Balancing Quality Enhancement and Accountability
Reforming the Dutch and Flemish accreditation system

by

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Summary
In the coming years the Netherlands (2010) and Flanders (2013) will introduce a so-called institutional audit as part of a new two tier accreditation system. This new system aims to focus quality assurance and accreditation in higher education more exclusively on the content of the programme and is intended to reduce the administrative burdens of internal and external quality assurance processes. Essentially this revision of the accreditation system should increase academic ownership of quality assurance systems within higher education institutions and introduce a 'light touch approach' based on 'high trust' earned during 25 years of external quality assurance procedures in both countries. In these 25 years the system has undergone a profound shift from quality enhancement to accountability. The new two tier accreditation system is intended to steer back to a more quality enhancement led approach. The introduction of this new system means that external quality assurance and accreditation will be more open to creativity and diversity in higher education and will focus less on descriptions of procedures.

This paper provides an outline of the new accreditation system as well as an overview of how in both countries a general consensus was reached as to the principles underpinning this reform. The structural evolution of the accreditation system presented in this paper is the product of two years of intensive discussions within the Dutch and Flemish higher education sector involving a wide variety of stakeholders at almost every step of the way. The involvement of a large variety of stakeholders in this process is reflected in the authorship of this paper, representing perspectives from the Accreditation Organisation of the Netherlands and Flanders (NVAO), Leuven University College(KHLeuven) and the Association of Universities in the Netherlands (VSNU).

Introduction
The initiative for the revision of the accreditation system in the Netherlands came during the summer of 2007 from the Dutch minister for education. In the Netherlands all programmes in higher education will have been accredited or refused accreditation by the NVAO in 2010. In Flanders the present cycle will be completed in 2013. The need for a revision of the system was broadly felt in the Netherlands and Flanders. From the perspective of Higher Education Institutions (HEIs) accreditation focussed too much on procedures and processes not directly relevant to education, was not cost-effective and was felt to be too bureaucratic. HEIs felt that the system had become geared too much towards accountability and had almost lost the important enhancement function. From the government perspective, as well as from the perspective of politics, accreditation was not flexible enough to be able to react quickly to public concerns about quality issues in higher education. Students felt that accreditation was helpful in eliminating programmes that did not meet standards, but were also concerned that accreditation was focussing too much on the procedural end of quality assurance. Prior to 2007 this uneasiness with the accreditation system had initiated a debate, lead by the Dutch Association of Universities (VSNU), advocating the adoption of the Anglo-American approach of institutional accreditation, leaving the assessment of individual programmes to the internal quality systems of HEIs. These proposals were unacceptable to politics, students, employers and the professional universities in the Netherlands (associated in the 'HBO-raad'). All parties however agreed that:
- the balance between enhancement and accountability should be restored;
- the system should focus more on the content of the programmes and less on procedural aspects;
- there is a pressing need to reduce red tape;
- academic ownership of the system should be increased.

On the basis of this understanding the Dutch minister asked NVAO to engage the student unions (ISO, LSVb), the VSNU, the HBO-raad and the association for privately funded higher education in the Netherlands (PAEPON) in a discussion on the future of the accreditation system. For this purpose the ministry set up a steering group.

1.   Involving the stakeholders

The discussions within the steering group took place during the summer of 2007 and a general consensus was reached as to the general outlines of the new system. Accreditation procedures should become less time consuming and more cost effective, but should continue to be conducted at the programme level. To achieve this it was felt that accreditation of the programme needs to be significantly reoriented towards learning outcomes and the content of the programme and aspects of quality that are mainly directed and determined at the institutional level would need to be assessed at the institutional level. This consensus was subsequently communicated to the larger associations of employers, who also committed themselves to the outlines of the new accreditation system proposed by the higher education sector. Having reached a general, all be it vague, consensus in the Netherlands, the Dutch and Flemish ministers of education decided to broaden the discussion to both countries. The start of the discussion in Flanders was difficult because in Flanders it was at that point in time deemed not appropriate to embark publicly on a discussion about a new accreditation system since the old one had been put into operation only a few years ago.

In the Netherlands the Dutch minister subsequently sent a proposal with the outlines of the new system to Parliament. NVAO was now charged by both ministers with developing new frameworks that could be applicable to both the Netherlands and Flanders. Uniquely it was decided that the new system would be tested in a pilot phase that would involve a broad selection of HEIs from both countries.

