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(eds.)

A Method for Mutual Recognition

Experiences with a method
for mutual recognition of quality
assurance agencies

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Foreword

The five Nordic countries have cooperated systematically in the field of higher education quality assurance for about ten years now. In practical terms this has meant that the representatives of the respective national quality assurance agencies have convened once a year to annual meetings where new projects have been initiated, evaluated and completed. The cooperation has been constructive and good-spirited throughout the existence of this unofficial network of the Nordic countries. This report is the latest result of this joint effort and one that, according to the Steering Group of ENQA, may well be of interest to our European colleagues, as well. This is why the Steering Group decided that this particular report should be published in the ENQA publication series.

Mutual recognition is a well-known method in quality assurance of education, not least because of the so-called "Washington Accord", an agreement among accreditation agencies in the field of engineering. The signatories of this agreement are committed to the recognition of each others' accreditation systems as well as engineering programmes.

The concept of the Nordic project on mutual recognition of evaluation agencies is entirely different from the one in engineering, however. For instance, there are a number of authority functions vested in the same evaluation agency, such as an authority of the approval of programmes or institution, a follow-up on evaluations, a setting of standards and an approval of foreign degrees. On the other hand, some agencies simply hold the responsibility for evaluation and their other functions are vested with other parties.

Thus, a mutual recognition of agencies that are responsible for evaluation will not automatically include other aspects, such as recognition of degrees. What this method can provide is international transparency and legitimacy for the agencies involved.

I would like to thank the working group consisting of the five Nordic agencies for the preparation of this report and hope that it will be of interest and value to our European colleagues.

Christian Thune
Chairman
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Contents

1 Introduction

1.1 Presentation of the Nordic Network

For about ten years, representatives from the national higher education evaluation agencies in the Nordic countries have convened for annual network meetings in order to share experiences and discuss current issues. One result of this co-operation has been the publication of joint reports.

1.2 Background for the project

In May 2001, the following agencies met in Reykjavik:

• Icelandic Ministry of Education
• Danish Evaluation Institute
• Finnish Higher Education Evaluation Council
• National Agency for Higher Education, Sweden
• Network Norway Council

One of the points of the joint discussion was internationalisation of higher education and quality assurance, the Bologna process in general and accreditation in particular, the outset of which was in the joint Nordic project "Quality Assurance in Nordic Higher Education – accreditation-like practices" (ENQA Occasional papers 2, ISBN 951-98680-2-X). There is no doubt that education is being internationalised in a sense that students and teachers demand higher education not only from institutions in their home countries but from institutions all over the world, and that the mobility of labour force is increasing. The Bologna Declaration makes it clear that quality assurance agencies play a central role in assuring the quality of education in an international context by committing the signatories to work for the "promotion of European co-operation in quality assurance with a view to developing comparable criteria and methodologies".

Accreditation as a method of making quality transparent has been vividly discussed among the European countries. The CRE project "Towards accreditation schemes in Europe?", conducted in 2001, suggested a number of mechanisms to create an international dimension in quality assurance including meta-accreditation of evaluation agencies. The project will not be discussed here. However, these developments and considerations led to a decision among the Nordic countries to continue working with internationalisation of quality assurance and to actively engage in the Bologna process. More specifically, mutual recognition of evaluation agencies was perceived as an interesting mechanism for internationalisation of quality assurance that carries a potential for cooperation and increased comparability with regard to criteria and methodologies.

Mutual recognition is not an unknown concept in quality assurance of education. Probably the best-known scheme of mutual recognition is the so-called "Washington Accord" which is an agreement among accreditation agencies in the field of engineering. The signatories of the agreement are committed to the recognition of each others' accreditation systems as well as engineering programmes. The consequence of the recognition process is that the graduates of the programmes accredited by the member organisations of each member nation are qualified to practice engineering at entry level in all the signatories' areas.

It is important to note at this point that there are important differences between the already established mutual recognition schemes and the mutual recognition of evaluation agencies carried out in this project. One important difference is a number of authority functions vested in the same agency. Some agencies integrate several functions, such as the authority of the approval of programmes/institution, the follow-up on evaluations, setting of standards and approval of foreign degrees. Other agencies solely hold the responsibility for evaluation and their

other functions are vested with other parties.

Thus mutual recognition of agencies with responsibility for evaluation will not automatically include other aspects, such as recognition of degrees. What it can provide is international transparency and legitimacy for the agencies involved.

Another important difference between the already established mutual recognition schemes and the Nordic agencies involved in this study is that the established schemes often comprise agencies with relatively specific tasks, such as engineering accreditation or laboratory accreditation. In all the Nordic countries, and in most of Europe, the quality assurance agencies are responsible for the whole sector of higher education.

1.3 Project objectives

The main objective of the project has been to test a method for mutual recognition of evaluation procedures in two Nordic countries. The most important aim of the project has thus been an introduction of additional discussion about mutual recognition on an international scale in addition to the Nordic perspective for a practical learning experience, which has allowed the participants to test possibilities and shortcomings in the recognition method.

A further objective of the project has been a consideration of the possibilities of implementing a system of mutual recognition. The key issue is what this kind of system would imply in terms of recognition of other related educational issues, e.g. recognition of degrees and diplomas and labour market recognition of graduates.

As a consequence of the weight being on the testing of the method, the project did not aim at making a decision as to whether the two participating agencies – The Finnish Higher Education Evaluation Council (FINHEEC) and the Danish Evaluation Institute (EVA) would recognise each other. The key question has been whether the tested method would form an adequate basis to make that type of decision in the future.

The focus of the recognition process has been in the methodological soundness of the evaluation procedures of the participating agencies. This soundness is due to the fact that the purpose of the recognition process is to determine whether or not an evaluation in country A is as good as in country B. In other words, the recognition process aims at testing the validity of the evaluation procedures and processes in the respective countries and determining whether they are compatible.

1.4 Terminology[1]

Recognition: affirmation that a methodology of an evaluation agency is sound and that the procedures are effective.

Mutual recognition: affirmation by two or more agencies that the methodologies of the agencies are sound and that the procedures are functioning accordingly.

Evaluation, assessment and review: a process, which examines the quality of the evaluation object, e.g. a programme or an institution

Audit: an evaluation of the strengths and weaknesses of the quality mechanisms established by an institution itself to continuously monitor and improve the activities and services of either a subject, a programme, the whole institution or a theme.

Accreditation: formal acceptance that a certain standard is met in a higher education course, programme or institution. Accreditation is verdicts based on an evaluative procedure.

Peer: a collegial expert member of college or group.

Protocol and guidelines: prescriptive frameworks for conducting a specific task. The protocol is the more formal of the two as it has to be followed in most respects, whereas guidelines can rather be perceived as structured advice.

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[1] The definitions are taken from "ENQA: Survey on European national evaluation procedures", 2002 (forthcoming) and from the International Network for Quality Assurance Agencies in Higher Education (INQAAHE) working group on mutual recognition.

1.5 The method

The project has been carried out by a working group comprised of members from all the participating evaluation agencies. The Danish Evaluation Institute has chaired the project.

The first step of the project was to prepare a protocol according to which FINHEEC and EVA would prepare a self-study. The self-study protocol was inspired by other recognition agreements, such as the Washington Accord, and it was based on the ENQA provisions for membership (see Annex A) in the relevant areas, such as Ownership and purpose, and Evaluation method. The protocol is built around four themes: Background, Ownership and purpose, Evaluation method and Quality assurance of agency procedures. The chapter on Evaluation method was divided into three subthemes: general planning, documentation and reporting. Due to the experimental character of the project a further theme was added, that of core issues of mutual recognition allowing the recognising agencies to add and comment on any issues found to be missing and to be of essential relevance to the recognition process. As the main purpose of the self-study is to present and "prove" the consistency and adequacy of the evaluation procedures, the self-studies are primarily descriptive in their nature rather than analytical and development-oriented.

An expert panel was set up consisting of the working group. The Finnish and Danish representatives did not participate in the panels visiting their respective agencies) but the representatives from Norway and Sweden acted as chairs of the panels in Finland and Denmark. Furthermore, Norway and Sweden made a secretary available for each panel. The independence and thus the adequacy of the expert panel with the described composition was discussed intensively. The reason behind the decision that the members of the working group formed the expert panel was because of the experimental nature of the project. From that perspective it was considered to be important that the members of the working group were directly involved in the process to discuss and conclude on the experiences afterward.

The group felt, however, that it was important also to have an external view on the process. It was therefore decided that two external experts in the field of evaluation, quality assurance and educational policy would be asked to comment on the project and to add their comments to the final report. The two external contributions have been prepared by Professor David Dill, University of North Carolina, Chapel Hill and Consultant Sami Kanaan, Evaluanda, Geneva (Switzerland). Their contributions are attached to the report as annexes.

On the basis of the self-study reports the expert panel conducted a 1 1/2 day visit to FINHEEC and EVA, respectively. The programme for the visit was decided by the working group but planned in detail by the agency being visited and approved by the chair of the expert panel[2]. The panel met with the agency management including the board/council and staff, rectors and staff from the evaluated institutions and in Finland student representatives and representatives of the relevant rectors' conferences.

After the visit the expert panel prepared a short feedback report to the two agencies listing the main strengths and weaknesses identified through the self-study and the visit. The feedback reports do not address the question of recognition as explained above, and they do not address the issues that would be expected from a regular recognition process.

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[2] The programmes are attached as Annex E.

2 The experiences with the method

2.1 The findings of the two panels in relation to the appropriateness of the method

On a general level the project has demonstrated that the applied method provided to a large extent sufficient information and understanding about the evaluation procedures of the participating agencies for a judgment of methodological soundness. Furthermore, the project made it possible to gain experience with a method for mutual recognition instead of creating a final model for mutual recognition. Thus it is not unexpected that the project revealed a need for modification of the concept with regard to several aspects. The experience with the method and the suggestions for modifications are presented in the following.

2.1.1 Criteria for mutual recognition

The themes and questions comprised by the protocol as well as the revised ENQA provisions have functioned as criteria in the pilot project.[3] The ENQA provisions have been included as they are considered to cover key areas of concern for evaluation agencies, such as independence and essential methodological demands. At the same time the ENQA membership provisions are a European reference point that all member agencies must comply. In this report criteria instead of provisions are used since provisions carry a connotation of formal precondition that is not found to be suitable in this pilot project.

The project has proved that the use of the predefined criteria is important in order to judge the soundness of the methods and processes used by the two agencies. To analyse and answer this question it is necessary to agree what constitutes methodological soundness and appropriate methods. These issues are addressed by the criteria as they express standards for good practice.

It is the belief of the working group that a solid process of mutual recognition should build on explicit minimum criteria that the agencies being recognised should positively fulfil to achieve recognition.

When making judgement on the basis of criteria it is important to keep in mind how they are formulated. In order to assure that the criteria respect specific national traditions, concerns and priorities and that they do not hinder diversity, the criteria must be formulated broadly enough to allow such variations. They should at the same time be precise enough to allow an assessment of the extent to which they are fulfilled by the agencies. Last but not least they should be internally coherent.

The ENQA provisions have in general been a relevant point of departure with regard to the areas that they cover. The ENQA provisions, however, have been prepared to function as provisions for membership and not for recognition. A consequence of this is on the one hand that a number of the provisions are not relevant in the context of mutual recognition, and on the other hand that some of the formulations have to be revised in order to fit the purpose of mutual recognition. A set of revised criteria/provisions is included in annex A. Furthermore the theme "Quality Assurance of Agency Procedures" was added to the self-study protocol as the internal quality assurance mechanisms of the agencies are considered to be of central importance when judging methodological soundness and effectiveness of procedures.

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[3] It should be noted that the revised ENQA provisions held a tentative status at the time of this project, because they were not formally approved until the ENQA General Assembly in May 2002.

2.1.2 Experts involved in the project

In this pilot project the members of the working group constituted the expert panels in order to gain experiences and draw conclusions on the basis of these experiences. This is obviously not the ideal situation for the future. The expert panel has to reflect the purpose of the mutual recognition exercise. To some extent the composition of the expert panel is dependent on the context or possibly the scheme that mutual recognition is a part of. This issue is not determined at this stage of the project. However, it is still possible to give some recommendations on a relevant composition of an expert panel.

