1. Dimensions of the Accountability for Quality Agenda

This part describes existing frameworks and arrangements for higher education quality validation in several countries, the range of reforms being proposed, and the given rationales for the reforms. It explores the specific and shared circumstances giving rise to the need for and direction of reform. It also explores the scope for common ground between governments and higher education institutions in responding to new challenges.

1.1 The current architecture for quality assurance in higher education

Over the last decade, and in some cases earlier, many countries have put in place quite comprehensive arrangements for quality assurance in higher education.

In the US, higher education quality is addressed by three main means: accreditation; program review; and assessment. Accreditation is a function of various non-governmental accrediting associations, each of which is responsible for establishing the criteria and procedures for evaluating the quality of educational institutions or programs. Accreditation serves to validate that an institution or program meets minimum quality standards, but “does not provide an indication of the level of program quality relative to other programs” (Gibeling, 2010). Program review is an internal function, (although as well as internal reviewers it may involve external reviewers from peer institutions), undertaken periodically every 5-10 years, and capturing a wide range of qualitative and quantitative indicators, designed to provide feedback for program improvement. Program assessment is a function of public organisations and agencies, each of which may require reporting against a specified set of indicators (typically progression rates and times, completion rates, and graduate destinations). Assessment generally “focuses on outcomes, involves a narrower set of measures (than program review) and is usually continuous rather than periodic” (Gibeling, 2010). Accreditation, program review and assessment can be seen to provide distinctive but complementary perspectives:

“Done properly, program review provides a perspective on the future, not a statement of the present or a description of the past. In contrast, program assessment tends to focus on past success in achieving specific outcomes and accreditation generally represents an evaluation of the current state of a program or institution. Thus the three types of evaluation provide distinct perspectives and add value in different ways. Furthermore, this difference in perspectives means that one form of evaluation cannot easily substitute for another” (Gibeling, 2010).

Box 1 outlines the main features of the US Accreditation and Quality Assurance System (Eaton, 2008). In Australian terminology, ‘accreditation’ means licensing of providers and registration of professional qualifications. Recognition is the term given to the process of assuring the quality of the accrediting bodies. The US concept of ‘quality assurance’ is much wider than the Australian notion of quality auditing. Accreditation in the US is about both quality assurance: assuring threshold quality in higher education; and quality improvement: assuring that institutions and programs have processes to try to do what they do better (Eaton, 2008). The quality improvement agenda focuses on the assessment criteria that each institution or program sets for itself. That is, US accreditation and quality assurance have a standards-referenced dimension and a fitness-to-mission dimension. The US does not have a national qualifications framework.
In 2008 there were 19 accrediting bodies for the accreditation of institutions and 61 bodies for the accreditation of programs (e.g. in law, medicine, engineering and health professions). The accrediting bodies are autonomous, non-governmental, not-for-profit organisations funded mainly from annual subscriptions from institutions and programs. The accrediting bodies develop minimum standards that must be met in order to be accredited. Institutions and programs undertake self studies based on those standards, and then are subject to review by peers in the profession, including through site visits and team reports. Accrediting bodies make standards-referenced judgements through their decision-making commissions and award or do not award accredited status. Institutions and programs undergo periodic review to maintain accredited status, which is required for access to federal and state funding (Eaton, 2008).

Importantly, US Accreditation and Recognition are grounded in a set of values:

- That higher education institutions have primary responsibility for academic quality: They are the leaders and the primary sources of authority in academic matters.
- That institutional mission is central to all judgements of academic quality.
- That institutional autonomy is essential to sustaining and enhancing academic quality.
- That the higher education enterprise—and the society—thrives on decentralisation and diversity of institutional purpose and mission.
- That academic freedom flourishes only in an environment of academic leadership of institutions (Eaton, 2008).

Box 1. Accreditation and recognition in the US

<table>
<thead>
<tr>
<th>Institutions and Programs</th>
<th>Accrediting Organisations**</th>
<th>Recognition Bodies</th>
</tr>
</thead>
<tbody>
<tr>
<td>19,400 Accredited Programs Create, fund, participate in Review and accredit</td>
<td>61 Programmatic Accrediting Organisations</td>
<td>Government Regulation US Department of Education Review and recognise</td>
</tr>
<tr>
<td>7,000 Accredited Institutions Create, fund, participate in Review and accredit</td>
<td>19 Institutional Accrediting Organisations - Regional (8) - Faith-Related (4) - Career-Related (7)</td>
<td>Self Regulation Council for Higher Education Accreditation</td>
</tr>
</tbody>
</table>

Create, fund, all members***

**Some accrediting organisations are recognised only by CHEA, some only by the US Department of Education, some by both.
***Not all accrediting institutions are members of CHEA.

...accreditation and quality assurance have a standards-referenced dimension and a fitness-to-mission dimension. The US does not have a national qualifications framework.
There is greater diversity within the higher education system in the US than in the UK and Australia, where the nation state plays a more extensive regulatory role. The US approach can also be contrasted to the dominant European model. In the former, universities themselves, operating in a competitive environment, determine their own missions and standards, and there is a social expectation of diversity in provision. In the latter, the missions and standards of different institutional types have been determined by legal statute, and there are social expectations of university equivalence in learning profiles and academic rigour (Beerkens-Soo & Vossensteyn, 2009).

Box 2 outlines features of the British system. The British system has a more developed approach to academic standards than Australia, including subject benchmark statements as references for guiding institutional decisions about curriculum and assessment, and external examiners as a source for institutions to validate the relative quality of student achievement and assessment tasks. The subject benchmarks refer mainly to minimum acceptable (threshold) expectations of (Bachelor’s degree) graduates, although they often identify ‘typical standards’ and some include higher degrees. The external examiners are a form of academic peer review which different institutions engage to check on their achievement against their particular objectives. Thus the UK, like the US, has a dual approach: one that is standards-referenced and the other which is mission-referenced.

