

Subject	External Quality Assurance
Module	External Quality Assurance (EQA) – Roles And Responsibilities
Topic	2.5 Operational Context of EQA

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1. Introduction



Contextual factors may determine or significantly influence EQA in a country. These include the:

- higher education policy, past and present;
- developmental stage of the higher education system;
- size and scale of the system;
- specific objectives to be served by the QA mechanism;
- sharing of responsibility among the various QA players; and
- ownership and control of institutions and EQA agencies

This topic will focus on two major factors:

- size and scale of the HE system in question, and
- ownership and control of EQA.

The implications will be considered along with selected national models

Objectives: Operational Context of EQA

Upon completion of this topic, you should be able to:

- explain the impact of system size on EQA
- identify the different entities that may claim responsibility for EQA
- describe the implications of QA ownership on the autonomy and functions of QA
- describe the role of external bodies that evaluate and/or accredit professional programs and practitioners
- identify the factors that influence the governance of EQA agencies and systems
- identify the primary funding sources for EQA agencies
- identify the measures taken to ensure the independence of a QA process
- describe ways to guarantee independent and ethical decision-making how differences in context lead to variations in QA approaches

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2. Size and scale of the HE System

The overall size and scale of an HE system may range from a single university to one that covers a region, such as The University of the South Pacific, which serves twelve Pacific island states; to a multitude of institutions in one country, as in China and India. In the U.S. there is actually no centrally-directed H.E. system, but many independent agencies that operate with Federal approval. Thus, the number of institutions and programs to be served may range from thousands to a few. When an EQA mechanism serves a large number of institutions its operational features must be shaped accordingly. This affects:

- Consideration of programs (which ones, at what level, by what standards);
- EQA policies such as agency authority and responsibility for QA decisions;
- Participation of agency staff in site visits;
- Unit of assessment (institution or program);
- Follow-up to QA decisions and actions;
- Selection of reviewers and formation of review teams; and provisions for training reviewers.

Scalability must be considered when an EQA agency is still in the planning stage, meaning the ability to adapt or grow in response to changes in the social, political, economic, and educational context. Important factors include:

- The developmental stage of the HE system;
- The present and potential size of the system;
- The intended scope of quality assurance; program, institution, or both;
- National and regional QA objectives;
- The level of involvement between the agency and institutions;
- The current social, political, economic and educational context, and the potential for change;
- Requirements for human and financial resources, in view of present and future demands.

In large systems, it may be impossible for agency staff to participate in every site visit. This may mean greater reliance on the external reviewers, especially the team leader. Responsibilities such as writing the visit report and making recommendations are typically delegated to the external reviewers, who must be able to work on behalf of the agency with minimum direct guidance from agency staff. Finding competent external reviewers may be less of an issue in larger HE systems but training them to follow policy and procedure with consistency remains a challenge. Efforts must be made to control variation in the proficiency of different teams. All of this assumes competent oversight by agency staff

Large-scale higher education systems often focus on QA at institutional level, while small systems may more easily focus on programs. Apart from size and scale, other factors may be at work. For example, the political influence of senior institutional executives, relative to that of faculties, academic unions, and disciplinary bodies, all with interests in QA policy.

The resources needed to implement a EQA strategy are influenced by system size. It may not be cost-effective for small systems to set up a new structure, and it may not be easy to find suitable personnel. One option is to reorganize existing structures, with greater emphasis on internal quality management by institutions. Regional QA agencies and arrangements may be another option, or even services provided by trans-national QA agencies – if government can ensure the reliability of such “imported” providers.

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It may be difficult to form external review teams in small higher education systems, when given a limited pool of well-regarded academics who have personal and professional relationships. Conflict of interest policy must be defined early and well.

For example, a large system such as the National Assessment and Accreditation Council (NAAC) of India, can be selective when choosing reviewers from a large pool. Reviewers who come from the state where the subject institution is located are ineligible for that review (which might not work in the case of Mauritius). Thus, size (large or small) is a tangible factor when planning an EQA system.

3. Ownership and Control

The demand for QA at national level has grown over many years. There has been a parallel growth in the number of QA players and their public profile, perhaps reflecting a governmental reaction to calls for greater accountability. As Neave asserted over two decades ago, this trend marked the "rise of the evaluative state". In practical effect, this would lead to policies for funding conditioned upon cost/benefit analyses, 'added value', output measures, and more recently, the attainment of learning objectives and outcomes.

