



RETHINKING STANDARDS FOR QUALITY ASSURANCE AND ACCREDITATION: THOUGHTS FROM THE FIELD

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- Purpose: to rethink our approach to setting standards for accreditation
- Approach: the author reviews experiences of accreditation over the last decade working in accreditation around the world
- Findings: suggest that we need to review accreditation standards on a regular basis in terms of criteria suggested in the paper including: clarity; simplicity; costs; the academic culture(s); measurability; efficiency of the process; its legitimacy, and national goals.
- Research implications: the importance of regular review of standards for accreditation in the light of changes in higher education, its context, and the national academic culture(s).
- Practical implications: the importance of regular review of accreditation standards.
- Originality/value: a fresh look at standards by a long-time professional in the field.
- Please provide up to six keywords: standards; accreditation, self-assessment, quality assurance, academic culture, national quality goals.
- Categorize your paper under one of these classifications: a technical think piece.

INTRODUCTION: WHY LOOK AT STANDARDS?

Over the past decade I have worked with accreditors in a number of different countries, including the United States, Pakistan, Ghana, Bangladesh, South Africa, Ethiopia, Madagascar, Tanzania, Afghanistan, Mauritius, among others. Each has standards or criteria for accreditation that are spelled out in detail. And they have many similarities – indeed the similarities are quite remarkable as became clear in the study I facilitated of accreditors in Africa (Hayward, 2006) – as are the differences. Some of those differences reflect the history and culture of the process. For example, in the US its non-government origins are reflected in the academic focus of standards. In South Africa, the repression, injustice and violence of *apartheid* resulted in demands for openness and social responsibilities in higher education standards. In Vietnam, in the context of a culture of distrust of authority, one finds questions about who should assess standards – who can be trusted to do that fairly. In Afghanistan, cultural factors, including an unwillingness to criticize others, have consequences for *peer review* of standards. We have a lot to learn from looking at both the similarities and differences in standards internationally. One size does not fit all. There are many things we can learn from interrogating our standards, from asking some tough questions about them, and rethinking whether they are taking us where

we want to be, providing the information we seek, and helping us carry out the tasks intended.

Standards are the backbone, the foundation, of our quality assurance and accreditation processes. They set out what we value in higher education, what we define as appropriate and expected from our higher education institutions, administrators, faculty members, and students. And they tell others what we expect of our institutions – the public, employers, students, families, and those who would establish new institutions. Standards are in many respects the public face of higher education in terms of what is expected by way of quality and performance. Thus it seems worth while to review standards for accreditation very carefully from time to time.

Are we getting the information we need? Do the standards measure what we want to measure? As we look at institutional and program self-assessments, are the standards telling us what we want to know? Are they appropriate to the present time? Are they posing an undo burden on our institutions, our faculty, and our administrators? And for some of us it might be time to ask ourselves – when was the last time we reviewed the utility and effectiveness of our standards? For some the answer to that question might be embarrassing. It is also important to ask if the standards we are using provide the institutions, the public, and our stakeholders with the information and the confidence they need to conclude that we are doing our job well.

Critics of accreditation abound in many parts of the world who do not think accreditation is doing a good job. In the United States, for example, a 2006 report of the Education Secretary's Commission on the Future of Higher Education (The Spellings Commission) criticized accreditation suggesting it has "significant shortcomings" especially in terms of its perceived failure to examine student outcomes, its lack of accountability, transparency, and what was seen as a "largely internal role" – that is the close relationship between higher education institutions and accreditors. The Commission called for a "transformation of accreditation" (US Dept. of Education, 2006, p. 15). They are not alone in their criticism of accreditation. India has just undergone some major changes in accreditation and in Europe work has been underway for some years on a major transformation of the process – a process reflecting general unhappiness with the current systems in the region.

As higher education has changed over the last decades, moving to mass education in many parts of the world, the role of the state has increased. As that has occurred we have witnessed growing criticism about what is felt to be the lack of accountability of higher education and seen increased demands for external evaluation of the process, especially in terms of accountability for the use of state funds.¹ As Judith Eaton has noted, when higher education entered a new era of growth and expansion it developed "accountability obligations to multiple constituents, including students, governing boards, institutional and programmatic accrediting organizations and local, state and federal government. Higher education is also accountable to alumni, donors, and the taxpaying public."² How can we respond to these demands?

There are other criticisms of accreditation including from those who believe it has not been transparent enough. Dickenson talks about the loss of credibility of higher education (Dickenson, 2009, p.3) in many countries in recent years, partly because of its growth and increased demand for access at a time when competition for places in higher education has grown tremendously. On the other hand are the critics who argue that accreditation is too closely monitored by governments. As access to higher education broadened, the role of governments as funders has grown with the need to meet its rising cost. This has meant greater involvement of government in higher education in the name of accountability. Where higher education ceased to be an elite entitlement that could be left to the institutions themselves to regulate, there were increased demands for greater public involvement in the review of higher education to demonstrate that “resources available to institutions yield presumed educational gains” (Eaton 2009, p.1).

