2016

Comparing Quality: The Quality Assurance and Enhancement Report for England and Northern Ireland and the Ontario Quality Assurance Framework

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Presented at the Higher Education in Transformation Symposium

November 2 - 4, 2016 in Oshawa, Ontario, Canada

Abstract

This is a comparative study of two reports on the assurance of quality in higher education that appeared contemporaneously in 2008. One was the result of a joint working group of the Quality Assurance Agency for Higher Education, the Higher Education Academy, and the Higher Education Funding Council for England. The other was the result of a task force of the Council of Ontario Universities and the Ontario Council on Graduate Studies. Both groups had the endorsement of government. Both groups began with extensive surveys of institutional opinion about existing quality assurance and enhancement regimes. Using NVivo software, documentary analysis, and archival records the paper identifies and compares several recurring themes, such as: the boundary line between academic support services and student services, the assurance of quality as separate from the enhancement of quality, balancing homogeneity and isomorphism, the institution versus the basic academic unit as the focus of assurance, self-regulation versus system regulation, the assurance of quality versus the enhancement of quality, the role and role of league ranking, performance indicators, and benchmarking, aggregation, and scope of jurisdiction. The paper pays particular attention to the balance between institutional autonomy and system-wide standards in promoting quality and innovation. Some particular findings are that the Ontario perspective focuses on assuring quality in contrast to the British approach's orientation to enhancing quality. The British orientation is towards formative assessment while the Ontario approach is more normative. Neither report discusses the demonstration of quality. Both approaches, then and now, rely on external audits, but the meaning of "audit" is different between the two.

Keywords: quality assurance, report, framework, Ontario, England, Ireland, comparison, higher education

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Setting the Contexts

The reports compared and contrasted here comprise two documents. The English report – Quality Enhancement and Assurance – A Changing Picture" (QEA) – appeared in 2008 (Higher Education Academy, 2008). It was a joint effort of the Higher Education Academy (HEA) and a tri-partite working group comprising the Quality Assurance Agency (QAA) and Higher Education Academy for England and Northern Ireland, and the Higher Education Funding Council for England (HEFCE). The report concluded with 32 findings and ten recommendations. The motivation for the report was to provide a framework of discussion for a national conference, held also in 2008. The report itself provides evidence of the need for the discussion. Two examples that will be examined further were, first, uncertainty about what "student experience" meant in practice and, second, a "which comes first "question about the logical order of quality assurance vis a vis quality enhancement. A further example is noteworthy because it might seem surprising to some. Following a review by the HEFCE of the English Quality Assurance Framework in 2005, the meaning of "quality enhancement" was formally defined, but the Higher Education Academy report only three years later cited considerable differences of opinion about what the term entailed.

The background in Ontario is different, and the report is in two parts: the Ontario Quality Assurance Framework (QAF) report and its accompanying proposed Guide to the Ontario Quality Assurance Framework. (The guide similar to the QAA Handbook for Institutional Audit.) In 2007 a review commissioned by the Council of Ontario Universities, with endorsement of the provincial government (Steenkamp, 2008,) recommended that a task force

be struck to devise a new quality assurance framework that would embrace undergraduate and graduate programs, and take into account existing internal review processes. The task force in mandate and composition was similar but not identical to a joint working group that was established at about the same time by the Higher Education Academy. Ontario already had arrangements for assuring the quality of university education, in the case of graduate programs since 1974 through a system somewhat like the QAA. In the case of undergraduate programs an array of "degree level expectations" (Ontario Council of Vice-presidents Academic, 2005) of which there were seven, all applied at the program level. The undergraduate process – called the Undergraduate Program Review Audit Committee (UPRAC) -- unlike that for graduate programs applied to ongoing programs only. No review or prior approval was required to introduce new undergraduate programs. The scheme was entirely voluntary and internal, although each university was obligated to engage external consultants, which was also a requirement for graduate programs. The purpose of the undergraduate scheme was expressly formative. The graduate system was external, including the appointment of external appraisers. The task force's remit applied to both systems with a single system as the ultimate objective.

A further explanatory note should be made about the Ontario context. Unlike the American elephant in the Canadian room, Ontario and Canada have no history of institutional accreditation (Brennan & Shah, 2000; Clark et al., 2009; Liu, 2015), and do not regard accreditation as assuring quality except in a consumer protection sense of meeting a minimum standard (as coincidentally the QAA system does). There is, however, a long history of accreditation of professional programs at the program level. For example: the American Association of Medical Colleges accredits all Ontario medical schools, and the Association of Professional Engineers of Ontario accredits programs in Applied Engineering. These examples

of accreditation, however, are voluntary. They are not required by government. In fact, governments from time to time have deliberately ignored recommendations of accrediting agencies, and the existing quality assurance processes did not recognize them.

