Subject	Operating an External Quality Agency
Segment	Methods of Review and Accreditation
Topic	2.3 Institutional Accreditation

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1. Introduction

This topic explores the role of external quality assurance (QA) agencies in the initial accreditation and recognition of institutions. As might be expected, there is much common ground with QA processes generally (including program accreditation), but in this case the judgments are being made to a great extent on promises of what will come rather than on a record of achievement. Consequently there are matters that are particular to accreditation of institutions and need careful consideration. This includes pre-accreditation processes such as registration. The topic discusses the essential ingredients of a scheme to judge such institutions.

Objectives: Institutional Accreditation

Upon completion of this topic, you should be able to
- discuss how the role of accreditation agencies has evolved during the last century
- identify the challenges that accreditation agencies face today
- explain the factors that need to be considered while establishing the framework for approvals
- describe the important points to consider in implementing accreditation processes

2. History of Institutional Accreditation

Accreditation of higher education (HE) institutions has existed in the United States for over a hundred years and in many developed countries since the second half of the last century. More recently, there has been a surge in other countries, with hither to little tradition of higher education, to adopt quality assurance systems. The aim is to improve the quality and development of their institutions, particularly new institutions. For the most part, the quality assurance and accreditation agencies in these countries deal with established universities and other tertiary colleges operating on traditional HE campuses and catering for students who are recent graduates of upper secondary or high schools (and in many cases of elite upper secondary schools).

Over the last several decades, most countries have seen an increased demand for higher education places. Institutions, usually supported by national and regional governments, have endeavoured to meet that demand often through new forms of provision, including online and blended learning. There is a very substantial emphasis on lifelong learning in the HE sector.

Another development is the evolution of the parallel provision of private (frequently for-profit) higher education alongside publicly funded institutions. Definitions of higher and tertiary education have also expanded; some systems are happy to include company education and training within the ambit of higher education while the recognition of prior learning or of experiential learning for the award of higher education degrees is becoming more common in some countries. However, it must be recognised that some other countries take a conservative view of this approach even though many higher education and quality assurance practitioners are enthusiastic for these changes.

On the decidedly negative side of changes in HE is the spread of diploma and accreditation 'mills'. A diploma mill is defined as:

> "An institution of higher education operating without supervision of a state or professional agency and granting diplomas which are either fraudulent or because of the lack of proper standards worthless"

Source: Webster's Third New International Dictionary

In the United States, the Higher Education Opportunities Act 2008 defined a diploma mill and endeavours to deal with the problems that these bodies cause. Other countries have also introduced legislation for the same purposes. Many of these laws rely on the judgments of quality assurance and accreditation bodies. The US Act defines diploma mills as follows:

 [Definition of a 'Diploma Mill' – United States](#)

Definition of a 'Diploma Mill' – United States

The term 'diploma mill' means an entity that:

(A)(i) offers, for a fee, degrees, diplomas, or certificates, that may be used to represent to the general public that the individual possessing such a degree, diploma, or certificate has completed a program of postsecondary education or training; and (ii) requires such individual to complete little or no education or coursework to obtain such degree, diploma, or certificate; and

(B) lacks accreditation by an accrediting agency or association that is recognised as an accrediting agency or association of institutions of higher education (as such term is defined in section 102) by-- (i) the Secretary pursuant to subpart 2 of part H of title IV; or (ii) a Federal agency, State government, or other organisation or association that recognises accrediting agencies or associations.

Source: US Higher Education Opportunities Act 2008

Challenges for QA agencies

In light of the development of these kinds of institutions (and bogus accrediting agencies), legitimate QA agencies that have a role in accreditation face a major challenge as to how they approach recognition of higher education institutions (HEIs). A formal accreditation procedure is probably the only way of protecting higher education students from the dangers of bogus institutions and bogus awards. But to achieve that protection, the legitimate agency must determine the standards and criteria which it will adopt for the initial approval and recognition of a higher education institution. It must also set out the procedures which it will follow in this exercise. In addition, the agency must also determine whether the same criteria will be used for traditional campus-based institutions as well as for the providers of on-line or work based programs who may or may not be operating within the same institutional eg a mainly campus-based institution (such as the University of Melbourne) that also provides on-line programs internationally (such as the Graduate Certificate in Quality Assurance).

The recent adoption of what are termed 'qualifications frameworks' (QFs) in many countries with their concentration on student learning outcomes and programs present their own challenges. QFs challenges the idea that the duration of a course is inevitably tied to outcomes as they do not focus a great deal on duration of a course. The older practice of reviewing or accrediting an institution based on inputs such as ratios of students to heads of faculty or the numbers of holdings in the library is now seen as less relevant although such measures had the merit of simplicity and an ease of comparability.

