International comparator study to inform the quality assessment review in England, Wales and Northern Ireland

February 2015

Quality Assessment Review

Report to HEFCE by Carolyn Campbell, Robin Middlehurst and William Lawton

Introduction

The Higher Education Funding Council for England (HEFCE) has commissioned an international comparative study of other countries' approaches to the quality assessment of academic standards and quality. The findings from this research are presented below.

The choice of countries was made by HEFCE in relation to three criteria: a focus on approaches that are risk-based, low-burden and outcomes-focused; systems that have quality assessment arrangements that could be compared with the UK and potentially applied or adopted; and the parameters of time-scale and budget for the research.

The three countries examined in this study are (in order): Norway, the US, and Australia. Given the size and diversity of the US system, two regional accreditation systems were chosen as exemplars. The research was contracted on 23.12.14 and the report was delivered on 12.1.15 by a team of three with extensive experience of international quality assessment arrangements, the current UK arrangements for quality assessment (across the four parts of the UK) and international higher education systems more broadly.

Terms of reference for the research

The research aims to provide:

- A qualitative account of how other countries approach and assess academic standards and quality, in particular with a focus on approaches that are risk-based, low-burden and outcomes-focused;
- A critical examination of the evidence demonstrating the impact and effectiveness of quality assessment in providing assurance in these countries;
- Some headline comments on the contemporary challenges encountered in the various countries' quality assessment approaches and, briefly, efforts taken to overcome them;
- Conclusions drawn on what parts of other countries' approaches could be applied or adopted in the UK, why and how.

A note on methodology

This research was undertaken in a short time-scale; as such, the team has relied on a desk-based search of relevant documentation that is publicly available, and only a small sample of such documentation has been identified, collected and analysed. Where feasible, this desk-based work has been supplemented by electronic conversations with key contacts.

A note on timing of the research in relation to quality assessment arrangements in each country

It is striking that all three quality assessment systems in this study are in a state of flux, with sometimes major and substantive changes – including legislative changes – either in train or on the horizon. Clearly, changes in higher education systems as a whole are also driving or have implications for quality assessment. In the US, debates about accreditation are taking place – and informing and influencing – the process of re-authorising the Higher Education Act. In Norway, the government has started work on a White Paper on the structure of higher education to be presented in the spring of 2015, with a statement that 'first we will set clear quality standards, and then the structure of higher education will follow due to [sic] these standards' (www.regjeringen.no/en/aktuelt/clear-priorities-in-higher-education-and/id749226). Australian arrangements have undergone significant change since 2011, when a new regulatory and standards-based system was introduced. Further legislation and changes to the system are now in progress, with one piece of legislation enacted in December 2014 and a more significant one still in parliament.

It is also worth noting that not only are systems in flux, but some quality assessment processes are relatively new. The Australian system has been operating only since 2012 and there have been waves of change each year since. Evaluations of the systems are ongoing and impacts are unfolding and shifting all the time, with a limited amount of analysis in the public domain. In addition, the degree of transparency in terms of information on reviewed provision and reviews is significantly different from one country to another due to agency practice in relation to the publication of reviews and other reports; this obviously has a bearing on the ability to judge effectiveness and impact, both from inside and outside the quality assessment system.

The picture of quality assessment arrangements in the three countries is fluid and dynamic, and arrangements are far from settled. The research presents a current snapshot and the picture will certainly look different in six months.

A note on context in relation to the research focus

It is important to note, first, that in the three countries, quality assessment arrangements (including changes to these arrangements) are set within particular political contexts which are themselves subject to change as successive governments of different political persuasions change the direction of higher education policy and, particularly, funding for higher education. Higher education policies are also influenced both by international pressures and issues – such as increasing connectivity between research and education systems globally and heightened

competition associated with international rankings – and by specific national socio-economic concerns. In the US, the escalating costs of tuition combined with student debt are a key factor in public and governmental pressures on the accreditation system, as well as concerns about poor completion and progression rates (particularly among for-profit providers) and in respect of students from minority populations. Changes in quality assessment in Australia arose after a comprehensive review of higher education (the Bradley Review, 2008) that outlined general concerns about the quality of Australian higher education and its international competitiveness; a lack of clear standards to benchmark provision was also highlighted. Even in a smaller and arguably more settled system such as Norway, recent government announcements linked to the prospective White Paper are set in the context of both domestic issues (such as rapid expansion in the number of higher education providers) and to issues of international profile and competitiveness in higher education and research. All three systems are also responding to changes in the technology of higher education and its impact on the design and delivery of provision and type and range of providers.

Secondly, and equally importantly, approaches to and systems for quality assessment do not stand apart from the overall regulatory framework and, indeed, what counts as 'the regulatory framework' is also changing. Higher education systems are required to be compliant with general legislation (on employment, competition, equality, health and safety, and bribery) and they are also impacted on to a greater or lesser extent in each country by other changing areas of legislation – most obviously immigration, but also freedom of information, national security and intellectual property. In relation to the academic areas of quality and standards of higher education, quality assessment systems are expected to expand their remits into previously unfamiliar territories, and in all three international comparator countries, this already means – or is likely to mean – new legislation as well as changes in quality assessment systems, processes and procedures.

Thirdly, the comparator countries have both centralised and decentralised, streamlined and fragmented quality assessment arrangements, sometimes established by governments, sometimes by academic and professional communities (or both), and increasingly with necessary, but often sharp, intersections and tensions between any of these levels and actors in the system. Not only is each system in flux, but one size and approach is unlikely to fit all cases, conditions and circumstances.

A note on terminology

The terms 'risk-based', 'low-burden' and 'outcomes-focused' are open to interpretation and, indeed, mean different things in the context of each country (and in relation to different kinds of provider in each higher education system). The terms

reflect different histories, socio-economic conditions, sets of values, academic and professional cultures, national policy priorities and political interests. There is also an important 'stages of development' dynamic for institutions in relation to quality assessment arrangements and to quality assessment systems as a whole.

Risk-based

In relation to risk, obvious questions to ask are:

- What risks are relevant to quality and standards, and are they different at institutional and programme levels?
- Who determines the nature and level of risk and associated quality assessment arrangements (regulatory and practical)?
- Once risk parameters are defined for a quality assessment system, what levels of risk trigger different kinds of intervention and action? By whom?
- Is the system all about risks (with associated powers and sanctions) or is it equally about reward and incentives?
- How do different parts of the system (regulation, agency processes, institutional internal quality assessment systems, governance arrangements, the work of professional and statutory bodies, funders and auditing requirements) inter-relate as part of a risk-management approach and what does this mean in practical terms?

In each country these issues are addressed in different ways.

Low-burden

The interpretation of 'low-burden' is also subjective:

- Any provider of goods and services has a responsibility for ensuring the quality and standard of what is offered, in the case of higher education, at programme and institutional level. There is also a strong interest in assuring quality and maintaining standards at national level, to ensure currency of qualifications, protect national reputations as well as the attractiveness of the higher education system, and to ensure efficient deployment of resources.
- Where should the basic level of quality assessment 'burden' fall (as defined by legislation or other codification)? This also raises the question of balance between internal and external approaches to quality assurance.
- What is a proportionate level of burden, for whom, and in what circumstances? This is also a risk issue.

- What are the scope and parameters of a 'low-burden approach to quality assessment in terms of cost, time, human resources – and at what level of the system – higher education providers, agencies, taxpayers and students?[1]
- Might a cost-benefit approach and analysis be more appropriate than a debate about the 'burden' of quality assessment?

In each country, the starting presumption is that the responsibility of assuring quality and maintaining standards rests first and foremost with individual higher education providers. Beyond this, there are debates about where the burden of (external) quality assurance should fall, how much of it is necessary (and for whom), and what is proportionate in relation to perceived or stated risks, and time and cost realities.

Outcomes-focused

The meaning of 'outcomes' in the context of the research focus is quite broad. Questions that arise include:

- Should the focus be directly on quality and standards outcomes of higher education (eg, attainment of graduate attributes, degree and diploma scores and profiles, completion rates, graduate employment statistics and trends, admission and progression data and trends, including progression to post-graduate study and success, efficiency and value for money, value-added measures and outcomes, and student satisfaction)?
- Should the focus be on outcomes from the quality assessment system that are less direct (eg, improvements in higher education providers' management of quality and standards in the context of articulated risks), or quality-enhancement-focused development (eg, achievement of negotiated and agreed quality assessment plans and targets at national or institutional level, institutional or national trends in student success and/or satisfaction for different groups of students at different levels accessing different types of provision)?
- Should 'outcomes' be referenced and benchmarked institutionally, nationally or internationally, and what are the appropriate criteria and reference points?
- Many institutionally focused (and programme-focused) quality assessment systems around the world (including the US) are essentially mission-centric, recognising a range of different outcomes. Quality assessment systems typically, therefore, have an appropriate degree of flexibility in their processes to cover diversity of mission among higher education providers and provision. How might this be interpreted across the devolved nations of the UK?

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[1] HEFCE has commissioned research into the costs of quality assurance, to be published in spring 2015.

These are large questions and beyond the scope of this research. It is clear, however, that each country addresses such questions in different ways and that answers are likely to be different as well as subject to change.

Structure of the report

This report is structured as follows:

- Three case-study country reports (in order: Norway, US, Australia) to provide a qualitative account of the approach to assessing academic standards and quality in each case, combined with an analysis of identified and available evidence of impact and effectiveness, and headline comments on the contemporary challenges encountered in relation to quality assessment approaches and efforts to overcome them.
- Conclusions on what parts of the other countries' approaches might be applied or adopted in the UK – and why and how.

Case study 1: Norway

Overview: Parameters of the higher education system in Norway

Norway has a state-owned and state-regulated higher education system. The Ministry of Education and Research has overall responsibility for higher education and all other levels of education.

Higher education is offered in four types of higher education institutions (HEIs): universities (8), specialised university institutions (8), accredited university colleges (37) and university colleges with accredited study programmes (16). The differences between HEIs relate to their self-accrediting authority. There are 20 private university colleges that account for about 10% of students. Of the 69 HEIs, 75% have fewer than 5,000 students. There are a few more institutions under the regulation of the Ministry of Justice or Ministry of Defence. There are more than 240,000 students in the higher education system.

All public and private higher education in Norway is subject to the Act Relating to Universities and University Colleges (Lov 2005-04-01 nr 15). An institution's right to award specific degrees and the prescribed lengths of study are codified in Regulations on Degrees and Titles Protected by Law (FOR 2005-12-16 nr 1574). The awarding of master's degrees is regulated by the Regulations on Requirements for Awarding a Master's Degree (FOR 2005-12-01 nr 1392).

Norway has adhered to the objectives of the Bologna Process in the European Higher Education Area. Most elements have been implemented through the reform of the Norwegian higher education system in 2003.

Norwegian higher education qualifications make up the levels from 6 to 8 of the Norwegian Qualifications Framework for Lifelong Learning (NQF) from 2011. The NQF describes the levels of qualifications as defined by the total learning outcomes in terms of the knowledge, skills and general competence that graduates at various levels should have achieved. The NQF has yet to be referenced to the European Qualifications Framework (EQF).

Funding

In general, there are no tuition fees in Norway, although fees may be imposed for certain professional education programmes, further and special education programmes and at private institutions. Fees for international students were recently proposed, but rejected.

Quality and standards

The Norwegian Agency for Quality Assurance in Education (NOKUT) was established by the Universities and Colleges (U&C) Act 2002 and became operative in January 2003. It is an autonomous governmental agency which provides external supervision and control of the quality of Norwegian higher education, as well as of all tertiary vocational education.

- An accredited HEI is granted the right to offer educational provision, without having to apply to NOKUT for specific programme accreditation, in accordance with the authority associated with its institutional category.
- As in Australia, Norwegian universities have self-accrediting status. Universities may – without external accreditation – establish study programmes at all levels. NOKUT provides a cycle of external evaluation of the institution's quality assurance systems for educational provision.
- Accredited university colleges have to apply for the accreditation of programmes at master's and doctoral levels.
- In those fields where specialised university institutions and accredited university colleges have the right to award doctorates or corresponding degrees, they may decide themselves which programmes and disciplines the HEI will offer.
- University colleges without institutional accreditation must apply to NOKUT for accreditation of study programmes at all levels. All tertiary vocational education (at Level 5 on the NQF) must be accredited by NOKUT.