Box 2. Features of higher education quality assurance in Britain

External regulations

The guidelines on academic standards and quality issued by the UK’s Quality Assurance Agency for Higher Education (QAA) describe the central role of the UK’s ‘Academic Infrastructure’ which features:

- **National Qualification Frameworks**, with their broad descriptions of awards and levels containing a broad description of the academic expectations associated with each level of award, together with more detailed descriptors of the skills and competences associated with award holders. England, Northern Ireland and Wales have a separate framework for Higher Education Qualifications, whereas Scotland has a single framework for all education and training qualifications.

- **Subject Benchmark Statements**, detailed descriptions of expectations for particular subject areas, focused primarily on the UK ‘first cycle’ degree—the bachelor’s degree with honours.

- **Programme specifications**, descriptions of the intended learning outcomes of specific programs, including “the means by which the outcomes are achieved and demonstrated”.

- The QAA published **Code of Practice** (intended to provide guidance on the maintenance of quality and standards) covering all aspects of quality management, including assessment and course approval and review as well as external examining.

Internal controls

UK universities and colleges have quite elaborate internal controls over quality and standards. The chief ones are:

- admissions policies, so that only students capable of benefitting from particular programmes are enrolled (though, crucially, these vary considerably between institutions, as well as between subjects within institutions);

- course approval, monitoring and review, so that only programmes that are fit to lead to an institution’s award are offered;

- assessment regulations and mechanisms, so that only students who reach the required level of attainment receive awards (again, these vary substantially between institutions);
• monitoring and feedback processes, so that opportunities are taken to improve the quality of what is offered;
• staff selection and development, so that only suitably qualified and trained staff teach students;
• staff appraisal, so that staff receive regular structured feedback on their performance.

External examiners

Within assessment, a key role has traditionally been played by external examiners. These are employed by, and answerable to, the institution concerned. Their job is to report on:

• whether the standards set for awards [at the institution concerned] are appropriate;
• the extent to which assessment processes are rigorous, ensure equity of treatment for students, and have been fairly conducted within institutional regulations and guidance;
• the standards of student performance in the programmes which they have been appointed to examine;
• (where appropriate) the comparability of the standards and student achievements with those in some other higher education institutions;
• good practice they have identified.

External accreditation

Professional, statutory and regulatory bodies usually accredit courses that lead to a professional or vocational qualification.

Sources: HEPI (2010); Harris (2009); QAA (2004).

Box 3 outlines the current arrangements in Australia. The architecture includes: a national qualifications framework; registration procedures for the licensing of providers to offer programs leading to higher education qualifications; consumer protection for fee-paying international students; a range of internal institutional quality monitoring procedures; independent external quality auditing; and public information about institutions, courses, graduate destinations and satisfaction. The Australian model involves a mix of common and customised indicators of capacity and performance, and has a more developed approach than the UK to consumer protection, through its tuition assurance scheme. Australia adopts a standards-based approach, with a focus on inputs, with regard to the initial accreditation of higher education providers, and a fitness-for-purpose approach to quality auditing, with a focus on processes, with regard to established universities. Quality auditing in respect of other higher education providers is more at arms length via audit of state & territory licensing agencies. Australia’s approach has involved the least consistent arrangements for the most risk-exposed sector.

---

7 Since 2008, the Australian Government has been developing an approach to validating the quality of university research through the Excellence for Research in Australia (ERA) initiative.
8 As at 6 June 2010, there were 1,179 private providers catering to international students in Australia. Of these, 54 (<5%) had over 500 students and 799 (68%) had fewer than 50 students (source: Australian Education International).
Box 3. Summary of the current Australian Higher Education Quality Assurance Framework

1. Qualifications  
   *Australian Qualifications Framework* describes qualification types, their characteristic learning outcomes and pathways to them. Institutions may refer to this in developing courses.
   - Institutions and professional bodies recognise and evaluate Australian and overseas credentials (with advice from the National Office of Overseas Skills Recognition).

2. Accreditation and approval
   - *National Protocols for Higher Education Approval Processes* set out criteria and processes for approving universities and other types of higher education institutions. State and territory governments accredit courses where the institution is not authorised to do so.
   - *Education Services for Overseas Students Act 2000* governs the approval of courses and institutions offering courses to overseas students within Australia. The Act also establishes tuition assurance procedures to protect students in the event of failure by a provider to continue operations.
   - Institutions approved for Commonwealth funding and assistance must meet the requirements of the *Higher Education Support Act 2003*, undergo a regular quality audit and meet other quality requirements.
   - Professional bodies accredit courses on a compulsory or voluntary basis in some disciplines.

3. Institutional self-regulation
   - As bodies that are responsible for accrediting their own courses, universities and certain other institutions approve, monitor and review the courses they offer through internal peer review and quality assurance.
   - Other institutions apply internal quality assurance practices subject to having their courses accredited by State and Territory governments under the *National Protocols*.
   - Institutions may follow voluntary codes of practice or collaborate to improve practice.

4. Independent quality audit
   - Australian Universities Quality Agency conducts regular quality audits of universities, some other institutions and government accreditation authorities. Reports are published.

5. Information provision
   - Official registers of approved institutions and courses.
   - Collection of data for performance indicators, e.g. Graduate Destination Survey and Course Experience Questionnaire.
   - Consumer information and websites (e.g. Study in Australia, Going to Uni) backed by requirements of the *Higher Education Support Act 2003*.

6. External monitoring
   - Various monitoring and annual or other reporting requirements associated with accreditation, approval or audit.

1.2 Proposed redesign of the quality assurance architecture

The 2008 report of the Review of Australian Higher Education noted that “for at least 30 years, Australia’s universities have been paying attention to course assessments, student evaluations, destination surveys, professional accreditation, external feedback and moderation” (Bradley et al., 2008). It noted that the first cycle (post 2001) of external quality audits of universities had “suggested that internal quality assurance processes were generally effective” and that the second cycle of audits (post 2004) looking at how institutions manage academic standards and outcomes, suggested that “this is taken very seriously by universities (with) evidence that institutions are moving towards more external validation of standards such as benchmarking arrangements” (Bradley et al., 2008).