Where the major part of higher education resides in long established institutions with widely recognised reputations, the quality agency may be content with overseeing quality enhancement exercises. But where there is inadequate provision and substantial public pressure to enhance provision, the standards required for licensure/accreditation may be more difficult to determine.

Reviewing new applicants for approval as educational institutions can be a very sensitive and time-consuming processes for a quality assurance agency. Rejection of an applicant could embarrass it publicly so approval requires extra work on both sides.

As a fundamental task, the agency has to determine the standards for institutional accreditation and publish these standards. It is likely that the agency will use standards developed by other agencies as a template from which to work. However, while it is convenient to have a template which has proved useful somewhere else, it is important to ensure that the set of standards (and indeed procedures) adopted by an individual agency suit the laws and administrative culture for which the standards are being prescribed. For example, it is common in the United States to require higher education institutions to provide a defined number of hours tuition in what is described as "general education". This is a requirement of long standing and has proved very useful for US higher education. Other countries find it appropriate not to require a general education provision. What is right in one country may not necessarily be right somewhere else.

3. Accreditation Frameworks

From the perspective of the quality agency with the task of evaluating applications for approval of HEIs, there are many questions to be addressed in establishing the framework through which institutions are accredited.

An example of a reference point for considering these and other questions when setting up an accreditation process for a country or region comes from the European Community which continues to work towards a common approach for the major components of the higher education system.

i Standards and Guidelines for Quality Assurance in the European Higher Education Area

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Standards and Guidelines for Quality Assurance in the European Higher Education Area

Basic Principles

The standards and guidelines are based on a number of basic principles about quality assurance, both internal in and external to higher education in the EHEA. These include:
- providers of higher education have the primary responsibility for the quality of their provision and its assurance;
- the interests of society in the quality and standards of higher education need to be safeguarded;
- the quality of academic programs need to be developed and improved for students and other beneficiaries of higher education across the EHEA;
- there need to be efficient and effective organisational structures within which those academic programs can be provided and supported;
- transparency and the use of external expertise in quality assurance processes are important;
- there should be encouragement of a culture of quality within higher education institutions;
- processes should be developed through which higher education institutions can demonstrate their accountability, including accountability for the investment of public and private money;
- quality assurance for accountability purposes is fully compatible with quality assurance for enhancement purposes;
- institutions should be able to demonstrate their quality at home and internationally;
- processes used should not stifle diversity and innovation.

Source: European Higher Education Ministers Bergen 2005

Apart from reference to statements about quality assurance, in general, the matter of accreditation of institutions will most likely be embedded within a national or regional approach. For example, in Australia, the matter of recognition of institutions rests with one of the 6 state/territories in the country although the framework has been established at national level. The scope of the Protocols is broad as shown in the box below which describes how the state of New South Wales (NSW) interprets the Protocols.

i Example of a System for Accrediting HEI Institutions – NSW, Australia

Example of a System for Accrediting HEI Institutions – NSW, Australia

Registration, Accreditation and Approval

Higher education approval processes in NSW are aligned with the National Protocols for Higher Education Approvals Processes and regulated through the NSW Higher Education Act 2001.

The Act empowers the Minister for Education and Training to approve the establishment of new universities, the recognition of interstate universities and the registration of overseas universities in NSW.

The Act gives the Director-General of the Department of Education and Training (DET) the authority to register Australian and overseas non self-accrediting higher education institutions; to accredit higher education courses of study offered by non self-accrediting higher education institutions and by overseas universities; and to approve registered non self-accrediting higher education institutions and recognised interstate universities to offer specified courses of study to overseas students in this State.

Higher education approval processes provide assurance that higher education courses are being conducted by approved education institutions and the courses are:
- equivalent in standard to courses leading to a qualification of that type or level across the higher education sector
- appropriate to the qualification conferred
- delivered in an appropriate way
- suitable for local and, where appropriate, international students.

Registration authorises an institution to deliver a higher education course or courses in NSW. This authorisation is subject to the institution having a course accredited.

Accreditation permits a registered institution to deliver higher education courses (that comply with the Australian Qualifications Framework) to students in NSW.

Approval permits a recognised or registered institution to deliver specified courses to overseas students in NSW.

Source:
https://www.det.nsw.edu.au/communityed/higheredu/registration/guidelines.htm

In the case of Oman, the Oman Academic Accreditation Authority (OAAA) has developed a two stage process for institutional accreditation comprising (1) Quality Audit and (2) Standards Assessment.