All higher learning institutions, particularly the universities, are responsible for conducting basic research as well as researcher training, primarily by means of graduate-level studies and doctoral programmes.

NOKUT is fully financed by the state. Its budget for 2012 was €12 million (£9.4 million) and the agency has a permanent staff of 70. Each year, it contacts around 200-300 experts for various evaluation and accreditation processes (NOKUT presentation to DAAD, Holmen, 2013). NOKUT is subject to regulation by the Ministry of Education and Research (MoE), and the MoE regulatory power incorporates the agency's objectives, responsibilities, and instruments, the appointment of experts, the audit and accreditation processes, as well as the standards and requirements, monitoring activities and appeals procedures.

Further detail on the quality assessment system

*Accreditation (*of institutions and study programmes*)* in the Norwegian quality assurance context is an *ex ante* evaluation of an institution or programme, which

confers self-accrediting powers to an institution regarding its programmes and awards (institutional accreditation), and/or permission for delivery of programmes and awarding degrees in areas for which an institution does not have self-accrediting powers (programme accreditation). These two types of accreditation have unlimited periods of validity: once granted to the institution the accreditation lasts.

The backstop, or protection against eventual abuse of these powers, is provided through two additional external quality assurance processes, developed and applied by NOKUT: *ad hoc revisions* of an institution or programme, which may end up with a withdrawal of the previously granted accreditation, and cyclical *audits of institutions' internal quality assurance* systems. Institutions that fail to obtain NOKUT's approval of their quality assurance systems lose the authority to establish new study programmes, or (in the case of non-accredited institutions) to apply for accreditation of new study programmes.

Higher education institutions in Norway also have quality assurance responsibilities regarding their provision under the U&C Act and the Ministerial Regulations no. 96 of 2010. These explicitly require universities and university colleges to have in place 'a system for their quality assurance work' and to submit their quality work to NOKUT's external monitoring and supervision.

NOKUT continues to operate its broad framework of *programme* accreditations, *institutional* accreditations, *audits* and *revisions*, but these procedures are seen to be part of an interconnected system, sharing the purpose of assuring the quality of 'all higher education provision in Norway' through evaluations at either programme or institutional level. The focus of accreditation is on aspects of an institution's activities that allows the determination of its institutional type and, hence, self-accrediting status in relation to the programme provision. In this system, audit and revision are interpreted by the agency as two forms of control and supervision of existing provision, where audit is where the institution, or a specific programme, is tested against the standards with the possible outcome that an accreditation may be revoked.

Change and development

A view of the consistency of NOKUT's various approaches to quality assurance and quality control has prompted a series of new developments since 2012:

- NOKUT made provisions for a more targeted approach to the revision of programmes. The new model, piloted and then implemented in 2012, prescribes a four-step process, involving mapping of risk-related indicators, data-reporting and dialogue with the institution, and finally revision, if the

risk assessment concludes that the internal quality assurance processes carried out by the institution are not sufficient. The model is also considered more flexible, as it allows for dialogue with the institution and helps counteract the areas where quality is at risk, thus avoiding revision and revocation of accreditation.

- NOKUT adopted amendments to its standards and criteria for institutional accreditation, where the requirements for different types of institutions are differentiated.
- NOKUT revised in this period its criteria for audits of internal quality assurance systems, where the number of criteria was reduced from 10 in 2008 to five in 2012. No institution has yet been audited under the new set of criteria, however.
- The agency made available open Internet access to its archive of reports, which helped improve institutions' ability to learn from each other's practices in quality assurance.

NOKUT has been given extra tasks over the years, including external quality assurance of tertiary vocational education and training and responsibility for recognition of qualifications as Norway's national agency. Since 2010, it has also been responsible for establishing and managing Centres of Excellence in Education at Bachelor's and Master's-level programmes. In 2011, the agency piloted its model for rewarding programme teams for excellent quality and innovative practices in their provision.

Despite changes, NOKUT's key responsibilities for quality assurance in higher education relate to *accreditation* (institutional and programme), *revision* of accreditations, and *audit* of quality assurance systems within the higher education institutions. NOKUT also undertakes periodic evaluations of the Norwegian higher education system with purely diagnostic and enhancement objectives.

NOKUT processes

NOKUT processes may vary, but provide a common pattern:

- A starting point for all evaluations, except audits, is an application by the institution, followed by administrative assessment by NOKUT (in the case of programme accreditation) which, if successful, continues with expert assessment by a panel, including a site visit (two site visits for all audits, but visits for programme accreditations are limited to third cycle and revisions of programme accreditations only) and the production and publication of the report with recommendations for improvement.
- NOKUT panels for audit and institutional accreditation include a student representative (as required for compliance with the European Standards and

Guidelines), and an international expert (for institutional accreditations, audits and PhD programme accreditations – note this is an indicator in the Bologna Process stocktaking report) which, together with the recommendations section in all reports, represent a good practice example in the agency processes (according to the European Quality Assurance Register (EQAR) Panel evaluation).

- Institutions are consulted about the reports and invited to provide feedback to the panel's evaluations which, in the case of programme accreditations, is used as a basis for additional evaluation, where conclusions may differ from the original.

A criterion-referenced approach

NOKUT's audit criteria require institutional internal quality assurance systems to satisfy a set of expectations regarding their characteristics: to engage staff and students; to set clear quality targets and have plans and management for their achievement; and to collect and document quality-related information, which is then to be analysed, reported and used for quality improvement. These are all referenced to the European Standards and Guidelines for Quality Assurance. The agency describes its audit criteria as being focused on 'the effectiveness of the QA system as a whole, and how it produces relevant and necessary information about educational quality'. It stresses the fact that its analysis of such information may prompt an in-depth scrutiny of specific programmes or subject areas.

A changing institutional landscape (with impact on higher education reforms)

Since 2003, the number of universities in Norway has doubled (from four to eight) and the number of specialised university institutions has increased. Several university colleges have explicit ambitions to acquire university status, which is demonstrated by the many mergers and merging processes in the sector. Furthermore, there has been a relatively strong growth in the number of new providers, as institutions that formerly could not offer higher education now have acquired the right to do so. The new providers are considerably smaller institutions than the long-established ones. There has also been a solid growth in the number of new master's and doctoral degree programmes in the university colleges. NOKUT has accredited more than 100 master's programmes and nearly 30 doctoral programmes in these institutions. In 1995, 10 institutions had the right to award doctoral degrees; in 2012, the number had risen to 28, including 10 state university colleges and four former state university colleges. All movements in the landscape are upwards – both in the sense that more and more programmes are developed at a higher degree level and in the sense that institutions are elevated in the institutional hierarchy.

This picture has some resonances for developments in England since 2012.

Dynamics and diversity

These changes have affected diversity in the sense that some existing university colleges, and of course the university colleges that have achieved university status, have become more similar to the older universities. This, however, is a slow process. The portfolios of the 'new' universities are still dominated by large professional programmes (teaching, nursing, engineering, etc) and relatively few of their students follow master's degree programmes. Programme diversity has increased in each individual institution, while the institutions, in many ways, have become more similar. So the development is towards increased diversity within institutions and diminished diversity among institutions.

Institutions, programme portfolios and students alike follow an 'upwards' drift, as higher degree levels and higher institutional status are perceived to entail competitive advantages, both in the interrelations between institutions and in the students' opportunities in the job market. These dynamic forces have both positive and negative aspects. On the positive side, it provides academic development, with more robust discipline communities, broader portfolios and potentially better quality in education and research and development (R&D). But, at the same time, this institutional drift may harm the institutions' broad base of bachelor programmes and lead to the establishing of too many small and vulnerable discipline communities with responsibility for master's and doctoral programmes. It is also possible to imagine a future trend where tertiary vocational education, which is supposed to be short and practically oriented, becomes more academically demanding, so as to reduce the educational opportunities for persons with weaker theoretical abilities.

The Norwegian government is clearly concerned by the potential 'fragmentation' of the higher education system and is addressing the structure of higher education in its current review.

Contemporary challenges for quality assurance (see also EQAR Panel comments below)

Further changes to the higher education system are planned. The Norwegian government has announced seven measures for higher education and research over the next four years. 'The goal is higher quality' and 'knowledge is the new oil'. The government has appointed an expert group to look at the funding for universities and university colleges. Work has started on a White Paper on the structures of higher education to be presented in spring 2015. 'First we will set clear quality

standards, and then the structures of higher education will follow due to these standards'.

Ministry goals for reform

'The goal for changes is to increase quality in Norwegian research and higher education through stronger academic environments and a reasonable degree of efficiency'.

'All state universities and university colleges are requested to evaluate how the individual institution will find its place in a landscape with fewer institutions and clearer expectations regarding academic standards. Universities and university colleges have sent their final submissions with a description of their preferred strategic position in 2020 and an evaluation of the main steps that must be fulfilled in order to reach that position. The institutions have also been requested to evaluate how they can become stronger through mergers with other institutions, or how they can lift quality at other institutions through mergers with them. The Ministry has encouraged extensive contact between institutions both within and outwith their own regions.'

Seven measures are promised in order to achieve higher quality (from the ministry website):

1. The task of the government-appointed expert group is to look at how funding can strengthen the quality of higher education and research.
2. A White Paper has been started. The aim is to ensure high quality in all academic courses offered by universities and university colleges. The White Paper will be presented in the spring of 2015.
    > 'First, we will set clear quality standards, then the structures of higher education will follow due to these standards. However, I think it is likely that one of the conclusions will be that we should reduce the number of higher education institutions. This does not necessarily mean a reduction in the number of campuses, but the quality requirements have consequences for the structures', says Torbjørn Røe Isaksen, Minister for Education and Research.
3. The government will put forward a long-term plan for higher education and research. This will strengthen the prerequisites for making long-term and strategic priorities that are important in order to achieve high quality.
4. Norway should develop more world-leading research. In dialogue with the higher education sector, the government will find and invest in relevant research environments and institutions that can contribute to breakthrough research in the world.

5. Norway aims to succeed in the new EU research programme, Horizon 2020. A strategy for Norwegian participation will be launched in spring 2015.
6. The government will look at the recruitment, employment and career structure of researchers.
7. The government will also focus on teacher education. 'Good teachers are the foundation of the knowledge society. How well we succeed in the higher education sector as well as the rest of society depends on good teachers'.

Evidence of the impact and effectiveness of quality assessment in providing assurance

The evidence obtained has come from an evaluation report of NOKUT for inclusion in EQAR and compliance with the European Standards and Guidelines (ESG). www.eqar.eu/fileadmin/agencyreports/NOKUT_External_Review_Report_2013.pdf

The impact of NOKUT (described as successful) includes:

- The ministry successively giving NOKUT more autonomy to define its QA processes and procedures (after a ministry site visit).
- Increased number of new institutions, including several private ones developing and colleges becoming universities. (However, the government's recent announcements suggest that this is not a wholly desirable impact and reforms may change this outcome).
- Reference to international standards (ie, ESG). (Note that these are 'principles-based standards for quality assurance', not academic standards).
- The EQAR Review Panel congratulated NOKUT's determination to use its control and supervisory powers for further development of HEIs and enhancement of the quality of their provision.
- It is clear for the panel that the present legal and regulatory framework in which NOKUT works sets limitations to the streamlining of its numerous external quality assurance activities and to timely methodological change and innovation. Such imbalances are linked to the growing number of small institutions, which raises an issue about whether the current quality assurance framework may promote a steady fragmentation of the higher education sector, rather than consolidation and improved competitiveness. The panel notes, however, that there are also national/regional development issues that are clearly linked to such matters. (Note – this is a focus of the government's proposed review).
- The panel was impressed by the considerable support that NOKUT receives not only from its key stakeholders, but also from the Ministry of Education and Research, which recently amended its regulations in order to provide an opportunity for NOKUT to determine supplementary requirements for accreditation.