New EQA mechanisms have been adopted in the quest for accountability. They are governed and funded differently, but all serve as policy instruments for whomever is in control. The questions of who establishes, owns, governs, controls and pays for EQA are critical for any understanding of the roles and responsibilities of the EQA players in a given HE sector. We will now examine these factors in detail.

EQA may be the responsibility of a body that is established with or without the direct support of government or HEIs. There are at least four different ways of describing the affiliation and ownership of EQA agencies:

Ownership of EQA

A governmental agency

EQA may be entrusted to a governmental agency; e.g., operating as a unit in the ministry of education (Hungary, Cambodia, other former arrangements in eastern Europe).

A body independent of the government

EQA may be the responsibility of a body that is fully independent of government, without a role for the government in its operations. Cases where HEIs themselves have established a QA agency are found in the US and the Philippines. Operating support may be obtained through fees paid by institutions and programs.

A 'buffer' body

EQA may be the responsibility of a 'buffer' body, established under a local organization, to carry out a governmental function. The government may play a role in its creation, but it is governed independently of government (for example, Quality Assurance Agency (QAA) in the UK or the Australian Universities Quality Agency (AUQA) in Australia)

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A professional body

EQA may be the responsibility of a body established without a direct role for the government or HEIs. Professional bodies and councils may provide evaluation and accreditation for professions such as engineering, accounting, medicine, etc. Their support may be a combination of institutional fees and subsidies paid by participating professional associations and disciplinary bodies. These entities may believe that there is a material advantage in taking responsibility for the quality of education in the fields they represent.

The ownership of EQA has implications for the autonomy of the corresponding processes, although most EQA agencies – including those established and funded by their governments - claim some degree of autonomy from government. Obviously, the non-governmental bodies can claim the greatest independence in decision-making.

In some cases, officials such as a representative from the Ministry of Education may sit on, or chair the national bodies (for example, the Accreditation Committee of Cambodia (ACC). When owned by the institutions, EQA depends on the voluntary acceptance of procedures by the member institutions although the institutions themselves may shape the EQA process and the criteria to be followed. This can awaken the issue of agency independence in its dealings with institutions or their collectives.

A 'bottom-up' orientation is found in the US where accreditation agencies are non-governmental entities within the higher education sector. Relatively few are truly membership organizations, although most of their 'parent' organizations are. With an eye to legal liability for EQA agency actions, U.S. accrediting bodies usually are incorporated separately from the parent organizations.

The ownership of EQA is often debated along with the purpose of QA. Political and ideological concerns can make it difficult to isolate the real issues. For some groups, government ownership is seen as bureaucratic; quality is evaluated according to predefined external standards and with a focus on control. On the other hand, ownership by the HEIs is seen as an internal, non-bureaucratic approach, with a focus on quality improvement rather than control. However, there is no simple and direct relationship between ownership of the EQA agency and the balance between quality improvement and control. Many government-owned systems emphasize quality improvement, while some institution-owned agencies tend to act as gatekeepers, preventing the entrance of newcomers in the higher education market. Experience has shown that the objectives and focus of an EQA tend to be independent of ownership.

The U.S. provides an example of how government recognition of accrediting bodies serves to implement government policy through accreditation. Strictly speaking, the U.S. Federal government has no direct competence in education, as this was omitted from the Constitution and goes to the States by default. However, the Federal government is responsible for the administration and ultimate use of Federal funds, e.g., for student financial aid and grants or subsidies related to students, institutions, and university-based research centers. The government uses accreditation to determine institutional eligibility for access to Federal funds. Accordingly, a Department of Education committee administers 'guidelines' for EQA agency recognition and makes those decisions. For all the talk about independence and ownership, Federal recognition of EQA agencies truly commands attention and

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changes behaviors. All U.S. accreditors are subject to Federal recognition, and in that way, become surrogates of government.

Government support for EQA, when it does not undercut the operational autonomy of agencies, has many advantages. In countries where the higher education system is undergoing reform, QA initiatives may be launched as part of a reform strategy, independent of government and institutions. In more mature systems, the HEIs may take a prominent role in EQA policy discussions and help to shape important developments in the system.