In recent years, we have all heard the criticisms from business and industry that higher education is not producing graduates with relevant skills, complaints about rising costs, demands for greater access, and a host of other complaints, many aimed at those involved in quality assurance and accreditation. Thus, as we think about standards, there are a number of issues we might examine in the course of our review. But first, let me say a few things about the history of accreditation and its implications for our review.

THE HISTORY OF ACCREDITATION AND STANDARDS

The first quality assessments appear to have taken place on the East Coast of the United States in the 1880s with several universities asking academics from other universities to carry out external reviews of their programs to provide them with an outside perspective on their academic programs. This was done as a kind of professional courtesy. The growth of quality assurance was driven by the expansion and diversity of higher education institutions and a desire to identify those institutions that were legitimate colleges (Brittingham, 2009, p. 14) differentiating them from those deemed to be sub-standard.

The first quality assurance organization was established in the United States in 1885 as the New England Association of Schools and Colleges. It did not adopt formal standards for membership until 1929 when it accredited the first private higher education institutions and several public universities. The first standards for accreditation appear to be those adopted by the North Central Association in 1913 (Brittingham, 2009, pp. 11 & 14).

The expansion of accreditation since that time has been driven by the growth of mass higher education around the world and its broader implications for increased cost to the state and the general public as well as a recognition that what happens in the university matters much more broadly than when it was primarily the realm of small elites and therefore not of general public concern. A second driving force was the realization that in a rapidly changing world, higher education must change too if economies are to remain or become competitive. In developing nations, the World Bank’s conclusions in 2002 that no state moves into the realm of developing nations without a high quality higher education system was a stark reminder that the state had a responsibility to make that happen (World

Bank, 2002). That recognition has seen the linking of quality assurance and quality improvement with the need for rapid change in higher education, flexibility, and self-adjustment – the capacity to deal with demands for change efficiently – as Neave puts it, the development of a “virtually organic capacity for self-adjustment” (Neave 1998, p. 274). We see this in suggestions that part of what quality assurance is about is making sure universities are keeping up with change; meeting or striving for world-class standards; making institutions competitive; producing graduates for today’s jobs, markets, and region-wide competition.

As higher education became viewed as more important to economic development around the world, one consequence was the rise of what has come to be called the *evaluative state*³ which was a reaction to the increase in state control of higher education. The “evaluative state” was an outgrowth of the increasing pervasiveness of state involvement in higher education and reflected an attempt to reduce state control through various kinds of public control tied to regular reviews of quality and yet also linked to institutional self-assessments. The hybrid that emerged was the result of both recognition that the bureaucratic centralized system didn’t work very well in the context of a need for rapid change and that what was needed was a system flexible enough to accommodate the rapid rate of change that required institutions to adapt in short periods of time (Amaral, A., & Rosa, 2010, p. 59). The problems, clearly spelled out by Neave, related to three domains of higher education: the historic systems of administrative control, on the need to find mechanisms of guidance which were faster, and about ways to speed up the process to implement change (Neave, 1998, p. 273). As higher education became more diversified moving away from an elite system with a narrow clientele and mostly similar values, this became more difficult. The results were both increased self-evaluation and the growth of intermediary bodies which served as the agents of evaluation and oversight, what for most of us are reflected in the quality assurance and accreditation system we have employed (Neave, 1998, p.275).

In developing nations, the need for quality higher education was increasingly recognized as central to development. At the same time the public saw that a good higher education was essential for their children. It was seen as the key to their success in increasingly competitive job markets. As a result, the public began to push for higher quality and greater government involvement in assuring that quality.

With the growth and the expansion of higher education came increased demands on quality assurance and accreditation. The expectations of accreditation grew as did the size of their mandates and the breadth of their tasks. In many countries, accreditation became like an “overloaded pack animal” as former university president Dickenson put it. He noted that “...accreditation has been burdened with expectations and duties far beyond either its design or its capability? Accreditation is often likened to a pack animal, saddled with more of a load than can reasonably be sustained” (Dickenson, 2009, p. 4).

Are we as accreditors, ministries, universities, government, or representatives of the public, putting too much of a load on accreditation? That is a question we need to ask – and to

answer. As we examine these issues there are a number of questions we ought to think about. I want to pose some of them here and explore them with you.

WHAT QUALITIES ARE WE SEEKING TO ASSESS AND ASSURE?