- Follow-up on audits was raised as an issue (currently six years with a proposal to extend to eight). The panel has concerns that, given the rapidity of change in higher education, NOKUT may wish to consider introducing a structured follow-up of audits.

The panel highlighted two areas where it believed NOKUT's approach to external quality assurance was commendable: the sector-wide research and its own accountability system. The continuous study of the developments in the national higher education system and publication of reports is a notable attribute of the agency work and brings numerous benefits to its external quality assurance processes. The review panel also wishes to emphasise the fact that NOKUT is not only working to maintain threshold academic standards and quality, but also to promote excellence, as demonstrated by its recent role in the nomination and appointment of national centres of excellence. Norway's 'Centres of Excellence in Higher Education' programme is one of 10 national initiatives in education or research examined in a recent European University Association (EUA) report, 'Funding for Excellence'. In Norway, three centres were selected (in music, maths and biology) and they each receive NOK 3 million (£260k) over five years, with possible renewal. The initiative is managed by NOKUT.

Supplementary comments

A risk-based approach

At a broad (national) level, risks to the quality and standing of Norwegian higher education are controlled through regulation and the authority of the ministry. The legal framework determines the criteria and processes of QA undertaken (and reviewed and developed) through NOKUT, as well as the powers and authority of the agency. Public funding for institutions is also an essential part of maintaining and raising quality (a hedge against risk).

In 2012, revisions to NOKUT's procedures led to a more targeted approach which involves a risk assessment – involving mapping of risk-related indicators, data-reporting and dialogue with the institution. Revisions to internal quality assurance processes (and accreditation) can be required and accreditation can also be revoked.

Burden of QA

The potential 'burden' of QA was altered in the changes to NOKUT's processes introduced in 2012 by altering its criteria for audits of internal quality assurance systems, where the number of criteria was reduced from 10 to five. NOKUT also adopted amendments to its standards and criteria for institutional accreditation to

increase flexibility and differentiate the requirements for different types of institutions.

A quality enhancement element (that also potentially reduced 'burden') was introduced in 2012 when the agency made available for open Internet access its archive of reports. This helped improve institutions' ability to learn from each other's practices in quality assurance.

Costs

NOKUT's principal source of income is the state budget, allocated by the Ministry of Education and Research. Financial regulations allow the agency to have its own source of income from sales of services, but this channel is being used to a lesser extent. About half of the total budget of NOK 61.9 million (£5.3 million) for 2011 has been used for activities related to external quality assurance. The budget allocation for 2012 was planned for NOK 57.4 million (£4.9 million) for all of the agency's activities, but an additional sum of NOK 4 million had been allocated to cover the growth in demand for recognition of foreign qualifications. For 2013, the estimated budget increase of NOK 10 million, compared to the original allocation for the previous year, was related to projections for increased demand on recognition of foreign qualifications (EQAR evaluation report).

Outcomes-focused

In the EQAR report, the evaluators comment that NOKUT describes its audit criteria as being focused on 'the effectiveness of the QA system as a whole, and how it produces relevant and necessary information about educational quality'. The agency stresses the fact that its analysis of such information may prompt an in-depth scrutiny of specific programmes or subject areas.

However, in separate analyses of and commentary on the audit-based approach in Norway (available on the NOKUT website under 'Research and Analysis'), there are several articles that question the ability of an audit-based approach of internal QA systems to adequately address academic standards.

Case study 2: United States (with focus on two regional accreditors)

Overview: Parameters of the higher education system in the US

The US has a federal system of government in which competency for education policy and provision is reserved to the individual states. There is no national system of higher education and considerable variation exists between the states' education systems. Policy innovation arises at state level and the main role of the federal Department of Education (USDE) is administering student aid programmes.

In 2010-11, there were about 21 million students (13 million full-time) in just over 7,000 HEIs in the US eligible for Title IV (federal) student aid funding. About 4,600 were degree-awarding universities and two-year colleges. Of these, there were some 1,650 public HEIs, 1,630 private not-for-profit and 1,300 private for-profit institutions.[2] Overall, the majority of institutions (5,000 of 7,000) were in the non-state sectors.

The USDE distributes $150 billion a year in grants, 'work-study' funds, and low-interest loans to some 15 million students. Federal student aid covers such expenses as tuition, room and board, books, computers and transportation.[3] This is quite separate from state-level loans and grants.

One cause of the rising cost of higher education tuition fees in the US is reduced state funding. But in the US, overall student debt was reported as having reached $1.2 trillion in summer 2013, of which $1 trillion was from federal loans.[4] The average debt on graduation was $26,000. Ivy League universities are able to provide means-tested financial aid to large proportions of their students, irrespective of country of origin.

Federal student aid programmes are governed by the Higher Education Act (HEA), which is reauthorised, in theory, every five years by Congress. The HEA in fact expired at the end of 2013 and is now (January 2015) running on a temporary extension while Congress works on new legislation. In spite of the process being more complex than usual this time around, reauthorisation should occur in 2015, and issues around accreditation and whether the foundations of oversight need to be reformed are part of the process.[5]

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[2] 'Table 5. Number of educational institutions, by level and control of institution: Selected years, 1980-81 through 2010-11', Digest of Education Statistics, National Center for Education Statistics, Department of Education.

[3] See Federal Student Aid, Department of Education. studentaid.ed.gov/types

[4] 'How The $1.2 Trillion College Debt Crisis Is Crippling Students, Parents And The Economy', Forbes, 7 August 2013. www.forbes.com/sites/specialfeatures/2013/08/07/how-the-college-debt-is-crippling-students-parents-and-the-economy/.

[5] TG website (loan administrators for the USDE). www.tgslc.org/policymakers/federal.cfm

Quality assurance in the US

Quality assurance of US higher education is regulated by parties at three levels:

- At federal level, the USDE recognises accreditation agencies and is responsible for the eligibility and certification process by which HEIs access Title IV (student aid) funding.
- At state level, 50 education commissions are responsible for regulating higher education according to a range of criteria that vary by state.
- At higher education provider level, voluntary, peer review-based accreditation by non-governmental agencies is applied on a cyclical basis with additional *ad hoc* interventions, including consideration of 'substantive change' requests.

The accreditation processes

The USDE does not undertake accreditations. To qualify for student funding, HEIs must be accredited by an agency recognised by the USDE. These accreditors are not funded by USDE; they are funded entirely by institutions. Within USDE, the National Advisory Committee on Institutional Quality and Integrity (NACIQI) oversees the recognition process.[6] Accrediting agencies are private (non-governmental) educational associations of regional or national scope. The USDE searchable database of recognised accreditation agencies is at ope.ed.gov/accreditation/Search.aspx. The Council for Higher Education Accreditation (CHEA), an umbrella advocacy body, has a parallel recognition process for agencies and a separate searchable database at www.chea.org/search/search.asp. Most – but not all – accreditation agencies seek recognition from both the USDE and CHEA, but only USDE recognition provides the essential access to Title IV student funding.

The goal of accreditation is to verify that an HEI or programme is of an established standard of quality. It is a peer-evaluation process that develops evaluation criteria and assesses whether those criteria are met. Institutions and/or programmes that request an agency's evaluation and meet its criteria are accredited by that agency.

Obtaining accreditation involves the HEI or programme preparing a detailed self-evaluation study on its performance compared with the accrediting agency's educational standards. The accrediting agency sends a team to visit the HEI or programme to determine if the standards have been met. If they have, accreditation

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[6] Members are appointed by USDE and Congress. See http://www2.ed.gov/about/bdscomm/list/naciqi.html and, for a further overview, http://www2.ed.gov/admins/finaid/accred/accreditation.html.

is granted and details of the accreditation status of the HEI or programme are published. Full accreditation reports are not published – though the WASC Senior College and University Commission (discussed below) started doing so in 2014. The accrediting agency undertakes periodic monitoring and re-evaluation of the HEI or programme's accredited status (see also below for more detail on processes).

Within the USDE, an Accrediting Agency Evaluation Unit provides consultative services to HEIs, supports the NACIQI mentioned above, reviews standards and procedures, and provides a link between USDE and accrediting agencies.

The accreditation bodies

The picture in the US is more complex still. There are three main types of accrediting agencies: national, regional and specialised. National and regional agencies accredit HEIs; specialised agencies accredit faculties and/or programmes. There are hybrid agencies which accredit both programmes and institutions, and some programmes and institutions can be accredited by more than one type of agency. There are no shared standards across the three types of agency, but they maintain a level of comparability of principles through voluntary association with, and recognition by, the CHEA.

National agencies

The national agencies focus on for-profit, career colleges and faith-based colleges. Some of the national accreditation agencies are:

- Accrediting Commission of Career Schools and Colleges
- Accrediting Council for Continuing Education and Training
- Accrediting Council for Independent Colleges and Schools
- Council on Occupational Education
- Distance Education and Training Council (DETC).

Many online programmes and institutions are accredited by national accreditors (though this does not constitute permission to operate in particular states – that must come from state level). While the DETC, for example, monitors only online programmes and institutions, online programmes may seek accreditation from other agencies.

Regional agencies

The regional accrediting commissions pre-date the existence of the national commissions and have an association with traditional colleges and universities that dates back more than a century. Some HEIs with regional accreditation do not accept

transfer credits for students from HEIs accredited by national bodies. The regional accreditors in the US are:

- Higher Learning Commission (formerly North Central)
- Middle States Commission on Higher Education (MSCHE)
- New England Association of Schools and Colleges Commission on Institutions of Higher Education
- New England Association of Schools and Colleges Commission on Technical and Career Institutions
- Northwest Commission on Colleges and Universities
- Southern Association of Colleges and Schools Commission on Colleges
- Western Association of Schools and Colleges (WASC) Accrediting Commission for Community and Junior Colleges
- WASC Senior College and University Commission.

This research will focus in on two of these: MSCHE and WASC Senior College and University Commission (WASC Senior, though the acronym WSCUC is now also used). These two agencies accredit a diverse range of providers, from well-known and highly ranked research-intensive universities to small, for-profit providers. MSCHE provides more detailed accreditation statements than other regional accreditors and is of particular interest because it accredits two UK universities. This was part of a MSCHE pilot project (now ended) to accredit non-US institutions outside the US. WASC Senior was the first regional commission to publish its reports[7] and piloted the use of a Degree Qualifications Profile (DQP) – a US equivalent to the Framework for Higher Education Qualifications in England, Wales and Northern Ireland (FHEQ) – as a benchmark.[8]

Specialised (or 'programmatic') agencies

Specialised accrediting agencies review individual programmes rather than entire institutions. The Department of Education recognises more than 40 specialised agencies in the arts and humanities, education training, law, community and social services, and healthcare. A few examples are:

- National Council for Accreditation of Teacher Education
- American Bar Association
- Association for Clinical Pastoral Education
- Commission on Collegiate Nursing Education
- Association to Advance Collegiate Schools of Business (AACSB).

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[7] See, for example, http://wascsenior.box.com/shared/static/meklvrfppat35uxttvp6.pdf.
[8] See www.wascsenior.org/redesign/dqp and www.luminafoundation.org/files/resources/dqp.pdf.

A number of UK university business schools hold AACSB accreditation. Such subject-specific accreditation is similar in focus but not the same as Professional, Statutory and Regulatory Body (PSRB)[9] accreditation in the UK. US accreditors do not have the power to license professionals like UK PSRBs; in the US, this is the competency of the individual states, which may require professionals seeking a licence to practise to have completed an accredited programme.

Criteria for USDE recognition of agencies

The detailed criteria by which the USDE recognises accrediting agencies are at www2.ed.gov/admins/finaid/accred/accreditation_pg13.html. Of particular interest are the following points, as they encapsulate a level of burden originating with the federal government and passed to institutions via the accrediting agencies:

- Agencies must monitor overall growth of institutions and programmes they accredit and, at least annually, collect headcount data from them (section 602.19).

- Agencies must notify accrediting decisions to the USDE, state governments, and the public within 30 days (602.26).