Yet it called for a thorough overhaul of the current framework, involving: ‘modernisation’ of the national qualifications framework to provide “more coherent descriptors of learning outcomes”; establishment of a national regulator with stronger powers for registration and re-registration of all higher education providers; revision of the processes for accreditation and audit; the adoption of “outcomes and standards-based arrangements”, and better information including “the performance of institutions in relation to the outcomes- and standards-based arrangements” (Bradley et al., 2008).

In response, the Government announced “a new era of Quality in Australian Tertiary Education” involving the establishment of a national body for regulation and quality assurance with a wide range of functions:

“The Tertiary Education Quality and Standards Agency (TEQSA) will enhance the overall quality of the Australian higher education system. It will accredit providers, evaluate the performance of institutions and programs, encourage best practice, simplify current regulatory arrangements and provide greater national consistency. TEQSA will take the lead in coordinating this work and establishing objective and comparable benchmarks of quality and performance. The agency will collect richer data and monitor performance in areas such as student selection, retention and exit standards, and graduate employment” (Australian Government, 2009).

Paralleling the establishment of TEQSA is a revision of the Australian Qualifications Framework, the development of a set of performance indicators linked to university funding for research and teaching, the exploration of learning and teaching standards in a number of disciplines, and a negotiated set of agreements through ‘funding compacts’ between universities and the central government.

Why has it become necessary to redesign the policy architecture in this way? What particular problems are to be solved? What are the main considerations giving rise to the new policy design?

One of the main reasons given for new forms of accountability for performance in academic areas, which for universities have traditionally been ‘out-of-scope’ for government intervention, is that other countries are developing contemporary quality assurance measures and “Australia now lags in hard measures of learning outcomes” (Bradley et al., 2008). The Higher Education Review report drew attention to the use of external examiners and subject benchmark statements in the UK, the call by the Spellings Commission in the US for increased accountability through the development of instruments to assess student learning, and the work of the OECD in the exploration of ways to assess higher education learning outcomes directly. Thus it is necessary to explore what is happening in other countries and through inter-governmental bodies.
1.3 Different national interests

There are various country-specific interests involved in the emergence of the accountability for quality agenda in higher education.

In the United States of America, where the Spellings Commission under the GW Bush administration raised the challenge of higher education institutions being publicly accountable for learning attainment standards, the underlying concerns were the apparent international slippage of the US against economic competitors, rising tuition prices, poor rates of student retention and degree completion, and a lack of comparable information about institutional effectiveness. A particular problem for the US is that its fastest growing population groups, Hispanic and African Americans—the main source of the future workforce—are those who achieve worst in the schooling system and have the lowest rates of higher education attainment. Earlier interest in improving student learning, from the mid 1980s led to most US states legislating for universities and colleges to implement 'student assessment' programs. In the early 1990s, the regional accrediting agencies added an assessment criterion to their standards for reviewing the accreditation status of institutions (Ewell, 2009). The interest in student learning at that time was driven in part by diversification of the higher education population, the adoption of continuous assessment replacing exams, concern about ‘flabby’ curriculum, and ‘research drift’ involving academic staff spending less time on teaching and relying on graduate teaching assistants (Sykes, 1988), and an “increasingly atomistic culture where faculty members focus on their individual specialisations rather than the collective effort to improve teaching and learning” (Dill, 2003).

In Europe, a greater focus on learning outcomes has been seen within the Bologna Process for enabling greater mobility of graduates across European labour markets, for increasing the attractiveness of European higher education to international students and scholars, and as a quid pro quo for new governance and financing arrangements that increase institutional operating flexibility over the use of inputs. A widening of the potential application of learning outcomes may be discerned from the sequence of communiqués of EU ministers, from an initial focus in the 2003 Berlin communiqué on their role in helping to define qualifications to support understanding of the equivalence of awards from different sources, to multiple applications in the 2007 London communiqué including: defining European Credit Transfer and Accumulation (ECTS) credits; aiding curriculum reform and innovation; shaping study programs; and promoting student-centred outcomes-based learning (Adam, 2008).

In Britain, concern about standards has arisen largely from grade inflation in the award of Bachelor’s honours levels, indications that students in England spend much less time studying than their counterparts in European countries, and questions about the dedication of academics to teaching

---

According to Eurostudent III survey results for 2005-2008, a student in England typically puts in 25 hours of lectures and private study a week, compared with more than 30 in the Netherlands or Germany, or 35 in France.
in an environment that primarily rewards research. The new Conservative-Liberal Democrats coalition government has moved early to require higher education institutions to publish ‘employability statements’ covering four mandated areas: careers, work experience, curriculum support and accreditation. The new Minister for Universities and Science has indicated a sharper focus on teaching quality and floated the idea of “creating new institutions that can teach, but do so to an exam set externally” (Willetts, 2010).

An earlier initiative by the Blair Government, in the aftermath of the 1997 (Dearing) report of the National Committee of Inquiry into Higher Education, established the current ‘academic infrastructure’ including benchmark statements, programme specifications, and the Code of practice. A national Quality Assurance Agency for Higher Education (QAA) was created, replacing the Higher Education Quality Council which had been formed in 1992 on the initiative of heads of universities and colleges. The QAA was established to provide independent assessments of how UK higher education institutions maintain their academic standards and teaching quality. Even earlier interest in research and teaching quality in the late 1980s and early 1990s reflected the intent of the Thatcher-Major government to raise Britain’s economic competitiveness by improving the labour market relevance of knowledge and skills formation, and shake up what was perceived to be an unresponsive and overly self-serving higher education sector (Middleton, 2000).

In Australia, the matter of ‘provider standards’ has arisen in the context of the financial collapse of several private tertiary education providers, and associated concerns about inadequate and inconsistent procedures for the entry of new providers into the education export industry. Concerns about ‘learning standards’ have arisen in the light of incidents of plagiarism, allegations of soft-marking, a blow-out in university student to staff ratios and reduced student time at study, and the Australian Government seeking to enlarge higher education participation, including from previously under-represented groups, initially through un-capping government-funded enrolment volumes in universities. The 2008 review panel, in recommending a “more deregulated and demand-driven funding system…in which higher education providers have the flexibility to set their own entry criteria for students”, noted that its adoption would require “a rigorous system of accreditation and quality assurance to ensure that standards are maintained” (Bradley et al., 2008).