After having conducted a thorough study of the development of accreditations processes on the institutional and programme level in several other countries and having identified the strong and weak points of these systems, the first step taken by NVAO was to involve its European partners in the development of the basic set up of the system. In January 2008 representatives from OAQ (Switzerland), ÖAR (Austria), QAA (UK), NOKUT (Norway) and the Akkreditierungsrat (Germany) met at The Hague to discuss the outline of the Dutch and Flemish plans. All Dutch and Flemish stakeholders were invited to take part in the discussion: the Flemish University Council (VLIR), the Flemish University Colleges (VLHORA) and the Flemish student union (VVS). From the Dutch side: VSNU, HBO-raad, PAEPON, LSVb, ISO and several commercial quality assurance agencies such as QANU, NQA, Certiked and Hobéon took part in these discussions. In the discussion with the international partners it became rapidly clear that many quality assurance systems in Europe are moving towards a mix of institutional review and programme assessment and seem to be converging towards a combined approach where institutional review and programme assessment complement each other.

Based on the outcomes of these discussion the actual drafting of the frameworks started early in 2008. After having produced a first draft a second round of consultation with all Dutch and Flemish stakeholders was organized. The results of these consultations were tabled at several large seminars in which students, auditors, peers, university administrators, quality assurance staff, and lecturers were asked to contribute their views on the new system.

This broad consultation process made sure that during the development of the new frameworks a wide variety of perspectives on quality assurance, both on the institutional and on the programme level, were made accessible to the developers of the frameworks at NVAO. These different perspectives were used in the further development of the system.

2. Structure of the system

In the new system accreditation will continue to take place at the programme level in both the Netherlands and Flanders, but an institutional audit will also be part of the system.

In the Netherlands the idea is that if this audit demonstrates that the internal quality assurance system of an institution is in good order, institutions are allowed a form of accreditation of their programmes that is limited to the content and the intended and achieved learning outcomes of the programme. This so-called limited programme accreditation aims to reduce red tape and is meant to engage and commit lecturers more intensively in the process of self evaluation and programme assessment. Limited programme accreditation should be more relevant to teachers in higher education and thus provide more room for creativity and diversity on that level. When the result of the institutional audit is negative or when institutions do not apply for an institutional audit, a comprehensive programme assessment is necessary. The comprehensive programme assessment strongly resembles the current approach to accreditation in the Netherlands and Flanders.

In Flanders VLIR and VLHORA have put forward the suggestion that the institutional audit should be mandatory and should be accompanied by the limited programme assessment. This means that there will be no room for the comprehensive programme assessment in Flanders.

In Figure 1 an overview of the proposed Dutch system is given.

3. Institutional audit

The aim of the institutional audit is to determine whether or not the executive board of an institution, based on its vision regarding the quality of the education it provides, has in place an effective system of quality assurance that can guarantee the quality of the programmes.

The framework for the institutional audit comprises of five related questions:

1. What is the vision of the institution regarding the quality of the education it provides?
2. How does the institution intend to realise this vision?
3. How does the institution measure the degree to which this vision is realised?
4. How is the institution working towards effecting improvements?
5. Who is responsible for what?

These five questions have been translated into five standards. In Figure 2 these standards are related to one another.

By focusing on the vision and policy of the institution itself and not adding a list of demands to the standards, the new system takes into account the growing institutional diversity in the higher education sector in both countries. Institutions will be judged on the way they realise their own ambitions (see standard 3 Results). The system stimulates diversity by inviting institutions to be explicit about their own ambitions and profile.

The audit committees that conduct the institutional audit are selected and appointed by the NVAO. The institution draws up a self evaluation report (called a critical reflection because it should also describe the strengths and weaknesses of the internal quality assurance system). In essence, this critical reflection answers the question of how the board of a HEI is 'in control' of the quality of the programmes offered.

For verification purposes a site visit is carried out consisting of two parts. During a first visit the audit committee gains insight into the day-to-day running of the institution and the working of the internal quality assurance system on the institutional level. The audit committee will normally have interviews with members of the board, administrators, lecturers, students and other stakeholders. Of course the content of the critical reflection is an important subject during these discussions.