- Agencies must provide to the USDE a copy of annual reports they produce, annual updates of directories of accredited institutions and programmes, an annual activity summary if requested, notification of any changes in procedures or accreditation standards, and notification of expansion of activities into, for example, distance education (602.27).

- Agencies must report to the USDE all institutions and programmes they accredit that they believe are engaged in fraud or 'failing to meet their Title IV, HEA, programme responsibilities' (602.27).

- Agencies must have 'regard for decisions of states and other accrediting agencies', ie, cannot grant accreditation (or 'preaccreditation') to HEIs that lack or have lost legal authorisation under state (not federal) law – unless they provide 'a thorough and reasonable explanation' as to why they should (602.28).

The criteria for recognition by the USDE include a lengthy section on an agency's need to be 'separate and independent' from any kind of trade or membership organisation and they provide guidelines for avoiding conflicts of interest. This is

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[9] Examples of PSRBs include the General Medical Council, the Architects Registration Board, and the Institute of Physics.

also a standard feature of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (EHEA).

The Criteria for Recognition page refers consistently throughout to 'accreditation or preaccreditation', the latter being a reference to candidate status that exhibits an element of risk-based practice, while giving the opportunity for providers to develop and demonstrate a track record towards meeting full accreditation standards.

As for direct impacts on HEIs, the section on 'substantive change' (602.22) is worth noting as a risk-based approach to quality assurance. Agencies are required to have clear guidelines for institutions on what constitutes substantive change. Retention of access to Title IV funding is conditional on institutions informing agencies of such items as the addition of courses or degree programmes that represent a 'significant departure' from those that were offered at the time of the last evaluation. This can include offering an existing programme in a different mode of study.

Substantive change also includes forays into transnational education (Section 602.24): agencies must require institutions to notify them of plans for branch campuses in particular (as in Australia). HEIs are also required to submit business plans for branch campuses that describe the proposed degree programmes and courses, operational and management resources, and all financial projections. Accreditation can be extended to branch campuses only after these details are evaluated, and agencies are required to visit new branch campuses within six months.

All costs for the above are borne by HEIs. The requirements triggered by substantive change could indeed be interpreted as a risk-based approach to quality assurance – but one which adds to, rather than diminishes, the burden on institutions.

The role of the individual states

The states authorise HEIs to operate within their jurisdictions. There is no common approach to accreditation criteria, though one constant throughout the country is the lack of a formal, legal requirement for accreditation. Access to the websites of the state higher education commissions/departments/offices (there is no standard terminology) is through the website of SHEEO (State Higher Education Executive Officers Association): www.sheeo.org/our-members. Further investigation reveals the great diversity in approaches – from New York as a recognised accreditor to the lighter approaches of Delaware, Hawaii and other states where diploma mills have been able to flourish.

A good, if lengthy, overview and analysis of how states require and use accreditation by both USDE- and CHEA-recognised accreditors can be seen at

www.chea.org/pdf/State_Uses_of_Accreditation.pdf. It also indicates which states have their own QA procedures in addition to accreditation by recognised accreditors. Such additional QA requirements at state level can be consequent to such factors as whether institutions are in receipt of state funding.

Middle States Commission on Higher Education

The Philadelphia-based MSCHE (www.msche.org/) covers HEIs in Delaware, Maryland, New Jersey, New York, Pennsylvania, District of Columbia, Puerto Rico and US Virgin Islands. As noted earlier, it accredits two UK universities – a vestige of an experiment in international accreditation which has now ceased in terms of new international accreditations. There are other such institutions in Canada, France, Switzerland and Taiwan. The MSCHE also accredits US universities abroad, such as Richmond, the American International University in London, incorporated in Delaware, and the American University of Paris.

The MSCHE describes itself as a 'voluntary, non-governmental, membership association dedicated to quality assurance and improvement through accreditation via peer evaluation'. A useful summary of its mission, standards and activities is at www.msche.org/documents/MediaBackgrounder2015.pdf.

The MSCHE requires an annual report from institutions, has a 10-year cycle of review and, typically, an accreditation activity every five years – either self-evaluation plus on-site review or a periodic review report. It has a range of additional follow-up actions and, of course, an emphasis on substantive change. Follow-up activities may take the form of reports, visits, or both.[10]

MSCHE fees

The MSCHE's complicated schedule of 'dues and fees' can be accessed at www.msche.org/?Nav1=INSTITUTIONS&Nav2=DUESFEES. For 2014-15, the base dues reflect institutional turnover and range from $1,186 to $26,332 (£780 – £17,400). The fees include an extra charge ('add $322 for each of the first 10 branch campuses') for branch campuses and additional locations with more than 500 students. In addition to these fees, institutions have to pay all expenses incurred for Commission actions and visits.

The scope of MSCHE standards

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[10] See 'Follow-Up Reports and Visits', MSCHE, Guidelines effective January 2010.
www.msche.org/documents/6B---4-Follow-up-reports-and-visits-guidelines-122109.pdf

The MSCHE has recently started to publish full reports and its Institution Directory contains detailed 'Statements of Accreditation Status' (www.msche.org/institutions_directory.asp). It also publishes 'Non-Compliance Public Disclosure Statements' when an institution has been placed on warning or probation, or has had its accreditation withdrawn. Public Disclosure Statements provide the current accreditation status, reason(s) for the Commission's action, next steps, and a timeline for that next review.

At time of writing (January 2015) there were 18 institutions on this list (www.msche.org/accreditationactions_pds.asp). One such is the public Baltimore City Community College, which is on warning because of insufficient evidence of compliance with Standard 2 (Planning, Resource Allocation and Institutional Renewal), Standard 3 (Institutional Resources), Standard 6 (Integrity), and Standard 7 (Institutional Assessment). The for-profit University of the Potomac in Washington DC is on probation because of insufficient evidence of compliance with Standards 2, 3, 7, and Standard 14 (Assessment of Student Learning).

It was similar with Richmond, The American International University in London. Its Statement of Accreditation Status shows that it was on probation for non-compliance with MSCHE Standards 1, 2, 3, 4, 5 and 8 and that probation was lifted in 2012. Standards 1-5 all relate to institutional structures; Standard 8 is about student admissions.

The pattern is clear: non-compliance in this process has more to do with governance, administration, planning and finance than with academic quality. This perhaps explains why the Quality Assurance Agency's (QAA's) Institutional Review of Richmond, dated May 2013, made no mention of the MSCHE probation and said that its academic standards 'meet UK expectations'.[11]

London Metropolitan University's Statement of Accreditation Status indicates that a report was triggered by the UK Border Agency's (UKBA's) removal of its sponsor licence in 2012. Its next periodic review is set for 2017 and next self-study evaluation for 2021-22.

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[11] Richmond, The American International University in London: Institutional Review by the Quality Assurance Agency for Higher Education, May 2013.
www.qaa.ac.uk/en/ReviewsAndReports/Documents/Richmond,%20The%20American%20International%20University%20in%20London/Richmond-The-American-International-University-in-London-IRENI-13.pdf

MSCHE standards revised

The 2014 edition of the MSCHE 'Standards for Accreditation and Requirements of Affiliation'[12] halved the number of standards from 14 to seven, though the MSCHE points out that this 'in no way reflects a decision by the Commission to diminish its commitment to supporting institutional self-assessment and quality improvement'.[13]

The revised standards were developed by a steering committee of higher education academic staff and administrators. The MSCHE argues that it has 'eliminated redundancies and sometimes-lengthy contextual statements' and shifted the emphasis to 'institutional self-reflection leading to meaningful improvements'.

The streamlined standards currently apply only to 15 institutions that are scheduled to submit self-studies and host evaluation teams in 2016-17. Of these, perhaps only the Rochester Institute of Technology is known in the UK. The revised standards will become effective for all MSCHE institutions that have self-study evaluation due in 2017-18 or later.

The seven revised standards are:

- Mission and Goals
- Ethics and Integrity
- Design and Delivery of the Student Learning Experience
- Support of the Student Experience
- Educational Effectiveness Assessment
- Planning, Resources and Institutional Improvement
- Governance, Leadership and Administration.

Even if halved in number, these standards have a broad scope and, in their coverage of institutional finance, planning, governance and management, are still more like UK criteria for degree-awarding powers. Again, this scope goes well beyond the UK Quality Code, which focuses on academic standards and quality.

The level of administrative burden on MSCHE member institutions can be seen on various university websites. Penn State University, a public, research-intensive institution, devotes a great deal of effort in complying with MSCHE requirements. It has a separate website domain devoted to the MSCHE (middlestates.psu.edu) and its listing by campus of all the different types of accreditations for the university, and last and next review dates, requires 43 pages.[14]

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[12] 'Standards for Accreditation and Requirements of Affiliation', 13th ed., MSCHE, 2014. www.msche.org/publications/RevisedStandardsFINAL-2.pdf

[13] 'Newsletter October 2014', MSCHE. www.msche.org/newsletters/October-2014141024132650.pdf.

[14] See http://middlestates.psu.edu/wp-content/uploads/sites/11525/2014/03/accreditations_by-college.pdf.

As for an outcomes focus, there is heavy emphasis with the MSCHE on the delivery of institutional missions, but no specificity as to what outcomes are expected. This is even clearer with the MSCHE's guidelines on 'Degrees and Credits', which remind institutions of federal programme requirements. They are largely focused on time issues such as contact hours, credit hours, and the durations of semesters and academic years.[15]

WASC Senior College and University Commission

The California-based, not-for-profit WASC Senior College and University Commission (www.wascsenior.org) covers HEIs in California, Hawaii, and the Pacific and a limited number outside the US. It accredits institutions rather than individual programmes. Before 2012-13, WASC was incorporated as a single entity that encompassed three commissions (WASC Senior College and University Commission, Accrediting Commission for Community and Junior Colleges, and the Accrediting Commission for Schools, WASC.) They are now separate entities that share the WASC acronym but have independent scopes and governance structures.

The WASC Senior mission and strategic priorities (which refer to the 'changing ecology' of higher education and concern with taxpayers' interests) are at www.wascsenior.org/about. Its 'purposes of accreditation' (www.wascsenior.org/about/purposeofaccreditation) include the claim that 'Voluntary, non-governmental, institutional accreditation as practiced by the WASC and the other regional commissions is a unique characteristic of American education. In many other countries, the maintenance of educational standards is a governmental function.'

WASC Senior fees

WASC Senior determines its annual fees on enrolment figures rather than turnover, used by the MSCHE. The WASC cap is much higher and the 2014-15 range is from $6,625 (for FTE enrolments up to 100) to a rather precise $146,988 (FTE more than 100,000).[16] As in the case of the MSCHE, there are charges for everything else, including visit costs.

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[15] 'Degrees and Credits' guidelines, MSCHE, June 2009. www.msche.org/documents/Degree-and-Credit-Guidelines-062209-FINAL[1].pdf

[16] 'WASC Senior College and University Commission Schedule of Dues and Fees, 2014-15'. www.wascsenior.org/content/dues-and-fee-schedule-2014-2015

WASC Senior standards

As is the case with the MSCHE, all WASC-accredited institutions submit detailed annual reports.

The WASC Senior 60-page 2013 Handbook of Accreditation contains information on standards, quality assurance, good practice and ethical conduct.[17] The process starts with three core commitments:

- To student learning and success.
- To quality and improvement.
- To institutional integrity, sustainability, and accountability.

WASC Senior has four overarching standards to which institutions must demonstrate 'substantial compliance' in order to become and remain accredited. They are:

- Defining institutional purposes and ensuring educational objectives.
- Achieving educational objectives through core functions.
- Developing and applying resources and organizational structures to ensure quality and sustainability.
- Creating an organization committed to quality assurance, institutional learning, and improvement.

Although these standards are couched in more active language than those of the MSCHE, they are also less precise and less obviously focused on issues like governance and finance. Requirements in regard to these issues, however, are addressed through 39 criteria for review (CFRs) distributed across the four standards.

Under the first standard, for example, CFR 1.3 is that 'The institution publicly states its commitment to academic freedom for faculty, staff, and students, and acts accordingly'. Under the third standard on resources and organisational structures, CFR 3.4 is that the HEI has operated without deficit for three years; deficits require plans for eliminating them. CFRs are cited by institutions in their institutional reports, by peer reviewers in evaluating institutions, and by the Commission in making decisions about institutions.