Thus in Australia, one purpose is to avoid quality erosion as participation expands. Another purpose is to rid the system of unprincipled providers through more rigorous and nationally consistent licensing procedures. Other purposes have also been suggested, including better performance information to help guide student choice, smoother pathways for learners seeking to move ‘seamlessly’ through tertiary education and training opportunities, and greater accountability for the effective use of taxpayer funds. Perhaps the multiple roles envisaged for the hydra-headed TEQSA reflect these multiple purposes but there is some risk that means and ends will become entangled.

…in Australia one purpose is to avoid quality erosion as participation expands. Another purpose is to rid the system of unprincipled providers through more rigorous and nationally consistent licensing procedures.
1.4 Internationally converging reform agenda

While various local factors account for the interest of different governments in the new agenda there is also a degree of international policy convergence, most evident among OECD member countries and participants in Europe’s Bologna Process. Some circularity in the line of argument needs to be recognised. For instance, the European initiative for a three-cycle (Bachelors/Masters/Doctorate) degree structure was modelled on the “international standard” set by the US (Scott, 2006). Now the US is looking to the Bologna Process as a model for its own transformation (Adelman, 2009). Similarly, the European ‘tuning’ project derives from the UK subject benchmarks exercise, albeit for different purposes (Brown, 2010a).

Specifically, there is a growing exploration or adoption of national qualifications frameworks, in varying forms and at different stages of development, across many countries not only within but also outside the European Union, including: Armenia, Azerbaijan, Belarus, Bosnia, Croatia, Egypt, Georgia, Herzegovina, Kazakhstan, Kosovo, Kyrgyzstan, Jordan, Lebanon, the Republic of Macedonia, the Republic of Moldova, Montenegro, Morocco, Russia, Serbia, Tunisia, Tajikistan, Turkey (Quintin, 2010).

How far these apparent convergences are similar, and what drives them, is not always clear. To what extent do common solutions to similar problems arising in different circumstances reflect the adoption of fads, rather than considered responses to analysed needs? How much do professional networks, such as quality auditing agencies, linking internationally, promote mechanisms which shore up their own interests? To what extent do inter-governmental bodies (e.g. The World Bank, UNESCO, OECD, ILO) influence the adoption of particular ‘innovations’ through policy reviews, selective ‘good practice’ suggestions (e.g. ‘charter schools’) or conditions on the provision of assistance (e.g. establishing QA processes)? How much of the convergence results from the sharing of technologies or technology borrowing or emulation, rather than “policy learning” (Chakroun, 2010)?

Internationally, the focus on outcomes in government policy spans a number of areas, as reflected in the resolutions of OECD Education Ministers in 2006 (see Box 4).

---

**Box 4. Resolution of OECD Education Ministers, Athens, 2006**

Higher education plays a vital role in driving economic growth and social cohesion. It has grown dramatically—with more than 17,000 higher education institutions in the world. At our meeting, we agreed on a new task: to go beyond growth, by making higher education not just bigger but also better.

We discussed how to meet this challenge. Every country is different, and there were many points of view. But we agreed that a major programme of reform is needed, giving more emphasis to outcomes in particular. Reforms are needed in six areas:

**Funding:** Some countries, particularly in Europe, need to invest more in higher education; for others the main issue is to make better use of existing funding. Reform will help to develop new sources of funding. A number of countries remain committed to higher education without fees for students, while others now accept the OECD Secretariat view that contributions from graduates to the costs of study can be an effective way of increasing resources, balanced by measures to support students from poorer backgrounds.

**More equitable education:** Access to higher education needs to be widened to benefit all social groups. This is a real challenge for school systems, as well as for higher education. Action is therefore needed throughout education systems to tackle the problem.

**A clearer focus on what students learn:** We need to develop better evidence of learning outcomes. At our meeting, the OECD Secretary-General offered the assistance of the OECD in developing new measures of learning outcomes in higher education, drawing upon its experience with the PISA survey.
Promote responsiveness and diversity: Reforms to improve incentives—to make institutions more accountable for quality and outcomes—are needed in many countries. We want to balance accountability for outcomes with a loosening of regulatory controls, and we intend to encourage institutions to pursue diverse missions, responding to the needs of students as well as a wide range of other groups.

Research and innovation: We all recognize the capacity of research and innovation to drive growth in knowledge-based societies. We recognize the twin challenges facing higher education systems—supporting world-class research, and delivering its economic and social benefits both locally and nationally.

Migration and internationalization: We discussed how students, teachers and researchers are increasingly studying and working outside their countries of origin. Most OECD countries are affected, some greatly. Responses include, for example, the Bologna process in Europe. Countries need to look at immigration policies, as well as higher education policy itself, to develop coherent responses.

We all agreed that higher education cannot escape major change. Sometimes change will be difficult. Our meeting here, and these conclusions, represent a clear signal of our determination to lead the necessary changes rather than be driven by them.


The 2006 meeting of OECD Education Ministers in Athens discussed in plenary session the topic of Improving the quality, relevance and impact of higher education. The record of the meeting reports that discussion was opened by Margaret Spellings, Secretary of Education, United States. She observed that quality, accountability, and affordability are key concerns of the larger OECD community and of the US Commission on the Future of Higher Education. In discussions it was noted that:

"...the 21st Century is witnessing the rapid transformation of higher education. More students than ever before enter higher education and a growing number study abroad. The job market demands new skills and adaptability, and HEIs ("Higher Education Institutions", which include universities, polytechnic schools and colleges) struggle to hold their own in a fiercely competitive marketplace" (OECD, 2006).

The report of the meeting (OECD, 2006) records that Ministers:

• Expressed shared concern about disparities in entry and success in higher education, and noted that these appear to be based in early learning, at home and in schools. They agreed that equity policies and analysis must focus here.

• Noted that internationalisation of higher education can provide competitive pressures and benchmarking that contribute to quality improvement.