In the U.S., institutional accreditation has evolved through a process shaped by the HEIs themselves. A key consideration was that the individual states lacked resources for EQA (even today), but regional associations (covering multiple states) could do the job with support from a pool of institutions. In most other systems, the initiative has come from government. In any case, a government desire to use EQA outcomes for vital decision-making, such as access to funding seems to strengthen the role and influence of EQA.

To further illustrate approaches to ownership and control, let us review the cases of Hungary, Canada and Philippines. The roles of government and the relevant minister in the establishment and functioning of the EQA body are very explicit in the case of Hungary.



[Affiliation of the EQA Agencies – Governmental \(Hungary\)](#)

Affiliation of the EQA Agencies – Governmental (Hungary)

Authorised by Para. (7), Section 80 of Act N. 80/1993 on Higher Education (HEA), the Government orders the following:

The legal status of the Hungarian Accreditation Committee (HAC)

1. §(1) The Hungarian Accreditation Committee (hereinafter: HAC) is an independent body created by the government for the tasks identified in §81 of the HEA.

(2) Pursuant to Para. (7), §80 of the HEA, the Minister of Culture & Education (hereinafter: the Minister) shall exercise the legal supervisory rights over the HAC. In his powers of legal supervision, the Minister shall examine whether the HAC composition, organisation, operation and decision-making mechanisms comply with the laws and regulations as well as with HAC's own rules of organisation and operation;

The HAC's Secretariat

31. §(1) The Government creates a Secretariat to take care of the administrative work of HAC. The Minister supervises the secretariat that is a body with full authority, and is funded from the central budget.

(2) The head of the Secretariat is both appointed and relieved from duty by the Minister in open public competition for the position. The Minister, in agreement with the HAC President, also issues the mandate. The relief from duty of the head of the Secretariat is subject to the approval of the HAC as a joint body.

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(Tamas Kozma, 2003, Accreditation in the Higher Education System in Hungary, Paris: IIEP-UNESCO)

In contrast to Hungary, in Ontario, Canada, the Council of Ontario Universities (COU) has taken the lead and established a QA mechanism for its members.



[Affiliation of the EQA Agencies - Owned by HEIs \(Ontario province, Canada\)](#)

Affiliation of the EQA Agencies - Owned by HEIs (Ontario province, Canada)

Council of Ontario Universities (COU)

Originally known as the Committee of Presidents of the Universities of Ontario (CPUO), the organisation was formed in 1962 in response to a need for institutional participation in educational reform and expansion.

The executive head of each of Ontario's provincially assisted universities comprised the committee. The committee was later enlarged to include two representatives from each member and associate institution: the executive head (university president, principal or rector) and an academic colleague appointed by each university's senior academic governing body. In 1971, the committee changed its name to the Council of Ontario Universities.

The Ontario Council on Graduate Studies (OCGS) was established by COU to carry out QA functions in graduate programs. The Ontario Council on Graduate Studies consists of the Deans of Graduate Studies (or equivalent officer) of each of the provincially-assisted universities in Ontario. OCGS does standard appraisal of proposed new graduate programs, and periodic appraisal, on a recurring basis, by discipline, of all existing graduate programs in Ontario, through its Appraisal Committee which consists of senior members of the professoriate of the member Ontario universities, elected by OCGS.

<http://ocgs.cou.on.ca>

The Philippines has adopted a system where the HEIs are “members” of private accreditation agencies, organised along the lines of the segmented higher education system.



[Private Accreditation Agencies with Membership Affiliation in the Philippines](#)

Private Accreditation Agencies with Membership Affiliation in the Philippines

The accreditation movement in the Philippines began in 1951, through the initiative of educators from private HEIs who were convinced of the need to enhance quality in higher education through a system of standards, continuous monitoring of their

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implementation, and voluntary self-assessmentFrom the 1950s to 70s, three accrediting bodies were formed: the Philippine Accrediting Association of Schools, Colleges & Universities (PAASCU); the Philippine Association of Colleges and Universities - Commission on Accreditation (PACU-COA); and the Association of Christian Schools, Colleges and Universities - Accrediting Agency (ACSCU-AA). Each of the associations has its own accrediting instruments and standards.