As a minimum requirement, experts from other agencies than those involved in the evaluation should be on the expert panel. If the purpose of the exercise is bilateral mutual recognition it is important that the staff also comes from the recognising agency. One of the members should be a representative of higher education institutions being evaluated by the agency. Such a representative has both a solid knowledge of the methods being used by the agency and an experience with the evaluation process. Furthermore, the institutional representative can provide the expert panel with an understanding of the national higher education system and the educational system in general which is normally an advantage in a panel. The last type of expert that should be included, is an expert with knowledge of evaluation both from a practical and theoretical perspective. An expert panel with this composition is believed to be qualified to make the necessary judgement about the methodological soundness and appropriateness of procedures.

2.1.3 Self-study

As mentioned in point 2.1.1 the self-study protocol and thus the self-study reports are considered to be adequate in terms of content in order to make the necessary judgement on a sound basis. There are two themes which are relevant to add, however, directly derived from this project. If mutual recognition schemes at bilateral, regional, European or even global level become a reality, the agency be-

ing recognised should present in the self-study the recognition agreements it has signed with other agencies and present an account of the consequences of these agreements. An additional aspect is agreements with subcontractors to carry out parts of an evaluation process.

The self-study protocol specified that the self-study reports prepared in the project should be descriptive and focus on documentation in order to fulfil the objectives of documenting methodological soundness. The descriptive character of the self-study reports was adequate to form a basis for the judgement of methodological soundness. However, the working group believes that future self-study reports should be evaluative in the sense that they should comprise an explicit account of how the agency complies with the specified criteria. It should be taken into consideration, however, that recognition is given for a longer period, typically from three to five years. Recognition is given on the basis of the situation in the year that the recognition process takes place. For a future recognition process, a question about "planned future changes" in the methodology should be added to see if the recognised methodology and procedures are due to be changed considerably. If the latter is the case it may be necessary, e.g. to recognise the agency for a shorter period of time.

FINHEEC and EVA had chosen two different approaches to the presentation of the self-study report. The FINHEEC report was a rather short one and referred to separate annexes. The Danish report was more elaborate but also referred to an even larger number of additional annexes containing documentation to support the written material.

Strengths and weaknesses of both approaches can be identified. The common experience, however, is that the self-study should be a self-contained document providing the experts with the necessary information about the themes to be covered. In other words, the self-study should not be dependent on additional material from other sources. At the same time it is a central element in the process that the agencies under recognition are capable of providing documentation to support the self-study report. Therefore the documentation that the agency con-

siders to be necessary to show the validity of the self-study should be available to the expert panel by the time of the site visit. If the expert panel has further wishes for documentation, they should be made available at the visit or sent to the panel afterwards.

2.1.4 Documentation

As mentioned above, the documentation should primarily be used to validate the self-study. In this respect it is the opinion of the working group that a core of key documentation should be identified, which is necessary for the expert panel in order to have access to a sufficient background information so as to make the final judgement about recognition. This documentation can be: legal documents, strategy papers, self-study manuals, examples of reports and results of the quality assurance mechanisms proving that they are being applied on a regular basis and CVs of the staff members who are involved in the evaluation of higher education.

Furthermore it is of utmost importance that the agencies have written information available presenting their methodology and the considerations, which are behind the methodological choices made. With regard to the specific, fact-oriented pieces of information, such as degree and institutional structures and procedures for recognising new programmes, the working group suggests that this should not be included in the self-study but should be established as a permanent body of knowledge in English that every professional evaluation agency should be obliged to develop and keep updated.

2.1.5 Site-visit

The length of the site-visit depends on the complexity of the agency under recognition. The number of activities that an evaluation agency is responsible for will add to the complexity of a visit. In the case of the pilot project a visit of 1 1/2 day's duration was found to be sufficient. A precondition for the site-visit to take place effectively within a 1 1/2 day's time span is that it is carried out according to

the guidelines, that the programme is known to all the participants and that the panel is well-prepared.

There was general agreement in the working group as to whom the panels should meet during the visits (see introduction for details). The final programme for each visit and for the groups that the panels met was decided by the visited agency and the chairman of the panel as not all the groups were relevant to be included to both visits. The decision of whom the panel should meet is dependent on the higher education system and the way the evaluations are conducted as well as the organisational structures of the agency. In the future there should be a time slot in order to allow the expert to study the documentation according to point 2.1.4.

A key question in relation to the visit is the selection of the representatives of the institutions and the stakeholders, such as rectors' conferences and student organisations. It is the experience from the project that staff (e.g. teachers) involved in evaluation and management have different conceptions of the evaluation.

2.1.6 The report

As mentioned in the introduction it had been decided not to produce a report dealing with the question of recognition because of the pilot nature of the project and thus the wish to focus on the methodological experiences. Instead, a short feedback to FINHEEC and EVA respectively has been produced stating strengths and addressing shortcomings.

However, in terms of a formal recognition process the final report from the expert panel is the most important element in the process. First and foremost the report should address all the criteria that the agencies under recognition have been asked to document and comment on. The judgment of the agency's fulfilment of the criteria will form the basis for the decision whether or not the agency can be recognised. The report should clearly identify which criteria are considered not to be satisfacto-

rily met if the process ends with "non-recognition". This feedback is essential to enable the agency to remedy the situation and reapply for recognition at a later stage.

The pilot project has shown that the expert panel gets a very thorough knowledge and understanding of the agencies participating in the recognition process, not only from the agencies themselves but also from the interviews with a large range of stakeholders. After the process the expert panel is in possession of valuable information and possibly ideas as to how the application of the methods and planning and implementation of procedures can be improved. It would be a waste of resources not to make this information available to the agencies under recognition.

2.1.7 Learning: a welcomed side-effect

It should be mentioned that even though the involved agencies have been actively engaged in the Nordic Network for ten years, the process has provided a remarkably detailed insight into the practices of the agencies. An insight with specific information is difficult to achieve through seminars and presentations and this must be seen as a major benefit arising from the project. In this way it may serve as a development tool for the agencies involved.

3 Prospects for a formal mutual recognition

The driving force behind this project was the Nordic countries' wish to venture further into the issue of internationalisation of quality assurance and, more specifically, the issue of mutual recognition of evaluation agencies as an interesting mechanism for internationalisation of quality assurance. The working group believes that mutual recognition may eventually provide higher education with an evaluation system that comprises both a national and an international dimension. Such an evaluation system might accommodate national differences while having international legitimacy. The national element could consist of the agencies with their place in a specific national system for higher education. The international dimension could consist of an international agreement on common features to be included in the recognition process. Furthermore, mutual recognition could serve as external quality assurance and thereby provide accountability for the evaluation agencies and strengthen their development.

In a broader perspective, this pilot project may also contribute to the debate on the recognition of degrees. Mutual recognition of evaluation systems could be the only, the primary or a supportive element in that regard if the relevant authorities decided to establish a framework for mutual recognition of degrees. Furthermore, mutual recognition could potentially facilitate operational co-operation among the recognised agencies. Co-operation could include joint evaluation projects or division of labour, for instance, with regard to very small subjects.

The pilot project has shown that it is possible to carry through a process that can give the participants the necessary information and documentation to judge methodological soundness of evaluations and evaluation procedures and make a decision about recognition of procedures. This is an important first step in deciding which road to take in the future in terms of deciding how the actual recognition process should take place.

3.1 Scenarios for mutual recognition

In the following chapter four scenarios for mutual recognition are presented. Two of these are bilateral in a sense that the full competence to recognise is vested with agencies. The other two are multilateral as the decision on recognition is taken by a multilateral body and is binding for all members.

The first scenario is purely bilateral – every aspect of the mutual recognition process is decided by the two agencies involved. In the second scenario the mutual recognition is still bilaterally based but it is conducted within a methodological framework that has been decided multilaterally. The third scenario is based on a multilateral methodological framework and the final decision on mutual recognition is taken on a multilateral level and binding for all involved agencies. However, the review process is bilateral since it is under the responsibility of the agencies involved. The fourth option is fully multilateral including a multilateral body as responsible for the process. The four scenarios can be illustrated in figure 1 one below.

	Multilateral dimension		
	Multilateral methodological framework	Multilateral decision-making on mutual recognition	Multilateral responsibility for the review process
Scenario 1*			
Scenario 2	▓		
Scenario 3	▓	▓	
Scenario 4	▓	▓	▓

Figure 1: The multilateral dimensions of the four scenarios
* Scenario 1 is entirely bilateral and has no multilateral dimension.

The four scenarios are obviously not the only ways to conduct mutual recognition. It is nevertheless the hope of the working group that the scenarios illustrate different ways to proceed in the field of mutual recognition. In the section below the scenarios are described in more detail and the pros and con are briefly discussed.

3.1.1 Scenario one: Bilateral mutual recognition

One form of mutual recognition could be recognition on a bilateral basis involving two agencies evaluating each other in order to decide whether their methods and procedures are comparable and thus compatible for recognition. The criteria for recognition will be identified and decided by the two agencies alone. Accordingly, this type of recognition will only involve and have effect on the respective two agencies.

This type of approach assures that neither the procedure used for recognition nor the results are in accordance with recognition done by other organisations. Furthermore it will be a very costly and time-consuming exercise, as all evaluation organisations would have to mutually recognise each other on a bilateral basis.

On the positive side the approach constitutes a thorough basis for detailed knowledge and understanding between the two recognised agencies as they are working closely together in the evaluation process. This allows for an emphasis on mutual learning and could possibly facilitate enlargement of the co-operation between the two agencies e.g. to include recognition of degrees. It is also an easy solution in terms of administration as all practical details are decided by and co-ordinated directly between the two agencies. It should also be mentioned that since no multilateral agreement is necessary, there are no obstacles to proceed for interested agencies.

3.1.2 Scenario two: Bilateral mutual recognition within a multilateral methodological framework

Another possible solution is for a number of countries to agree on a scheme of mutual recognition in terms of procedures and criteria for recognition. The agencies would have committed themselves to use the decided scheme for mutual recognition when conducting mutual recognition of each other. However, the recognition decision would be taken on a bilateral basis and the recognition process would still be carried out on a bilateral basis involving staff from the involved agencies.

This approach suffers from some of the same shortcomings as the approach presented above in terms of costs because all agencies would have to recognise one another. An important difference, however, is that the recognition has its starting point in an agreement shared by a large number of coun-

tries. Thus the major benefit of this scheme is on the one hand that agencies do not give up autonomy and on the other that the multilateral scheme facilitates the development of a multilateral mutual recognition.

The model carries the same advantages as that of the bilateral recognition. The bilateral process and the decision-making process might provide for a common understanding of the methods and procedures and the expected thoroughness. It should be mentioned again that this could be expected to facilitate an enlargement of the recognition to other areas.

3.1.3 Scenario three: Multilateral decision-making on mutual recognition based on a bilateral process

One way of avoiding the problems of bilateral mutual recognition is to add multilateral decision-making to a bilateral process based on an agreed methodological framework. This way the multilateral effect is achieved without an establishment of a new body with responsibility for the process. The recognition process takes place between two agencies. However, as the recognition process is based on criteria and according to procedures agreed to be sound by a group of countries, the recognition by two will also be recognised by the rest of the countries.

The advantage of this approach is obviously that it is thorough both in terms of analysing and understanding the activities of the countries involved in the recognition process and in terms of recognition procedures and criteria as they stem from a larger scheme. At the same time it is more efficient as the recognition is not only relevant for the two involved agencies, but for the rest of the participants in the scheme. It is also efficient in terms of administration as the initiative to launch the process comes from the countries wishing recognition and is carried out by them. In other words, there is no need for a central administrative body to plan and implement the process that is the responsibility of the individual signatories. Decision on and revision of criteria and procedures as well as admittance of new members to the scheme could be done at annual meetings among the participants of the scheme.