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[17] '2013 Handbook of Accreditation', WASC Senior College and University Commission, July 2013. www.wascsenior.org/resources/handbook-accreditation-2013

WASC Senior – level of burden

The WASC Senior purposes of accreditation (above) state that the process aims to 'reduce burden and cost of accreditation'. Its 2014-15 strategic priorities include piloting 'a risk-based approach to accreditation'. Until now, therefore, it appears that WASC Senior does not consider that it already has elements of a risk-based approach, such as candidacy, different periods of accreditation and substantive change review.

This now seems to be changing. WASC Senior is proposing a revised 'Decision Framework', ie, duration of accreditation. It would mean granting six years for initial accreditation, and six, eight or 10 years for renewals, depending on confidence levels regarding compliance (although substantive change may at any time trigger intervention).[18] Feedback from member institutions was due on 13 January 2015.

By adopting this framework, the Commission 'expects to attain a greater level of coherency across the set of reaffirmation decisions it makes'. It would appear to be a risk-based revision but does it lower the burden on institutions?

WASC Senior's programme of upcoming reviews shows 136 activities scheduled for 2015 (www.wascsenior.org/institutions/reviews). Of these, only 15 are accreditation visits. 31 are mid-cycle reviews, 21 are substantive change reviews, 25 are interim reports, and there are another 18 categories of review activity. Substantive change ('change that may significantly affect an institution's quality, objectives, scope, or control')[19] was discussed earlier, and the mid-cycle reviews were introduced in 2014 as a response to USDE's requirement for accreditors to monitor the accredited.[20] This might therefore burst the myth that US accreditation is always on a low-burden 10-year cycle.

As with the MSCHE, it is possible with WASC Senior to demonstrate the far broader reach and sanctions of the American accreditors compared to the scope of the UK Quality Code. United States University, a small institution in San Diego chosen here randomly, was placed on probation by WASC Senior in 2013 for the following deficiencies: it lacked a strategic plan, employed insufficient academic staff, had a dysfunctional governing board, had poor grievance policies and procedures, and ran operating losses.[21]

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[18] 'Revised Decision Framework for Periods of Accreditation', WASC Senior, November 2014. www.wascsenior.org/annoucements/revised-decision-framework-periods-accreditation
[19] 'Developing Substantive Change Proposals', WASC Senior. www.wascsenior.org/resources/subchange
[20] www.wascsenior.org/resources/mid-cycle_review
[21] Letter from WASC Senior to the President of US University, 10 July 2013.
https://wascsenior.box.com/shared/static/ctn5q3wttnkhecwxooh2.pdf.

Reforming QA in the US: Appropriate scope, federal influence and effectiveness

The required reauthorisation of the HEA has triggered a cyclical debate over quality assessment procedures in the US. Accreditation stakeholders in the US were startled in February 2013 when background materials for President Obama's State of the Union address contained proposals for accreditation reform. The paper said that the President would call on Congress 'to consider value, affordability, and student outcomes' in determining access to Title IV funds – either by changing the existing system or by 'establishing a new, alternative system of accreditation' to provide access to student aid 'based on performance and results'.[22]

The president of the CHEA was quoted as saying they did not know yet what this meant for accreditation but that 'a new system of accreditation that is government-run is a concern'.[23] The debate since has centred on the appropriate extent of federal government influence and the related issue of appropriate scope. These relate directly to institutional burden, but also to the effectiveness of the accreditation process.

The National Association of Independent Colleges and Universities (NAICU, which represents 1,000 private, not-for-profit HEIs) argued during consultations with NACIQI in June 2014 that the US accreditation process had become jeopardised by 'mission creep', best illustrated by the growing list of time-consuming federal legal requirements that divert attention toward procedural infractions and away from quality assurance.[24] Compliance with Title IV requirements, it was suggested, was a function better handled by USDE officials. A 'check-box, compliance mentality' was the worst thing that could happen to accreditation.

Interestingly, NAICU does not think that full disclosure of accreditation reports is an answer; the argument is that too much transparency undermines the 'frankness and candour' that make accreditation successful.

In response, NACIQI articulated four broad categories for accreditation reform:

- Simplify the accreditation process.
- Permit nuance in accreditation.
- Examine the balance between compliance and quality assurance and access to Title IV funds.

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[22] 'The President's plan for a strong middle class & a strong America', 12 February 2013. www.whitehouse.gov/sites/default/files/uploads/sotu_2013_blueprint_embargo.pdf

[23] 'Obama's Accreditation Proposals Surprise Higher-Education Leaders', The Chronicle, 13 February 2013. https://chronicle.com/article/Obamas-Accreditation/137311.

[24] Presentation by Susan K Hattan on behalf of the National Association of Independent Colleges and Universities to the National Advisory Council on Institutional Quality and Integrity, 18 June 2014. www.naicu.edu/docLib/20140627_SKH_Statement_outline_-_6-18-14.pdf

- Consider NACIQI's role.

Draft recommendations under these headings were not apparently published by NACIQI but were reproduced on the website of Inside Higher Ed.[25] 'Simplifying procedures' is objectionable but the third theme above has more contentious content. Draft recommendation 3.1 is to 'eliminate a two-tier system' by converting all accreditors into national accreditors. The regional accreditors are unlikely to applaud, even though there is no geopolitical rationale for the regional accreditors as they are constituted, and that a new alignment based on institution type may seem more sensible.

Draft recommendation 3.3 is to 'establish less burdensome access to Title IV funding for high-quality, low-risk institutions'. This is explicitly a 'risk-adjusted approach to accreditation' as a response to institutional burden; it states that USDE will have more time and resources to focus on institutions that pose the greatest quality concerns. The draft goes on to describe how a pilot scheme might work, including institutional eligibility requirements.

Finally, the fourth theme about the role of NACIQI laments its under-utilisation and lack of decision-making authority. It recommends reconstituting NACIQI as 'an operational committee with terminal decision-making authority' and its own staff.

Evidence of impact and effectiveness of quality assessment in providing assurance

Certainly the higher education accreditation system in the US has had an impact. Accreditors have powers with dramatic consequences for institutions. A huge amount of material, both positive and negative, is in the public domain. An institution's accreditation status can be found quickly; when that status is under sanction it is a straightforward matter to determine the precise reasons for it, and what comes next.

But because accreditors operate in a litigious society, the use of these powers can also impact on themselves. The Accrediting Commission for Community and Junior Colleges (another branch of WASC) found this in 2013 when it withdrew accreditation from City College of San Francisco: it landed in court and had its status as an accrediting body threatened at congressional level. This is perhaps one reason behind the reluctance to publish full reports.

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[25] See 'Draft recommendations to inform accreditation policy, 2014'
www.insidehighered.com/sites/default/server_files/files/scan0002.pdf.

US accreditation has been admired internationally as the gold standard even if it seems a little tarnished. Some programmatic accreditations – from, for example, the AACSB and the Accreditation Board for Engineering and Technology – are highly sought after and sometimes funded by governments abroad.

Accreditation has made an effective contribution to sustaining the international reputation of US higher education for quality – even if the sector is so large and diverse that quality is inevitably less even. Accreditation has served as a protection from diploma mills: not one of the most infamous US diploma mills was accredited by a USDE-recognised accrediting body.

Headline comment on challenges and efforts taken to overcome them

The US higher education quality assurance industry faces many challenges – even President Obama (momentarily) weighed in. It is not entirely clear that the vast amounts of paperwork have significant impact on quality enhancement across large parts of the sector. It is also likely that the accreditation process is a victim of its age; were it to be started from scratch now it would no doubt be structured differently.

All stakeholders appear to agree on the need for more simplicity in the quality assurance and accreditation system. But there is disagreement on the need for more transparency. As has been noted, the lack of full transparency is best demonstrated by the withholding of complete accreditation reports from the public domain. WASC Senior and others are slowly moving to full disclosure but it is not yet a universal move. The website of WASC Senior notes that 'Colleges and universities have been under increasing pressure to become more accountable for student academic achievement; to be more transparent in reporting the results of accreditation; and to demonstrate their contribution to the public good.' The pressure for transparency and accountability is amplified by Congress and state politicians, but representative bodies express concern that it will actually undermine openness and full disclosure. It is a widespread irony, in many sectors and many countries, that the pressures for transparency and accountability increase as public funding withdraws, and higher education is no exception.

Institutional representative bodies have also noted mission creep originating in the federal administration. An increase in regulations increases overall burden and pushes the system towards box-ticking and away from quality enhancement. This is accompanied by proposals for more direct control over Title IV access by the USDE.

In the US, it appears that a significant number of institutions that are classed as non-compliant with accreditation requirements appear to get into trouble over

governance, administration, planning, finance and student support services rather than academic standards.

Accreditation in the US cannot generally be described as 'low-burden' or 'lighter touch'; it requires much more than self-assessment reports every 10 years. This section demonstrated the growing number of activities that constitute the accreditation process. Autonomous HEIs require approval for a wide range of educational and operational changes, from offering existing courses in an online format to opening a branch campus.

The US approach to 'substantive change' can be seen as a risk-based approach to quality assurance, but the requirements thereby triggered constitute an enhanced rather than a diminished burden on institutions. Institutional accreditation is not the only type that HEIs have to accommodate in the US. There is also programmatic or specialist (subject-specific) accreditation. This is part of the overall burden on institutions.

The reference points for academic standards are not the same as in the UK and there is a lack of clarity, in relation to institutional accreditors, on how academic standards are described. In the US, qualifications frameworks are not widely used, although, as noted earlier, there are pilot projects on a DQP in order to determine its utility as a framework to help institutions assess the quality of degrees. Arriving at measurable learning outcomes standards still seems to be a work in progress, though some accreditors, notably WASC Senior, are working on it.

Case study 3: Australia

Overview: Parameters of the higher education system in Australia

Australia has a federal system of government with responsibility shared between federal and state or territory levels. The Australian Commonwealth (federal) Government department with the main responsibility for higher education and research is the Department of Education and Training (formed in December 2014; its broad mandate includes early childhood and school education, vocational education and training (VET), and international education and research).

Australian universities are autonomous bodies, within a legislative framework, responsible for managing quality through internal accreditation processes and codes of practice.

TEQSA (the Tertiary Education Quality and Standards Agency) is required by law to maintain a National Register of higher education providers on the internet. It shows that, in January 2015, the Australian higher education sector consisted of 172 providers, of which 40 were universities and 129 were other higher education providers. There were also two overseas universities (including one from the UK) and one 'university of specialisation' (University of Divinity).[26] Within this total, 48 had 'self-accrediting authority' (including all of the universities), meaning they can self-accredit some or all courses.

In 2014, there were 1.27 million students in the higher education sector (26% international students) of which 1.19 million were in the university sector. The interests of international students are protected by the Education Services for Overseas Students (ESOS) Act which provides tuition and financial assurance.[27] The ESOS legislation requires education providers to enter into a written agreement with overseas students; it protects students if their visa is refused or their education provider is unable to offer the course.

Quality and standards

In 2000, the Commonwealth Government introduced its first quality assurance framework for higher education along with the National Protocols for Higher Education Approval Processes; the introduction of the ESOS Act; and the formation

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[26] 'National Register of higher education providers', Tertiary Education Quality and Standards Agency, January 2015. www.teqsa.gov.au/national-register

[27] www.aei.gov.au/regulatory-information/education-services-for-overseas-students-esos-legislative-framework/esos-act/pages/default.aspx.

of a national agency to undertake external audits of institutions, the Australian Universities Quality Agency (AUQA).

At that time, the quality assurance framework consisted of five key elements, including:

- State and territory responsibility for the registration, re-registration and accreditation of higher education providers other than universities.
- The role of AUQA in undertaking a five-yearly cycle of external audits.
- Commonwealth Government monitoring of universities' performance data submissions.
- Expectation that universities would continually develop and enhance quality and standards.
- Compliance with various laws, regulations and guidelines, including national protocols and national codes.