As we think about standards, it is useful to ask about the qualities we are seeking to assess and assure. In looking at accreditation around the world, one is struck by the wide range of goals set for accreditation in various parts of the world. In a study for the World Bank in 2006 we identified fifteen goals from the eleven national quality assurance agencies examined (Hayward, 2006). They were: performance, quality improvement, avoidance of fraud, elimination of substandard institutions, external review, information for stakeholders, relevance, a basis for certification, setting minimum standards, fostering quality improvement, verification of mission, accountability, regulation, allocation of resources, protection of the integrity of higher education, and a basis for international recognition (Hayward 2006, p. 8). In Europe, the guidelines for internal quality assurance list seven standards relating to policies and procedures for quality assurance: monitoring and periodic review, assessment of students, quality assurance of teaching staff, learning resources and student support, information systems, and mechanisms to inform the public (ENQA, 2009, pp. 16-19). What then are the major qualities people are seeking to assess and assure? Let's look at some of them.

- **The quality of educational services.** Most standards are trying to get at the quality of these services. Do they meet expectations? Are the teaching staff appropriately trained? Are the facilities adequate? What are reasonable expectations? How can we judge that? We get many answers to these questions. Srikanthan and Dalrymple, for example, see TQM as a useful way to judge higher education services (Srikanthan & Dalrymple, 2003). Most accreditation seeks to measure the quality of services.
- **Education level or appropriateness.** Are the courses and the material presented at the appropriate level? Are they challenging enough, preparing the student for today's job market? Are they relevant and what we should expect of a university, a first year or a graduate program?
- **Fulfillment of the institution's mission.** Is there truth in advertising? Does the institution deliver what it promises in its mission statement? This has been a particular focus in the UK and Europe, assessment of whether or not the institution is fulfilling its mission appropriately.
- **Accountability.** One of the major goals of accreditation has been to hold institutions, especially public ones, accountable. We see that very strongly in the goals of the European higher education area (ENQA, 2009, p. 12). And more recently it has become a major concern of government in the United States and its renewed scrutiny of higher education.⁴
- **Value for money.** The issue of value for money spent is another important issue and is related to accountability for both public and private institutions. What is the cost per student? Is it appropriate? Related to the question of value for money is recognition that the cost may be higher where a higher quality or level of

achievement is demanded. In an excellent piece by Daniel et. al. the authors explore what they call the “iron triangle” of access, cost, and quality noting that as quality increases so too does cost and if you increase access cost goes up or quality goes down. That is the “iron triangle” aspect of the interrelationship between the three. They explore alternative models that they suggest might help reduce the tight relationship they find between the three and thus reduce costs (Daniel, J., Kanwar, A., & Uvalic-Trumbic, 2009).

- **Improvement of the institution or the system.** A number of writers expressed concern about the narrow focus on accountability and value for money, fearing, as Newton argued that “...the proposes of quality seemed heavily weighted in favor of accountability, while improvement usually felt like a distant second” (Newton, 2010, p. 51.). Or perhaps improvement was not a concern at all. The European effort is designed both for enhancement of quality and for accountability seeing the two as compatible. These are among the basic principles on which the European effort is based (ENQA, 2009, pp. 12 & 14).
- **Guarantor of minimum standards.** An increasingly important goal of quality assessment is certification of standards in a way that meets cross national expectations of employers, other universities, and governments. We see that as an underlying theme of the European standards and guidelines which are “...designed to be applicable to all higher education institutions and quality assurance agencies in Europe, irrespective of their structure, function and size and the national system in which they are located” (ENQA, 2009, p. 12). This is a tall order.
- **Assuring student learning outcomes.** In recent years there has been growing concern about what students have learned. Higher education was called upon to demonstrate success – to provide concrete evidence of achievements by the students, increased skill, greater knowledge, to identify the value added by the higher education process. As Peter Ewell put it in 2001, “Student learning outcomes are rapidly taking center stage as the principle gauge of higher education’s effectiveness” (Ewell, 2001, p. 1). The outcomes were defined as: “particular levels of knowledge, skills, and abilities that a student has attained at the end (or as a result) of his or her engagement in a particular set of collegiate experiences” (Ewell, 2001, p. 6). And it was not only achievement and skills; outcomes could be measured in job success and personal satisfaction. Thus most accreditors, in the US and in many other parts of the world, now require evidence of learning outcomes. It has become important to demonstrate skills for employers and the employability to students and their families. This is also a response to public concern about “what and how much students have learned” (Ewell, 2001, p. 2). And increasingly around the world outcomes are sought to demonstrate that graduates meet employer’s demands for a “21st Century workforce that was highly literate, well-versed in problem solving and collaborative skills, and equipped with appropriate technical skills to meet the needs of an emerging ‘knowledge economy’” (Ewell, 2001, p. 2).
- **Institutional productivity and efficiency.** Related to accountability and outcomes are the growing demands to show that higher education institutions are productive (Gates et. al. 2002) and efficient. Part of that push is both public and private demands to demonstrate value for money, part of it reflects, as noted earlier, the

growing suspicion that higher education institutions are wasteful, too costly – a reflection of their loss of legitimacy and a lack of trust.