At the end of the first visit the chair of the audit committee delivers brief feedback to the institution. This feedback contains the committee's initial impressions of the quality assurance at the institution. Furthermore, it indicates the 'audit trails' that will be conducted during a second visit a few weeks later. The trailing technique is inspired by the German and English approaches to the institutional audit. Audit trails are used to gather evidence of the effectiveness of certain institutional approaches, policies

or procedures in practice. Usually a particular policy's trail is followed from the institutional level to the program level and back (vertical trail) or a certain subject is examined horizontally in a number of programmes, departments or faculties. The subjects of the audit trails and where they will be conducted are chosen by the audit committee, but institutions may give suggestions for specific additional subjects and places.

After the second visit, the secretary of the audit committee draws up an advisory report on the basis of which the NVAO takes a decision. A 'positive' decision remains valid for six years. The accreditation of (all) programmes may then take place via the framework for the limited programme assessment. A 'negative' decision leads to the withholding of approval for a period of a minimum of three years. Programme assessments take place via the framework for comprehensive programme assessment.

4.   Programme assessment

The assessment of programmes is thus conducted on the basis of a limited or a more comprehensive framework, depending on whether the institution has successfully passed the institutional audit. The framework of the comprehensive programme assessment consists of 16 standards and focuses on 6 questions:

1.   What are the intended learning outcomes of the programme?
2.   How does the design of the curriculum contribute to those learning outcomes?
3.   What are the qualities of the staff, given the intended learning outcomes and programme?
4.   What is the quality of the teaching facilities (library, labs, student counselling etc.)?
5.   How is the quality of the programme guaranteed?
6.   Are the learning outcomes achieved?

The framework of the limited programme assessment focuses on 3 standards that can be translated into 3 questions:

1.   What are the intended learning outcomes of the programme?
2.   How does the design of the curriculum contribute to those learning outcomes?
3.   Are the learning outcomes being achieved?

In table 1 the two programme assessment frameworks are related to each other.

Especially the framework of the limited programme assessment is focused on the core of the teaching and learning, leaving the assessment of more circumstantial quality aspects like teaching facilities and human resource management to the institutional audit. This way lecturers, students and peers are stimulated to focus on the content of the programmes. Like in the framework of the institutional audit the standards are formulated in a open way so that departments can emphasize the specific profile of their programmes in a creative way and will be assessed on the basis of their own ambitions and objectives. This is a significant departure from the present accreditation framework that comprises more than 20 (sub)standards and is therefore more prescriptive by nature. The new rules for programme assessment make it almost impossible for departments to produce a self evaluation according to a preset format. Programmes will in this way be forced to reflect on their own ambitions and results. This new approach will stimulate creativity and highlight diversity between programmes.

The programme writes a self evaluation following the standards of the framework. This report is expected to be self critical and address strengths and weaknesses of the programme and the improvement measures that have been taken as a result of the previous assessment.

The actual assessment is conducted by an expert panel of peers, who carry out an on-site visit. In the Netherlands, the initial selection of these experts is done by the institutions themselves. The panel is submitted to NVAO for approval and NVAO appoints the panel. All the members of the Panel are required by NVAO to sign a code of conduct. The panel is assisted by an independent secretary who has to be trained and certified by NVAO. In Flanders, the Council of Flemish University Colleges (VLHORA) and the Flemish Interuniversity Council (VLIR) together compose the panels. The independence of these panels is guaranteed by the Flemish ministerial Council of Recognition.

After the on sit-visit the secretary of the panel draws up an assessment report. In this report the panel gives a substantiated decision regarding the standards and the overall quality of the programme, both on a four-point scale. Based on this report, the institution applies for accreditation by NVAO. NVAO can take one of two possible decisions: accredited (for a period of six years) or not accredited.

5.   Pilots

The final draft of the frameworks – agreed upon by all stakeholders in June 2008 – was used to conduct 9 pilots with the institutional audit and 11 pilots with the limited programme assessment, using programmes from the 9 HEIs participating in the pilot with the institutional audit. Participating in the pilot were 6 HEIs from the Netherlands (2 universities and 4 professional universities) en 3 HEIs from Flanders (1 university and 2 university colleges). The audits were conducted in the fall of 2008 and the limited programme assessments were carried out early in 2009.

The pilots were evaluated by NVAO and by the Dutch inspectorate for higher education. Three of the most important results of the pilots were that:

1.   the institutional audit was considered demanding and challenging but a very useful and important instrument for the further development of a quality culture in HEIs;
2.   the new focus of the framework for the limited programme assessment (more centred on the content of the programme and learning outcomes, less on procedures) was appraised by lecturers and members of the expert panels;
3.   although in some pilots a reduction of bureaucratic burdens was realised, no firm conclusions could be drawn about this subject from the pilots.