The disadvantage is that there is no central control of the process that shapes the basis for the mutual recognition decision, which might lead to a situation where two agencies with a relatively low standard recognise each other in such a way that the standard is not transparent for the rest of the signatories.

3.1.4 Scenario four: Multilateral mutual recognition based on a multilateral responsibility for the review process

The fourth scenario is mutual recognition on a fully multilateral basis. The solution implies that a number of countries set up a scheme or agreement for recognition. The scheme is administered by a body – which could also be one of the signatories – that organises the process on application from an agency for recognition and makes sure that the recognition process is carried out in accordance with the procedures and criteria agreed by the signatories. Each agency is recognised individually and then automatically recognised by the rest of the signatories.

The advantage of the multilateral approach is that it covers a large number of countries and is thus more efficient and international in its scope than compared to a primarily bilateral approach. However, it lacks the reciprocity and therefore presumably thoroughness of understanding that a bilateral approach can offer with the risk of applying a lowest common denominator in terms of judgments leading to a high degree of recognition. Such a situation is not desirable as it can undermine the value and thrust of the whole exercise. Furthermore it demands more administrative back up to run a scheme that is based on application for recognition.

3.2 Focus of the mutual recognition

The possible form of recognition cannot be valuably discussed without taking the question "as what to recognise" into account (the object). We have identified four immediate objects for mutual rec-

ognition:

- The starting point for this project has been the methodological soundness of an evaluation institution. The focus of this recognition procedure has been to assess whether the methodology used by an agency is as sound as the methodological principles used by another agency. It is the quality of the evaluation process which is in focus.

- Another option may be to recognise the total evaluation scheme. This might include the comprehensiveness of the evaluation scheme and the question of whether an evaluation scheme based on institutional level evaluation could be recognised as equal to a scheme based on subject or programmatic evaluation. It is thus the full evaluation scheme that is in focus.

- A third option may be to recognise the total system for quality assurance. Recognition of the total system for quality assurance will also include other types of quality assurance, such as external examiners and the trustworthiness of the procedures for establishment of new programmes and institutions. This would include questions, such as whether a system based on a political approval of degrees could be recognised as equal to a system based on accreditation-like procedures.

- The fourth option is to link the recognition of degrees to the recognition of quality assurance. The central idea of this approach is that if the quality assurance is reliable and if the degrees are based on comparable objectives then the degrees can be recognised within the same procedure as quality assurance. This might include other elements, such as a comparable degree structure (e.g. Bachelor/Master), possible also comparable degree descriptors. The focus of such a scheme would have to be quality assurance in the broadest sense.

The four alternative objectives for mutual recognition mentioned above illustrate that the more extensive and concrete (and therefore useful) the object for recognition becomes, the more complex the question that has to be solved also becomes. And especially as regards recognition of degrees more

parties have to be involved. Recognition of degrees is not an issue that can be settled among quality assurance agencies. Other parties have to be involved, not the least the ENIC/NARIC networks.

The consequence of the first three options would be that an evaluation carried out by one of the participating agencies is recognised by the others as equivalent to an evaluation carried out by themselves. There are two immediate implications of this, however. Firstly, it gives the involved agencies legitimacy through transparency and external assurance of the validity of the evaluations conducted. Secondly, it implies that if agency X and agency A have recognised each other, an evaluation conducted by agency X within the mandatory area of agency A should be recognised by agency A as equal to an evaluation conducted by itself.

The differences between the first three objects are thus not the consequence but the rigorousness of the procedure. The more elements and details involved in the mutual recognition procedure, the more certainty of the results. However, since the consequences are the same, a careful consideration must be given whether it is worth the extra effort to include all elements. The fourth option provides significantly more valuable results since there is a direct benefit for graduates. If mutual recognition of quality assurance could be used as the basis for recognition of degrees, graduates would have direct assess to the same rights in any country as a graduate from an institution in that country.

3.3 Initiatives to support mutual recognition

Regardless of the level of ambition chosen for a mutual recognition scheme and no matter how it is organised, the pilot project has illustrated that some types of information are central in support of a sound and well-functioning mutual recognition process. This information is not only relevant in relation to mutual recognition but in general in order to create a higher degree of transparency and accuracy with regard to the agencies' work and the context they work within.

Agencies that will participate in a mutual recognition process will have to provide one another with extensive information on several issues including information about evaluation practices and procedures. In order to provide a basis for mutual recognition it is necessary to establish good practises of transparency of evaluation procedures. This should explicitly include both the core methodological elements and more marginal issues well known in the country. The project has illustrated that even among the Nordic countries with annual network meetings it can be difficult to fully grasp the differences between the agencies. The information must be provided in English.

In addition to adequate information it is necessary to build trust among the agencies. With rather considerable differences in terms of evaluation methods, educational systems and general culture, an evaluative procedure could be insufficient to create a basis for mutual recognition. Such confidence-building measures could include a scheme for an exchange of staff members and use of staff members as experts.

Independent of the type of mutual recognition chosen, a number of questions central to a recognition process are important to consider. These questions are listed below.

- *Establishment and alteration of criteria.* How are the criteria decided and revised?
- *Time span:* How long should the recognition period be (e.g. three or five years)?
- *Cost:* By whom are the costs of the experts covered, for instance?
- *Appointment of experts:* How should the experts be identified and appointed: by all parties involved appointing an expert, by asking a third party such as ENQA or some other party to appoint the experts or to establish a pool of experts to draw from? The last suggestion depends on the formality of the recognition agreement chosen. Furthermore the adequate number of experts has to be decided.
- *An authorising mechanism.* For a mutual recognition process to have a formal value an authorising procedure has to be established. This is especially important if the recognition scheme contains one or more multilateral elements. It is necessary with such a procedure to testify that the process has taken place according to agreed criteria and procedures and that the result be it recognition or non-recognition is valid.

4 Recommendations

The working group finds that the project has been an important experience that gives valuable input to the future considerations about possibilities for both internationalising quality assurance and making higher education more transparent. On the basis of the experiences gathered during the project the working group wants to propose the following recommendations:

- **Review of the protocol on the basis of the above-mentioned experiences with a purpose of conducting new recognition reviews.**

- **Organising of a conference possibly within the auspices of ENQA to present gained experiences and future plans.**

5 Final reflections

These reflections derive from the final discussion in the working group after having received the contributions from the two external experts who were invited to comment on the project. The experts were asked to give feedback on whether the suggested mutual recognition scheme will fulfil the following objectives:

- Provide transparency and thereby legitimacy for quality assurance agencies in an international context
- Function as external quality assurance for the quality assurance agencies
- Contribute to the creation of a European/international dimension in quality assurance
- Contribute potentially to a system of recognition of degrees.

The working group has noticed that the external experts have found that the project to a large extent successfully fulfils the defined objectives, with the exception of mutual recognition of degrees. The many critical as well as constructive comments and observations were welcomed as valuable and supportive advice for the further process. Therefore we recommend that the readers of this report would get acquinted with the contributions in full (included as Annexes B1 and B2) and not only the following comments.

During the process the working group had come to an agreement that mutual recognition of degrees is not easily and appropriately incorporated in a mutual recognition scheme of agencies – at least not at this stage. Rather the issue of recognition of degrees seems to be better served through a strengthened cooperation between quality assurances agencies and recognition bodies on national and international level.

The issue of a developmental purpose of the self-study process and report has been discussed by both the experts and the working group. This would normally be a necessary requirement for a good self-study process. However, the working group finds that it is not without problems to apply this as a principle in a process that involves reflection on fulfilment of given criteria. Sami Kanaan suggests that the self-study could include a more evaluative aspect of strengths and weaknesses of the agencies through a "comply or explain" approach. This could cope with a balance between a need for explicit international criteria and different national contexts. This way agencies should either comply with the established criteria or explain why they are not relevant. The working group sees this as a thought-provoking suggestion that could stimulate further discussions.

Both experts have taken the issue of the risk of a Nordic / European bias into consideration. Sami Kanaan stresses that one of the reasons the project could be conducted relatively easily is the high level of mutual knowledge that already exists among the involved agencies and that a process involving more differentiated agencies could challenge the suggested procedures and the time schedule. David Dill asks the question whether the criteria used are truly international or whether they carry an unnecessary European bias. These reflections are taken very seriously by the working group in light of the objectives pursued in the project. It should be mentioned, however, that the working group has been surprised that even though the involved agencies have been working together on a regular basis for ten years prior to this process new differences were discov-

ered and the general level of understanding of each other's procedures was increased.

Both contributions point to the need to broaden the criteria used. Evidence of the effects of the evaluations carried out and the agencies' ability to respond to changes in the environment are among the supplementary items mentioned as relevant. These comments emphasise that the discussion on the criteria to be used in a mutual recognition scheme (not to mention how they should be established and revised) is far from having reached a conclusion.

A final comment on the reflections from the experts is that both mention that there exist other ways of adding an international dimension to quality assurance than mutual recognition, either through other schemes of quality assurance or through other types of schemes, e.g. those based on political agreements. The consequence of this reflection is that at the moment the most important issue is not whether or not an international evaluative mechanism should be called mutual recognition or something else. Instead it has become evident to the working group that regardless of the context and the purpose, projects like this one offer a remarkable learning experience for all the agencies involved. This conclusion stresses the value of international assessment of quality assurance agencies as a way of creating development of agencies in addition to transparency and mutual trust.

6 Annexes

The self-study reports from FINHEEC and EVA can be found on www.finheec.fi and www.eva.dk/English/Publica.html. They can also be ordered from:

The Finnish Higher Education Evaluation Council
PO Box 1425
00101 Helsinki, Finland
Phone: + 358 9 1607 6913
Fax: + 358 9 1607 6911

The Danish Evaluation Institute
Østbanegade 55
2100 Copenhagen Ø
Denmark
Phone: + 45 35 55 01 01
Fax: + 45 35 55 01 11

Annex A: Provisions

Adapted ENQA provisions

The revised and tentative ENQA membership provisions and the ENQA methodological provisions have been used as point of departure for the mutual recognition project conducted. The working group has discussed the usefulness of the provisions with regard to mutual recognition. Two provisions were found to be without relevance: the provision on professional organisations and the provision on commercial organisations. With regard to professional organisations the argument is that the crucial point is whether or not agencies conduct evaluations within more than one field. With regard to commercial organisation the working group found that the risk of a unsound dependency of the financial source is present both when the source is the government and when the source is specific institutions.

In relation to the other ENQA membership provisions the following remarks can be made:

- **The agency undertakes external quality assessments (at institutional or discipline level) on a regular basis meaning that the decision to conduct evaluations is not taken on an ad hoc basis**;
  – It is not obvious what 'on a regular basis' is. The working group suggested that it is understood as opposed to ad hoc.
- **These quality assessments may involve evaluation, review, audit, assessment or accreditation and they should belong to the core functions of the agency;**
  – This provision is found relatively uncontroversial. It could be argued that it is not very useful because it is too broad. However, the working

group finds that even though a common vocabulary would be of great help, the type activity acceptable within the Mutual recognition scheme should be describe in terms of methodological key components rather than thought definitions.

- **The agency should be involved in external quality assurance of more than one subject / field;**
  – This provision could be verified without difficulty.

- **The agency must act outside higher education institutions. An organisation or entity inside a higher education institution is not considered an external quality assurance agency by ENQA;**
  – This provision could be verified without difficulty though a description of the agency's organisations structure.

- **The agency has been recognised as national or regional quality assurance agency by the competent public authorities;**
  – This provision could be verified without difficulty though legal acts recognising the agency.

- **The agency must have been operating for a minimum of two years to be eligible for recognition**
  – This provision could be verified without difficulty though legal acts recognising the agency.