• Recognised that key stakeholders—including students, families and governments—must have better information about topics such as quality and cost to make decisions and hold institutions accountable for their performance. They noted that students must play a key role in assessing both quality and relevance of learning.

• Expressed agreement that higher education should be responsive to economic and social needs, and that graduates should have skills suited, among other things, to working life. They also voiced concern about a possible mismatch between labour market needs and student qualifications.

• Agreed that research should be geared to the need for innovation and be relevant to the problems of the wider...
society. This requires, for example, suitable policies for knowledge and technology transfer, and research funding systems that are linked to these outcomes.

- Identified areas where the OECD can play a key role for member countries. These include measuring learning outcomes, and hosting international dialogue concerning labour market outcomes and international benchmarking.

The report of another session (OECD, 2006) on the theme of Measuring the quality and impact of higher education records that:

"Mr Gwang-Jo Kim, Deputy Minister of Education and Human Resource Development, South Korea, noted that the validity of judgements about the quality of higher education remained contested and highlighted the need for more discussion on standards and methods to be used for defining and evaluating quality in higher education. In particular, while various indicators for the quality of research are available, much more would need to be done to establish appropriate measures for the quality of teaching, to avoid bad teaching going unnoticed and good teaching unrewarded. He underlined that measuring the quality of higher education outcomes was needed both to justify the allocation of public resources and the effectiveness with which they are used by increasingly autonomous institutions, and also to pursue enhancements in the quality and relevance of educational outcomes more broadly and systematically, so that higher education institutions serve economies and local communities effectively. Participants reviewed existing arrangements for quality assurance at national levels. They saw more transparency in higher education outcomes as a key driver for improving institutional performance, but noted that knowledge on standards and methods that can be used to define and evaluate higher education quality was just beginning to emerge. Participants in the working group invited the OECD to explore ways to:

1. Reduce the knowledge gap about the effectiveness of higher education governance and finance in relation to performance.

This would require a better articulation of the purposes of higher education as well as agreement on standards and methods to be used for defining the quality of higher education outcomes. This, in turn, would depend on a better assessment of the competencies that would enable individuals to compete in a global economy. Significant challenges would lie ahead in measuring such competencies validly and reliably. Participants also noted the differences in the information needs on the quality of higher education outcomes of providers, governments and employers.

2. Build on the success of PISA, to explore similar methodologies for assessing the value higher education institutions add in terms of student learning outcomes.

Work would need to be undertaken in ways that include multi-dimensional criteria for educational quality to reflect the diversity of purposes, consumers and providers of higher education within and across countries. Participants underlined the need to strengthen benchmarking processes in ways that go beyond the ranking of institutions. Assessment systems need to go beyond measurement and enable both governments and the institutions themselves to improve higher education quality in a dynamic process. Quality has many dimensions, and extensive piloting would need to be an essential part of such methodological development."
1.5 Common governmental objectives

From these deliberations, five broad objectives may be gleaned:

i. preventing erosion of quality—this ‘safety-net’ objective has two aspects. One aspect is to shore up against further slippage relative to past benchmarks. The slippage arises from concerns that apparent productivity gains (graduate output per unit of staff) mask efficiency improvement (lower funding rates per student, and higher student:teacher ratios) at the expense of diminishing quality of educational effort (student time at study, and staff time at preparation, teaching, feedback and assessment), and output (breadth and depth of graduate knowledge and skills). The other aspect is avoiding a structural lowering of quality in the future. Concern about lowering may arise from enlargement and diversification on the demand and supply sides: from the entry of new cohorts of students who are less well prepared than conventional cohorts; and from the entry of higher education providers whose ways and means of teaching and assessment deviate unacceptably from established practices.

ii. improving relevance of graduate formation to economic and social needs, including the development of new capacities and adaptability needed in changing labour markets. This objective implies a change to established higher education ‘fitness of purpose’ assumptions, given expressed concerns about a possible mismatch between labour market needs and student qualifications, and deficiencies in the competence of graduates to perform in the contemporary competitive environment.

iii. improving performance in teaching and learning as a means of addressing objectives (i) and (ii) above. This objective focuses on pedagogy but extends also to the effectiveness of higher education in developing required skills among students. However, it implies a level of external concern about the internal processes by which higher education institutions design and deliver student learning experiences and evaluate their effectiveness.

iv. increasing the transparency and accountability of higher education institutions to students, employers and governments. This is a multi-faceted objective embracing the above three objectives and providing a basis for public confidence that the institutions succeed in educating the students they admit and graduate. It involves improving the availability of information for parents and students to compare institutional offerings, quality and cost in relation to study choices. It involves increasing the information available to employers about the capabilities of their current or potential employees.

v. achieving value for money. This involves justifying the allocation of public resources by demonstrating that they are being used efficiently and effectively.

Some interaction among the objectives can be noted. For instance in the OECD discussions reported above, there are crossover references to “pursue enhancements in the quality and relevance of education more broadly and systematically, so that higher education institutions serve economies and local communities effectively”, and some see “more transparency in higher education outcomes” as a “key driver for improving institutional performance”. Taken together, they suggest a strongly reformist intent, as indicated in the Athens communiqué, with ministers expressing “determination to lead the necessary changes rather than be driven by them.”

The accountability objective is overarching; it brings together relevance, performance and transparency. This is the defining characteristic of the new “accountability for quality agenda”, and it is far-reaching.
1.6 A shared purpose?

The interest in shoring up the quality of higher education—the quality of the experience for learners and its effectiveness in producing graduates with the requisite understandings and abilities—is shared within as well as among nations. In Australia, Britain, the US and elsewhere, suggestions have been made to governments from time to time that higher education quality is deteriorating through the combined effects of wider participation, erosion of the funding rate per student, reduced study time and lower levels of student engagement, increased administrative and research workloads of academic staff, the extensive use of casual staff for teaching, and financial pressures to pass fee-paying students.