These and other results were discussed with a large number of participants in three seminars held in spring 2009. The results of these discussions again led to a significant revision of the frameworks that were put up for discussion with VLIR, VLHORA, VVS, VSNU, HBO-raad, PAEPON, LSVb, and ISO. Because the reduction of red tape was one of the major reasons for reviewing the system, a lot of time was spent in these final stages on discussing how the system could be made less time consuming. Measures that have been taken as a result are (among other): a mandatory training and certification by the NVAO of secretaries and chairmen of committees so that they can be trained in what it means to conduct a light touch programme assessment, and the inclusion in the framework of a list of documents to be provided with the self evaluation report to reduce the paperwork for programme and expert panels. Although the pilots have demonstrated that the new instruments are effective and perceived to be more relevant to staff, students and administrators, the question remains whether the actual implementation of the system can produce the much desired reduction in red tape. It is however clear that a reduction of this administrative burden can only be realized in close cooperation between HEIs and NVAO.

This final round of consultation subsequently produced frameworks that were discussed during a formal meeting of the Dutch and Flemish ministers of education. Having thus gained the approval of both governments, the new law is now tabled for discussion in the Dutch Parliament in December 2009.

In Table 2 all the steps involving the stakeholders are listed in a timeframe.

6.   Conclusion

As was argued above the new accreditation system stimulates diversity by inviting institutions and programmes to be more explicit about their own ambitions and profile. The limited number of standards supports creativity, allowing the higher education sector even more freedom in the development and teaching of their programmes. The question remains whether it is more appropriate to operate the institutional audit and the limited programme assessment as two separate (Flanders) or interrelated processes (the Netherlands). The pilots have indicated that both produce good results on their own account and therefore they could be used independently. On the other hand it can be argued

that 'earned high trust' in the form of a positive outcome of the institutional audit is a prerequisite for the introduction of the limited programme assessment.

Involving an arguably large and critical group of stakeholders at every step of the way has been challenging, but fruitful and rewarding. The new accreditation system has improved from the charcoal sketches that were made in 2007 and the initial frameworks that were used during the pilot phase. It is more in tune with the actual day-to-day practice in institutions and programmes. Although some remain concerned whether the reduction of the administrative burden will in fact be realized, stakeholders appreciate the way in which they have been involved in the design of the new system. In the end this continuous consultation has provided a sector wide commitment. We would argue that without such a commitment from the sector itself a real quality culture is hard to achieve. Instead, it will produce a system that is more rigid and geared to compliance rather than to diversity and quality enhancement.

In Table 3 the challenges and success factors as identified in the various sections of this paper are summarized.

Points for discussion
1. Accountability needs accreditation frameworks with a large number of set standards. Quality enhancement needs open frameworks. Accountability and quality enhancement sit uncomfortably together in one system.
2. The involvement of stakeholders in setting up the accreditation frameworks has the tendency to produce tight and demanding frameworks since everyone wants to have his or her own points implemented. One should be aware of this when frameworks are to be produced that give the institutions the opportunity to exploit their diversity and creativity.
3. The comparability of accreditation systems within Europe is an important element to be considered when developing a new system. How important or prescribing should the European Standards and Guidelines be when developing a new system?
4. Will the combination of an institutional audit and accreditation based on open standards really deliver programme assessments that focus on quality enhancement and stimulate creativity and diversity?
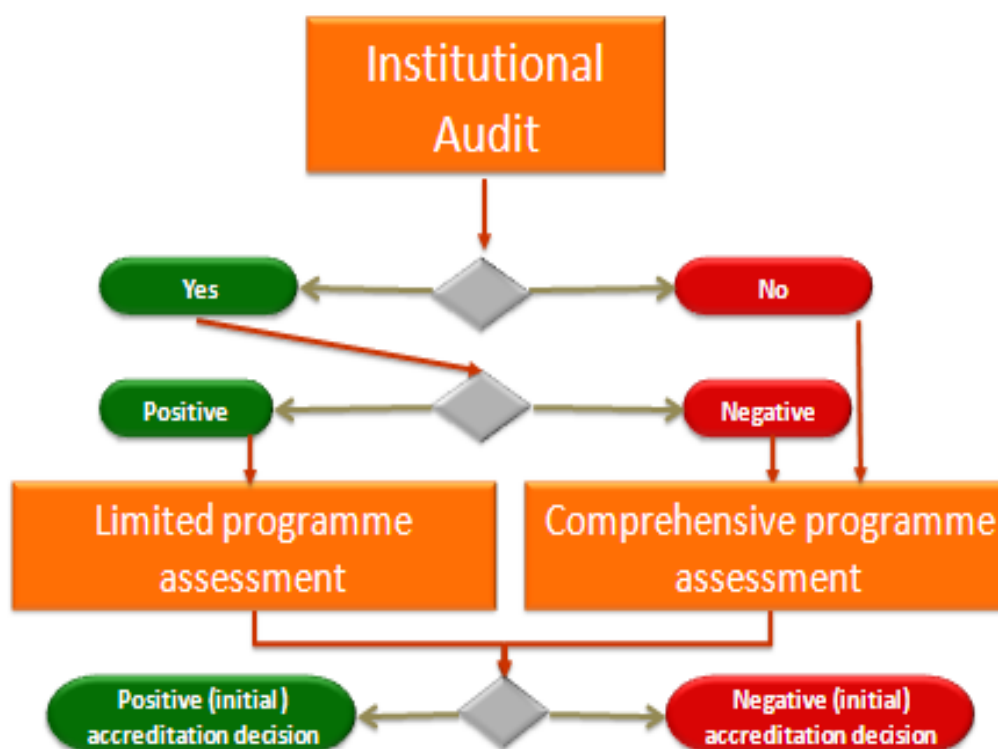
Figures and tables