Both systems have performance indictors and student surveys in common. England conducts a National Student Survey annually, and a separate National Higher Education Statistics Agency that calculates and reports an array of performance indicators. Ontario annually conducts a survey of all graduating undergraduates, while the federal government conducts surveys of students as they leave graduate programs. Ontario is one of two Canadian provinces that deploy performances indictors on which some funding is based. Ontario's indicators arose from a report commissioned by a provincial Task Force on Accountability (Ontario Ministry of Education and Training, 1993) and prepared by a special committee of the Council on University Planning and Analysis. The report had three effects relevant to this discussion. First, of 25 indicators devised by the report, nine were specifically identified as expressions of quality per se. Although these indicators formed the basis for the principal Canadian league table, ranking plays no role in the assurance of quality. The indicators applied to programs at all levels. Second, the report a led to a protocol for externally auditing of university processes for reviewing undergraduate programs. These were not quite audits in the QAA sense. They were audits of procedures deployed institutionally, and not of the normative results of those procedures. Third, the task force unequivocally affirmed boards of university governors as the central actors in accountability and the assurance of quality.

A final note contextual note has to do with the composition of the two systems of higher education to which the comparisons and contrasts apply. The Ontario system compared to the England and Northern Ireland (ENI) system is quite homogenous. The quality assurance

process applies only to universities, conventionally defined. Colleges and other specialized post-secondary institutions are covered by other processes (Skolnik, 2015). The QEA report not only embraced more institutions, it embraced a greater variety of institutions and took pains to identify the different categories into which they fall, for example, pre- and post-1992 reorganization.

In summary, taking the title of the QEA paper as a point of comparative reference, the prior Ontario system had two principal parts. The graduate component was about quality assurance while the undergraduate component was mainly about quality enhancement. Accreditation of professional programs and performance indicators was a secondary but not integral part. As in the ENI context there was in the Ontario system a connection between the assurance of quality (QAA) and eligibility for funding. (HEFCE) but only for graduate programs. For undergraduate programs the basic purpose of the process was exclusively enhancement and formative with no connection to funding. The QAA defined "quality enhancement" as applying to the "student learning experience," as did the formative dimension of the Ontario undergraduate arrangement.

Research Design

The fact that two reports addressing nearly identical issues appeared at the same time in two comparable jurisdictions was a coincidence. Clark's paradigmatic "triangle" (Clark, 1983; Lang, in press) provides a reliable test of their comparability. The elemental research question in terms of comparison is whether or not in discussing quality assurance the two agencies that prepared reports were using the same lexicons to discuss different concepts, or the reverse: the same concepts discussed in different terms. In other words, to use Scott's anthropological model for public sector planning (Scott, 1998), did each system "see" the issues in the same way? Was

the vision of either or both systems affected by confusion about the meaning of certain concepts and terminology? Regardless of similarities or differences in terminology, concept, or vision, what generic themes emerge from both reports?

NVivo software was used to analyze the documentary records of both reports. The records were different in certain methodological respects. The Quality Enhancement and Assurance (QEA) report was based on an analysis of a series of semi- structured interviews with a sample of institutional representatives. Out of a possible 138 institutions 64 participated. The results of the discussions were reported as findings, and included positions taken and short quotations specific to institutions individually without attribution to maintain confidentiality. The QEA report also referred to certain Quality Assurance Agency (QAA) and National Student Survey (NSS) provisions – for example, audits. In those cases NVivo was applied to the relevant sections of those secondary documents.

Once approved, the Ontario Quality Assurance Framework was expanded by the addition of a Quality Assurance Guide. NVivo was applied to the original (2008) versions of both. At this point it is important to note that the author was a member of the Ontario [Broadhurst] Task Force on University Accountability, chairperson of the Council on University Planning and Analysis special committee on performance indicators for the Broadhurst task force, the Ontario Council on Graduate Studies Appraisals Committee, and the Quality Assurance Transition/Implementation Task Force that devised the new Ontario Quality Assurance Framework, and had access to all the proceedings, records, and other documentation of those bodies, which included submissions from institutions, to all of which NVivo was also applied where there was discussion of quality assurance. These submissions were institutional, unlike the survey results in the HEA report that were expressions of individual v NVivo “key word” and

"node" functions were used to analyze and identify generic patterns and themes across both cases. Some "key words" for example were "strategy," "planning," "standards," and "bottom-up." Some examples of "nodes" were "student learning," "post-graduate research," "league table," and "institutional mission." Overall, 65 "key words" and "nodes" were used in the analysis. The discussions that follow are organized around the several themes, problems, or points of contention thus identified. The resolution (or lack of one) that each task force applied to each respective issue is then described.