However, there are some differences in the ideological motives of parties in government. Conservative politics, especially in the US but also penetrating the so-called ‘culture wars’ in other countries, including Australia and Britain, stress ‘basics’ in learning. The predisposition of the conservative approach (to generalise a mix of orientations) is to ‘blame’ curriculum cluttering with ‘relativist’ or ‘left-leaning’ perspectives for a demise in student learning achievement in the ‘basics’. Extensive media coverage around this agenda saw apparently increasing community support for it to the extent that other political parties, especially those whose traditional appeal to voters rested on progressive education, have adopted core tenets of the conservative view. Thus we have an apparent political consensus on the need to restore and verify educational standards (whatever they are). Ironically, a main target of conservative attack, in the US, Australia and elsewhere, has been the outcomes-based education (OBE) reform agenda, which focused on individual student performance assessed against criteria specified in learning objectives, rather than compared with the rest of the class, but which reduced the importance given to curriculum content.

A related concern, but one which is more contentious, is that of the ‘comparability’ of graduate attainment. Country reviews have pointed to asserted but unverifiable differences in the quality of graduate output from one institution to another. The Spellings Commission remarked on the absence of information about “how much students learn in colleges or whether they learn more at one college than another.” The UK House of Commons Select Committee for higher education argued from the premise that “students, understandably, want to know the worth of their degrees” but observed an absence of comparable standards. The Select Committee favoured nationally “consistent” standards, noting that students who have limited study choices do not wish to be discriminated against by virtue of their degrees being seen to be inferior to those of another institution but without evidence of commonalities and differences.

This ‘comparability’/‘consistency’ objective brings together aspects of transparency, recognition of qualifications wherever or however obtained, relevance of learning to labour market requirements, and equity and fairness in opportunities for students. It also challenges the objectives of diversity and excellence.

The meaning given to key terms like “outcomes”, “standards”, “competence”, “employability”, and various qualifiers such as “comparable”, “consistent”, “equivalent” and “same”, varies across countries and within them. The lack of a common nomenclature in the policy discourse makes it difficult to understand how much “convergence” there is in intent and practice. Additionally, the bundling of different purposes (e.g. to ensure minimum standards of operation, to justify expenditure of public resources, to address quality erosion, to promote ‘seamless’ lifelong learning, to improve employability of graduates, to compare graduates of different institutions) within a single policy envelope (standards-based performance accountability) makes it difficult to discern which problem the solution is designed to resolve. These matters are considered in some detail at Part 4 below.

“…students, understandably, want to know the worth of their degrees…”
In his address to the 2009 UNESCO World Conference on Higher Education, the OECD Secretary-General identified the need for concerted action in three areas:

“The first priority is access and equity… The second priority area is efficiency and effectiveness… The third key area is quality and relevance. The (financial) crisis means that institutions need to work smarter. One proven way to progress in this regard is to encourage institutional autonomy. That means greater freedom to determine curricula, research priorities and strategy. Of course, that autonomy has to go hand in hand with accountability for outcomes and the way resources are used” (Gurria, 2009).

We can draw upon this statement, alongside the 2006 Athens communiqué of OECD Ministers for Education, to distil the overarching challenge from the perspective of governments. That is:

**cost-effectively enlarging higher education access and success through greater operating flexibility for institutions with stronger accountability for results and without diminution of quality.**

Importantly, if this is the main agenda, then it should be one of mutual benefit for higher education institutions and governments, as well as for students, employers and other interested parties. Thus it could be an agenda of joint development.

However, there are three major hurdles to be overcome on the path to collaborative reform. One hurdle is substantive: the adequacy of funding per student, at least in the public university sector which, in all countries, is subject to a level of price control by government. A quality agenda that is predicated on diminishing resource inputs, through reduced government outlays and tuition price limits, will be seen for what it is: a political device to deflect responsibility. The adverse reaction to the 2006 report of the Spellings Commission reflected *inter alia* a strong view that the political intent was to provide higher education on the cheap (Bennett, 2007). The main indicator to watch in this respect is the student to staff ratio. The Australian Government has recognised the importance of the student staff ratio in the quality of the student experience:

“Relative to the UK, Australian graduates from the class of 2006 rated their university experience lower on every measure bar one— which related to satisfaction with the feedback they received.

Relative to the US and Canada, Australian graduates from the class of 2007 rated their university experience lower on every measure— with no exceptions.

Discrepancies in ratings between Australian graduates and their UK and North American counterparts appear to be greatest in those areas most impacted by large student—staff ratios, such as:

- Student and staff interaction
- Enriching educational experiences
- Whether staff are good at explaining things
- Whether teaching staff make subject material interesting for students.” (Gillard, 2009).

A second hurdle relates to the management of tensions among the competing interests of different stakeholders. An agenda to increase the relevance and responsiveness of higher education to the needs of employers, or to ‘put students first’ in terms of ensuring they can exercise choice and gain value through higher education, can be seen to involve a desire to break free from ‘provider capture’, and that can lead to adversarial positions, not least because it is predicated on the assumption that higher education institutions are unresponsive and care insufficiently about students.
A confrontational approach on the part of government bodies can limit the scope and undermine the sustainability of reform. It might provide executive government with simple campaign themes and single out an enemy to be defeated as a means of garnering political support from particular constituencies, as has been seen in various countries through battles to overcome teacher union resistance to the publication of school-level results of students on literacy and numeracy tests. But an approach that alienates professional educators rather than gains their sign-on may achieve only superficial compliance and fail to achieve real reform, while eroding deeper educational foundations.

Similarly, self-interested resistance by universities to legitimate concerns of the community, rather than efforts to shape the agenda, can result in lost opportunities and poor design of policy instruments. In the context of the debate around the Spellings Commission in the US, it has been suggested that “the current choice is between proactively taking responsibility for demonstrating accountability on the academy’s own terms or passively having requirements dictated from the outside with little or no control” (Ewell, 2009). However, a third path to explore is that of joint development of a mutual responsibility framework that serves the purposes of governments and the communities they represent, and higher education institutions and the communities they serve.

The third hurdle relates to scope. A broad scope that admits diversity and provides flexibility is more likely than a narrow scope that envisages commonality and seeks compliance to address the issues at hand and gain professional support. On the one hand, the scope envisaged in the communiqués above appears to be wide, encompassing a range of policy areas, including funding, student access, teaching and learning, research, and internationalisation. On the other hand, there is a narrowness of concept underpinning the overall approach.