In 2003-04, changes were made, including the introduction of performance-based funding for learning and teaching (LTPF), using a range of metrics (retention, progression, outcomes of national Course Experience Questionnaire (CEQ) and Graduate Destination Survey (GDS)) to reward public universities. The LTPF was discontinued in 2009 and the Carrick Institute for Learning and Teaching (subsequently renamed the Australian Learning and Teaching Council) was introduced to provide funding and grants to public universities to promote and enhance learning and teaching quality. Various changes were also made to the National Protocols for Higher Education Approval Processes following review.

A major review of higher education (the Bradley Review) was undertaken in 2007, reporting in 2008[28] and leading to a series of reforms (including reviews of ESOS and the Australian Qualifications Framework (AQF)) in 2009 and the establishment of a new agency combined with a different approach to quality assurance that embraced all types of providers and was backed by legislation.

TEQSA was established by the TEQSA Act 2011 and is an independent, national quality assurance and regulatory body. The three basic principles for regulation which TEQSA must comply with when exercising a power under the Act are:

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[28] Bradley, D., Noonan, P., Nugent, H. & Scales, B. (2008). *Review of Australian Higher Education.* Tertiary Education Research Database.

- Regulatory necessity
- Reflecting risk
- Proportionate regulation.[29]

TEQSA evaluates the performance of higher education providers against the Higher Education Standards Framework – specifically 'Threshold Standards', which all providers must meet to enter and remain in the higher education system. TEQSA also administers the ESOS Act.

TEQSA's objectives are to:

- Ensure national consistency in the regulation of higher education using a standards-based quality framework and applying the three regulatory principles.
- Protect and enhance Australia's reputation for quality higher education and excellence, innovation and diversity.
- Protect students undertaking higher education.
- Ensure that students have access to information relating to higher education.
- Encourage and promote a higher education system that is appropriate to meet Australia's social and economic needs.

Under the TEQSA Act, the agency's functions include:[30]

- Registering regulated entities as registered higher education providers.
- Renewing the registration of these providers.
- Accrediting courses of study (for providers without self-accrediting authority (SAA)).
- Renewing the accreditation of courses (for providers without SAA).

Until December 2014, all of the above applied for a maximum of seven years (but see Footnote 30 below, for very recent changes).

TEQSA is also responsible (under the ESOS Act) for the registration of providers of higher education courses, foundation programmes and English Language Intensive Courses for Overseas Students (ELICOS) programmes to overseas' students.

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[29] 'TEQSA's approach to public reporting of regulatory decisions – Consultation paper', TEQSA, March 2013. www.teqsa.gov.au/sites/default/files/PublicReportingConsultationPaper.pdf
[30] Note changes enacted in December 2014 under the TEQSA Amendment Act: TEQSA will be able to extend, on its own initiative, the period of registration and accreditation beyond seven years. This is reportedly contributing to more efficient regulatory practices and will reduce the regulatory burden on providers. The period of extension can only be increased if not previously extended – bringing a maximum at present of 14 years.

All higher education providers are required by law (from 2011) to comply with Threshold Standards. The Threshold Standards were made as 'legislative instruments' in December 2011, and TEQSA commenced regulating against them in January 2012. The original framework also made provision for the development of other 'Non-Threshold Standards' including:

- Teaching and Learning Standards.
- Research Standards.
- Information Standards.

The Threshold Standards Framework was developed in consultation with the sector prior to the establishment of both TEQSA as the regulator and the Higher Education Standards Panel. The Standards are based in part on the former National Protocols for Higher Education Approval Processes and the AQF, adapted for regulatory purposes. It is important to note that the Standards are not designed by TEQSA, and TEQSA cannot amend them as they are linked to legislation.

A 'Process for Reviewing and Developing the Threshold Standards' was established and commenced in 2013. A series of technical amendments was made to the Higher Education Standards Framework (Threshold Standards, 2011) by the Commonwealth Minister for Tertiary Education, Skills, Science and Research, after receiving advice from the Higher Education Standards Panel and after consultation with stakeholders. A consolidated version of the framework was registered in March 2013[31].

The Threshold Standards are contained in four chapters with subsections:

Chapter 1: Provider Registration Standards
- Provider standing
- Financial viability and sustainability
- Corporate and academic governance
- Primacy of academic quality and integrity
- Management and human resources
- Responsibilities to students
- Physical and electronic resources and infrastructure

Chapter 2: Provider Category Standards
- 'Higher Education Provider' category
- 'Australian University' category

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[31] www.hestandards.gov.au/higher-education-standards-framework

- 'Australian University College' category
- 'Australian University of Specialisation' category
- 'Overseas University' category
- 'Overseas University of Specialisation' category

Chapter 3: Provider Course Accreditation Standards
- Course design is appropriate and meets the qualification standards
- Course resourcing and information is adequate
- Admission criteria are appropriate
- Teaching and learning are of high quality
- Assessment is effective and expected student learning outcomes are achieved
- Course monitoring, review, updating and termination are appropriately managed
- Criteria for authorising 'Self-accrediting authority'

Chapter 4: Qualification Standards
- Higher education awards delivered meet the appropriate criteria
- Certification documentation issued is accurate and protects against fraudulent use
- Articulation, recognition of prior learning and credit arrangements meet the appropriate criteria

It is worth commenting from a UK perspective that some of these chapters match chapters in the UK Quality Code and also echo the criteria for degree-awarding powers.

TEQSA's approach to development and review of its own quality assessment processes

TEQSA commenced its operations in 2012. Given that the new system was significantly different from its predecessor (the institutional audit process managed by the AUQA), TEQSA itself adopted a staged approach to design and development of its processes. There have been three stages (as reported by TEQSA, up to 2014-15):[32]

The first phase (2012-13) involved the design and implementation of the first registration and accreditation processes and the re-registration of 10 providers with SAA, including eight Australian universities. TEQSA also designed and implemented the first full round of risk assessments of higher education providers and implemented a number of measures to streamline processes and minimize the

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[32] See Appendix F of KL Dow & V Braithwaite, 'Review of Higher Education Regulation Report', 2013. http://docs.education.gov.au/system/files/doc/other/finalreviewreport.pdf.

burden of the process on providers. A small number of providers were not fully risk-assessed as they were new (and not yet delivering education and awards) or were in the process of withdrawing registration.

In a subsequent internal review, TEQSA planned to review its regulatory processes and risk framework before moving to its next phase of regulation in 2014-15. However, in response to calls by providers to reduce the regulatory burden, TEQSA accelerated its reform of administrative processes (Stage 3) while acknowledging the potential risk to students if there was a subsequent failure to detect quality problems.

External review commissioned by the Commonwealth Government

In 2013, a review of the Higher Education Standards and National VET Standards began. In the same year, an independent review was commissioned by the Australian Commonwealth Government into the Higher Education Regulatory Framework.[33] According to the report's authors (Professor Kwong Lee Dow AO and Professor Valerie Braithwaite) this review was established to address concerns raised by the sector about the effectiveness of Australia's higher education regulatory framework. This report, and associated review and consultation, is important in a number of ways:

- It outlines the rapid changes in the development of the Australian tertiary sector (particularly in the context of globalisation, expansion and diversification of the system, funding changes and differing political agendas for the system). Regulatory changes have typically been associated with funding changes and differing political ideologies for higher education associated with different governments.
- It highlights the array of regulatory changes, reviews and changes in QA arrangements that the Australian higher education (and tertiary sector, including VET) has had to deal with over two decades and the associated regulatory burden on institutions and providers (we document a sample in our comparative study for HEFCE, but the review report includes a wider array of changes including those relating to research).
- It notes the fragmentation of regulatory instruments and the need for co-ordination in order to streamline and simplify the regulatory system. (Note that similar comments were made in the draft recommendations by NACIQI for accreditation policy in the US. But, in the US, there is less chance of

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[33] Dow & Braithwaite, 'Review of Higher Education Regulation Report', *op cit*.

simplifying the system because of the political context and long-standing tensions between federal and state systems).

- It records, in a useful appendix, the various design, development and re-design stages that TEQSA has necessarily gone through over a period of three years in order to create and develop a very different QA approach to the one that had gone before (ie, a standards-based approach covering all types of provider, backed by legislation and involving a single national system). TEQSA has, in the meantime, received a stream of criticism of the new approach (leading in part to the independent review of higher education regulation) and commissioners have been appointed and resigned in the process.

As a consequence of this review of regulation, significant changes have been proposed to the Australian Government, both in relation to TEQSA and in relation to the Higher Education Standards Framework (these are in addition to the Higher Education and Research Bill 2014 currently before parliament which may result in still further changes).

First, in 2013, in line with the recommendations of the *Review of Higher Education Regulation*, TEQSA initiated - with input from the higher education sector – changes in its key regulatory processes, including a reduced scope of assessment for renewal of registration processes and streamlined evidentiary requirements of providers when preparing applications for renewal of registration, course accreditation and renewal of accreditation.

In addition, TEQSA significantly remodelled its approach to its risk assessments of providers with overarching risks reduced from three to two (ie, risk to students and provider collapse). Key improvements reportedly included a simplified design, focusing on students, staff, finance and regulatory history, a strengthened focus on international students, greater flexibility for different provider models, and improved information for providers. TEQSA significantly reduced the provider information requirements (in 2013) and exempted universities from the information collection. TEQSA also worked with the Department of Education to identify potential areas for further rationalisation of provider information collection and reporting.

TEQSA introduced a provider portal in the last quarter of 2013–14 to allow higher education providers to lodge applications online.

The reforms implemented in 2013–14 were intended to reduce:

- Reporting requirements for universities and other higher education providers.

- Duplication of requirements across regulatory bodies.
- Time taken to make regulatory decisions.

Secondly, in 2014, there have been further outcomes from the *Review of Higher Education Regulation*. It has led to new legislation passed in December 2014 in relation to the agency (TEQSA Amendment Act 2014)[34] and to new advice to the minister from the Higher Education Standards Panel in relation to changes to the Higher Education Standards Framework (Higher Education Standards Framework: Advice to Minister, December 2014).[35] The document submitted on the Standards Framework is intended to replace the current framework (as described above) in its entirety. Parallel documents provide a comparison between the previous framework and the new one proposed.[36]

The proposals submitted to the minister replace the following Threshold Standards in the current framework:

- Provider Registration Standards.
- Provider Category Standards.
- Provider Course Accreditation Standards.
- Qualification Standards.

They also remove the concept of 'Non-Threshold Standards' in the 2011-13 framework and shift more towards outcome-focused standards.

The new framework has three parts:

- The Standards for Higher Education (representing the minimum acceptable requirements for the provision of higher education in or from Australia by higher education providers registered under the TEQSA Act 2011).
- Criteria for Higher Education Providers (enabling categorisation of different types of higher education providers according to certain characteristics, including the types of providers that are eligible to apply for registration and whether a provider is responsible for self-accreditation of a course of study it delivers (Note: again there are parallels here with the NACIQI recommendations in the US).
- Definitions and Explanations of Terms (defining the meaning of terms and elaborating on the nature and scope of items or concepts in the framework).

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[34] www.aph.gov.au/Parliamentary_Business/Bills_Legislation/Bills_Search_Results/Result/bId=r5175
[35] www.hestandards.gov.au/final-proposed-framework
[36] www.hestandards.gov.au/sites/default/files/PartAwithCurrentFramework-December2014pdf;
www.hestandards.gov.au/sites/default/files/PartBwithCurrentFramework-December2014.pdf

Funding (2014-16)

The Australian Government moved to a new student demand-driven funding system in 2012. The main components of the system include:

- Mission-based compacts (annual agreements between the Commonwealth and individual universities). Entering into a compact is one of the quality and accountability requirements which a higher education provider must meet under the Higher Education Support Act (HESA) 2003. The compact sets out how each university's mission aligns with the Commonwealth's goals for higher education, research, innovation, skills' development, engagement and Aboriginal and Torres Strait Islander access and outcomes. These compacts are published.
- Commonwealth Grant Scheme (CGS) providing subsidised tuition costs to universities. From 2012, public universities have been able to decide how many domestic students they would enrol on bachelor's level courses (excluding medicine) and receive funding for these Commonwealth-supported places (CSPs) (ie, a cap on undergraduate student numbers was removed). For 'designated' courses of study (non-research postgraduate courses, medicine courses, enabling courses and courses of study leading to a diploma, advanced diploma or associate degree), the government provides funding to public universities for an agreed number of CSPs in a given year. A small number of other providers are funded by CSPs allocated by the government, particularly for national priority areas. Each higher education provider in receipt of funding from the CGS enters a funding agreement with the Australian Government. These agreements are published.
- Higher Education Loan Program (HELP) that provides financial assistance to students through an income-contingent loan scheme.
- Education Investment Fund that provides funding for projects that create or develop significant infrastructure in higher education, research and vocational education and training institutions.
- Higher Education Superannuation Program.
- Structural Adjustment Funds (as a bridge towards the new funding arrangements).