In striving towards common standards and instruments, the Federation of Accrediting Agencies in the Philippines (FAAP) – an umbrella organisation of accrediting agencies –was established in 1976. FAAP is the co-ordinating body for the 3 accrediting associations. Along with the formation of an accrediting agency for state colleges and universities, a fourth accrediting body was formed – the Accrediting Association of Chartered Colleges & Universities of the Philippines (AACUP). AACUP is mainly for members of the Philippine Association of State Universities and Colleges (PASUC), and PAASCU is mainly for Catholic schools (PACU-COA for non-sectarian groups, and ACSCU-AA for the Protestant sector.) The system of accrediting bodies is not restrictive, however: some institutions, members of PAASCU, are from the non-sectarian or Protestant groups, or from the state sector, whereas certain sectarian schools are accredited by the PACU-COA.

(Arcelo, A. A. 2003. In pursuit of continuing quality in higher education through accreditation. The Philippine experience. Paris: IIEP-UNESCO)

EQA for Professional Education

Some forms of EQA are provided by organizations external both to higher education and government. Their shared concern is the quality of education in professional areas of study. We should distinguish between professional EQA agencies that evaluate and accredit university degree programs, and professional bodies concerned with the professional licensing or registration of university graduates.

The first category is focused on education leading to the “first-professional degree,” while the second category is concerned with the professional recognition of graduates, and in some cases, provisions for continuing professional education. A prime example of the former is the large number of “specialized” accrediting bodies in the United States; e.g., architecture, business, engineering and computer science, various health sciences, etc.

Professional bodies in the second group provide a form of QA through licensing or registration procedures. They focus on the qualifications of graduates and their progress toward full professional registration. In the U.S., the exams for engineering registration are developed by the National Society for Professional Engineers (NSPE), in cooperation with a council of State licensing boards (neither of which is an accrediting body). The State boards award the P.E. license on the basis of NSPE exam results and validated work experience. Along with some two dozen disciplinary bodies these two organizations are members of ABET, the recognized U.S. accreditor for engineering.

Canada offers another example. APENS is the licensing and regulatory body for some 4500 Professional Engineers and Engineers-in-Training who practice in Nova Scotia or on provincial projects (www.apens.ns.ca). To practise as an engineer to offer professional engineering services to the public in Nova Scotia, licensing by this body is required. APENS recognition, and that of similar organizations worldwide, has implications for the national and international mobility of engineering professionals. It is a member of a national body - Canadian Council of Professional Engineers

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(CCPE) which in turn is a signatory to the Washington Accord for the mutual recognition of engineering education among its signatories. It is interesting that CCPE also handles the evaluation and recognition of degrees presented by candidates for Canadian citizenship.

4. Governance

The governance and control of EQA depends in part on the EQA arrangements in place at the time that EQA systems are introduced. For example, the long-standing external examiner feature of British HE was developed and controlled by the HEIs themselves. This influenced the way that EQA evolved in the UK.

On the other hand, in emerging higher education systems, a lack of institutional capacity for quality assessment and monitoring may propel EQA in a different evolutionary direction. The establishment of national EQA is often a response to QA problems that cannot be corrected by existing mechanisms. Thus, national QA arrangements are generally a responsibility shared among many players, who have different yet complementary roles and responsibilities.

The level and type of responsibility borne by given EQA agency will usually reflect the extent of government involvement in the formation of that agency. For example, if an agency is expected to play a central role in the national HE system, going beyond quality into matters such as institutional authorization, approval of new programs, or conferring the power to award degrees -- it is likely that government is the motive force. When it is important for other countries or states to recognise and accept the actions of an EQA system, the government may have more input in the establishment and implementation of an EQA system. This does not mean that EQA becomes a government function, even when provided by an independent organization that is still part of the public system.

It should be noted that while accrediting agencies in the U.S. are not part of a public system and do not receive Federal funding, they derive their authority from government recognition of agencies and the use of accreditation to determine eligibility for access to Federal and State funding.

Institutions may play a central role when the main purpose of QA is academic. When the purpose is to ensure that professional education meets the objectives and standards of the guild, professional associations come to the fore.

Regional surveys of QA bodies have shown that in most cases, the basis for EQA and its authority is government. In only a few cases does the authority come directly from institutions, which are themselves EQA clients.