By way of illustration, the Athens working group on ‘measuring quality and impact’ identified as a goal, to reduce the knowledge gap about the effectiveness of higher education governance and finance in relation to performance. It suggested that “this would require a better articulation of the purposes of higher education as well as agreement on standards and methods to be used for defining the quality of higher education outcomes.” The inferred line of argument is that (i) effectiveness needs to be measured in order to inform government decisions about funding and governance (of institutions that ‘provide’ higher education); (ii) for effectiveness to be measured the purposes of higher education need to be made more explicit; (iii) (provider) performance in relation to purposes needs to be based on student learning outcomes; (iv) (learner) performance in relation to outcomes needs to be standards-referenced. Importantly, the group went on to assert: “This, in turn, would depend on a better assessment of the competencies that would enable individuals to compete in a global economy. Significant challenges would lie ahead in measuring such competencies validly and reliably.” Thus the line of argument continues: (v) learning outcomes need to be economy-relevant and competency-based; and (vi) the main challenge is to work out how to measure the competencies properly. By this logic it becomes appropriate and theoretically feasible to compare the performance of different providers against a standard set of competencies expected of graduates for a given level of qualification.

However, there are several leaps in this logic chain, the most obvious leap being that from (a) the need for standards-referenced performance assessment to (b) the need for common standards. Standards are typically fixed criteria against which all products or services in a class may be assessed. But there...
are usually different standards set for different classes according to the level of performance expected. In a competitive race, for instance, qualifying standards for athletes vary according to talent and task; you don’t expect local athletes to be judged against Olympic standards just as you don’t test Olympians merely against local standards. There may well be common principles applied, e.g. that no competitor should gain unfair advantage through use of drugs or technological aids, or that all participants in an event should be able to demonstrate track record to complete the task. However, the standards to which any common principles apply are not the same.

There are practical dilemmas, alongside a body of research evidence casting serious doubt on the validity of using standardised tests of general intellectual skills for assessing individual students, then aggregating their scores for the purpose of comparing institutions (Banta, 2007). In Part 5 below, this ‘logic 1’ model is contrasted with a ‘logic 2’ model, which locates the onus for demonstrating effectiveness on the assessment function of individual higher education institutions.
1.7 The problem of conflation

There are three confluations of particular interest in the above line of argument. One is that institutional effectiveness is a product of student achievement. A second is that higher education learning outcomes can be reduced to competencies. And the third is that qualifications stand independent of the experiences that shape learning and the places where they are obtained and, by inference, universities are no different from other institutional types, nor from each other, in the production of graduates.

To what extent should the effectiveness of a university be determined on the basis of the success of its students and graduates? This question itself poses a multitude of queries, e.g. What roles are universities expected to play in contemporary society? How do universities differ from other providers of higher education services? How much is the worth of a university education “a function of being there” (Brennan et al., 2010) derived from the cultural values it represents, the insights it exposes, the experiences and interactions it enables, the new interests it develops, and the social networks it helps to forge? Insofar as higher education quality is essentially a reflection of the quality of relationships—between students and teachers, among students and among researchers—is it “more appropriate to evaluate a university’s capacity to build a community of learning than it is to measure the characteristics of university outputs” (Sursock, 2007)? What is graduate success, and at what point should graduate success be evaluated? Should graduate success be measured against what a qualification testifies to or against the utility of the qualification in providing access to employment or further learning? How can we identify the specific contribution of universities to graduate capability development (separate from other life-forming experiences)? Given differences across disciplines and study programs, how useful is it to compare institutional averages or ranges? How appropriate and meaningful is it to compare diverse institutions having different populations and purposes against the same standards? And to what extent is graduate achievement a product of student effort in making use of the opportunities offered by a university?

“A student’s coursework and classroom experiences shape both the nature and extent of his or her acquisition of subject matter knowledge and academic skills…what the student does to exploit the academic opportunities provided by the institution may have an equal, if not greater, influence” (Pascarelli & Terenzini, 2005).

The conflation of higher education with competency accumulation, as distinct from knowledge and skills integration, is especially worrying in the Australian context, where a positivist, atomistic model of competency-based training in the vocational education and training (VET) sector is narrowly oriented to operational skills, and where ‘modernisation’ of the Australian Qualifications Framework involves aligning outcomes statements across the vocational and academic domains, based on the VET competency model. For universities, this conflation is dangerous, for it reflects an idea of the university as no different from any other ‘provider’ of higher education services and as “merely a source of modular products currently in vogue” (Boulton, 2010).
1.8 The problem of confusion over standards-based approaches to learning outcomes

The notion of standards-based learning outcomes for purposes of national quality assurance is confusing.

For the standards-based bit, what is a ‘standard’ and what is the scope of the agenda: standards-based education; or standards-based teaching; or standards-based student achievement; or standards-based institutional performance; or standards-based assessment; or standards-based reporting, or all of the foregoing? Whose standards? Who is to set them? Who is to own them? Are they to be fixed or dynamic standards, standards of acceptability or aspirational standards? Are they standards relevant to particular programs or institutions or are they common standards?

For the outcomes-oriented bit, what is an ‘outcome’ and what is the scope of the agenda: educational outcomes, cognitive achievement, assessment outcomes, employment outcomes, income outcomes, wellbeing outcomes? And if the focus is on ‘learning outcomes’, which ones—enabling or culminating (Spady, 1994)?

What are the objects of comparison and the criteria? How would national sets of objects and criteria fit with different institutional purposes and approaches to curriculum, teaching and assessment? Or is there an implicit agenda to develop a common curriculum in higher education as is happening in primary and secondary education? If standardised tests are to be used, how could they do any more than indicate the spread of student achievement along a limited set of generic measures? And what inferences could be validly drawn about institutional effects? If the object of comparison is the assessed works of students, for which sample of works? at what point in time to degree? at a ‘pass’ or other grade? And what would be shown—the variability of student achievement or the variability of assessment—and what would the ‘findings’ be taken to mean—that variability is good or bad?