- **Relevance of instruction.** In recent years we have heard increasingly from business people and employers that graduates do not meet their needs – that the programs offered by higher education institutions are not relevant to the jobs being offered. With that come increasing calls for universities to become more attuned to the need of employers (Gates et. al. 2002, p. 2). This has brought a more instrumental focus to higher education in many places and moved away from the assumption that there is something beneficial about a higher education per se, that it makes a better citizen, a more developed and creative mind, someone with a broader world view. The goal of higher education is seen by many as primarily preparation for employment.
- **Consumer protection.** And finally, there has been a growing demand for consumer protection. Part of that is a result of both the increasing diversity and number of higher education institutions. With that have come a growing number of higher education institutions of dubious quality – some designed primarily to make money with little if anything invested in the education process. Some are fraudulent from the outset and are outright diploma mills going to great length to deceive the public and employers.⁵ People are increasingly looking to governments to protect them from such fraud.⁶

WHAT IS THE QUALITY WE ARE TRYING TO ASSURE?

I am not going to get into a discussion of definitions of quality, but I do want to say something about it. I am talking about “quality as excellence” (Saarinen 2010, p. 56.), though I find “fitness for purpose”⁷ useful in looking at specific cases, and “quality as perfection” (Saarinen, 2010, p. 56) satisfies my instincts as an academic. What I want to emphasize is that we all see quality as many things and that makes definition difficult, which in turn makes setting standards even more difficult, let alone seeing if we meet them. So, let us recognize that and move on.

WHAT ARE THE SPECIFIC NATIONAL GOALS FOR QUALITY ASSURANCE?

As Gates et. al. (2002, p 5) point out, it is important to define the goals of accreditation before selecting the measures of quality. We have talked about many of the goals used around the world. But as we review our own standards it is useful to ask ourselves, what goals are we trying to assure? Do the standards we are using meet those goals? Do they go beyond them? Do they fail to meet them? Are we getting the results we seek when assessing these standards?

The complications for quality assurance in some countries revolve around the variety of goals set for accreditation. The institutions’ goals may focus on quality improvement based on a particular vision of what a higher education should be. As we have seen, businesses may be focusing on narrow goals related to the needs of that particular employer, and government may have other goals such as good citizenship, particular ideological

orientations, or specific areas of technological training wanted. As we review our standards, we need to identify the range of goals sought, assess them, and think about the extent to which our standards give meaningful information about whether or not institutions are meeting these goals. The recent arguments in the United States, for example, on the part of Department of Education, were based on the assertion that accreditors were not adequately measuring student outcomes. We need to take such assertions seriously and be able to respond to them whether or not we think they are correct. Similarly, arguments by businesses that we are not turning out students who meet their needs should be explored and interrogated. We need to be able to show that what we are doing is appropriate, and if it is not, take remedial action, or explain why we think a particular goal is not appropriate to higher education.

WHO DECIDES THE GOALS FOR QUALITY ASSURANCE? HOW MUCH OF A ROLE DOES HISTORY, TRADITION, NATIONAL & LOCAL CONDITIONS PLAY?

In looking at standards, it is worth asking ourselves, “Whose goals are they?” The institution’s? Government’s? The public’s? Some mix? Does it matter? If we look at this question historically, we find that the early standards in the United States were largely set by institutions themselves in an effort to insure that they were providing the quality intended – asking other academics to look at their programs and assess them. The early assessments were designed as a tool for self improvement. They reflected the interests of the profession. Soon thereafter, with the creation of the first accreditation association, the New England Association of Schools and Colleges in 1885, the focus changed somewhat to an effort to differentiate quality institutions from those not up to par as the number of higher education institutions grew to 900 in the 1890s (Brittingham, 2009, p. 13). This was both in the professional interest of educators and in the public interest. It marked a change in focus, an additional focus for accreditation – serving the public interest. As we have seen, the role of accreditation as serving the public interest has increased over the years in a variety of ways from guaranteeing value for money, assuring minimal quality standards, protection from fraud, and informing the public. As Judith Eaton put it so well in 2006 writing about accreditors, “...it is very much in the professional interest of these organizations to provide additional, robust attention to the public interest. To this end, accreditors would benefit from routinely asking themselves probing questions to determine how well they serve the public interest, building confidence and trust” (Eaton, 2006, p. 3).

In most of the world, the goals and standards of accreditation are seen as those of the government. Most accreditation processes around the world have been set up by governments. That was the case with all the African accreditors examined in the World Bank study in 2006 (Hayward, 2006). In Asia, all but three of the fifteen quality assurance agencies examined in another study were started by governments (Lenn, 2004, p. 7).

There are a few countries in which the accreditation process is non-governmental, as in the United States. Nonetheless, even in the US accreditation is recognized by government and in recent years, the Department of Education has increasingly tried to regulated

accreditation. Still, the standards and goals are largely defined by the accreditation organization and higher education institutions – by the professionals in higher education rather than by government agencies or as part of the political process.