The points mentioned above influence the governance of EQA providers. In general, there a central governing body or board deals with strategy, objectives, and policy decisions. Those decisions provide the framework for implementation of the EQA program. Members of the governing board are usually nominated, appointed, or elected according to the rules of the organisation. Agencies will try to ensure representation from a cross-section of the relevant stakeholders in order to bring different backgrounds and expertise to the governing board. The composition of the governing board often indicates the relative power of different stakeholders. Some EQA systems place international experts on the governing board to obtain outside perspectives.

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5. Funding

As might be expected from the discussions of ownership and governance, there are different funding schemes that involve either one or several of the following:

Funding Schemes

Governmental funding

In government-initiated EQA systems, government provides the initial funding, and pays at least for part of the operational expenses of the agency. Even EQA agencies owned by an institutional association may get subsidies and occasional grants from government.

Fees from HEIs

In many systems, whether government-supported or HEI-owned, institutions pay for accreditation services. The fee normally covers expenses related to the external review, plus the cost of training activities. In some cases there is a “maintenance” fee, a proportional share of agency operating expense.

Fee for services

This is income received by the EQA agency for services provided to institutions or organizations, outside of the accreditation process. These services may related to conferences, workshops, consultancy, research, or grant-funded projects.

Most EQA agencies follow a 'cost recovery' or 'fee for service' principle and charge HEIs for the EQA services related to them, irrespective of the ownership of the agency.

Surveys conducted among the Asia-Pacific Economic Cooperation (APEC) economies have indicated that most EQA bodies, even the ones that claim to be independent of the government get substantial funding for QA purposes.

6. Independence

The legitimacy of QA activities rests on independence. It must be clear to all stakeholders that QA activities and decisions are free of interference from third parties. To ensure independence the QA process usually has a series of checks and balances:

- Governments authorise or supervise private/“independent” EQA agencies (e.g., the U.S. Department of Education applies a rigorous set of guidelines for the recognition, operation, and transparency of accrediting agencies);
- Academics and representatives of professional associations act as external reviewers for public agencies;
- Potential conflicts of interest are addressed;
- Some systems have clauses about their independence written in the legislation or Constitution.

It is mistakenly thought that the origin of agency funding determines the independence of an agency. Given that every EQA needs funding, it can be said that none are entirely independent of their funding sources. Fortunately, it is not in fact necessary for agencies to be independent in terms of funding – what must be

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independent are its judgments. It is possible to have well-defined policies, procedures and structures to guarantee independence of decision-making, by ensuring that all relevant evidence is considered, and that decisions are based entirely on this evidence.

Different societies have different views on what works best to achieve this end. Some approaches are:

- Including a range of stakeholder perspectives, so that each 'keeps the others honest';
- Distributed decision-making, where different types of decisions are made by different committees within the organization.
- Independence may be assured by including the requirement in legislation, with consequences for breaches (e.g., Higher Education & Training Awards Council (HETAC), Ireland);
- Giving oversight responsibility to a minister of education (e.g., New Zealand Qualifications Authority (NZQA));
- Giving oversight responsibility to parliament.

However, appropriate and ethical behaviour in any sphere of activity can never be absolutely guaranteed. Independence can fail because of the lack of structures, or because the structures are ignored, bypassed or subverted. In some systems, EQA staff or reviewers may hesitate to be candid for fear of direct negative consequences. In other cases, the EQA system could be subverted by powerful interests pressing the agency to approve an institution that fails to meet the required standards. In most higher education systems, there is a pecking order and a general sense of which institutions are 'good' and which are 'bad'. When those in power (or even review panel members) act to enforce preconceptions without reference to the facts, the EQA system is undermined. Such problems are not unique to the education sector, for when they occur, they are usually present in the society in question.

7. Discussion

Discussion: Operational Context of EQA

Consider the size of the higher education system of your country and the amount of QA to be done. In that setting, what type of ownership and control will you suggest for the EQA mechanism and what is your rationale?

8. Implications of Differences in Context

Given the differences in the social, educational, economic and political contexts in which QA operates, there will be differences between EQA agencies and their approach.