Using whatever general quality assurance and accreditation approach is relevant in the country or region, the designers of a framework for accreditation need to consider a number of specific questions such as the following:
1. Will the agency review or accredit institutions which have not commenced operations?
2. Will the agency review or accredit institutions before they have graduated their first cohort of students?
3. Does the agency restrict itself to baccalaureate (or higher) degree-granting institutions?

4. Must the institution to be accredited have a minimum number of students before the agency will accept an application for review or accreditation?
5. Do all applications follow the same process?
6. Will the agency distinguish between Public and Private, Non-Profit and For-Profit institutions?

Let us now review these questions:

[Designing the Framework]

Designing the Framework

Will the agency review or accredit institutions which have not commenced operations or before they have graduated their first cohort of students?

There is a very obvious difficulty here. The institution cannot operate without accreditation and on the other hand it cannot be reviewed unless there is some operation to be reviewed. The need for an interim or candidate status appears obvious. This will require undertakings by the applicant institution that the criteria and standards set out by the agency will be met at a future time. It will also require evidence of work in progress which will provide a basis for trust on the part of the agency. A clearly defined timetable for achieving adherence to the criteria will also be required.

The distinction between Quality Assurance and Improvement is most obvious in the assessment for accreditation or licensure of new or newly presenting institutions.

Aspects to be considered include:
- Should the review process be divided into stages to ensure that the HEI is ready to meet requirements before a final decision is made?
- If so, should the HEI qualify for any type of provisional accreditation?
- Should such provisional approval allow the HEI to grant degrees?
- What should the standards for provisional accreditation be?
- Who is responsible?

Does the agency restrict itself to degree-granting institutions?

QA agencies are usually mandated to deal with higher education institutions but much depends on the definition of higher education applicable in the particular country. Where associate degrees, certificates or diplomas at sub-baccalaureate level form part of the framework of higher education qualifications, it is customary that an institution offering sub-baccalaureate qualifications is subject to normal accreditation and review processes.

Must the institution to be accredited have a minimum number of students before the agency will accept an application for review or accreditation?

The short answer is to refer the reader to the reply to Question 1 (above). But there is an additional consideration where a new institution has neither the ambition nor intention to have more than a very small number of students. In this, and in many other instances, it is useful for the agency to ask itself what is the HEI mission or more bluntly "what are we trying to do?" The fundamental question in accreditation is: "On the basis of the evidence provided are we confident that the student body will acquire the knowledge, skill and competencies at an appropriate level."

Do all applications follow the same process?

In some systems, all institutions follow the same process, whether or not they have been approved previously. A new applicant would follow the same self-study process/report and team visit that is applied to all institutions. Thus, a long established institution would follow the same process as a new institution in the start-up phase.

This does not exclude the possibility of some preliminary meetings with the quality agency staff to review requirements. One advantage of this approach is that it eliminates complex levels of review and the need for different types of standards. It might also be feasible to review all programs of one type together - "across the board" - more easily and with more consistency. The disadvantages might be that it does not provide an opportunity for early "weeding out" or special training, based on a preliminary type of review.

Will the agency distinguish between Public and Private, Non-Profit and For-Profit institutions?

There is no fundamental reason why an agency would distinguish between institutions on this basis. There may, however, be requirements in the agency's charter or statute (particularly if it has been established by government) where it is constrained from treating public and private institutions in the same manner. Where different criteria are used for different types of institutions this should be made clear to students and to the general public.

Likewise the staffing requirements and qualifications which may be set out for traditional academic institutions may not be appropriate in more vocationally-based institutions or example.

It will be clear from the consideration of the questions above that the outcome, in terms of the framework for conducting accreditation exercises, will vary from country to country or even within countries operating a number of QA agencies.

4. Accreditation Processes

The general QA guidelines on the procedures, review teams and site visits apply equally to the accreditation process. There are, however, some considerations that are particularly important in accreditation exercises. Click the tabs below to view more explanations on this.

Considerations on Accreditation Exercises

Procedures

A quality assurance agency must not play favourites with higher education institutions, so it is important that all applicants follow the same process. Nonetheless, it is reasonable and sensible for the agency to give due regard to the size and resources of the applicant institution. Since the function of the agency is to give a fair determination of the quality of the institution and of its processes and facilities and this may require some flexibility in approach. But this approach must be

based on an open and transparent assessment of what is necessary for the circumstances.

Standards and criteria

The agency needs to clearly set out the framework against which HEIs are to be judged. The agency should recognise that there is no merit in setting out its requirements in obtuse language or in-house jargon. The criteria, standards and processes should be set out in straightforward, simple and concise language.

