urgency to discuss the bill in plenary, Lopes (2015) informs that the project progressed until 2015, when discussions were abandoned due to the political crisis that emerged, culminating in President Dilma's impeachment in 2016. This was the last time, to date, that the topic of higher education evaluation has been on the agenda of the National Congress. However, the perspective

of market regulation appears to be the trend to be followed by the system, as the following discussions suggest.

## 5 Ongoing Trends and Perspectives for the System

To understand the trends and directions of SINAES, Costa, Oliveira, and Gomes (2020) undertook a study of the legal alterations and regulations for the regulation, supervision, and evaluation of higher education implemented by the Brazilian state between 2016 and 2019, encompassing the Michel Temer government and part of the Jair Bolsonaro administration. According to the authors, during this period, the government “has been eliminating more objective mechanisms and criteria that established quality standards, as well as procedures that had been created with the involvement of public agents in the supervision of HEIs and courses” (Costa; Oliveira; Gomes, 2020, p. 15). This signals a greater flexibilization of criteria as a way to facilitate the expansion of courses and vacancies in private HEIs, particularly in the Distance Education (EAD) modality.

For the authors, this movement of flexibilization and facilitation of the expansion of higher education supply through private initiative results in alterations in the purposes, organization, conditions of offer, and functioning of HEIs, dismantling SINAES policies, moving toward the deregulation of higher education by the state and heading towards self-regulation by the market.

Evidence for their considerations includes the weakening of the Technical Commission for Monitoring and Evaluation (CTAA), through Directive No. 840 of August 24, 2018, which introduces the possibility of appealing against its decisions, which were previously non-appealable, shifting the final decision to the President of INEP; the reduction of the responsibilities and relevance of CONAES, through Decree No. 9,235 of December 15, 2017, which also grants a certain autonomy to colleges; and the confusion of institutional roles when, during the period analyzed, the SERES/MEC (Secretariat of Higher Education) occasionally assumed functions that are legally assigned to INEP.

In particular, Decree No. 9,235 of December 15, 2017, and Normative Directive No. 20 of December 21, 2017, grant exemptions from external on-site evaluation for both authorization and recognition and renewal of courses, subject to specific criteria. Costa, Oliveira, and Gomes (2020) also argue, through their analysis of the material, that on-site evaluation procedures have been relativized, tending to base their work more on evidence constructed by HEIs than on more objective aspects.

The nod to the market and the trend of increasingly flexible on-site evaluations have been taking shape. More recently, in February 2021, without further discussion,



the INEP website reported a proposal to update SINAES, originating from the head of the autarchy, through changes to Law No. 10,861 of April 14, 2004. The intention was to draft a bill and submit it to the National Congress.

According to the website, the proposal's objective was to initiate a debate to improve higher education assessment systems in Brazil.

Through this discussion, INEP hopes to enable the flexibilization of the assessment process management, generate integration between on-site evaluation, internal evaluation, the National Student Performance Exam (ENADE), and Quality Indicators, as well as create new indicators that provide transparency in data (INEP, 2021a).

Details of the aforementioned proposal, nor its content, were not included in the news or made available. The information was limited to indicating that the proposal was presented and discussed with CONAES and representatives of HEIs, without specifying which institutions or whether there were representatives of public or only private HEIs. The proposal was not located, and no public HEI issued a statement on the matter. The fact is that, two weeks later, the respective president of INEP was dismissed, according to the press, due to disagreements with the management of the then Minister of Education and problems with the National High School Exam (ENEM); the fourth president of the autarchy in the Bolsonaro government assumed the position, the fifth in the span of two years; and, as far as has been investigated, the aforementioned proposal was shelved by the new administration.

The new administration, with the support of the then Minister of Education, Milton Ribeiro (linked to a large private and religious university, the same one to which the then president of INEP, Danilo Dupas, was also affiliated), taking advantage of the disruptions brought to the field of education by the COVID-19 pandemic, immediately moved to flexibilize the external on-site evaluation, creating through Directive No. 165 of April 20, 2021, an anomaly: an on-site evaluation that is not in person, but virtual, which was not foreseen in the SINAES Law. Article 1 of the Directive defines:

§ 1º Virtual External On-site Evaluation is defined as an assessment environment in which new or innovative procedures can be implemented to enhance and modernize external visits for the evaluation of HEIs and undergraduate courses.