In relation to the ENQA methodological provisions the following remarks can be made:

- **Assessments (evaluation, review, audit, accreditation) are conducted on a regular basis;**
  – This provision is identical to the first membership provision

- **Agency's procedures are along the lines of the recommendations made following the European pilot project:**
  – autonomy and independence in terms of procedures and methods concerning quality evaluation both from government and from higher education institutions;

The issue of how autonomy should be understood in an operational manner is not easy. The agency cannot be an island and must be open to suggestions from the institutions, public authorities and other stakeholders for improvement of the method. On the other hand, autonomy is essential in order to establish accountability and public trust in the system. The working group agrees that in order to be independent the assessments laid down in the report cannot be influenced by neither institutions nor ministry nor any other stakeholder. Furthermore the formal decision on the terms of reference, the methodological outline, the appointment of experts and the guidelines for the self-evaluation must rest with the agency (secretariat, council or expert panel). The agency must have established some general methodological principles in relation to the mentioned elements. Within the framework of these principles the elements can be drafted with more or less influence from the institutions and other stakeholders. These general methodological principles should represent the values held by the agency with respect to self-assessment, experts and reporting.

– self-assessment;

Self-assessment must be based on guidelines formally approved by the evaluation agency.

– external assessment by a group of experts and site visits[1];

The expert panel must as a minimum include peers, community experts and students as well as others with special insight in the evaluation object. The site-visit could in some cases be replaced by other mechanisms that allow the group of experts to confront the material provided by the institutions.

– publication of a report;

– the agency is working on the basis of procedures known to the public

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[1] The formulation has been changed from "external assessment by a peer-review group (group of experts) and site visits" to the present wording.

The formulation has been changed from "agency is working on the basis of a public manual/protocol" to the present wording. The working group is of the opinion that the former formulation might suggest that there is one manual/protocol to be used in all evaluations. This is not a necessity in order to conduct mutual recognition if there is general methodological principles and if this and the core documents used for the evaluation are made public.

Supplementary provision

The working group is of the opinion that four provisions should be added to the ENQA provisions. The first is related to stakeholders ,the other three to quality assurance.

- **The agency has identified key stakeholders and maintains regular contact with these in order to make a decision on the basis of the views of the stakeholders.**
- **If some or all of the elements in the evaluation procedure are subcontracted to other parties, the agency has reliable mechanisms that ensure the quality of the material produced by subcontractors**
- **The agency has established internal quality assurance mechanisms that are included in the key elements in the evaluation procedure.**
- **The agency can provide documentation for the quality of its evaluations.**

Annex B1: Through the Looking Glass – Comments on the Nordic Pilot Project on Mutual Recognition

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Introduction

When Lewis Carroll's Alice went *Through the Looking-Glass* she emerged in a world of contradictions. In the world of public policy we constantly confront a paradox about government regulation: who evaluates the evaluators? This issue has taken on special importance in the field of higher education, because if academic standards are to be maintained in the new world of global competition, we will need to develop novel means for assuring academic quality across nations. We would hope, in the public interest, that the concept of global academic quality assurance does not prove to be as absurd as the ideas Alice encountered in Wonderland!

At the OECD/US Forum on Trade in Educational Services held this May in Washington DC it was agreed that the emergence of a global market for higher education over the last decade is challenging the traditional national mechanisms by which academic quality was assured and academic credentials recognized. Developing an academic quality assurance framework for this brave new world will be a leading policy challenge for the international higher education community.

National Autonomy	Mutual Recognition	Monitored Decentralization	Coordination	Explicit Harmonization	Federalist Mutual Governance
National governments make decentralized decisions with no consulting or explicit coordination	Decentralized decisions with market competition for convergence. Entails explicit acceptance of regulations and standards of others	Obeisance to agreed rules with monitoring of rule concurrence	Collectively designed mutual adjustment of national policies	Agreement on regional or world standards	Continues bargaining and joint centralized decision making (Requires strengthened supranational institutions)

Whether the issue is competition policy (i.e., the focus of the current GATT negotiations) or academic quality assurance, there appear to be 6 general approaches to public policy:[1]

Historically academic quality assurance has been achieved through "national autonomy" with national quality agencies and/or educational ministries providing the necessary functions. The Nordic Pilot Project provides a first step towards a formal procedure for "mutual recognition" between national quality agencies, although as implemented with collectively defined criteria, a review involving third parties, and the possibility of recognition for fixed terms the model may move more towards "monitored decentralization." Within Europe "coordination" of quality assurance policies might possibly be achieved eventually via the Bologna Accord. Whether such a process would also lead to "explicit harmonization" with national agreement on regional academic standards, as has been the case for example with standards for commercial products within the EU, is still unclear. "Federalist mutual governance" might imply, for example, that academic standards would eventually become the responsibility of the EU apparatus in Brussels. With respect to academic quality assurance, Dirk van Damme has outlined a similar progression of coordination steps at the global level.[2]

Because of the pre-existing institutional framework of the EU, academic quality assurance policy in Europe may move beyond mutual recognition to adopt one of the more advanced forms of coordination outlined above. But globally the evolution of a framework for academic quality assurance is most likely to be achieved by smaller, incremental steps and is liable to lag behind the growth in international activity of higher education. Responding to a suggested need for an international agency for global accreditation (see for example, van Damme, 2002) at the recent Washington Forum, John Martin a Director of the OECD declared unequivocally, "I will make the 100% prediction that there will be no global accreditor!" Some form of mutual recognition or monitored decentralization of quality assurance agencies therefore appears to be the most likely scenario for future global development.

I have been asked to review the methods used in the Nordic Pilot Project on Mutual Recognition to assess whether the scheme as outlined will fulfill the following objectives: provide transparency and thereby legitimacy in an international context; function as external quality assurance for the quality assurance agencies; contribute to the creation of a European/international dimension in quality assur-

[1] H. J. Aaron, R. C. Bryant, S. M. Collins, and R. Z. Lawrence, Preface to the Studies on Integrating National Economies, in F. M. Scherer, *Competition Policies for an Integrated World Economy*, Washington DC: The Brookings Institution, 1994. Note that the documents of the Nordic Pilot Project also provide a related set of four scenarios for mutual recognition.

[2] Dirk van Damme, "Trends and models in international quality assurance and accreditation in higher education in relation to trade in education services," paper presented at the OECD Forum on Trade in Education Services, Washington DC, May 2002: http://www.oecd.org/pdf/M00029000/M00029607.pdf

ance; and potentially contribute to a system of recognition of degrees. I will address each of these issues in turn.

Will The Scheme Provide Transparency and Thereby Legitimacy in an International Context?

The Nordic Mutual Recognition scheme offers a number of effective means for achieving legitimacy for the participating quality assurance agencies. First, as mentioned above the scheme as implemented actually goes somewhat beyond bi-lateral "mutual recognition," because the criteria were developed and applied by representatives of a number of agencies and countries in addition to those under review. From my perspective this collective process would provide greater legitimacy to the reviewed agencies because it means that the criteria applied were likely debated in a more public and even-handed manner as well as applied more objectively than might be the case in a truly bi-lateral negotiation where both parties have a self-interest in the outcome. This type of collective form of mutual recognition is also likely to be more respected by the general public because it provides the opportunity for a more open and equitable treatment of potential candidates. A truly bi-lateral process is likely to be dominated by the largest, wealthiest, or more influential countries, whose quality assurance agencies might make very subjective decisions as to which countries or agencies they will consider for recognition.

A major criterion of the Mutual Recognition process is "transparency." The Nordic Pilot Project approach is therefore more similar to an accreditation than to an evaluation. For example, an agency could not claim "fitness for purpose" as a rationale for their methodological approach to academic quality assurance, but instead would have to meet "explicit minimum criteria" including procedures "along the lines of the recommendations made following the European Pilot Project." As a consequence agencies will need to make their processes and procedures publicly available. This is a crucial test of legitimacy for any regulatory body, particularly one engaged in the field of education where unstated, or unclear criteria for judgment would conflict with the basic ethic of the profession as well as with public expectations. In addition, one expected impact of the WTO negotiations on higher education is the requirement that each country's regulations for academic licensing, accrediting, or degree recognition be transparent and applied in the same manner to all eligible entities.

In addition to transparency of criteria and procedures, however, the Nordic Pilot Project Working Group usefully introduces what I consider a second necessary condition for legitimacy. Measurement theorists routinely distinguish as to whether a measure or process is reliable and/or valid. A drug may have precisely the same effects each time it is administered and in this sense is highly reliable. But if the drug fails to cure the intended disease we would question its validity. Reliability is a necessary condition for validity, but not proof positive that a process is indeed valid. Recognizing that academic quality assurance agencies are engaged in similar or identical evaluation practices does not guarantee that these practices assure academic standards.

As higher education becomes a more global enterprise the importance of developing an institutional framework that will help assure and maintain academic standards becomes more critical. This may appear obvious – at least to traditional academics – in the case of new Internet education providers, but is equally applicable to the recognition of the credentials of students and professors who wish to cross borders, or the expansion of traditional higher education to meet social demands. Appealing as increased student access, academic mobility, and free trade in educational services may be in the abstract, if these developments are achieved through the dilution or corruption of existing academic standards then the social costs of such changes may outweigh their social benefits.[3]

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[3] Van Damme (2002), for example, has noted that in an effort to encourage internationalization some European student mobility programs such as ERASMUS and ECTS have largely ignored the issue of academic standards. For a recent relevant criticism of the assumed relationship between higher education expansion and economic growth see: A. Wolf, *Does Education Matter? Myths about Education and Economic Growth.* London: Penguin Books, 2002.

Unfortunately, as the recent furor in the US over the Arthur Anderson accounting firm and the Enron Corporation attests, the existence of self-regulatory institutions provides no guarantee that appropriate standards are being maintained. Questions have also been raised in the US about the extent to which the well-established framework of institutional accreditation effectively safeguards academic standards. There is little evidence for example that the academic accreditation process has helped to control or even addressed the increasing problem of grade inflation in US colleges and universities.[4] In addition, accrediting agencies have only recently incorporated into their reviews evaluations of institutional processes for assessing student learning and this reform occurred only after pressure from the federal government and independent actions by the states to encourage an orientation toward student assessment.[5]

Establishing the legitimacy of quality assurance oversight agencies, therefore, like assuring the quality of universities themselves, will ultimately require evidence that quality assurance methods actually influence academic standards. In this sense the criteria of the Nordic Pilot Project introduce a new essential requirement that "the agency can provide documentation for the quality of its evaluations," that is that the agency should be able to report on the effects or impact of its work.

Will The Scheme Function as External Quality Assurance for the Quality Assurance Agencies?

The criteria incorporate the recommendations from the earlier European Pilot Project and as such include a valuable emphasis on a set of methodological principles to which a national agency must adhere in order to receive mutual recognition. These practices include: 1) autonomy and independence in terms of procedures and methods concerning quality evaluation both from government and from higher education institutions; 2) self-assessments; 3) external assessments by a group of experts and site visits; 4) publication of a report; and 5) the agency is working on the basis of procedures known to the public. I will suggest some possible limitations of this framework below, but by emphasizing the methodological practices essential to academic quality assurance the Nordic Pilot Project form of mutual recognition makes an important contribution towards building the capacity of each national agency to conduct academic quality assurance.

Several of the stated criteria will also assist each agency in further building its own legitimacy through adaptation and evidence. One example is the Project's emphasis on a national agency demonstrating continuous quality improvement. The logic of continuous improvement is fundamental to academic life and informs all activities in scholarship and research. Given the inherent ambiguities in the process of academic quality assurance at both the institutional and oversight level an orientation toward continuous improvement appears a necessary prerequisite for any quality assurance agency that expects to earn legitimacy in the eyes of its stakeholders.[6]

As noted above, the legitimacy of the national agencies involved in academic quality assurance will ultimately be determined by whether their processes prove to be valid, in the sense that they demonstrably help assure academic standards. The proposed criteria for the Nordic Pilot Project usefully address this issue by requiring as a core criterion that each agency engage in studies on the impact of their processes. This is an important criterion for if it is pursued by each agency it will help develop over time either support for the effectiveness of the existing processes or information that can be usefully used for the redesign and improvement of the quality assurance processes.