In its extreme form, the proposed approach envisages comparing higher education output quality independently of the learning setting, the disciplinary context, and the purpose of both the student and the higher education institution. This matter is considered in Part 4 below.

In the Australian context, the Bradley panel, citing Martin & Stella 2007, asserted that “significant evidence exists internationally of an increasing need for quality assurance based on achievement of standards and a shift away from the earlier predominance of the fitness for purpose approach” (Bradley et al 2008, page 133). The panel went on to argue that “Australia is at risk of being left behind if it fails to respond to these international pressures.” However the cited text offered a much more nuanced reading of international pressures and response options. Importantly, the cited authors distinguished between the purposes of ‘accreditation’ of providers and ‘quality assessment’ and ‘quality audit’ (Martin & Stella 2007). They also made a number of significant observations about the appropriateness of different approaches in different circumstances. In particular, they noted that whereas a ‘fitness for purpose’ approach is the more appropriate approach for quality improvement, ‘accreditation’, which imposes a cut-off point as to what is acceptable and what is not, is most appropriate for quality control in circumstances of rapid growth of private higher education providers, where its role is to protect students and families from low-quality or fraudulent providers:

“When the aim of external quality assurance (EQA) is to judge whether an institution or a programme should be accredited or not, it is necessary to use a standards-based approach.

Accreditation, the standards-based approach of EQA, may apply either minimum or high-level standards. When minimum standards are used, which is more common, it tends to resemble a
licensing scheme for institutions or programmes, and thus functions as a periodic licensing system. Minimum standards usually address input factors relating to students, staff, buildings, facilities and finances, as well as process elements such as governance and management systems. The main objective of such an accreditation system based on minimum standards is to enforce conformity with standards and accountability” (Martin & Stella 2007).

Thus “standards”, in this context and for this purpose, are “minimum norms” demanded of all accredited higher education institutions and for which they must be accountable (Martin & Stella 2007). The reason for the increasing international use of a standards-based approach is the considerable growth in the number of private providers of higher education and the need to tighten loose licensing procedures.

It does not follow that there is a shift away from fitness for purpose approaches to external quality auditing, internal quality self-regulation and assessment. To the contrary, in summarising the findings of the OECD international review of tertiary education over 2004-07, it was noted that “the emphasis is shifting in many countries from external control and regulation to greater responsibility by TEIs (tertiary education institutions) for their own quality monitoring, thereby leaving greater scope for internal mechanisms geared towards improvement” (Santiago et al, 2008).

The representation of the wider adoption of standards-based approaches to licensing as a retreat from fitness-for-purpose quality assurance is based on a false dichotomy. In the US, the UK and Europe it is widely understood that, with threshold norms safeguarded, the best approach is one that promotes improvement and diversity (Borden 2010; Ewell 2009; Martin & Stella 2007; Dill 2003). To that end it is seen to be necessary both to build academic capacity and professional commitment to improvement, and to provide the community with confidence through greater transparency and external verification of institutional quality self-regulation.

As the Bradley panel noted, Australia’s quality assurance system in respect of universities does not give rise to any crisis of confidence (Bradley et al, 2008). Australia’s basic problem has been that its provider licensing requirements and procedures have been fragmented across different jurisdictions. Even where a reasonably demanding threshold has been set for initial registration of private providers, there has been insufficient monitoring of provider compliance with the conditions of registration (e.g. number of students, number of qualified teaching personnel). Hence a strengthening of the accreditation system is necessary, for both initial provider licensing and periodic re-registration.

However, it does not follow that the fitness for purpose approach to quality assurance for institutions that exceed the threshold registration requirements should be discarded or transformed within a stronger accreditation regimen. When such a shift, which involves ‘satisfy’ or ‘not satisfy’ assessments, is paralleled by a re-alignment of the national qualifications framework within a competency-based model, which involves ‘meets’ or ‘does not meet’ assessments, risks arise that important features of higher education will be overlooked and undervalued, that innovation and diversity will be stifled, and the course will be set on a path to mediocrity.
1.9 Why it is an ‘accountability’ agenda

The value of any particular quality is a stakeholder-relative concept (Newton, 2010), and in higher education the key stakeholders are academic institutions, students, employers of graduates, and governments. There can be fundamental differences in perceptions of ‘quality’ between these different stakeholder groups as well as differences within the groups, and these can give rise to misunderstandings and conflicts (Harvey & Green, 1993; Santiago et al., 2008).

Approaches to quality assurance can be distinguished in terms of their concern for accountability or improvement (Sachs 1994). From a higher education system perspective both approaches are necessary (Santiago et al 2008), yet there is some dispute about the extent to which they are compatible (Vroeijenstijn, 1995; Thune, 1996; Woodhouse, 1999; Dano & Stensaker, 2007). Some argue that there are essential differences between accountability-driven external QA processes and improvement-oriented internal QA processes (Ewell, 2009). The former are seen to focus on summative, objective (largely quantitative) comparative indicators of performance against fixed standards for public reporting while the latter adopt formative and more nuanced (qualitative as well as quantitative) indicators of progress designed to guide educational interventions through multiple feedback loops. Some suggest that external processes do little more than induce compliance because they fetter academic engagement (Middlehurst and Woodhouse, 1995), or lead to ‘gaming’ or short-term ‘impression management’ (Williams, 1997; Newton, 2001; Harvey, 2004), while others contend that external processes can act as a fillip to internal improvement (Stensaker, 2007), as is claimed for the AUQA audits in Australia over the period 2002-2008 (Bradley et al., 2008).

To the extent that the new quality agenda involves mostly quantitative comparative indicators and is designed via a “determination to drive change” on the part of governments, it is predominantly an accountability agenda. The available evidence indicates that compliance regimens do not induce institutional performance improvement. In the case of the US, for instance, Dill has found that “traditional accreditation, state assessment regulations, and performance funding have generally been ineffective in strengthening institutional processes for academic quality” (Dill 2003). If improvement is a government objective, then room needs to be made purposefully in the policy design for institutionally-driven, academically-led approaches to quality enhancement.