§ 2º Virtual External On-site Evaluation involves the organization, monitoring, and supervision of evaluation visits conducted by evaluation commissions, in a format mediated by technologies.

§ 3º Virtual External On-site Evaluation is the responsibility of the General Coordination for the Evaluation of Undergraduate Courses and Higher

Education Institutions (CGACGIES) of the Directorate of Higher Education Assessment (DAES) (INEP, 2021b).

The regulation of virtual external on-site evaluation came through Directive No. 183 of April 23, 2021. The result of implementing this instrument was that, according to the INEP website, in just two months of operation, the rate of in-person and virtual visits surpassed the total for the entire year of 2020, with the virtual modality accounting for 79.2% (531 out of 670) of the visits. The website informs that the forecast for the following months was to reach an average of 800 evaluations per month, solely in the virtual modality, due to the automation of procedures. Regarding the number of regulatory decisions, the INEP website indicates that, thanks to virtual external on-site evaluation, this number increased by 292%, and the rate of regulatory processes filed and finalized in the same year, just in the first five months of 2021, was 71%. These numbers were celebrated by the president of INEP and the Secretary of SERES/MEC, suggesting a potential expansion in the use of the instrument.

Although Directive No. 165 of April 20, 2021, clearly stated that the virtual external on-site evaluation should be in effect as an emergency and temporary measure, during the validity of the public health emergency declaration, the news reports that, due to the speed of the processes, representatives of private sector entities expressed their support for the adoption of the new format permanently, alongside the in-person evaluation, even after the COVID-19 pandemic. The news highlights the promotion of regular meetings with associations representing HEIs to discuss and refine the instrument. However, at no point is it clear whether public HEI representatives were involved in these discussions, only highlighting the statements of private sector representatives:

Virtual evaluation is indeed heading towards success. We strongly desire for it to remain even after the pandemic, extending to other courses and improving the tools, said Celso Niskier, Director-President of the Brazilian Association of Higher Education Institutions (ABMES).

We know that this ongoing evolution is not simple. These are challenging actions that require a lot of maturity. The synergy between SERES and INEP has greatly facilitated the success of these initiatives. We advocate for virtual procedures to not end after the pandemic and to become more robust, so they can coexist with in-person evaluation, asserted Iara de Xavier, Technical Director of the Brazilian Association of Independent and Integrated Colleges (Abrafi) (INEP, 2021c).

For Elizabeth Guedes, President of the National Association of Private Universities (Anup), "the new format is a significant advancement, considering that virtual visits will contribute to alleviating regulatory processes," she analyzed. In the opinion of Ivanete da Rosa Silva de Oliveira, President of the National Association of Institutional Researchers (ANPI-IES), the results are

already visible, "precisely due to the volume of processes that have been accelerated since the implementation of the model" (INEP, 2021d)

In June 2022, the virtual external on-site evaluation, this modality created exceptionally during the COVID-19 pandemic, was incorporated into the SINAES Law through Law No. 14,375 of June 21, 2022, stemming from Provisional Measure No. 1,090/21, which addresses the forgiveness of debts from the Student Financing Fund (Fies) to private higher education institutions.

It is important to clarify that, as Ristoff (2021b) points out, the context in which these novelties occur is one of systematic weakening of INEP, as a state institution, by the Bolsonaro administration. As the author lists, the actions of weakening include: successive changes of presidents and the appointment of individuals lacking technical expertise and experience with the autarchy's core activities to leadership and coordination positions; interference in the autarchy's activities; exclusion of the institute's technicians and specialists from discussions regarding changes in the methodologies of large-scale assessments; silencing of studies and results that contradict the government's ideological stance; and budget cuts to the autarchy.

All of this, particularly concerning the occupation of specific MEC secretariats regarding specific institute matters, seemed to indicate even greater centralization of the Ministry and stricter control, primarily over the content of exam tests, seeking ideological alignment with the prevailing conservative stance of the government.

In 2023, President Lula again assumed the government of the republic for his third term. Camilo Santana, former governor of the state of Ceará, known for implementing and encouraging large-scale external assessments within basic education in that state, was appointed to the MEC. Manuel Palacios, with extensive experience in the field of educational evaluation and with past stints in MEC secretariats, assumed the presidency of INEP. On the national education agenda that year, discussions regarding the reform of high school and the construction of the new National Education Plan (PNE) took center stage.