After considering a number of case studies of EQA agencies, Van Vught and Westerheijden (1993) argued that "while a general model comprising a national agency, institutional self-evaluation, external peer review and published reports continues to have validity, it masks a whole range of differences in the methods used" (in Brennan and Shah, 2000). The differences they identified include:

- The level of assessment (institution or program);
- The focus of assessment (on teaching, research, administration);
- The types of peers used (including their selection and training);
- The balance between the use of direct observation, interview, or performance indicators;
- Whether methods are standardised or flexible to deal with different institutional types and characteristics;

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- The nature of reports and other outcomes; and
- The link with decision-making; e.g., between accreditation and funding.

The survey reports of the APEC economies highlight notable variations in many aspects of EQA approaches.



[Diversities and Similarities](#)

Diversities and Similarities

The establishment, ownership, legal basis, governance, funding and the level of independence of the EQA agency vary among the APEC economies. Correspondingly, the scope and objectives of the agency and the characteristics of its QA Framework differ. Variations are seen in aspects such as:

- Unit of QA: Institution vs. Programs
- Nature of the EQA Process: Mandatory vs. Voluntary
- Aspects considered for QA
- Role of Institutions in Constituting the Review Team
- Role of Agency Staff in On-site Visit
- Disclosure of QA Outcomes
- Implications of QA Outcome
- Appeals Mechanism
- Post-QA Follow-up

At the same time, whatever their approach to QA in terms of the aspects listed above, the EQA systems of the APEC region have the following common critical core elements:

- Review based on pre-determined criteria;
- QA process based on a combination of self-assessment and peer review; and
- Final decision by the EQA agency.

Source: Enhancement of QA Systems in Higher Education in APEC Member Economies, Prepared for DEST by AUQA, 2006

System Comparisons

As shown above, there are many operational differences among the APEC members. Other regional EQA groupings would probably look the same. What matters is the similarity of core elements, especially pre-determined criteria. Note however, that nothing has been said about the substance and comparison of standards. One way to compare QA systems is to determine what each system actually makes people do -- whether, and in what ways, a QA system changes behaviors.

9. Summary

This topic covered the following main points:

- The size of the system to be covered by EQA is a determining factor and impacts the following:
 - Consideration of programs
 - Policies and practices of QA such as role of the EQA agency in QA decisions

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- Participation of agency staff in site visits
- Unit of assessment (institution or program)
- Follow-up to QA outcome
- Selection of reviewers
- Constituting the review team
- Place given to training of reviewers
- The questions of who establishes, who owns, who governs, who controls and funds EQA are critical to understanding the nature of the roles and responsibilities the EQA players have in the broader higher education sector.
- EQA may be the responsibility of any of the following entities:
 - A governmental agency
 - A body that is fully independent of the government
 - A 'buffer' body, established under a local organisation
 - A body that is established without any direct role of either government or the HEIs
- The non-governmental bodies have the greatest independence in decision-making.
- Government ownership is regarded as bureaucratic with quality evaluated strictly towards predefined external standards and a focus on control. In contrast, ownership by the HEIs is seen as an internal, non-bureaucratic approach with the focus on quality improvement rather than on control.
- Professional bodies and councils conduct accreditation of programs in professional areas of study such as engineering and accounting.
- The factors that influence governance arrangements for EQA include the EQA arrangements already in place in the HEIs and the level and type of responsibility carried by an individual EQA agency.
- EQA mechanisms are funded through different schemes, which involve either one or a mixture of the following:
 - Governmental funding
 - Fees from HEIs
 - Fee for services
- Following are some checks to ensure independence of a QA process:
 - Authorising or supervising private EQA agencies by the government
 - Including academics and representatives of professional associations as external reviewers for public agencies
 - Addressing potential conflicts of interest
 - Having clauses about independence written in the legislation or Constitution of the system
- The following are some approaches to ensure an ethical and independent decision-making process:
 - Including a range of stakeholder perspectives
 - Having multiple levels of decision-making
 - Including the requirement in legislation, with the implication of serious consequences of breaches
 - Giving the responsibility to a minister of education
 - Giving the responsibility to the parliament.
- The differences in the social, educational, economic and political context in which QA operates leads to variations among EQA agencies and the approaches they use. These differences can include the level and focus of assessment, the nature of reports, the types of peers used and the links with decision-making.
- A good way to compare EQA systems is to examine what each system makes people do – whether, and to what extent, a system changes institutional and faculty behaviors.