The agency will find it useful to provide regular workshops or seminars for newly presenting institutions to explain the framework and what it means for their individual situation. Lack of clarity on the part of the applicant institution will create endless and frustrating work for the agency and also frustration for the applicant.

It is important, however, to find a balance between clarity regarding standards and procedures and the coaching of applicants. Agencies should be wary of the dangers of providing coaching.

Time line

While unexpected delays occur in any human activity, the expected timeline for the process should be published by the agency. The applicant institute should know, in general terms, how long the process will take.

Pre- accreditation review

The agency should give consideration to establishing a process of pre-accreditation review following initial meetings with the applicant institution. Such a review would deal with communicating what the agency sees as the core standards for an accredited institution. It is in no one's interests to have an applicant undertake a full submission with considerable time and effort invested by the agency and its expert panel on an application which is clearly unlikely to succeed.

If an applicant appears to meet core requirements, the HEI may wish to explore, with agency staff, more in-depth issues such as whether the HEI meets most of the other standards for full approval. Areas of relevance would include governance, planning, general education (where required), assessment of student learning, and whether the HEI has the capacity to meet the standards in due course where it is not in full compliance.

This pre-accreditation review can filter out HEIs that are not ready to apply and identifies necessary areas of improvement for the benefit of the HEI.

Self-evaluation

A self-evaluation (or self-study as it is also known) forms a major part in all quality assurance processes although in the case of initial accreditation there is very little "self" to "evaluate". Nonetheless, the agency needs to pay particular attention to the following factors:

Factors to Consider during Self-Assessment

Mission

The institution should be clear about its stated mission. There is a major difference between the requirements for a large research university in a major centre of population and those of a small vocationally-based college serving the needs of a dispersed rural population. The two institutions may provide valuable service to their communities, but they should have a clear idea about what they are trying to achieve. Institutions should also state their broad strategic intentions for the period up to the next expected quality assurance review, eg for the next five years or so.

Legal standing and incorporation

The agency should receive sufficient documentation to satisfy itself about the institution's legal standing and its adherence to laws and ordinances of the jurisdiction in which it exists.

Financial stability

The institute should supply documentation, such as annual financial and audit documentation to assure the agency of its financial standing.

Governance

The governance structure should meet the standard requirements for an academic establishment as well as the statutory and good practice requirements in the agency's jurisdiction for a corporate body. Provision for the participation of faculty and student representation should merit particular scrutiny.

Academic processes and administration

This section of the self-assessment will require much of the agency's and the expert panel's attention. This part of the document includes the institution's internal quality assurance procedures. It also deals with the committee structure, including departmental and school boards and the overall academic board or council together with its role and responsibilities. Among the many documents from different parts of the world dealing with these matters, the European Standards and Guidelines for Quality Assurance in Higher Education may be particularly useful.

Faculty requirements and qualifications

While it is becoming less common to specify particular ratios for faculty appointments the institution will be expected to set out its policies in respect of staff numbers, qualifications and promotion.

Student entry and transfer requirements, assessment of student achievement and student entitlements

The institution will be expected to provide evidence of a firm and lively commitment to student welfare, education and learning as well as arrangements for admission, credit transfer and so on.

Appeal processes

Students should have a guaranteed means of redress when they believe they have not been treated fairly particularly in respect of assessments and graduation.

Reading: Guidelines for Self-Assessment

Among the many documents from different parts of the world dealing with these matters, the European Standards and Guidelines for Quality Assurance in Higher Education may be particularly useful. Read the first section that deals with standards and guidelines for internal quality assurance:

[Standards and Guidelines for Quality Assurance in the European Higher Education Area](#)

Interaction with HEIs

The agency must endeavour to set out its requirements clearly and should deal with applicants in a considerate, helpful and courteous manner. The agency should be careful that it does not try to be a coach for the applicant on the one hand and then sit in judgment on the application when it is submitted. The agency should be cautious in suggesting the areas which the applicant needs to amend or complete details. Where the agency takes this route it may find itself constrained from giving a negative judgment for a failing which had not been brought to the attention of the applicant.

Agencies should also be cautious about their obligations to make judgments on applications and a natural desire to assist and support applicant institutions. The fundamental obligation is to provide clarity in the regulations.

Expert panels

There are no special requirements for expert panels for initial accreditation site visits. The general approach for constituting panels for quality assurance reviews or audits applies also for accreditation activities. It may be advisable to concentrate on members with broad experience and considerable prudence. There should be less emphasis on experts from narrow discipline areas or particular reputation in research areas. The Chair should be chosen on the ability, inter alia to lead the panel to a consensus view.