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[4] See H. Rosovksy and M. Hartley, *Evaluation and the Academy: Are We Doing the Right Thing?*, Cambridge, MA: American Academy of Arts and Sciences, 2002. http://www.amacad.org/publications/monographs/Evaluation_and_the_Academy.pdf

[5] Dill, D. D. "Accreditation, Assessment, Anarchy? The Evolution of Academic Quality Assurance Policies in the United States." In J. Brennan, P. De Vries, and R. Williams, (eds.) Standards and Quality in Higher Education. London: Jessica Kingsley, 1997, pp. 15–43.

[6] Dill, D. D. "Designing Academic Audit: Lessons Learned In Europe And Asia," Quality in Higher Education, 2000, 6(3): 187–207.

Until such time as this evidence of impact can be accumulated, the Nordic Pilot Project attempts to establish the validity of the quality assurance processes of national agencies through a form of "concurrent validity" – do the stated processes comply to the recommended minimal best practices agreed to by a group of professionals in the field. This is an important and useful interim means of validation. I think, however, some specific additional steps could further strengthen it.

While academic quality assurance oversight methods have sometimes been borrowed and/or adapted from the fields of research and evaluation, more typically the methodologies have evolved from practical experience and not been subjected to analysis and careful criticism by relevant evaluation experts. In the US for example, recent new experiments with accreditation have revealed substantial gaps between traditional accrediting processes and the approaches deemed appropriate by evaluation professionals. The new alternative accreditation renewal process – the Academic Quality Improvement Project (AQIP)[7] – recently implemented by the North Central Association, for example, is consciously designed to emulate the Malcolm Bald ridge National Quality Award process. Those professional accreditors who have been exposed to the Baldridge process have commented that it is significantly more systematic and rigorous than traditional US accreditation processes. Similarly the accreditation process recently developed by the US Teacher Education Accreditation Council (TEAC)[8] is based upon the concept of Academic Audit as implemented in the UK and Hong Kong, but educational professionals have systemically designed it for application to teacher education with extensive experience in evaluation and research methodology. The TEAC approach is not only radically different from traditional professional accreditation models in the US but also has made a number of interesting alterations in the basic approach of academic audit. Finally, the American National Standards Institute (ANSI) has just announced an

ISO/IEC Standard 17024, General Requirements for Bodies Operating Certification Systems of Persons, which will facilitate mutual recognition of personnel certification programs by providing an internationally recognized framework and evaluation system.[9]

The economist John Dunlop once wisely observed with regard the design of professional education that it should be relevant with as much rigor as possible, rather than rigorous with as much relevance as possible. I would certainly concur with this sentiment in regard the methods of external academic quality assurance. At the same time the methods and approaches outlined in the Self-Study by the EVA in Denmark suggest an enviable degree of rigor and systematization both with regard to the underlying evaluation processes as well as their improvement. There are likely a number of reasons for this sophistication, but one point that differs in my experience with other quality assurance agencies is the apparently strong relationship EVA has cultivated with evaluation professionals in the design and improvement of its methods. This would suggest that submitting the results of the current Nordic Pilot Project to a panel of respected evaluation professionals drawn from Scandinavia and/or from some of the accrediting groups just mentioned above might be a very effective means for further developing and strengthening the validity of this Mutual Recognition Process

Will the Scheme Contribute To The Creation of a European/International Dimension in Quality Assurance?

The Nordic Pilot Project outlines a series of criteria that a National Quality Assurance Agency would have to meet at a minimum level. The collective agreement on these common criteria provides a working outline for a European/international dimension of academic quality assurance. While these criteria represent a very effective foundation for defining an international dimension to quality as-

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[7] http://www.aqip.org/index.html

[8] http://www.teac.org/

[9] http://www.ansi.org/public/events/open_forum/Personnel_cert.html

surance, several points may require further definition.[10]

Are the criteria sufficiently explicit?

The criteria incorporate the recommendations from the earlier European Pilot Project and as such include a valuable emphasis on a set of methodological principles that must be followed for an agency to receive mutual recognition. That is, does the quality agency follow recommended methodological practices in conducting its evaluations? These practices include: 1) autonomy and independence in terms of procedures and methods concerning quality evaluation both from government and from higher education institutions; 2) self-assessments; 3) external assessments by a group of experts and site visits; 4) publication of a report; and 5) the agency is working on the basis of procedures known to the public. The criteria also acknowledge that there are in fact different quality assurance processes, such as audit, assessment, or accreditation, and further suggest that the agency must have established some general methodological principles in relation to the mentioned elements.

This raises the question as to whether the general methodological procedures suggested by the European Pilot Project are sufficient for assessing the adequacy of such different quality assurance processes as accreditation, audit, and subject assessment. Is it possible that a national agency carrying out one or more of these processes may meet the stated general criteria, but conduct academic audits for example in a highly flawed manner? In a small study I did of academic audits in a number of countries, there appeared to be observable variations in the approaches employed and in my view related variations in the effectiveness of the methods.[11] Whether the general methodological format of the

self-study employed in the Nordic Pilot Project provides sufficiently explicit criteria to make a professional judgment about the appropriateness and adequacy of the evaluation methods being employed by a national agency to assure academic standards may require further consideration.

Are the stated criteria appropriate to a European/international context?

The working group connected with the Nordic Pilot Project, following a review of the overall experiment, has made some useful suggestions of additional criteria to be incorporated into the mutual recognition process. In my view, however, some of the existing criteria appear to reflect a particularly Nordic and/or European perspective on quality assurance and may need to be further broadened or at least clarified in order to apply effectively in an international context. Some suggested points for further debate follow.

First, a basic criterion of the mutual recognition process is that the eligible agency "needs to conduct evaluations in more than one field" This seems to suggest that international accrediting agencies that focus on one professional field such as the Accreditation Board for Engineering and Technology (ABET) or the Association to Advance Collegiate Schools of Business (AACSB) would not be eligible to participate in this type of mutual recognition scheme. There may be good and practical reasons for this exception, but I would suggest both the reasoning and the strengths and weakness of this approach need to be more systematically explored. As noted below, while such professional societies and accreditors have not played a significant role in academic accreditation or recognition in Europe, they have greater power in other parts of the world. In addition, under the influence of world trade agreements it is possible that such accrediting agencies will play an even greater role in international academic quality assurance in the future. If the suggested mutual recognition process is to apply internationally, I think it would be unwise to ignore the reality of the professional accreditation agencies.

Second, the scope of academic quality assurance as defined in the document appears somewhat nar-

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[10] The observations that follow might also be due to a misunderstanding of the text on my part.

[11] Dill, D. D., Capacity Building Through Academic Audits: Improving "Quality Work" in the UK, New Zealand, Sweden, and Hong Kong, *Journal of Comparative Policy Analysis: Research and Practice*, 2000, *2*(2): 211–234. Dill, D. D., "Designing Academic Audit: Lessons Learned In Europe And Asia," *Quality in Higher Education,* 2000, *6*(3): 187–207.

row, perhaps reflecting the particular history and tradition of academic quality assurance in the Nordic countries. For example, as global competition for academic degrees escalates there has been a noticeable increase in the development of new academic programs and degrees in many countries. The process by which these programs are designed and approved is generally considered an integral and important part of the processes by which institutions assure the quality of their academic degrees in countries such as the UK, Hong Kong and in accreditation reviews in the US. The descriptive documents on the Nordic Pilot Project are somewhat ambiguous as to whether the degree and/or program approval process should be included within the scope of academic quality assurance activities. In both Denmark and Finland, it would appear that Ministries of Education still pay an important role in new program/degree approval and therefore evaluation of this process appears to be outside the remit of the relevant quality assurance agencies. In other countries this is much less true. As institutions clamor for self-accreditation status so that they have the flexibility to create new academic programs and better compete with rival universities, it is possible that this type of authority may increasingly be delegated to the institutional level. This would suggest that the scope of responsibilities of national quality assurance agencies, if they are to be effective in influencing academic standards, might need to be more clearly defined.

Another example of the problem of scope can be seen in the issue of external examiners. This form of quality assurance to be sure exists only in certain Nordic and Commonwealth countries. However, it is intriguing that EVA in Denmark, while noting the relevance of external examiners to the quality assurance system, appears to define their activity as outside the agency's purview. It is worth noting that in the UK systematic academic audits of the universities' quality assurance procedures, which included a review of their external examiner system, discovered weaknesses in the latter system. These evaluations have subsequently led to recommended reforms of the external examiner system in the UK as a means of better assuring academic standards.

While these particular examples may be solely a function of the particular context of academic quality assurance in the Nordic countries, they do I think raise the large r question as to whether the scope of review by a national quality assurance agency may be related to its effectiveness in assuring academic standards and should therefore be a consideration in any mutual recognition process.

Will the Scheme Potentially Contribute to a System of Recognition of Degrees?

I find the possible relevance of the Nordic Project to degree recognition more difficult to assess. In part this is because the European context for degree recognition following the Lisbon Convention and the establishment of formal national recognition agencies (ENIC/NARIC) is distinctly different from the US experience (and from the rest of the world).

In the US, a common framework of degrees has emerged which is enforced by both institutional and professional accrediting agencies. This framework determines who is eligible for college or university admissions, but for the most part judgments on the admission of any individual student are made by the institution itself. Decisions on the admission of foreign nationals, which necessarily include the recognition of academic credentials, are also made by each institution, sometimes utilizing available informational guides to help interpret the meaning of academic transcripts, but with little or no influence by government. Professionals from other countries seeking to practice in the US must, like US graduates, meet state professional licensing requirements, which vary, but are connected with exams administered by the relevant professional societies. The US has no formal degree-recognizing agencies or processes in the European meaning of the term, as I understand them.

As part of the globalization of society and the economy many nations are reconsidering their academic degree frameworks in order to provide greater mobility and opportunity for their citizens. The Bologna process reflects this reality, but similar developments are occurring outside Europe as well. This adaptation was signaled early on by the al-

most universal adoption of the MBA as a recognized degree. The common emerging framework usually defines first level or bachelor's degrees, second level masters and/or professional degrees, and third level taught doctoral and/or research degrees. From an economic perspective this standardization of degree frameworks is a wholly rational national response to an emerging market for academic degrees that is increasingly competitive and global.

In both Finland and Denmark as suggested in the Project self-studies the Ministries of Education appear to retain relatively tight control over the accreditation of new degrees and recognition of academic credentials. Assuming the Bologna process leads as expected toward a common framework of degrees across Europe I would think that this development might have the more decisive effect on improving the recognition of academic credentials. National quality assurance agencies might increasingly be asked by their governments to conduct reviews to accredit new degree programs within this framework. At the same time, I would expect that the increased delegation of autonomy and authority to universities that has occurred across Europe over the last decade might lead European universities to demand, similar to their US and British counterparts, greater authority over individual admissions/degree-recognition decisions for non-European applicants.[12]

Finally, in the US professional associations and accreditors play a larger role in both academic accrediting and professional degree recognition than is true in Europe. One effect of the emerging global market for academic degrees and of the WTO negotiations on world trade has been to strengthen the international influence and potential power over academic standards and degree recognition of professional associations such as those in medicine, architecture, and engineering (cf. The Washington Accord). It is possible that in the new global world of higher education many governments and institu-

tions may come to see the most prestigious professional accrediting associations as having a greater degree of legitimacy than the relevant national quality assurance agencies.[13] This may in turn limit the influence of national quality assurance agencies over academic accreditation and academic recognition at least in certain high-profile professional fields.

For this reason and as noted earlier I believe the mutual recognition process between national quality assurance agencies and professional associations/accrediting agencies will need to be more carefully and systematically explored than is suggested in the current Nordic Pilot Project.

In sum, I believe the effects of mutual recognition of national quality assurance agencies on academic degree recognition is apt to be limited because of the more significant influence of government approved degree frameworks, institutional control of admissions, and the increasing power of certain professional associations to define standards for academic and professional recognition. I think the most likely role in this process for national quality assurance agencies may be with regard to the accreditation of academic degrees that do not fall within the WTO-defined orbit of professional degrees.

Conclusion

In sum, I believe that the Nordic Pilot Project makes a very important and helpful contribution to our collective search for a new global framework for academic quality assurance. By developing, testing and critiquing the criteria and method for mutual recognition in a very public manner, the project provides a basis for a needed public debate about how academic standards will be assured in the new environment. It becomes clear to all that the mutual recognition scheme itself is to be defined and constructed incrementally and confirmed though actual experience.