Further higher education reforms have been proposed for 2016, with new legislation presented to the House of Representatives on 3 December 2014 (the Higher Education and Research Reform Amendment Bill 2014).[37] The Bill has met serious resistance so has not yet been passed into legislation. If it does pass, it may mean

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[37] www.aph.gov.au/Parliamentary_Business/Bills_LEGislation/Bills_Search_Results/Result?bId=r5325

further changes to TEQSA and the QA system (in addition to changes already enacted in the TEQSA Amendment Act 2014).

Headline comments on challenges encountered and efforts to overcome them

Key points in the *Review of Higher Education Regulation* (Dow & Braithwaite, 2013) highlight some of the contemporary challenges associated with regulation of higher/tertiary education in Australia and the task of TEQSA in particular. These include:

- The importance of sustaining a high quality sector that strives for excellence and is competitive nationally and internationally.
- The belief that such a system is best managed within a framework where providers themselves are predominantly responsible for maintaining and enhancing quality and supported in doing so (in order to allow providers time to focus on their core business).
- The two key issues revealed in the consultations: widespread support for a single national regulator and, in parallel, a need to strengthen the legislative framework within which TEQSA operates to provide a better guide as to *'the meaning of the principles of regulatory necessity, risk and proportionality across the sector, and as a consequence, TEQSA's approach to regulation. This is the first step in changing a culture of top-down data-collection in tertiary education that has become widespread and cost insensitive'.*
- The crowded regulatory environment for tertiary education into which TEQSA was introduced with existing arrangements in contradiction to its mandate (hence the need for streamlining) and establishing transparent relationships and communication between regulatory entities – and recognition of the work of different agencies.
- The principles underpinning TEQSA – ie, principles of necessity, risk and proportionality – intended by government (and supported by the sector) do not appear to be operating in the manner intended.
- The review recommends a reduction in the scope of TEQSA (given that other aspects of regulation already provide assurance in key areas) – so that TEQSA can focus on two important issues: provider registration and course accreditation.
- It also recommends aligning the work of different government departments and their data requirements in respect of the regulatory burden on higher/tertiary education.

There are other sources of evidence of impact and current challenges, including TEQSA's annual reports on performance[38], and stakeholder submissions to both the review of Higher Education Regulation and the associated Senate Inquiry on the TEQSA Amendment Bill[39]. But detailed analysis of this evidence (however relevant) was beyond the time-scale of this research.

Supplementary comments

TEQSA's objectives as defined in the TEQSA Act 2011 (and subsequent amendments, 2014) are seen as essential in order to protect and promote the interests of higher education students and the reputation of Australia's higher education sector - by protecting and enhancing quality, excellence, diversity and innovation in the provision of higher education.

The QA approach used is to apply a standards-based, quality and risk-reflective approach to registration of higher education providers and to the accreditation of courses of study in order to protect and promote achievement of high standards and quality throughout Australia's higher education sector, covering all types of provider and provision.

TEQSA offers guidance and support to providers in meeting the Standards, notably through the assignment of a case manager (a member of TEQSA staff) to each provider as a principal point of contact. However, it is worth noting (from a UK perspective) that the TEQSA QA process is not a 'peer-based-review' system.

In recognition of diversity, TEQSA tests the appropriateness and robustness of providers' QA processes and the achievement through them of quality learning outcomes for students, against the Threshold Standards. How providers meet the Threshold Standards is open to them to demonstrate, with evidence.

Risk

In undertaking assessment of risk (the first of the regulatory principles), TEQSA draws on information presented by providers (and/or available from other sources) including:

- An annual risk assessment for **all providers** based on 12 selected risk indicators – focusing on potential risks to the quality of higher education

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[38] For example, www.teqsa.gov.au/sites/default/files/publication-documents/TEQSA2014AnnualReport_Section03PerformanceReview.pdf.

[39] www.nteu.org.au/policy/regulation_governance/teqsa; www.universitiesaustralia.edu.au/news/submissions-and-reports/Senate-Inquiry-on-the-TEQSA-Amendment-Act-2014.

provided to students and to the financial viability and sustainability of providers. A copy of TEQSA's Risk Assessment Framework is available.[40]

- Formal regulatory assessments of risks of non-compliance with the Threshold Standards are undertaken at any of three stages: application for registration, an application for renewal of registration or an application for re-accreditation of existing courses or accreditation of new courses from a provider without SAA.

TEQSA has commented that while the agency's regulatory approach is 'risk-based' - and although there is some discussion of this - the importance of the risk assessments as a basis for regulatory assessment has not been fully explored.

In another area of risk, TEQSA has an equivalent power to that in the US when an institution makes a 'substantive change' from its position. For example, the opening of a new campus would need to be notified to TEQSA – under a wide 'Material Change Notification' requirement – whether in Australia or overseas; and universities with offshore campuses must maintain standards at least equivalent to those provided in Australia. Case managers are an important part of these processes given their knowledge of providers.

TEQSA also has significant regulatory powers which can escalate depending on the level of risk identified (eg, from requests for information to denial or removal of registration or accreditation).

Although more difficult in relation to universities with self-accrediting status, TEQSA also has the power to step in if there is cause for serious concerns – in order to protect the interests of students - and this has occurred.

Burden

The concept of burden is related to the principle of 'proportionate regulation' in the TEQSA Act. TEQSA decides on levels of intervention in relation to compliance with the Threshold Standards in ways that are least burdensome, but commensurate with reducing the risks of non-compliance. TEQSA will provide support and guidance to facilitate 'lowered risk of non-compliance' in a manner that is co-operative rather than adversarial.

In relation to burden, it is important to note that TEQSA does not accredit for professional recognition; as in the UK, this is separate. TEQSA requires providers to

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[40] www.teqsa.gov.au/regulatory-approach/risk-assessment-framework.

notify students as to whether or not a course is accredited by a professional body where relevant. The agency also takes into account decisions made by professional bodies (and vice versa). TEQSA is planning consultations with professional bodies to try to get better integration between TEQSA's accreditation processes and theirs.

A further element of 'burden' is the cost of the QA system. Government funding for TEQSA in 2014-15 and beyond has been significantly reduced following the Government's acceptance of the recommendations of the *Review of Higher Education Regulation* (Dow & Braithwaite, 2013).

Budget and budget projections for TEQSA, 2013-14 to 2016-17 (A$)

	2013-14	2014-15	2015-16	2016-17
Appropriations	$18,524,000	$15,623,000	$11,525,000	$9,026,000
% Reductions from 2013-14		16%	38%	51%
Year on Year Reductions ($)		$2,901,000	$4,098,000	$2,499,000

Revenue from Government for 2014-15 is budgeted at $15.6 million (£8.4 million). TEQSA's funding for 2014-15 is reduced by 16% from its 2013-14 figure. TEQSA has in place partial cost recovery arrangements for specified services (including registration and re-registration of providers; accreditation and re-accreditation of courses; and major variations to registrations and accreditations) to higher education providers (various fee schedules are provided). The administered revenue in 2014-15 from cost recovery arrangements is estimated to be $4.3 million[41], which is returned in full to the government's central treasury funds.

Outcomes-focused

The TEQSA approach has focused on inputs, processes and outcomes at the programme, institution/provider and national levels as well as in relation to the objectives of the agency.

However, the revised Higher Education Standards presented to ministers in December 2014 are now more explicitly outcomes-focused with several input and process standards having been eliminated or merged with others[42].

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[41] TEQSA budget 2014-15: http://docs.education.gov.au/documents/teqsa-budget-statements-2014-15.
[42] www.hestandards.gov.au/higher-education-standards-framework.

Conclusions

This study has not employed the UK systems (and their separate national characteristics across different jurisdictions) as a point of reference for the international comparisons. On the basis of our knowledge and expertise, we suggest that there are many features of the systems in the UK that are as strong (or stronger) than the comparators. A key issue, however, is that this does not apply across the diverse range of provision and providers in the UK, nor is it backed by legislative process.

Characteristics of quality assurance systems: who, what, how?

There are significant differences between countries, including across the UK, in terms of the roles and responsibilities of actors in the regulation of higher education. In the US it is a shared enterprise with multiple actors across the 'triad' of the USDE, the states and the non-governmental accreditation community, the latter being the main external quality assurance provider. There are both institutional and programme accreditation but the latter is not directly analogous with the work of PSRBs in the UK, as it is the states that licence professionals, not the accreditors. While the USDE does not accredit institutions or programmes, it has a legal duty to publish a register of the same, and it influences accreditation policy through NACIQI and the process of recognising accrediting commissions and the provisions of the Higher Education Act relating to access to federal funding.

In Australia, recent reforms and legislation resulted in a single national regulator for higher education – TEQSA – which has a quality assurance function at both institutional and programme levels. Professional accreditation and recognition is a separate process, although the outcomes may be taken into account by TEQSA and vice versa, but further work on cooperation between the processes and bodies concerned is intended.

In Norway, a single agency – NOKUT – carries out a range of activity at institutional and programme levels, depending on the status and nature of the institution. In both Norway and Australia, the status of an institution (defined in both cases in legislative instruments) is the determining factor as to whether programmes have to be accredited. In both systems (as is the case of recognised bodies in the UK), universities and certain specialised institutions are designated as 'self-accrediting' in relation to degree programmes and do not need to seek the approval of the agency to introduce new, or to revise existing, provision. Institutions of different definitions in Norway and Australia do need to seek programme approval or accreditation depending on the scope of their authority. The definitions of institutions of higher education providers are both protected in law and subject to different forms of

'accreditation' or 'evaluation of quality assurance systems', also formally part of the regulatory system. In the US, accreditors also limit the scope of their accreditation of institutions, specifying in accreditation statements the level of awards, mode of study, location of study and similar covered by their accreditation.

In the US, accreditation remains a peer review process, as with quality assurance across the UK and for most processes in Norway. This is not the case in Australia, where TEQSA commissioners and senior staff have roles and decision-making powers analogous, perhaps, with the former HM Inspectorate powers.

There are similarities across all the countries in terms of the agencies dealing with an increasingly diverse range of providers. This is less so in Norway, where the system is smaller and providers more homogeneous in comparison with the UK and Australia, although dealing with diversity and an expanding number of small providers still appears to be prompting a concern. The US regional commissions, TEQSA and QAA are dealing with a wide range of providers – heterogeneous in terms of size, maturity, funding, nature of provision and more. This raises the issue: does one size/model/mode (of process or regulation) fit all? – which is a live issue in the current US debate - or, perhaps, how and when to differentiate between different providers and provision within the same system and standards in a transparent and effective way, which appears to be the solution in Australia.

Risk, powers, actions and sanctions

While the higher education review process in England (and from 2015 in Wales) and in Australia are explicitly labelled as either risk-based or risk-reflective, the powers, sanctions and scope of action of the agencies vary considerably. The (legal) power of intervention in Australia comes with sanctions, including withdrawal or change of institutional and programme status by TEQSA itself.

In the US, in the context of the coming reauthorisation of the Higher Education Act, draft recommendations to inform accreditation policy have appeared, which include a reference to the establishment of a risk-adjusted approach to accreditation in order to provide less burdensome access to federal funding for high-quality, low-risk institutions. It could, however, be argued that current accreditation processes have an element of risk assessment and monitoring through the candidacy and pre-accreditation routes, substantive change processes, and the annual reporting requirements of the accreditors. The accrediting commissions also have a range of action and sanctions, from concern to warning to probation to denial or withdrawal of accreditation, which can ultimately result in actions including the removal of access to federal funds.