Site visit

The parameters of the 'site visit' for dealing with an initial accreditation in a start-up institution are very different to a site-visit for an established institution. However difficult the organisation of the visit may appear, the meeting between the expert panel and the principals of the applicant institution is very necessary. The panel must be able to leave the site-visit meetings with a judgment on new HEI and its management.

Report

The normal guidelines on QA reports apply here. Care should be taken to cover all deficiencies uncovered by the panel as it will be difficult to bring forward new areas for action at a later date. As in all reports, the recommendation should come from the expert panel as a body. It is the responsibility of the panel to give a recommendation based on the evidence including evidence from the site-visit. In the long term, an overgenerous report benefits nobody.

The practice of publishing, or not publishing, reports varies throughout the world. Many long established agencies and education systems have resisted publication. But there is a marked tendency in recent years towards greater openness and transparency so that even in those countries where resistance to publication of reports is strongest the issue appears to be open to debate again.

Agency decision

While the recommendation of the panel is very likely to be endorsed by the agency or by its boards, the final decision usually rests with the board of the agency. On the very rare occasion when the agency is convinced that it would be inappropriate to accept the recommendation of the panel, it would be expected that the application would be reassessed de novo by new expert panel.

Agency Decisions

A positive decision

This may appear to be the easy and more congenial decision, but the agency needs to have a system in place to monitor progress in the early years. The challenge is to be helpful to the institution without being directive.

The agency may decide to provide an interim or probationary accreditation, subject to particular conditions or regular review. In deciding on this type of accreditation decision, the agency needs to consider the consequences of its decisions for the HEI. In particular, the agency needs to consider the effect of its decision on the availability of public funding, access to employment for graduates and ability of the institute to open for business under the laws of the land. The experience of many long-established agencies is that interim accreditation followed by coaching does not really solve problems and that the 'tough love' of a negative decision is more useful and honest in the long run.

A negative decision

The agency may find it convenient to establish a period of time before it will receive a fresh application from an institution which has had a negative decision. It is likely that reforms arising from the exercise will take some time to implement.

Appeal mechanism

It is advisable that the procedures set out by the agency include provision for an appeal mechanism where the applicant institution is dissatisfied with some aspect of the process. The agency may determine that an appeal may only be entertained on the basis of a failure of the agency to adhere to the public procedures and criteria. The appeal body should be independent of the initial accreditation process and of those persons who had involvement in the initial decision.

In conclusion, it may be said that there are many pitfalls in the processes leading to initial accreditation – or rejection as the case may be. The stakes are high for the agency which needs to maintain credibility and authority at the same time as encouraging and supporting applicants to present their best possible case. For the institutions, there are many risks also to reputation and their future. The implication is that the processes have to be managed with care and thoughtfulness every step of the way.

5. Discussion

Discussion: Institutional Accreditation

Search the Internet to find details of criteria for initial approval of new higher education institutions by two accrediting agencies – preferably in your own country

and one other. (The criteria may not be contained in an explicit form, but you should be able to identify implicit criteria in agency policies or application forms).
1. Compare the two sets of criteria to see what the differences might be. What is common and what is different in the criteria?
2. Identify any features that might be added to the criteria used in your own country to improve the approach.

Imagine that you are the CEO of a new accrediting agency and you have just recruited several new staff who have not worked in an accrediting agency before although all have worked in the sector. You are planning to brief them on how they should conduct themselves in interacting with applicants for accreditation. Make a note of 5-8 points you will raise for discussion.

6. Summary

This topic covered the following main points:
- Accreditation of HEIs has existed in the US for over a hundred years and in many developed countries since the second half of the last century.
- More recently, there has been a surge in other countries, with little previous tradition of higher education, to adopt QA systems. The aim is to improve the quality and development of their institutions, particularly new institutions.
- The challenge faced by accreditation agencies is to determine the standards and criteria which they will adopt for the initial approval and recognition of a HEI and the procedures which they will follow in this exercise.
- From the perspective of the quality agency with the task of evaluating applications for approval of HEIs, there are many questions to be addressed in establishing the framework for accrediting institutions. These include
  - standards and guidelines for quality assurance
  - location of the institution - within a national or regional board
- Using whatever general quality assurance and accreditation approach is relevant in the country or region, the designers of a framework for quality assurance need to consider a number of specific questions, eg, the degree offered, the number of students to be registered, the nature of the institution, etc.
- The guidelines on the procedures, review teams and site visits apply equally to the accreditation process. There are, however, some considerations that are particularly important in accreditation exercises. These include
  - procedures, standards and criteria and time lines
  - pre-accreditation review and self-evaluation
  - interaction with HEIs
  - expert panels
  - site visits, reports and agency decisions