To the extent that the efforts to set up European Standards succeed, there will also be international accreditors with a reach across national boundaries. In the European plan, they will share their authority with national authorities, and in the long run, the Ministers at the Berlin Communiqué insisted that European standards would be “consistent with the principle of institutional autonomy, the primary responsibility for quality assurance in higher education lies with each institution itself and this provides the basis for real accountability of the academic system within the national quality framework” (ENQA, 2009, p. 13). As was made clear in the discussion of standards for Europe: “This makes a single monolithic approach to quality, standards, and quality assurance in higher education inappropriate” (ENQA, 2009, p. 11).

In the long run, for our purposes here, it does not seem to make a great deal of difference whose standards they are, rather what is important is whether or not the standards get at the goals intended in an effective, efficient manner. As we review standards, that will be our primary consideration.

ACADEMIC CULTURE(S), QUALITY ASSURANCE AND STANDARDS

In most of the world we can identify certain characteristics of an academic culture or cultures which impact on quality assessment. Most countries have created a culture of quality assurance based on the use of external examiners, boards of visitors, self-assessment, Ministry inspectors, professional review boards, and other review processes. These traditions affect the way in which standards are assessed and the effectiveness of the process. As we look at our standards we will want to take our own *academic culture* and history into consideration.

In some countries the process of quality assessment has been hindered by institutions that feel that no one knows enough to evaluate them. I saw that in Madagascar recently on the part of their flagship institution. It was seen in the arrogance of Harvard University in the early years of accreditation in the US in which it was argued that “no one else was good enough to judge Harvard.” In Ethiopia in 2003, a number of private higher education institutions argued that it was improper to introduce accreditation, that no one had the right to review them. Their view was expressed as: “let the market decide.” If people want what we offer, they should be free to have it.⁸ And yet, in higher education sadly, too many institutions happily take the money of students (often from families desperate for education but with little money) and it is only on graduation that they learn that the degree is worthless. It is in this context that accrediting organizations or government agencies are given authority to identify poor quality or the fraudulent institutions and close them.

The effectiveness of quality assurance is impacted by different cultural norms related to the willingness of individuals (academics or not) to make judgments about other academics or

institutions, trust in government and colleagues and a host of other cultural factors. In some cultures there is an unwillingness to say anything critical about anyone else. That poses problems for peer review and assessment at the present time in both Afghanistan and Madagascar. Similarly, there is the problem of trust in some societies – the ongoing suspicion of officials which has created tensions in both Afghanistan and Vietnam for those involved in setting up an accreditation process. Recognition of the effects of the culture one is operating in is critical as noted by Nguyen et. al. who point out that: “...one cannot attain a sophisticated understanding of current Vietnamese society, and particularly the Vietnam higher education system, without taking the persistence of traditional Vietnamese culture into account.” They point out that: “...Vietnamese beliefs and values about authority, hierarchy and social relationships could be an obstacle to implementing this approach [self-study, peer review and external evaluation]” (Nguyen et. al. 2009, pp 128 & 131. The authors noted that the fact that: “...administrators and academic staff expressed skepticism about the honesty, fairness and expertise of potential external agencies infers concern and reservations about the effectiveness of the current quality control system...” (Nguyen, et. al. 2009, p. 128). Can one have external quality evaluations in those contexts? Yes, I think one can, but it involves great care in recognizing the problems involved and planning for them.

I know of no country that does not have some traditions of quality assessment. Most of us live in countries where higher education admission is based on examinations of some kind. That is quality assessment. We use examinations to select the best secondary students for admission to at least some higher education. To be sure, there are also many institutions that take anyone able to pay or have “open admission” for students over a certain age.

Most of you come from countries with a long history of peer reviews for journals, for promotions and hiring. Many of you come from systems which use external examiners to review test results, programs, or departments. In some places, Ministries of Education have inspectors who examine institutions. Thus, there are many ways in which we make quality judgments in various aspects of academic life. Those traditions enhance the ability to put in place effective accreditation systems.

Thus, we know that local traditions, experience, notions of privacy, propriety, and trust, affect the quality assessment process. How do they affect our own ability to carry out quality assurance effectively? We need to think about that as we review our own standards.

WHAT MIGHT BE USEFUL CONSIDERATIONS WHEN WE ASSESS THE UTILITY OF OUR STANDARDS FOR ACCREDITATION?

We have explored a bit of the history of accreditation, some of the major goals and themes of accreditors, various cultures of accreditation, and looked at the sources of its authority in a number of different contexts. What do these suggest about standards? What kinds of questions should we ask about the standards we use? What criteria might we use in our assessment?

a) **Clarity of Standards:**

Do each of the standards get at what we want to know? Do they provide adequate information about the quality being provided? Are the results clear and unambiguous? Do institutions understand what is asked of them? Are their self-assessment statements as useful as they might be? Can we make the standards and what is needed to assess them clearer?