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[12] If universities achieve this greater control over student admissions it will also likely lead to greater differentiation in student quality among institutions as is the case in the US and is apparently becoming the case in the UK.

[13] Note that several European Universities that operate in countries with national quality assurance oversight agencies have nonetheless voluntarily sought accrediting for their Engineering programs from the US-based Accreditation Board for Engineering and Technology (ABET).

Annex B2: A Method for Mutual Recognition – External comment on a project of the Nordic Quality Assurance Agencies

Sami Kanaan, evaluanda – Geneva, Switzerland (former QA programme manager of the European University Association)
14 June 2002

Structure of this note

The note starts with an introduction about the context and the scope of my task, followed by a chapter on the context of this project (2), a chapter on the objectives and the general features (3), a review of its different phases and procedures (4), a contribution for the answer of the 4 questions put forward to the two foreign experts (5), and finally a concluding comment with some recommendations (6).

1 Introduction

The Danish Evaluation Institute (EVA) asked me, as one of two foreign experts, to review the main aspects of the mutual recognition project between quality assurances agencies in the context of the Nordic Network of Quality Assurance, with a particular focus on the process and the methodology, as well as on the conclusions of the project.

According to the documents received, the project consisted of three phases.

In the first phase, a project group of the Nordic QA Network drafted a protocol for self-study and guidelines for a visiting panel.

In the second phase, the Finnish Higher Education Evaluation Council (FINHEEC) and the Danish Evaluation Institute (EVA) produced a self-study report and were visited by a panel composed of specialists from other Nordic countries.

The third phase resulted in a brief report on the two visited agencies, followed by a final report on the lessons learned. This report is available in its advanced draft version.

My task as one of two independent experts has been defined as to review the method used in the first and second phases of the project as well as the general conclusions the working group has drawn from the first two phases. I have been asked to focus my comments on whether the suggested mutual recognition scheme could fulfil the following objectives:

1 Provide transparency and thereby legitimacy in an international context
2 Function as external quality assurance for the quality assurance agencies
3 Contribute to the creation of a European/international dimension in quality assurance
4 Potentially contribute to a system of recognition of degrees

2 Context of the project

The members of the Nordic Network of Quality Assurance are certainly fully aware of the present international context in which the project operates. Considering their involvement in international networks, they are closely following recent developments in the debate around the internationalisation of quality assurance, the necessity for increased transparency and co-operation between quality actors, the impact of the Bologna process, the challenges of new modes of delivery, the rise of a "labelling" market, etc.

There is no need, therefore, to enter into a substantial description of this context and an analysis of its consequences that are relevant for any pilot project in the field of mutual recognition in quality assurance at transnational level. The overall project report of the Nordic Network gives a brief introduction on this context, and makes a welcome attempt of positioning this specific project in the wider debate on accreditation and mutual recognition.

Still, a few remarks on the background may be useful to understand the perspective that is behind this note.

In general terms, the option of a so-called meta-accreditation scheme of agencies is often opposed to the option of mutual recognition among agencies, as if the two options were mutually exclusive. A new international body, the ownership of which

is not defined, would manage the first one, possibly a joint venture between established agencies, authorities and higher education institutions, students and other stakeholders. The second one would correspond to a self-regulation approach among the established agencies.

Among other recent initiatives the CRE/EUA project on accreditation (2000–01) led to the conclusion that there are many different ways to approach this discussion, which cannot be confined to any type of binary choices. It also became clear that any choice on how to deal with the internationalisation of quality assurance and mutual recognition has to be put in the perspective of what would be the purpose. The key question of *who are the end-users*, the primary target audience, of a European (or international) scheme for quality assurance has not yet been fully discussed. To say it bluntly: many actors are looking for a solution, but are we really sure about the problem we are trying to solve?

The issue here is not to deny or underestimate the needs for some type of international framework in the field of quality assurance, not the least because of the necessity to introduce a kind of *"consumer protection"* against for-profit trash providers. And the enthusiasm of many higher education institutions in Europe for obtaining "labels" by getting accredited through different kinds of agencies and procedures would confirm that there is, at least, a perceived need, if not a problem to solve. Still, one may ask whether this sudden interest for sometimes quite burdening and expensive procedures has also to do with the hope that they may replace one day existing national procedures in this field…

However, it seems crucial to keep in mind that *different models and approaches may serve different purposes*:

- The most often mentioned purpose is the increased student mobility, either during undergraduate studies or in the transition from undergraduate to graduate studies. However, even with a strong increase of "physical" student mobility, it will remain a small minority of the student population.
- A related purpose is based on the perspective of the higher education institutions, especially in

Europe: to make the "supply" (viz. the European higher education) more "transparent" and understandable in order to attract more non-European potential (fee-paying) students.

- An other frequently discussed purpose would be the mobility within the European labour market and therefore the need for the recognition of degrees. However, part of these issues are covered by specific regulation of the European Union, and, as for student mobility, any increase, however desirable it may be, will not hide the fact that it will also only remain a minority. But it is legitimate to ask whether the quality assurance agencies could contribute to the promotion of professional mobility in Europe.
- The already mentioned "consumer protection" purpose is certainly one of the most relevant ones; even if most European countries do not feel threatened by the emergence of sometimes dubious higher education institutions, mostly with profit-making aims, the diversification trend in the higher education sector is very strong, even in countries with well established public systems, thus matching an increasing demand for higher education at least in certain fields and for certain types of degrees.
- Considering the increasing competition among higher education institutions, also in the field of recruitment of students, international schemes for quality assurance could also contribute to positioning the institutions in the market. But this purpose implies looking for excellence (whatever definition of excellence is used), while the previous one (consumer protection) looks more at minimal/average thresholds.
- A purpose, which is often crucial for justifying the existence of quality assurance agencies at national (or regional) level, does not yet exist at European level: "taxpayer protection", in the sense of verifying the sound use of public resources invested in higher education.

The discussion can also be *organised in terms of actors* (higher education institutions, authorities, students, employers, teachers, agencies, etc.): Which audience has which types of needs in terms of transnational quality assurance?

31

To this day, most established agencies serve mainly the needs of national (or regional/local) public authorities, which still fund most of the higher education system, and in this sense correspond to the purpose of the *"taxpayers protection"* mentioned above. Public opinion, including students, parents, employers, teachers, etc., is often an indirect target audience. But in recent years most agencies have developed communication and dissemination of evaluation results quite intensely.

Another way to put the same questions forward is to ask *what will be the actual output of a given model,* and which end-user it is supposed to serve.

The quality assurance agencies are certainly not expected to bring answers to all of these questions. In principle, the mentioned key actors of the system are supposed to organise the debate, take options in co-operation with the agencies, and implement them.

Obviously, the real debate behaves in a more complex way. But the agencies are well positioned to raise the attention, at least, as they did for the last years, on the implications of the various options in this field. Thus, the debate would not only be focused only on the tools and the models, without clarifying the expectations and the purposes.

3 Objectives and general features of the project

The Nordic Network for Quality Assurance should be congratulated for taking this initiative, which constitutes certainly a very valuable contribution to the current European and international debate on promoting transparency and compatibility in the field of quality assurance.

The project is rooted in a well-established network, which has a high level of experience in common ventures and a high level of mutual knowledge on each member's activities and features.

It is also obvious from the overall report that the authors carefully conceived the project in order to avoid any excessive expectations or interpretations, as well as to define clearly its scope and its limits.

However, the project has also a certain level of ambition, when suggesting that the Nordic experience could contribute to discussions on a wider international scale by creating practical experience.

The explicit aim is to test a method for mutual recognition of evaluation procedures between two Nordic agencies in the field of quality assurance. The project does not aim at a mutual recognition of the participating agencies as such, nor of the recognition of degrees of the respective countries, although it is admitted that these issues are closely related. But the project expects the tested model to provide international transparency and legitimacy for the agencies involved, and is supposed to provide evidence whereas this model may be used in a wider context. It aims at considering the possibilities to implement a system of mutual recognition and the implication on the recognition issues for other education-related issues like degrees.

The efforts of the authors to clarify the terminology used should also be positively recognised. There is no unique and universal set of definitions for the terminology in the field of quality assurance, but each major project or venture (and the actors concerned) should always state how these concepts are used specifically.

It would have been interesting *to know more about the assumptions behind the project*, related to the purposes of a mutual recognition model between agencies and the discussions between the various methodological options. Maybe these assumptions have been discussed within the Network prior to the launch of the project and belong to the well-established common understanding of the Network members. But they could have been made explicit for a wider audience. Especially the co-operative Nordic context seems to fit well for running such a sensitive discussion, considering the already existing level of mutual trust:

- What are the needs or the intentions for additional developments in "internationalising" the Nordic higher education framework beyond the existing mechanisms among the Nordic countries?
- Who is supposed to take effective benefit from a mutual recognition of agencies and from increased transparency and legitimacy, except the agencies themselves?

- How would, for instance, the education authorities or the higher education institutions, or the students, consider and use this information?
- What are the priorities among the various purposes mentioned in chapter 2 (student mobility, marketing, consumer protection, competition, professional mobility, etc.), for which action seems to be needed beyond existing mechanisms?
- What are the preconditions to be fulfilled in order to ensure the effectiveness of a mutual recognition model?

There is most probably no single or simple answer to these questions. But the range of answers has a direct influence on choosing a mutual recognition model. The project as such may certainly not answer all these questions, but it creates an opportunity to raise them and to make a contribution. The project report shows that the Network members were at least aware of most of these issues, especially after having implemented the two pilot cases (in chapter 3 of the report). Therefore it also fulfilled a function of raising awareness on issues not only related to the methodology but to the framework and the concepts behind. The last question, regarding the preconditions, has been partly answered: a more developed mutual knowledge of the agencies through a well designed and managed information system and trust building measures like staff exchange would be necessary. This issue of the *necessary preconditions* is discussed again further below.

4 Comments on the different phases and elements of the project

Overall design of the project

The overall methodological design looks sound and reasonable for this purpose. The intensive and systematic attention given to the criteria has to be acknowledged, and this will probably be the most valuable contribution of the project to the wider European and international debate.

Very pertinently, the project report insists on the fact that the different possible models are to be differentiated, among other dimensions, along the level of "multilateralism". To be able to describe these

different levels, the project report defined three main levels of responsibility: the methodological framework, the decision-making processes on mutual recognition and the review process as such. This list could possibly be slightly more differentiated and consider ownership and decision-making power for the following aspects:

- definition of the criteria and of the methodology
- recruitment of experts and nomination of panels
- management of the system
- formal decisions about the outcomes of a procedure
- quality assurance of the system

The report shows that the Network was willing to take critical views on the pilot cases and be open for changes in the tested model, something that should be welcomed.

Design of the evaluation criteria and the self-study framework (protocols and guidelines)

The project started from the ENQA provisions on membership and on methodology, as well as from the Washington Accord procedures for engineering education, as a basis for the criteria used in this pilot process. These provisions were transformed to fit for a recognition process. As mentioned, this is substantial work and will be extremely useful for any further initiative in this field. The proposed set of criteria looks very robust and coherent for the analysis whether a quality assurance agency is credible and may be recognised by peers.

However, *the criteria could give even more attention to contextual and impact-related elements*, beyond the present requirements to present the formal framework in which the agency operates. In order to get a full picture of an agency, and even if each agency may have various functions within a given higher education system, it seems essential to obtain sufficient self-study input on the following items:
- context analysis / perception of the (changing) expectations of the stakeholders of the agency
- purposes and functions of the agency in its context: balance between improvement and accountability, changing demands from the environment,

strategic partnerships, impact of the agency activity on the institutions and the students, etc.

- international dimension in the activity of the agency and in its context, apart from formal agreements
- overall direct and indirect impact of the outputs of the agency (impact of the reports, formal status of those, follow-up, perception by the different stakeholders, including public opinion, etc.)