In April 2024, at the "20 Years of SINAES Seminar," organized by INEP to commemorate the system's two decades, novelties for the coming years were presented and discussed. One innovation involved presenting a proposal to revamp ENADE (new reference matrices, item models, and exam format), specifically for evaluating teacher training courses, encompassing the assessment of practical skills developed throughout supervised internships. This proposal was driven primarily by the low performance in evaluations of teacher training courses, particularly those offered in the distance education modality.

Another important point presented by INEP technicians at the event was the discussion about creating a basket of indicators. The idea, according to INEP technicians, was to revive the work done by the Higher Education Indicator Study Group (GEIES) in 2013, with the goal of enabling HEIs to select indicators that best represent their realities.

## 6 Concluding Remarks

It is evident that, since 2008, with the implementation of quality indicators and the emphasis placed on system regulation, institutional evaluation, particularly the dimension of self-assessment, has been continuously sidelined by system actors and HEIs. Furthermore, in recent years, there has been a noticeable increase in the influence of private HEI interests on INEP's discussions and actions regarding higher education, coupled with a tendency of right-wing governments to flexibilize external on-site evaluation.

In short, SINAES, despite existing for twenty years and persisting through multiple administrations, has become increasingly detached from its original, formative-based proposal. The emancipatory evaluation perspective has been further weakened by objective aspects intended for regulation, now present and amplified within the system's dynamics, mirroring the political circumstances that emerge in the national landscape.

Perhaps, as Ristoff suggests, this is the first of the great challenges to be faced by SINAES, lest the entire evaluation process loses credibility: "to effectively shift the focus of evaluation toward institutional evaluation (this is the origin of SINAES, and, until proven otherwise, it would be essential to give institutional evaluation the protagonism it rightfully deserves)" (Ristoff, 2021a).

## References

BRASIL. Lei nº 10.861, de 14 de abril de 2004. Institui o Sistema Nacional de Avaliação da Educação Superior e da, outras providências. **Diário Oficial [da] República Federativa do Brasil**, Brasília, DF, 14 abr, 2004.

BARREYRO, Gladys Beatriz. Do Provão ao SINAES: o processo de construção de um novo modelo de avaliação da educação superior. **Avaliação: Revista da Avaliação da Educação Superior**, Campinas, Sorocaba, v. 9, n. 2, 2004. Disponível em: <https://periodicos.uniso.br/avaliacao/article/view/1267>. Acesso em: 14 jul. 2021.

BARREYRO, Gladys Beatriz; ROTHEN, José Carlos. Percurso da avaliação da educação superior nos Governos Lula. **Educação e Pesquisa**, São Paulo, v. 40, p. 61-76, 2014. Disponível em: <https://www.revistas.usp.br/ep/article/view/81861>. Acesso em: 13 jun. 2021.

BARREYRO, Gladys Beatriz; ROTHEN, José Carlos. Avaliação da educação superior como política pública. *In*: ROTHEN, José Carlos; BARREYRO, Gladys Beatriz. **Avaliação da educação: diferentes abordagens críticas**. São Paulo: Xamã, 2011. p. 75-88.

BARREYRO, Gladys Beatriz; ROTHEN, José Carlos. Para uma história da avaliação da educação superior brasileira: análise dos documentos do Paru, Cnres, Geres e Paiub. **Avaliação: Revista da Avaliação da Educação Superior**, Campinas, Sorocaba, v. 13, n. 1, p. 131-152, mar. 2008. Disponível em: <https://www.scielo.br/j/aval/a/hWYTSMnMrWR5Q3TyzCpdQRj/>. Acesso em: 13 jun. 2021.

BARREYRO, Gladys Beatriz; ROTHEN, José Carlos. "SINAES" contraditórios: considerações sobre a elaboração e implantação do Sistema Nacional de Avaliação da Educação Superior. **Educação & Sociedade**, São Paulo, v. 27, p. 955-977, 2006. Disponível em: <https://www.scielo.br/j/es/a/k4GvPggGxKXNKJ85ZMySjnL/>. Acesso em: 13 jun. 2021.