A final note of limitation: the research question and design have a specific point of comparative reference in time. The comparison does not extend to events that occurred after the two reports appeared. Despite an intuitive temptation to use the HEA report as a comparative proxy for the QAA *vis a vis* the Ontario Quality Assurance Council that followed the Ontario report, the study deliberately does not do so. There have been changes in the QAA process since 2008, and although the current process in Ontario closely follows the framework recommended in 2008 it is not exactly the same, nor has its effect on institutional behavior been entirely as anticipated.

Focus

The origins of quality assurance in Ontario in the 1970s had a system-wide focus. The purpose, whether aimed at assuring quality or enhancing quality, was the performance of the system at-large. The focus, further, was on disciplines instead of institutions. The process was comparative and mainly external. The language spoken was planning. For example, how should graduate programs in Physics evolve across the system? Later, but only for graduate programs, the focus shifted to individual degrees, which in a hierarchical sense meant from system to institution to program to credential, for example a Master of Science in Civil Engineering. In

some cases, the focus was sharpened further to “fields” within graduate degrees, for example Physical Chemistry within Chemistry.

This continued to be the focus within Ontario, with undergraduate programs degrees added under the new QAF. The logic of the Ontario focus is inherently that the quality of the system and each institution is the sum of its parts. The new Quality Assurance Framework is fundamentally “bottom up” and self-regulating. The task force that drafted the new framework was acutely conscious of the potentially ossifying effects of isomorphism. They saw a heavily “top down” system-oriented approach as coercive in the practical sense that all institutions and programs would be driven to single models. Ontario was thus resisting a trend that Brennan and Shah (2000) saw as “favour[ing] the institution as the expense of the basic unit” (p. 347).

Terms like “bottom up/top down” and “isomorphism” appear either rarely or not at all in the QEA report. Some de facto concerns in that direction were, nevertheless, expressed in interviews by a considerable number of institutional participants. The meaning of “quality enhancement” provides an example. The QAA had put forward a definition. According to the report, almost all participants knew of that definition. But there were many who believed that in terms of QAA audits evidence of “quality enhancement” should be allowed to vary from institution to institution. Others took the view that while “enhancement” could be reasonably defined at the system level “quality” could not be. Some, perhaps with creeping isomorphism in mind, believed that there should be no workable system-wide definition was possible.

In terms of focus the difference can be described as being between means and ends. In the HEA report one could reasonably deduce that there was a consensus around quality enhancement as an end but a diversity of views about the means of delivering and measuring it. The Ontario framework in contrast is virtually entirely about ends. There every university is

required -- that is, “top down” – to submit to the Council on Quality Assurance for prior approval an Institutional Quality Assurance Process (IQAP) that complies procedurally with the new framework. Thus the means are deliberately “bottom up.” They can and do vary from institution to institution. To understand this differentiation between means and ends as a basis of comparison, consider the role of external appraisals that are common to both systems. Under the QAA process, and evidently from the QEA report without serious concern, external appraisers are not only external per se, they are appointed and instructed externally, and report externally. Under the new Ontario framework external reviewers are required and must be appointed according to specified criteria, but they are selected and appointed by each university, program by program. The appraisers’ reports are made initially to each university’s president or provost, then to the board of governors, and in turn for information to the Council on Quality Assurance.

A final note about focus is a reminder about the differences between the two systems. As previously explained, the Ontario system is relatively homogeneous. There is no formal hierarchy or other differentiation when compared to the system embraced by the QAA and HEFCE. Thus perhaps it should not be surprising that there would be a wide variation of opinion about the means of delivering the ends of quality enhancement, and even about what the term “quality enhancement” meant. There, of course, may be such variation within the Ontario system, but the new framework does not force the issue, leaving means to institutional discretion.

Quality Enhancement versus Quality Assurance

Here we see the most fundamental and frequent difference between the two reports and the documentation that surrounds them. The term “quality enhancement” occurs over and over again in the QEA report. This should not be taken as meaning that the participants in the QEA study were unconcerned about assuring quality. Their concern, however, was very particular:

was quality enhancement the bedrock of quality assurance, or should quality enhancement be understood as only a collateral extension of quality assurance? There was, nonetheless, relatively little comparative evidence of disagreement or confusion about what "quality assurance" meant.