The controversy in the United States recently about standards for getting at student learning outcomes provides a good example of the problem of clarity. Most accreditation agencies in the United States have had standards about student outcomes for a number of years. Nonetheless, those looking at them from outside academia believed that these standards were not adequate. Part of the reason for that was ambiguity about the meaning of "student learning outcomes." Does it mean just passing a course or finishing a program with a good grade? That is an outcome? No, that was not sufficient from the point of view of any accreditor. More was demanded of institutions.

Yet, on close examination of what was meant by student learning outcomes it turned out that accreditors were measuring many different things. They included cognitive learning, career success, and individual satisfaction with the program. Different accreditors were measuring student outcomes in a variety of ways and at different levels including that of the institution, a program, and the students.⁹ For some what was important was the skills gained (perhaps measured by testing before and after course work) or, as for ABET the engineering accreditor, a list of tasks a graduate should be able to accomplish. For example, ABET standards in Aerospace Engineering and Astronautical Engineering stated that:

"Aeronautical engineering programs must demonstrate that graduates have a knowledge of aerodynamics, aerospace materials, structures, propulsion, flight mechanics, and stability and control."

Astronautical engineering programs must demonstrate that graduates have a knowledge of orbital mechanics, space environment, attitude determination and control, telecommunications, space structures, and rocket propulsion" (ABET 2005-6, p. 5).

For some accreditors outcomes could be measured through presentation of a portfolio, or in the arts by giving a performance. Student outcomes could also be measured in terms of employer satisfaction, graduate satisfaction, or an assessment of the quality of one's education after five years of employment. None of these are faulty ways to measure student outcomes, but the variety of meanings, methods of measurement, and meanings attributed to them did nothing to hinder the

impression in the Department of Education and elsewhere, that accreditors were not doing their job.

The importance of clarity was echoed by Michael Lambert, Director of the Distance Education and Training Council (DETC), an accreditor of distance education institutions, who noted that the DETC experience had shown that the accreditors have to be very prescriptive since they deal in the for profit sector and dare not leave anything to the imaginations of those they review.¹⁰

For most accreditors the emphasis in recent years has been on clarity, to add descriptions of each of the standards to make them as clear and straightforward as possible. That was the response of several directors of associations with whom I discussed this question recently. They have added sections to their standards that “elaborate” on the standards.¹¹ This greatly cut down on the questions the accreditor received about self assessments. Another director noted: “Too few words can be a problems as well. As my predecessor said, Institutions want to know what to do, but they don’t want to be told what to do. The section of our standards on Assessment seemed to strike the right balance in 2005. Now we may be able to say the same thing in fewer words.”¹²

What does that suggest for us? It suggests that standards must be clear and the method (or methods) of measurement must be unambiguous and complete. Broad agreement on meaning is also a necessity. We need to show how each standard gets at the quality of the program or institution we are assessing. The links to quality need to be clear. We also need to test our standards against the possibility that the environment or the context will change given the fast pace of change in technology and in many fields. It is important to ask, will each standard stand up to the test of time?

b) Simplicity:

One of the lessons from my experience is to avoid a tendency to set out too many standards – to make accreditation too complex. This is especially likely early in the process of establishing an accreditation agency when people are trying to be all encompassing and thorough. I have been involved in setting up accreditation processes in five different countries and have seen the tendency to include too many standards and to make them more complex and detailed than necessary. In one case, the initial list for accreditation included twenty-two standards. It is not that one can’t think of twenty-two standards that might be appropriate to accreditation, but is it useful to assess that many standards? Each one needs to be defined, its components spelled out, and its parts broken down into units that an institution can respond to in its self-assessment. How much does each of those standards add to the total picture? Don’t some of them begin to duplicate others? What is the value added of each? Can some of them be combined?

My own experience suggests that in most cases “less is more.”¹³ Some accreditors have reduced the number of standards they require. The Western Association of Schools and Colleges recently shortened their requirements to only four standards. They are: 1) institutional purposes and ensuring educational objectives; 2) achieving education objectives through core functions; 3) developing and applying resources and organizational structures to ensure sustainability; and 4) creating an organization committed to learning and improvement (Western Association of Schools and Colleges, 2008, pp. 11-22). Most accreditors have not reduced the number of standards significantly.

Part of the reason is the pressure of government to increase regulations in a number of countries including the United States. Michael Lambert, head of the DETC notes that: “Finally, the Federal government has gone a bit wild with imposing dozens of new requirements on accreditors in their attempt to control higher ed and control how the \$100 billion in federal student aid is being spent. ... I personally have never seen any real solid evidenced where more legislation and more rules lead to better education or better learning ... but it seems to make bureaucrats happy to say they are monitoring education. In sum, less may be more here....”¹⁴

Probably the answer is some middle ground. I don’t find the very short list of standards helpful in that they tend to confuse things by conflating categories too much. They tend to lack the clarity institutions crave. On the other hand, long lists of standards are also not very helpful. As the Europeans have noted, it is important to “place only an appropriate and necessary burden on institutions for the achievement of its objectives” (ENQA, 2009, p. 11). Long lists add to that burden.

c) Costs:

Another concern is the cost of accreditation, both of the process itself (peer reviewers, site visits, agency staff, travel to the site, accommodations) and to the institutions in terms of the time and staff involved, diversion from other activities such as teaching and research, and other costs of the process such as fees for accreditation, hospitality, publications and data collection. Institutional chancellors and presidents in both South Africa and the United States have frequently complained about the costs and what they see as the unnecessarily complex and time consuming aspects of the process. Some of this is an inevitable part of the quality assurance process and is necessary to its success. But in the process of reviewing our standards, it is important to assess the time that ought to be involved in assessing standards, the complexities we as accreditors ask of the institutions, and make a cost-benefit analysis of what we are asking institutions to do. Can we make the process more cost effective? What might we do to limit costs? Do we need all the information we are asking institutions to generate? Do we use it? The cost factor should be a part of our assessment of each of our standards. What is the real cost of each? Does it provide that amount of benefit to our understanding of quality? We need to thoughtfully ask these questions of each standard.

d) Measurability:

How easily can we measure the standards we are setting? Quality is a notoriously hard variable to measure. We need to think about the standards we set and the ability to measure them clearly and easily. We also need to ask if our measures produce consistent results. Would we get the same results a few weeks from now? If not, why not? We all know how hard it is to assess the quality of a single member of the faculty. Yet, over time we have developed methods to do so that produce fairly consistent results often including: evaluations of the quality of research (peer reviews, quality of the journals, reviews of the text); quality of teaching (student evaluations, peer evaluations, student success); portfolios of the faculty members work; letters of evaluation; honors and awards; research grants; other marks of distinction. We use multiple measures to make these assessments and most of the time people agree on the results.

Some aspects of quality are more difficult to measure. We have noted the difficulties in measuring student learning outcomes as a case in point. That does not mean we should not try to get at student education outcomes, but it does suggest that we need to be very careful as we look at and work on such measures. In each case we need to ask if institutions can provide us with reasonable measures of their compliance with the standards. If not, we need to ask whether or not we should use them. Our ability to measure different standards may change over time. We are finding, for example, that over time we have better measures of student outcomes in part because institutions are keeping better records, carrying out pre- and post-program surveys, following up on student outcomes with employers and the students themselves as alumni, and developing better measures of the value added by higher education over time. We need to continue to be self-conscious about measurement. Where we find continuing problems, we need to think about changing standards or about ways to improve measurement.

e) Efficiency of the process:

How can we make the process of accreditation more efficient and productive? Have we honed the list of standards down to a number that provides the information we need but is not excessive? Are we getting the information we need without overburdening the institutions? Have we avoided redundancies and time consuming processes with little benefit? These are all important questions we need to ask as we assess our standards.

Jethro Newton talks about what he sees as the growth of the quality assessment burden and the emphasis in the 1990s on accountability over quality improvement which he suggests fell to a distant second place in our priorities. He notes: "So maybe quality as experienced in context meant burden, bureaucracy and game playing, rather than value for money or perfection" (Newton, 2010, pp. 51-52). He

concludes by suggesting that: “Arguably, then amongst the lessons learned from the Quality revolution is that achieving success in improvement initiatives is riven with difficulties. Quality is essentially contested; there are competing voices and discourses; front-line academics and managers may view quality differently” (Newton, 2010, p. 53). And in that he is correct. Any thoughtful analysis of standards will take that into consideration and seek to insure that the standards used and the process itself is as efficient as possible and gets at the goals we espouse for it.

f) Legitimacy of the process - and various perceptions of it.

In some places, the accreditation process builds on a long history of peer review, external examiners, and self-assessment. Thus the formalization of accreditation comes in a context in which many of the processes are already part of the academic culture. This was certainly the case in Great Britain and the United States but contrasts sharply with what we noted in Vietnam and Afghanistan. Thus, in the former cases the process builds on a certain level of *academic credibility*, as Dickenson notes (2009, p. 8). This credibility came largely at the institutional level from the fact that accreditation was based on a model in which the academics and professionals assess and make the major decisions about accreditation. But such credibility is not in place in many countries where accreditation has been started and fostered by governments and where the initial aims were more about accountability than quality improvement. That may not affect its legitimacy in the long run but it does put great pressure at the outset to insure the integrity, honesty, and transparency of the process.

Thus, the effectiveness of standards will in part be determined by the legitimacy of the process for all its stakeholders, the institutions, citizens, governments, students, families, business, graduates, and others. Massification has increased the number and diversity of stakeholders and thus the difficulty of gaining broad legitimacy. So it becomes especially important that the process itself demonstrates early on that it is run in an honest, ethical, and transparent way that fosters legitimacy broadly.

Success in fostering legitimacy will require that the process is clear; self-assessment broadly participatory, well managed, and well written; the peer review process seen as fair, professional, and transparent; the evaluation and assessment of standards impartial; and the decision about accreditation based on the merits of the case and nothing else. Part of guaranteeing that is to insure that the staff of the accreditation agency is well prepared; the standards clear and unambiguous; the peer reviewers well trained, professional, and unbiased; and the decision-making process for accreditation, is clear, transparent, and fair.