COSTA, Aline Fagner de Carvalho e; OLIVEIRA, João Ferreira; GOMES, Daniela Fernandes. Mudanças na avaliação da educação superior no período 2016 A 2019: flexibilização (Des)regulamentação e Autorregulação. **REVELLI**, Inhumas, v. 12, p. 1-21, 2020. Dossiê: Políticas para educação superior e Plano Nacional de Educação, 2020. Disponível em: <https://www.revista.ueg.br/index.php/revelli/article/view/9924>. Acesso em: 13 jun. 2021.

DIAS SOBRINHO, José. Qualidade, avaliação: do SINAES a índices. **Avaliação: Revista da Avaliação da Educação Superior**, Campinas, Sorocaba, v. 13, p. 817-825, 2008. Disponível em: <https://periodicos.uniso.br/avaliacao/article/view/284>. Acesso em: 13 jun. 2021.

DIAS SOBRINHO, José. Sobre a proposta do Sistema Nacional de Avaliação da Educação Superior. **Avaliação: Revista da Avaliação da Educação Superior**, Campinas, Sorocaba, v. 9, n. 1, 2004. Disponível em: <https://periodicos.uniso.br/avaliacao/article/view/1257>. Acesso em: 13 jun. 2021.

DIAS SOBRINHO, José; BALZAN, Newton César. **Avaliação institucional: teoria e experiências**. São Paulo: Cortez, 2000.

FERNANDES, Ivanildo Ramos; GRIBOSKI, Claudia Maffini; MENEGHEL, Stela Maria. Novos indicadores para a educação superior brasileira: eles são necessários? *In*: SIMPÓSIO AVALIAÇÃO DA EDUCAÇÃO SUPERIOR, 3., 2017, Florianópolis. **Anais [...]**. Florianópolis, SC, 2017. Disponível em: [https://repositorio.ufsc.br/bitstream/handle/123456789/179396/102\\_00654%20-%20ok.pdf?sequence=1](https://repositorio.ufsc.br/bitstream/handle/123456789/179396/102_00654%20-%20ok.pdf?sequence=1). Acesso em: 14 jul. 2021.

FRANCO, Sérgio. O SINAES em seu processo de implementação: desafios e perspectivas. **Revista Entreideias: educação, cultura e sociedade**, Bahia, v. 1, n. 2, 2012. Disponível em: <https://periodicos.ufba.br/index.php/entreideias/article/view/6392>. Acesso em: 13 jun. 2021.

FREITAS, Luis Carlos de. **A reforma empresarial da educação: nova direita, velhas ideias**. São Paulo: Expressão Popular, 2018.

INSTITUTO NACIONAL DE ESTUDOS E PESQUISAS EDUCACIONAIS ANÍSIO TEIXEIRA – INEP.  
**Inep apresenta proposta de atualização do Sinaes.** 2021a. Disponível em:

<https://www.gov.br/inep/pt-br/assuntos/noticias/institucional/inep-apresenta-proposta-de-atualizacao-do-sinaes>. Acesso em: 17 jul. 2021.

INSTITUTO NACIONAL DE ESTUDOS E PESQUISAS EDUCACIONAIS ANÍSIO TEIXEIRA – INEP.  
**PORTARIA Nº 165, DE 20 DE ABRIL DE 2021.** 2021b. Disponível em:

<https://www.in.gov.br/en/web/dou/-/portaria-n-165-de-20-de-abril-de-2021-315215701>. Acesso em: 17 jul. 2021.

INSTITUTO NACIONAL DE ESTUDOS E PESQUISAS EDUCACIONAIS ANÍSIO TEIXEIRA – INEP.  
**Modalidade virtual viabiliza 670 avaliações desde abril.** 2021c. Disponível em:

<https://www.gov.br/inep/pt-br/assuntos/noticias/avaliacao-in-loco/modalidade-virtual-viabiliza-670-avaliacoes-desde-abril>. Acesso em: 17 jul. 2021.

INSTITUTO NACIONAL DE ESTUDOS E PESQUISAS EDUCACIONAIS ANÍSIO TEIXEIRA – INEP.  
**Regulação tem impulso com avaliação virtual e cresce 292%.** 2021d. Disponível em:

<https://www.gov.br/inep/pt-br/assuntos/noticias/avaliacao-in-loco/regulacao-tem-impulso-com-avaliacao-virtual-e-cresce-292>. Acesso em: 17 jul. 2021.