However, these items are more analytical than descriptive. The methodological choice that the self-study process should be descriptive in the original model has indeed been raised and criticised in the context of the project after the two pilot cases.

Since one of the major criteria of analysis should be *the capacity of the agency to adapt to new demands and trends, and to permanently improve its action, while maintaining a solid and credible methodological framework and governance model*, the agencies should be required to perform a SWOT analysis, or anything similar, as well as to formulate their strategies of change and development. It is exactly the same requirement that is put forward to higher education institutions, which also tend to remain too descriptive in their self-evaluation reports.

The report also tackles the sensitive issue of *finding the right balance* between establishing a common set of standards of expectation regarding quality assurance agencies, on the one hand, and respecting the diversity of national and local settings and practices, on the other hand. A possibly useful approach could be to introduce a rule of *"comply or explain"* around common principles: those have to be met and if they are not, it has to be explained. A complementary approach would be to apply a *"if … then…"* rule: define a set of core principles which should be valid for any agency, accompanied of conditional principles which depend on the exact mandate and context of the agency (programme or institutional evaluation, balance between improvement and accountability, formal status and impact of the reports, type of higher education system, scope of the agency, etc.).

Self-study reports

Reading the two available self-study reports (EVA and FINHEEC) leads to raise two main remarks:

- the self-study framework (protocols and guidelines) were well designed, since they allowed each agency to produce a clear and comprehensive report;
- still the two reports are very different, as the general report states, which shows the wide margin of interpretation possible based on the same common guidelines.

Although part of these differences could be avoided through additional and more precise instructions in the protocols, this experience allows reminding to all interested and concerned actors that *diversity is not just a buzzword in the field of quality assurance*. Any model has to take diversity as one of the given main features, and not as a secondary dimension or an obstacle.

The fact that the report has to be autonomous in itself, and give all key information without the annexes, should belong to the core requirements of any self-study report. This is very important when the language barrier will increase and English definitely be the "lingua franca", in order to avoid depending too much on annexes in the local language, or putting too much translation burden on the evaluated agency.

It is true that the regional, European or international networks of agencies could strengthen their common efforts to establish *a joint database with reliable descriptive elements*, as to build a common documentation and thus limiting the amount of necessary specific documentation in an agency evaluation process.

Panel visits and reports

Regarding the two panel visits, the report states that the composition and the exact mandate of the panels has been intensively discussed. Due to the distinctive features of this pilot operation the choices made are not necessarily valid for a more generalised approach. The attention given in the report (par. 2.1.2) following the two pilot cases to the issue of the profiles of panel members are most welcome.

The panel visits were designed along a similar format, which seems to make sense for this purpose. Still, one is allowed to ask whether the panels could actually implement their task with a very short visit also because they already had a relatively well-developed knowledge of the visited agency and of the more general socio-economic context. Obviously, the extensive materials received in advance contributed to a large extent to the preparation of the team, but the approach would have to be tested when the evaluated agency is visited by a panel that is much less familiar with the context. This latter case is most probably more representative of an average situation. In the two pilot cases the panels can by no means be accused of having been too friendly to the visited agencies. But for the credibility of any mutual recognition model, a minimal "distance" between evaluators and evaluated agency would be recommendable, as required also from models of mutual quality assurance in networks of higher education institutions.

But this could also lead to the conclusion that a 1.5 day long visit is too short, or that two visits could be useful, especially if the improvement dimension of the process, for the direct benefit of the evaluated agency, is to be strengthened.

As the report states, the aim was not to implement a full-scale mutual recognition in this project but to test a model that could be used for this purpose. It is therefore logical that the two panel reports do not enter into more detailed and summative judgements. However, even for a testing purpose, and considering the amount of work put in the self-study process by the two visited agencies, the reports are very short. Although long reports are not useful, one could have expected a slightly more substantial feedback from the panel to the visited agency, with a more systematic assessment on whether the pre-defined criteria are met or not. This is partly done in the report on the visit to FINHEEC.

It would have been interesting to implement the "testing" idea to the end and to simulate, so to say, a full-scale mutual recognition process by asking the expert panel to assess whether the two agencies meet the defined criteria and could therefore have their procedure be recognised in the framework of this model.

5 Comments on the key issues raised by the conclusions

The two foreign experts were asked to react on four key questions, as a conclusion to comment on the different aspects of the model and its practical experience.

As a general comment, the overall project of the Nordic Network is certainly a very pertinent experience, carefully conceived and implemented, based on a robust and coherent methodology, with an openness of its owners for change and improvement. Any specific comment with a more critical orientation should not diminish the weight of this main statement.

1 Provide transparency and thereby legitimacy in an international context

It is may sound evident but should be said again; prior to any general model of mutual recognition and of international quality assurance, the transparency of the existing practice of quality assurance agencies, in terms of criteria, procedures, outputs, etc., has to be developed substantially. The Nordic project constitutes an important step in this direction and the report confirms that major efforts are necessary in this field. In this context, it has to be said that further reaching measures to increase mutual knowledge and trust, like staff exchange, make sense only between agencies with sufficient human and financial resources to undertake such a policy. However, increasing the transparency is a necessary but not a sufficient condition to reach legitimacy. Established agencies have in principle a certain level of legitimacy in their own countries, based on legislation and accepted practice in a given context. Expanding the legitimacy at international level is a complex venture, depending on what is exactly meant and what is exactly aimed for. As soon as the discussion is taking place about operational models of internationalising quality assurance, legitimacy will need more than only transparency. This project, by contributing to the transparency on practices of two agencies, and on the options discussed by a group of 4 countries, gives the Network members at least the legitimacy to be fully recognised as competent and relevant actors in the

wider debate on these topics, something already very useful.

2 Function as external quality assurance for the quality assurance agencies

The tested model certainly contributes to the attempts for a more systematic external quality assurance. In any system the development of an external scrutiny, based on a sound and reliable methodology, contributes to the transparency and thereby the legitimacy of that system. Since the present model is based on external review within a framework of explicit criteria, it therefore corresponds to this principle and contributes to the transparency and thereby legitimacy in an international context. And tribute may be given to the Nordic Network to have taken this initiative and created the opportunity for practical experience.

However, *a more generalised implementation of such a model has to ensure a wider basis in order to ensure a really international dimension*. It is not meant that in this project the panels were not critical enough, but the same model has to be tested in a context where the existing mutual knowledge and the level of existing co-operation is not yet a developed as in the Nordic Network. This also implies that the level of multilateralism should be developed enough to ensure this wide and consistent basis, something that represents a plea for the scenario 3. But this should be further discussed.

3 Contribute to the creation of a European/ international dimension in quality assurance

At this stage, any project designed and implemented in a credible way constitutes a contribution to a European dimension in quality assurance. The debate on the establishment of a more generalised system with effective decision-making procedures will take more time. It is today too early to say what could be a European system, among the various options mentioned and discussed. In fact, as said earlier, the discussion on the models has to be related to the discussion on purposes. The Nordic project has also contributed to this level of the discussion, but in a limited manner. It would have been interesting if the Network had developed further the discussion on *how a full-scale Nordic system (considered as an experimental area) could be designed and implemented*, which also means answering the questions on the purposes and the end-users of a model for the mutual recognition of agencies.

4 Potentially contribute to a system of recognition of degrees

The contribution of this project is less evident to confirm. There is a contribution at the level of the discussion, since the issue was raised within the Network (chapter 3 of the report). But the report does not go very far into that direction; it could have used the opportunity of elaborating a possible procedure on how to relate the recognition of agencies to the recognition of degrees. In a way, the actual pilot project (the two reviews) is disconnected from the discussion in chapter 3 on this specific issue. Here the transparency issue should be raised again. Many efforts have been put recently in Europe to promote the recognition of degrees on a voluntary basis, one of the measures being a substantial increase of mutual knowledge about degrees. The idea here is to promote what could be called *structured and qualified transparency*, and this is an essential step. Considering the diversity of degrees and curricula in higher education, the option of using mutual recognition of quality assurance agencies, or systems, as a way to achieve mutual recognition of degrees is to be seriously considered. The key assumption is to assume that if a higher education system has a credible and sound system of quality assurance, the degrees are also to be considered as credible. The principal advantage of this option is certainly the fact that it reduces substantially the complexity of the recognition system by eliminating the needs for direct and comprehensive comparison of degrees. But certain actors could also see this advantage as a caveat, since this comparison seems essential to understand how to approach a specific foreign degree, comparatively to local degrees, especially in terms of access to the labour market. That is where co-operation between quality assurance agencies and national degree-grant-

ing / degree-monitoring authorities/agencies could become crucial, and put new requirements on quality assurance agencies about the exact type of information delivered (and to which audience, for which purpose).

6 Final comments

To summarise, the Nordic Network has implemented a very interesting project, based on a sound methodology, which has certainly made very relevant contributions on the following aspects:

- design of criteria for the evaluation of an agency in the perspective of a mutual recognition process
- design of a possible procedure of evaluation for this purpose
- general contribution to many aspects of this discussion, especially in chapter 3

The Network members not only increased transparency about operating concepts and practices of quality assurance agencies, but gained legitimacy to be recognised as relevant actors in the wider debate on the internationalisation of quality assurance.

To some extent, the Network has probably been almost too shy by not simulating an entire recognition process, and by not trying to design a pilot procedure going towards the recognition of degrees. This can still be made and would be a very useful experiment.

But it may also be asked what are the necessary preconditions to ensure the success of such an ambitious venture. The Nordic Network has a well-established tradition of co-operation, mutual knowledge and trust. Any model supposed to be implemented and operated in a wider context will have to cope with less optimal preconditions. It may be therefore recommended to (among other things):

- further develop the pilot model in the Nordic context, and to simulate a complete recognition approach, or different scenarios;
- complete the set of criteria with more contextual and impact-related elements, as described in chapter 4 above;
- implement a similar pilot project in a more heterogeneous group of agencies, in order to assess the adequacy of the scheme regarding length and number of visit(s), the composition of panels and the format of panel reports;
- to pursue work and discussion on the set of common criteria, including the options of introducing rules like "comply or explain" or a two-level set with common core criteria and conditional ones ("if … then …" rule);
- to pursue work and discussion on the relation to possible schemes on mutual recognition of degrees, around this concept of "structured and qualified transparency".

Annex C: Self-study Protocol – Pilot Project on Mutual Recognition between Nordic Evaluation Agencies

Danmarks Evalueringsinstitut

Contents

0 Introduction

This self-study protocol is part of a pilot project on mutual recognition of evaluation agencies. The Nordic Network on Quality Assurance initiated the project in order to gain experience with methods relevant to mutual recognition.

Mutual recognition could eventually provide higher education with an evaluation system that comprises both a national and an international element. Such an evaluation system could accommodate national differences while having international legitimacy. The national element would consist of the agencies embedded in a specific national system for higher education in general and a specific steering system in particular. The international component would consist of the international accord regulating the mutual recognition system and of the international features of the recognitions process. Mutual recognition could furthermore serve as external quality assurance and thereby provide accountability for the agencies and facilitate development.

In a broader perspective this pilot project could hopefully feed into the debate on recognition of degrees. In the long-run mutual recognition could possibly support a framework of mutual recognition of degrees, if the relevant authorities decided to establish such a framework. Furthermore mutual recognition could potentially facilitate operational co-operation among the recognised agencies.

Beside the self-study the project will include a visit to the agencies under scrutiny. The project will result in a report on:

1 The prospects for a formal mutual recognition between the Nordic evaluation agencies
2 The methodological experiences
3 Further perspectives for mutual recognition
4 Feed-back to the scrutinised agencies

The focus of this protocol is on presentation and explanation rather than on analysis and assessment. Normally, a mutual recognition evaluation will mainly focus on compliance with agreed criteria. However, in this project the focus is different because there are no previously agreed criteria. A main purpose of the project is to explore the possibility of establishing criteria and accordingly the primary focus will be on description. The only use of criteria in this self-study protocol is the provisions concerning the membership of ENQA (European Network for Quality Assurance in Higher Education).

The protocol consists of the following four main sections.