CONCLUSIONS:

What does all this suggest about standards and how we might rethink them? What rules of thumb might use as we think about our standards? It seems to me that this discussion suggests a number of principles we might keep in mind as we periodically assess the effectiveness and utility of our standards.

First is the question of the goals for accreditation. Do our standards meet the test of our goals? Do they provide answers to the questions posed about higher education by higher education institutions, by the public, by employers, by students and their families, by other stakeholders? Do they get at the qualities set out in our goals? Perhaps more importantly, are the goals reasonable? Are we asking too much or too little of the institutions? Have we overloaded the institutions with too many goals, piled too much onto the accreditation process - the "over packed animal" syndrome? Have we made it a bureaucratic burden rather than part of a regular process of self-assessment and review? And if we have, what can we do about it? Are we under pressure from other stakeholders to broaden the process? Can we reduce the burden and still maintain our credibility and legitimacy? These are tough issues we need to confront.

Second, are our standards clear? Do they identify the qualities we are trying to measure? Third, are the standards simple and straight forward? Do they lay out what is sought in a clear and unambiguous way? Fourth, are the standards cost effective? What are the time and cost factors involved for institutions in demonstrating that they meet each standard? Is it too onerous? Are the demands in time and money involved reasonable? Fifth, is the standard measureable? Have we laid the standards out in a way that makes clear what measurements are expected? Are those measurements reasonable? Are the replicable? Sixth, are the standards taken as a whole reasonable? Have we put them together in a way that allows the institution to efficiently and effectively demonstrate that it meets the quality standards we have set? Could we make the process more efficient without weakening it? Is the benefit of the information being provided worth the burden imposed? Does it reward the effort? Seventh, does the process demonstrate its own legitimacy? Do the values demonstrated by the self-assessment provide benefits to the institution that make it worth the effort? Do the stakeholders see the benefits and regard the process as legitimate? Can we improve upon it to make it clearer, more participatory, more transparent, more self-fulfilling? Eighth, does the process take into consideration the academic culture we are dealing with? Is it appropriate to the traditions and values regarding excellence and quality in the societies that are involved? If not, how can we be more sensitive to local traditions and culture? Finally, do the standards seem to meet the test of time? Are they appropriate to the rapidly changing world and technology of higher education? If the answers to any of these questions are negative, we need to make major changes in the accreditation process. If we can answer these questions positively, in the affirmative, we have succeeded in setting out standards that will foster the well-being of our higher education system and the nation as a whole.

- ¹ For a brief description of accountability and improvement see: Harvey, L., and Williams, J., (2010). "Editorial: Fifteen Years of Quality in Higher Education, *Quality in Higher Education*," vol. 16, no. 1, pp. 7-8.
- ² See the very useful discussion of accountability by: Eaton, J., (2009) "Accountability: an Old" Issue in a New Era." *Inside Accreditation*, CHEA Vol. 5, No. 4.
- ³ For a useful discussion see: Neave, G., "The Evaluative State Reconsidered." *European Journal of Education*. Vol.33. no. 3, pp. 265-84.
- ⁴ An excellent discussion of accountability, historically and in contemporary times can be found in: Eaton, J., (2009). "Accountability: An 'Old' Issue in a New Era." *Inside Accreditation with the President of CHEA*, vol. 5, no. 1, June 2, 2009.
- ⁵ One of the best studies of diploma mills remains the book by Steward, D., and Spille, H., (1988) *Diploma Mills: Degrees of Fraud*, Washington DC, American Council on Education/Oryx.
- ⁶ "Some, mainly from agencies which accredit programmes or institutions, take the view that external quality assurance is essentially a matter of 'consumer protection....'" ENQA, (2009), *ibid.*, p. 12.
- ⁷ See *Glossary* of quality assurance terms prepared by Hayward, F. (2001), *Glossary*, Council for Higher Education Accreditation, www.chea.org/international/inter_glossary01.html.
- ⁸ Comments by presidents of private higher education institutions in Ethiopia in 2003.
- ⁹ This excellent description is paraphrased from Ewell (2001) *ibid.* p. 5.
- ¹⁰ Personal correspondence with Michael Lambert, Director of DETC, July 6, 2010.
- ¹¹ Personal communication with Marge Jackman, Associate Director, Commission on Collegiate Nursing Education, July 6, 2010.
- ¹² Personal communication with Barbara Brittingham, Director, Commission on Institutions of Higher Education, New England Association of Schools and Colleges, July 5, 2010.
- ¹³ From a poem by Robert Browning from 1855 called "*Andrea del Sarto*." Citation: <http://www.phrases.org.uk/meanings/226400.html>.
- ¹⁴ Personal Communication with Michael Lambert, Director of DETC, July 6, 2010.

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