INSTITUTO NACIONAL DE ESTUDOS E PESQUISAS EDUCACIONAIS ANÍSIO TEIXEIRA – INEP.  
**SINAES – Sistema Nacional de Avaliação da Educação Superior:** da concepção à regulamentação. Brasília: INEP, 2009.

LEITE, Denise. Ameaças pós-rankings sobrevivência das CPAS e da auto-avaliação. **Avaliação:** Revista da Avaliação da Educação Superior, Campinas, Sorocaba, v. 13, p. 833-840, 2008. Disponível em: <https://periodicos.uniso.br/avaliacao/article/view/286/287>. Acesso em: 17 jul. 2021.

LEITE, Denise. **Reformas universitárias.** Avaliação institucional participativa. Petrópolis: Vozes, 2005.

LEITE, Maria Cecília Lorea. Avaliação e Relações de Poder: PAIUB e Exame Nacional de Cursos. **Avaliação:** Revista da Avaliação da Educação Superior, Campinas, Sorocaba, SP, v. 3, n. 1, p. 59-67, 1998. Disponível em: <https://periodicos.uniso.br/avaliacao/article/view/1338/1329>. Acesso em: 17 jul. 2021.

LOPES, Pedro Isaac Ximenes. **Avaliação e regulação da educação superior:** intenções e tensões na proposta de criação do Instituto Nacional de Supervisão e Avaliação da Educação Superior (INSAES). 2019. Tese (Doutorado em Educação) - Centro de Educação, Universidade Federal do Rio Grande do Norte, Natal, 2019. Disponível em: <https://repositorio.ufrn.br/jspui/handle/123456789/27744>. Acesso em: 17 jul. 2021.

POLIDORI, Marlis Morosini. Políticas de avaliação da educação superior brasileira: Provão, SINAES, IDD, CPC, IGC e outros índices. **Avaliação:** Revista da Avaliação da Educação Superior, Campinas, Sorocaba, v. 14, p. 439-452, 2009. Disponível em: <https://periodicos.uniso.br/avaliacao/article/view/314>. Acesso em: 17 jul. 2021.

POLIDORI, Marlis Morosini; MARINHO-ARAUJO, Claisy Maria; BARREYRO, Gladys Beatriz. SINAES: perspectivas e desafios na avaliação da educação superior brasileira. **Ensaio: Avaliação e Políticas Públicas em Educação**, [S.l.], v. 14, n. 53, p. 425-436, oct. 2006. Disponível em: <https://revistas.cesgranrio.org.br/index.php/ensaio/article/view/585>. Acesso em: 17 jul. 2021.

RIBEIRO, Jorge Luiz Lordêlo de Sales. SINAES: o que aprendemos acerca do modelo adotado para avaliação do ensino superior no Brasil. **Avaliação: Revista da Avaliação da Educação Superior**, Campinas, Sorocaba, SP, v. 20, p. 143-161, 2015. Disponível em: <https://periodicos.uniso.br/avaliacao/article/view/2170>. Acesso em: 17 jul. 2021.

RISTOFF, Dilvo I. **Grifos, gárgulas e a Lei do SINAES**. Educa2022, 2021a. Disponível em: <https://www.educa2022.com/post/grifos-g%C3%A1rgulas-e-a-lei-do-sinaes>. Acesso em: 17 jul. 2021.

RISTOFF, Dilvo I. **O Inep, o andaime e o sonho**. Educa2022, 2021b. Disponível em: <https://www.educa2022.com/post/o-inep-o-andaime-e-o-sonho>. Acesso em: 17 jul. 2021.

RISTOFF, Dilvo I.; GIOLO, Jaime. O SINAES como sistema. **Revista Brasileira de Pós-Graduação**, São Paulo, v. 3, n. 6, 2011. Disponível em: <https://rbpg.capes.gov.br/rbpg/article/view/106>. Acesso em: 13 jun. 2021.

VERHINE, Robert E. Avaliação e regulação da educação superior: uma análise a partir dos primeiros 10 anos do SINAES. **Avaliação: Revista da Avaliação da Educação Superior**, Campinas, Sorocaba, v. 20, p. 603-619, 2015. Disponível em: <https://periodicos.uniso.br/avaliacao/article/view/2323/pdf>. Acesso em: 13 jun. 2021.

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