1 Background information necessary to comprehend the context in which the agency is operating
2 Ownership and purpose of the agency
3 The evaluation method used by the agency
4 The quality assurance procedures of the agency

Besides these main sections, the agency should describe what it considers to be the essential core criteria and methodological elements in a future formal mutual recognition process. This part of the self-study is related to the final reporting of the pilot project and not to the evaluation of the agency.

If possible, the self-study should provide documentation for all statements in the report. The documentation should preferably consist of material produced prior to the self-study. This is especially relevant in section two, three and four.

The Danish self-study with enclosure should be distributed to the members of the working group no later than January 18, 2002. The Finish self-study should be distributed no later than January 25, 2002.

The self-study should be written in English whereas the enclosed documentation could also be in a Scandinavian language.

1 Background

This section should provide the background information necessary to comprehend the context in which the agency is working. The section is expected to include:

- A brief account of the history of the agency in particular and of evaluation of higher education in general (max. 2 pages)
- Description of the legal framework and other formal regulations concerning the agency (e.g. parliamentary laws, ministerial orders or decrees)
- A brief outline of the national higher education system including:
  – Degree structure
  – Institutional structure
  – Procedures and involved parties in establishing new subjects, programs and institutions
  – Other quality assurance procedures (e.g. external examiners)
  – Status of Higher Education institutions in relation to the government
- Internal organisation of the agency
- Other responsibilities of the agency than evaluation of higher education
- A description of the agency's main stakeholders (e.g. rectors conference and student organisations)
- Number of conducted evaluations and number of units evaluated

2 Ownership and purpose

This section should include an account of the ownership of the agency and of its purpose. It is expected to include:

- Ownership in terms of:
- Who initiated and established the agency (government, higher education institutions, others)
  – How the agency is financed

- The nomination and appointment of the board
  – The composition of the board
- The right to initiate evaluations
- The role of the agency in follow-up on evaluations: consequences and sanctions
- The purpose of the agency (if not stated above as a part of the description of the legal framework)
- A report on how the agency meets the ENQA membership provisions:[1]
  · "The agency undertakes external quality assessments (at institutional or discipline level) on a regular basis;
  · These quality assessments may involve evaluation, review, audit, assessment or accreditation and they should belong to the core functions of the agency;
  · The agency should be involved in external quality assurance of more than one subject / field;
  · The agency must act outside higher education institutions. An organisation or entity inside a higher education institution is not considered an external quality assurance agency by ENQA;
  · The agency has been recognised as national or regional quality assurance agency by the competent public authorities;
  · The agency must have been operating for a minimum of two years to be adopted as a regular member. Until that time the agency holds a provisional status;
  · Professional organisations can be adopted as associate members only;
  · Agencies or organisations operating on a commercial basis cannot become regular members."

3 Evaluation method

This section is on the method and models used for evaluations. It is divided into three subsections. The first is on the general planning of the evaluation, the second is on the procedures for collecting documentation and the third and the final section is on the analysis of documentation and drafting of the report. General items include:

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[1] Regulations of the European Network for Quality Assurance in Higher Education concerning provisions for the membership of ENQA. Specifically section 3.2 (with amendments of ENQA General Assembly, May 22–23, 2001)

- Division of labour between agency and experts
- The extend to which the method is modified to specific evaluations
- Compliance with ENQA methodological provisions:[2]
  · "Assessments (evaluation, review, audit, accreditation) are conducted on a regular basis;
  · Agency's procedures are along the lines of the recommendations made following the European pilot project:
  – autonomy and independence in terms of procedures and methods concerning quality evaluation both from government and from higher education institutions;
  – self-assessment;
  – external assessment by a peer-review group (group of experts) and site visits;
  – publication of a report;
  · Agency is working on the basis of a public manual/protocol".

3.1 General planning

This subsection accounts for the overall planning of an evaluation. It is expected to include the following items:

- Procedures related to establishing the terms of reference/project plan
- Reference(s) for evaluation (predefined criteria, legal documents, subject benchmarks, professional standards, the stated goals of the evaluated institution)
- Procedures related to the identification and appointment of experts
- Identification and appointment of the internal project team
- The role of the internal project team
- Briefing/training of experts
- Briefing of and communication with the evaluated institution

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[2] Regulations of the European Network for Quality Assurance in Higher Education concerning methodological element that agencies applying for the regular membership must apply to on the request of the membership review committee (decided by ENQA General Assembly, May 22–23, 2001)

- Meetings between experts: number, scope and time schedule in relation to the overall evaluation process

3.2 Documentation

This subsection accounts for the procedures for collecting documentation. It is expected to include:

- Procedures related to self-evaluation
  – The specification of content in the protocol provided by the agency
  – The procedural advise provided by the agency
  – Training/information of self-evaluation teams
  – Time available for conducting the self-evaluation
- Procedures related to the site-visit
  – Predefined questionnaires/interviewing protocols
  – Principles for selection of participants/informants (categories and specific participants)
  – Principles for the length of the visit
  – Number of meetings and average length
  – Documentation of the meetings (minutes, transcription etc. internal/external)
- Other kinds of documentation (surveys, statistical material)

3.3 Reporting

This subsection accounts for the analysis of the documentation and drafting of the report. It is expected to include:

- Purpose of the report
- The drafting of the report (agency staff or experts)
- Format of report (design and length)
- Content of report (documentation or only analysis/recommendations)
- Principles for feed-back from the evaluated parties on the draft report
- Publication procedures and policy (e.g. handling of the media)
- Immediate follow-up (e.g. seminars, conferences)
- Long term follow-up activities (e.g. follow-up evaluation or visit)

4 Quality Assurance of Agency procedures

4.1 Procedures and systems

This section accounts for the quality assurance procedures. It is expected to include the following items:

- Qualifications and skills of professional staff and management, including recruitment, training and qualification development
- Continuous quality assurance systems in place (e.g. feed-back from institutions, experts and stakeholders and internal accumulation and dissemination of knowledge and experience)
- Evaluation of the agency
  – Self initiated or external initiated
  – Internal or external responsibility
  – Whole/parts
- General initiatives to keep the agency informed on state of the art and new developments within the field of evaluation of higher education (membership of domestic and international organisations, partnerships and networks)

4.2 Effect documented by Quality Assurance

The agency should report on the effects of its work documented by the quality assurance systems and evaluation mentioned above.

Core Issues of Mutual Recognition

This section is related to the final reporting on the pilot phase of the mutual recognition project and not to the evaluation of the agency. It should account for relevant criteria and methodological elements that the agency holds as essential if it should recognise another agency. Both in terms of criteria that another agency is to meet in order to be recognised and in terms of the method that should be employed.

The agency is invited to adapt its own structure on this section.

Annex D: Guidelines for the external panel in the Nordic pilot project on Mutual Recognition

This self-study protocol is part of a pilot project on mutual recognition of evaluation agencies. The Nordic Network on Quality Assurance initiated the project in order to gain experience with methods relevant to mutual recognition.

Mutual recognition could eventually provide higher education with an evaluation system that comprises both a national and an international element. Such an evaluation system could accommodate national differences while having international legitimacy. The national element would consist of the agencies embedded in a specific national system for higher education in general and a specific steering system in particular. The international component would consist of the international accord regulating the mutual recognition system and of the international features of the recognitions process. Mutual recognition could furthermore serve as external quality assurance and thereby provide accountability for the agencies and facilitate development.

These guidelines describe the external evaluation that will be conducted of two agencies as a part of the pilot project. They comprise guidance on:

- General organisation
- The site-visit
- The drafting of the report

The guidelines should be seen as supplementary to the *Protocol for Self-study* that present the internal process at the agencies involved.

General organisation

The agency under scrutiny should provide a self-study drafted in correspondence with *Protocol for Self-study*. The self-study should be sent to the expert-team no later than two weeks before the visit (the exact date is stated in the Protocol).

The appointed expert panel will have a chair and a secretary in addition to [two] regular members.

The site-visit

The visit should have the length of two days including preparation and follow up. The day before the visit the panel will meet and agree on relevant themes for the meetings. The Chair and the secretary are responsible for providing the other members with a draft for interview-guides for the site-visit no later than one week before the visit. The purpose of the site-visit is to validate the self-study. The interview-guides should be drafted with this perspective in mind.

The visit should include separate meetings with members from the agency board, management, staff, experts, owners/key stakeholders (if relevant) and representatives from evaluated institutions. The meetings should be of approximately one hour. The agency under scrutiny put submits a program for the visit is, which has to be approved by the chair.

The chair will preside the meetings. All members of the expert group are invited to ask questions. The secretary takes minutes from the meetings.

The drafting of the report

The day after the visit the expert panel should outline the general conclusions. On the basis hereof the secretary will provide the group with a tentative report. The other members will comment in a written form to the secretary and the chair. The chair and the secretary will incorporate the comments in a second draft to be approved by the panel. The approved version should thereafter be send to the agency under scrutiny for comments on factual errors. The secretary will incorporate the comments in cooperation with the chair. The final report is send to the working group.

The report is expected to be brief and focus on shortcomings in relations to the criteria specified in the self-study and in relation to the documentation used for supporting statements in the self-study.

Annex E1: Programme of 4–6 Feb. 2002 site-visit

4 Feb. 2002

Meeting facilities booked at the hotel Phoenix Copenhagen from 17.00 and the rest of the evening.

5 Feb. 2002

09.00–10.30	Management
10.45–12.00	Evaluations officers from the Higher Education Unit and evaluations officers involved in projects related to Higher Education
12.00–13.00	*Lunch*
13.00–14.00	Staff from the Data Processing and Quality Assurance Unit
14.15–15.15	Representative from the Ministry of Education
15.30–17.00	Representatives from evaluated institutions

Dinner (Panel and Management)

6 Feb. 2002

09.00–10.00	The Chairman of the Agency board
10.15–11.45	Experts
12.00–13.30	Final meeting and lunch with management

Meeting facilities are available at EVA for the rest of the day for the follow-up meeting.

Criteria for selection

The participants in the meetings with the experts and the representatives from the evaluated institutions will be selected in agreement with the following criteria:

- They must have participated in an evaluation finalised no later than 1998
- The experts and the institution representatives must be selected from the same evaluations.
- The main academic field must be represented within the selected evaluations
- Both academic and professional experts must be included
- No representative from a program or institution currently under evaluation can participate in any of the meetings
- They must live in Denmark or Southern Sweden.

Annex E2: Programme of 14–15 Feb. 2002 site-visit

FINHEEC 12.2.2002
Anna-Maija Liuhanen
Nordic project on mutual recognition
Interview at FINHEEC, Annankatu 34–36 A,
4th floor

14 Feb. 2002

8.45	*Welcome. Kauko Hämäläinen*
9.00– 9.45	Ministry of Education: Markku Mattila, Juha Arhinmäki, Anita Lehikoinen, Monica Melén-Paaso, Hannu Sirén
10.00 –11.00	Council members: Ossi V. Lindqvist, Mauri Panhelainen, Toivo Katila
11.15 –12.15	Experts 1: Juhani Jussila, Anneli Lappalainen, Lars Lundsten
12.15 Lunch	
13.15–14.15	Experts 2: Ilkka Virtanen, Pekka Ruohotie
14.30–15.30	Evaluated institutions: Arto Mustajoki, Merja Salo, Mirja Toikka, Päivi Sutinen
15.45–16.45	Staff: Tapio Huttula, Sirpa Moitus, Hannele Ellä, Jouni Kangasniemi, Karl Holm, Kari Seppälä

15 Feb. 2002

8.30–9.15	Finnish Council of University Rectors: Paavo Uronen, Tapio Markkanen
9.45– 10.30	Rectors' Council of Polytechnics: Tapio Varmola, Kaj Malm
10.45–12.00	Students: Terhi Nokkala, Ida Mielityinen, Tommi Himberg, The National Union of Finnish Students SYL; Jouni Kantola, Jenny Lauronen, Marjaana Haapakoski, Union of Finnish Polytechnic Students SAMOK
12.15–13.15	Management: Kauko Hämäläinen, Anna-Maija Liuhanen