While the track record of higher education review in England is a measure of risk which can reduce the interval and duration of review visits, should 'risk-based' also be applied to the new and different as well as the tried and tested? Should risk assessment be based on more regular reporting rather than cyclical review? In both Australia and the US, we have seen that there are annual reporting requirements to the review agency for all institutions associated with it, regardless of status. In the UK, while the same type of data might be reported by some providers to other authorities, annual reporting to the quality agency for publically funded providers is not the norm. Should QA comprise risk-based systems with greater powers of intervention, regular reporting requirements and a range of possible actions and sanctions? This is not simply to assess risk at individual institution level but possibly to identify system-wide risks.

Standards: whose and for what?

The status, ownership and scope of standard (relating to provision and institutions) applied in the quality assurance of higher education varies across the comparator countries. The UK Quality Code is the nationally agreed, definitive point of reference for all those involved in delivering higher education programmes that lead to an award from, or are validated by, a UK higher education provider entitled to award degrees. The Quality Code differs from the standards or standards framework used respectively by US regional accreditors and TEQSA in terms of its more limited overall scope, but stronger focus on academic standards and quality. Degree-awarding powers criteria are wider in scope and more comparable with some aspects of the quality standards in Australia and the US.

Unlike the US regional commissions standards and those in Australia, the UK Quality Code does not lay out standards, apart from Expectation 2.1 relating to academic governance, specifically for institutional governance, leadership, planning and financial management. Neither do ethics and integrity figure directly, and there is little reference to student well-being and facilities. Some of these are, however, considered in the review of alternative providers in the UK seeking review for educational oversight purposes in the Higher Education Review Plus process begun last year.

Completion of the Standards Framework in Australia now approaches, with amendments having been made in December 2014. Unlike the Quality Code, the Standards Framework has legal status. It describes Threshold Standards and could be characterised as encompassing some of the chapters of the Quality Code, some of the criteria for degree-awarding powers and university title, some aspects of UK legislation such as the Equality Act, as well as having more detailed standards relating to institutional governance, research, integrity and financial probity. This

reflects the role of TEQSA as a regulator of higher education rather than simply a quality assurance agency.

In the US, accreditors own their standards but there is direction from the USDE when it comes to federal recognition of the accreditors as gatekeepers for access to federal funds. While this might be disputed, the effect is that some standards are embedded in legislation, albeit vicariously, to ensure accountability for the use of federal funds.

In many European countries, standards used by agencies are also embedded in legislation and, like the position with TEQSA, cannot be altered by the quality assurance agency – although there is always the question of interpretation and the ways in which different types of institutions demonstrate that they meet the standards. Both Norway and Australia have moved to more flexible approaches within the same processes to accommodate diversity and, in the US, there is an array of accrediting agencies that cater for different types of providers.

 In the UK, the extent of consultation and engagement with the sector and stakeholders in the development and revision of the Quality Code is a strength. While such consultation is a feature shared in the US and Australia, the significant difference in the UK is the level of engagement with, and involvement of, students. In addition, there is a stronger focus on academic standards in both the Quality Code and other aspects of the UK approach to QA, such as the use of external examiners.

Arguably, the UK system is more outcomes-focused than other systems – particularly the US, although there is now considerable effort underway there to shift the focus from inputs to outcomes. The re-drafted Higher Education Standards in Australia (presented to the minister in December 2014) are explicitly outcomes-focused with several input or process standards having been explicitly removed.

Low-burden

There is a prevailing myth that the US has a 10-year cycle of accreditation across the board and that this intervention is therefore relatively less burdensome than the English six-year cycle for Higher Education Review. This ignores mid-term and periodic reviews, annual reporting and substantive change requirements in the US, all of which add significant burden.

Australia currently has a seven-year cycle up to re-registration at the moment (with an extension of up to another seven years possible), but the system carries a requirement for registration of all providers regardless of status and an annual risk assessment for all, as well as programme accreditation for non-self-accrediting

institutions. There is also a provision for material change in Australia that echoes the US substantive change requirement.

There are principles and concepts and practices in each system that are of potential interest to the UK and some that are already in place or shared, for example with Norway, compliance with the European Standards and Guidelines for Quality Assurance, meaning the involvement of students in review processes and transparency and information sharing through publication of review reports. However, none of the comparator systems is an exact mirror of conditions or circumstances prevailing in the UK, so that it would be neither feasible nor desirable to import one process or adopt one aspect without proper consideration of relevance and fit. On the other hand, what is noticeable (from a modest sample and time-limited analysis) is a shift towards QA approaches that are backed by legislation and that accommodate diversity and stages of development towards self-accrediting status.

Since a comprehensive review of its higher education system, Australia has moved to a risk-based regulatory system, including quality assurance, covering all higher education providers in the country. The Standards Framework and an agency (TEQSA) with legislative bases are in place, with clear definitions as to the limitations of institutional autonomy over awarding powers and programme approval - allowing for different levels of intervention by the agency in relation to different categories of providers - with different levels of authority within the regulatory framework. This process has not been without challenge, and some characteristics of the HE system - namely access to public funding - are still under discussion.

In England, no such review has been undertaken for more than a decade. Since the Education Reform Act 1988, which provided some protection of degree and university title, and the 1992 Further and Higher Education Act which laid the responsibility for the assessment of the quality of provision funded by the Funding Councils, there has been no comprehensive higher education legislation (apart from that relating to student loans, criteria for degree-awarding powers and the Office of the Independent Adjudicator). Unlike the situation in the US, with parameters being set at the time of evaluation and with the requirement for changes to have prior approval, the descriptions of titles in Norway and of categories of institutions in the TEQSA Act, the granting of degree-awarding powers in the UK is much more permissive – and in negative circumstances, potentially open to abuse.

The shape of the higher education sector and nature of provision in England has changed significantly over the last two decades with the growth of an (until recently) unregulated alternative sector, the changes in access to degree-awarding powers and university title, especially in England, and the web of often complex partnership

arrangements between degree-awarding institutions and other organisations in the UK and abroad. Movement towards a partial regulatory framework embracing non-degree-awarding, alternative providers was, however, driven not by higher education policy but by the requirements of the Home Office, including for annual reporting by, and monitoring of, alternate providers without degree-awarding powers for a licence to sponsor international students.

In comparison with Australia, the regulatory framework in England is fragmented and incomplete (and according to a 2013 report from the Higher Education Commission, 'outmoded and unfit for purpose') and review processes do not consistently cover all aspects of institutional governance and financial management and planning as is the case not only in Australia, but also in the US regional commissions' practices for all providers.

It is striking that in the centralised Australian system and the decentralised US system, agencies have some requirements of institutions which all providers, irrespective of level of degree-granting status, funding, or mode of delivery, have to meet - such as annual reporting directly to the agency and substantive or material change processes - and that the agency has the teeth and sanctions itself to take action in the case of risks realised or standards not met.

After its bumpy start, the Australian system is moving to a lighter-touch, risk-based system. The agency provides a one-stop shop for information on providers and provision, and recent revisions to the TEQSA Act have afforded the possibility of accreditation of seven years for universities, and potentially for 14, but still with the option of intervention through TEQSA's material change clause or triggered by other causes for concern.

Having undertaken this study, this expert team is of the view that there are important points to be considered and lessons to be learned across the UK from the QA approaches of the comparator systems.

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List of abbreviations

AACSB	Association to Advance Collegiate Schools of Business
AQF	Australian Qualifications Framework
AUQA	Australian Universities Quality Agency
CEQ	Course Experience Questionnaire
CFR	Criteria For Review
CGS	Commonwealth Grant Scheme
CHEA	Council for Higher Education Accreditation
CSP	Commonwealth supported place
DETC	Distance Education and Training Council
DQP	Degree Qualifications Profile
EHEA	European Higher Education Area
ELICOS	English Language Intensive Courses for Overseas Students
EQAR	European Quality Assurance Register
EQF	European Qualifications Framework
ESG	European Standards and Guidelines
ESOS	Education Services for Overseas Students
EUA	European University Association
FHEQ	Framework for Higher Education Qualifications
GDS	Graduate Destination Survey
HEA	Higher Education Act
HEFCE	Higher Education Funding Council for England
HEI	Higher education institution
HELP	Higher Education Loan Program
HESA	Higher Education Support Act
LTPF	Performance-based funding for Learning and Teaching
MoE	Ministry of Education and Research
MSCHE	Middle States Commission on Higher Education
NACIQI	National Advisory Committee on Institutional Quality and Integrity
NAICU	National Association of Independent Colleges and Universities
NOKUT	Norwegian Agency for Quality Assurance in Education
NQF	Norwegian Qualifications Framework for Lifelong Learning
PSRB	Professional, Statutory and Regulatory Body
QA	Quality assessment (but not used for 'quality assurance')
QAA	Quality Assurance Agency for Higher Education
R&D	Research and development
SAA	Self-accrediting authority
SHEEO	State Higher Education Executive Officers' Association
TEQSA	Tertiary Education Quality and Standards Agency
U&C	Universities and Colleges (Act)
UKBA	United Kingdom Border Agency
USDE	United States Department of Education

Biographical details

Carolyn Campbell

Carolyn Campbell is Senior Consultant at the Observatory on Borderless Higher Education. Prior to this she was Head of International at the Quality Assurance Agency for Higher Education. She has also held a post in the Erasmus Bureau in Brussels and at Roehampton University. Carolyn is currently the external Academic Board member for a UK business school and a member of the International Advisory Committee of the Lumina Foundation in the United States of America. She has represented the UK in the Structural Reform Working Group in the Bologna Process. Carolyn's research interests include internationalisation and cross border education and the regulation and quality assurance of higher education. She has contributed to European Commission, OECD and Unesco publications and projects on cross border higher education and quality assurance.

Dr William Lawton

Bill Lawton is from Newfoundland and has lived and worked in the UK since 1987. He was Director of the Observatory on Borderless Higher Education from 2011-14. Under his leadership the Observatory's research output included survey reports on international branch campuses, the use of recruitment agents, massive open online courses (MOOCs), a 'horizon scan' on higher education in 2020, and a report for Jisc on transnational education (TNE) and related network requirements.

Bill was a founding member of the UK HE International Unit, from 2007-10. He wrote front-page opinion pieces for 60 issues of *International Focus*. Between 2000 and 2007 Bill worked at the Canadian High Commission in London, as a political analyst on UK devolution and latterly as Head of Academic Relations. In the 1990s he lectured in politics at the University of Hull. His PhD is from the University of Edinburgh.

Bill's areas of expertise and experience are higher education internationalisation, especially TNE, the interplay of TNE and mobility, and the digital higher education revolution; UK, American, Canadian, southeast Asian and Indian higher education and policy; UK politics, especially devolution; Canadian and American politics; nationalism and federalism.

Professor Robin Middlehurst

Robin Middlehurst is Professor of Higher Education and Policy Adviser in the Vice Chancellor's Office at Kingston University London. Her research interests include borderless education and internationalisation, governance and leadership, and quality assurance and enhancement in higher education. Robin was Director, Strategy, Research and International at the Leadership Foundation for 10 years from 2004 and from 2014 has been seconded part-time to the Higher Education Academy, the UK's national agency for the quality enhancement of teaching, learning and the student experience in higher education. Robin has held academic posts at the University of Surrey and the Institute of Education, University of London and has served as a governor at two UK universities. She co-designed and co-directed the UK's Top Management Programme for Higher Education from 1999-2014. She is a trustee of the British Accreditation Agency, the independent accrediting agency for private providers in further and higher education, serves on the Advisory Board of the Observatory on Borderless Higher Education and is a member of the editorial board of Wonkhe, a widely-read policy blog. Professor Middlehurst has published extensively on leadership, governance, management, quality and internationalisation of higher education and undertakes consultancy for governments and higher education agencies in the UK and overseas.