Figure 1: Structure of the new accreditation system (the Netherlands)

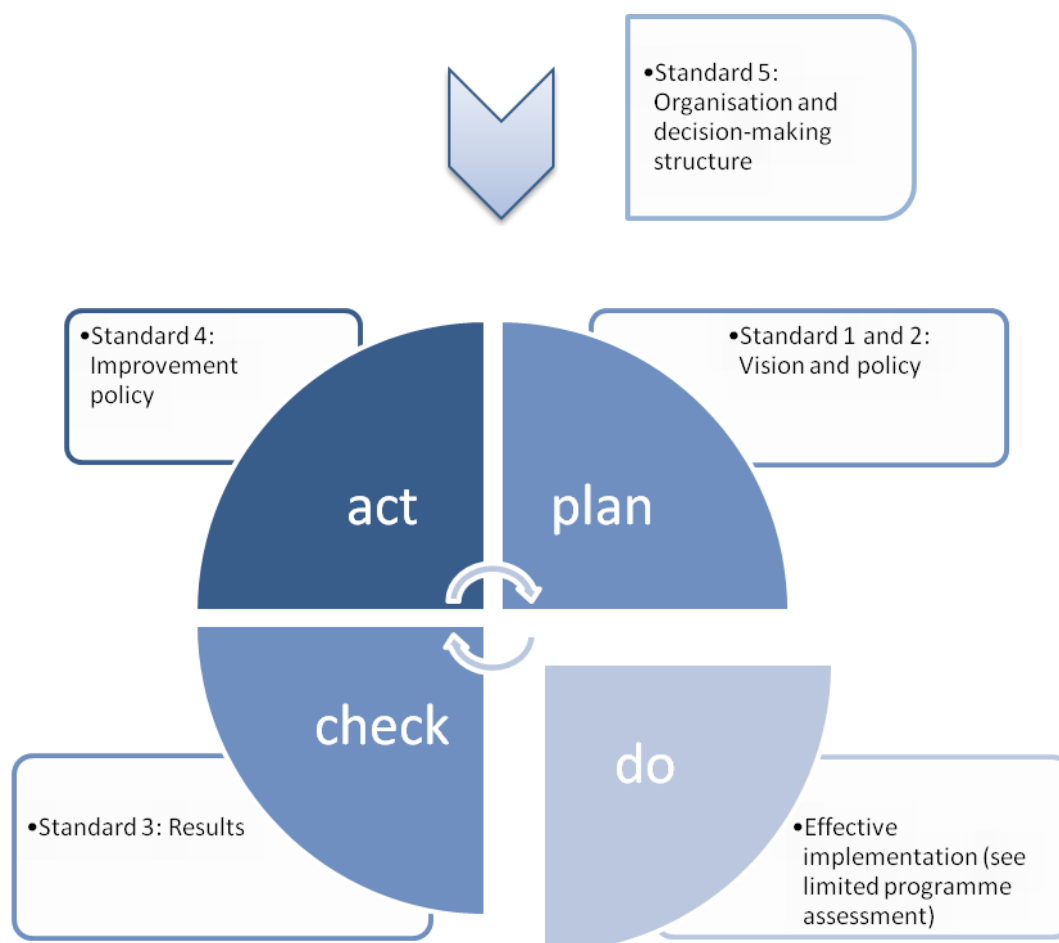*Figure 2: Institutional audit: Standards in relation to the Deming circle.*

Table 1: Limited vs. comprehensive programme assessment

Limited programme assessment	Comprehensive programme assessment
1. Intended learning outcomes	1. Intended learning outcomes
2. Teaching and learning environment	2. Curriculum
	possibility of achieving the intended learning outcomes
	study stimulating structure
	didactic concept and teaching methods
	qualifications of the incoming students
	studiability
	legal requirements regarding the scope and duration
	3. Staff
	effective staff policy
	expertise
	size
	4. Services
	buildings and the material facilities
	student guidance and counselling and information provision to students
(Institutional audit)	5. Quality assurance
	periodical evaluations
	measures for improvement
	stakeholders
3. Learning assessment and realised learning	6. Learning assessment and realised learning outcomes
General conclusion	General conclusion

Table 2: Timeframe

Time	Involvement of stakeholders	Result
Summer 2007	Request for revision of the accreditation system by the Dutch minister for education.	
September 2008	Installation of a steering group with representatives of the student unions (ISO, LSVb), the VSNU, the HBO-raad (associations for universities and professional universities) and the association for privately funded higher education in the Netherlands (PAEPON).	• General consensus about the broad contours of the new system. • NVAO is charged with developing a new accreditation framework applicable to The Netherlands and Flanders.
Fall 2008	Thorough study by NVAO of the development of accreditations processes on the institutional and programme level in Finland, Singapore, the United States of America, England, Scotland, Germany, Switzerland, Norway and Sweden.	Identification of the strong and weak points of the foreign systems.
January 2008	Consultation of representatives from OAQ (Switzerland), ÖAR (Austria), QAA (UK), NOKUT (Norway) and the Akkreditierungsrat (Germany) to discuss the Dutch and Flemish plans to reform the accreditation system.	Consensus: by and large all quality assurance systems in Europe are moving towards a mix of institutional review and programme assessment.
Spring 2008	Consultation of Flemish representatives: the Flemish University Council (VLIR), the Flemish University Colleges (VLHORA) and the Flemish student union (VVS) and consultation of Dutch representatives VSNU, HBO-raad, PAEPON, LSVb, ISO and quality assurance agencies: QANU, NQA, Certiked and Hobéon.	Actual drafting of the accreditation frameworks.
	Second round of consultation with all Dutch and Flemish stakeholders.	Input for seminars.
	Several large seminars with students, auditors, peers, university administrators,	Input for the frameworks of the

Time	Involvement of stakeholders	Result
	quality assurance staff, and teachers.	pilots.
June 2008	Consultations of the Steering group.	Framework for the pilots is agreed with both governments and the stakeholders involved.
Fall 2008	9 pilots with the institutional audit	Evaluation of the pilots by NVAO and the Dutch inspectorate for higher education
January / February 2009	11 pilots with the limited programme assessment	Evaluation of the pilots by NVAO and the Dutch inspectorate for higher education
Early March 2009	Discussion of the pilots and the evaluation with a large number of participants in the audits and programme assessments.	Significant revision of the frameworks.
	Discussion of the prescribed documentation for the institutional audits and the programme assessments with a number of participants in the audits and programme assessments.	Consensus about the prescribed documents in order to reduce the administrative burden.
End of March 2009	Discussion with VLIR, VLHORA, VVS, VSNU, HBO-raad, PAEPON, LSVb, ISO.	Revised frameworks.
April 2009	Discussion in a formal meeting of the Dutch and Flemish ministers of education.	Frameworks are put into the new Dutch law.
Winter 2009	New law is tabled for discussion in the Dutch Parliament.	?

Table 3: Challenges and success factors

Challenges
1. Two countries with different cultures together in one system.
2. Research universities, university colleges, professional universities and privately funded HEIs together in one system.
3. Convincing Politicians that the system should not be too rigid.
4. A reduction in red tape.
Success factors
1. A system that offers institutions and programmes ample opportunities for creativity and stimulates diversity.
2. Fine-tuned frameworks.
3. Sector-wide commitment to the system.
4. A system that is geared to quality enhancement.