For the Ontario task force the centre of attention and debate was quality assurance and the practical meaning of "quality." As far back as the 1993 Broadhurst report on university accountability and consequent "key performance indicators," and the later "degree level expectations" the province's university sector had been, one might go so far as to say, pre-occupied with defining and measuring quality. The new framework has an entire section on "evaluative criteria" that identify quality and academic standards. With the exception of the "degree level expectations" protocol for under-graduate programs – which were expressly "formative" -- quality enhancement was never a principal focus. Much of the discussion around quality enhancement revolved around differences between "formative" and "normative" approaches. Had the QEA study included participants from Ontario universities, the participants might have used "formative" as a synonym for "enhancement" albeit much less frequently. Does this mean that Ontario universities are unconcerned about quality enhancement, whatever terminology is used to describe it? In terms of the debate reported in the QEA report, it would be fair to say, as the NVivo analysis confirms, that Ontario is squarely on the side of quality assurance as taking precedence over quality enhancement and as being the foundation on which quality enhancement should be built. But that is not the same as a lack of concern for enhancement.

One of the revisions made in the Ontario quality assurance process prior to inception of the task force was a provision that allowed universities to add questions and requests

to the remit given to external appraisers (Connell, 1999). Under this arrangement – which is somewhat akin to what the QAA calls "supplementary trails" -- the appraisers were still appointed and instructed externally, but a second institutionally determined set of supplementary instructions was permitted (but not required). This provision was in practical effect rolled-over into the new framework. The case for this arrangement was primarily intended as a "formative" step that in the QEA study probably would have been categorized as "quality enhancement."

A final note: what about "demonstrating quality"? In research literature assuring quality, enhancing quality, and demonstrating quality often discussed together as optional models (Biggs, 2001; Grimes, 2014). Of the three, demonstrating quality is most often associated with "learning outcomes." Here we see a connection to the experience of Ontario, which for undergraduate programs prior to the QAF was strongly oriented to learning outcomes, and to a considerable degree still is. The NVivo analysis indicates that, generically, comments made by participants in the QEA study could have been as easily categorized as being about the demonstration of quality as the enhancement of quality.

Student Experience as Academic Experience

In analyzing the QEA report it soon became evident that "quality enhancement" had a horizontal or lateral meaning as well as a "which comes first" vertical or hierarchical meaning with regard to the "student learning experience." More often than not, the term appears to have meant "enhancement of the entire student experience." On the Ontario side there was a comparable debate about the boundaries of "student experience" only insofar as the assurance of academic quality was concerned, thus stopping significantly short of the QEA what otherwise might have seemed to be a consensus about what "student experience" entailed. Thus the QEA meaning was intentionally inclusive while the Ontario approach

was exclusive. Here it is important to remember that the focus of quality assurance under the Ontario model is the degree awarded. These differences turn on different axes.

One axis is exemplary of the previous discussion of "quality assurance" versus "quality enhancement." In other words, to what extent does the enhancement of the student experience lead to the assurance of quality? Is every aspect of the student experience a factor in assuring quality, or are only some aspects relevant to it? From the Ontario point of view the quality assurance process should include only those student services, however defined and wherever offered, that directly affect the academic quality of student performance degree program by degree program. In other words, the test is not an exact or universal definition of a given student service. Instead it is the connection of the service to the academic experience. In fact, according to NVivo, the term "academic student service" was unique to the Ontario documentation. The Ontario framework, like most quality assurance protocols, lists evaluative criteria and requires universities to apply them in their internal quality assurance processes and instructs external reviewers to apply them. That is the basis of the connection: does the performance of a given student service effect an evaluative criterion? The answer to this question may turn-out to be different from university to university, and from degree program to degree program within a given university. This is reflective of the broader Ontario viewpoint that places quality assurance ahead of quality enhancement: the evaluative criteria of academic quality are the defining boundary.

Given much conventional wisdom about the connections between student performance and student experience this solution might seem short-sighted. Perhaps it is. However, it may be a logical accommodation of the National Survey of Student Engagement. The survey – usually simply called NSSE -- was developed in 2001, and now is in broad use throughout North

America, including Ontario (Kuh, 2013). The Ontario task force knew about NSSE. Were NSSE not available, the solution might have been different. The new framework, however, does not require use of NSSE results. Some QEA respondents expressed doubts about the utility of the NSS in enhancing quality. They might have said the same about the NSSE.

The other axis is exemplary of the discussion of focus. This might seem to be a semantic technicality, but based on the NVivo analysis it appears to be another boundary issue. It is a problem of organizational dissonance. Quality assurance fundamentally, although in many different ways, is oriented to programs of academic study. Thus universities are organized around faculties and departments. Student services, however, do not always function at the program level, departmental level, or even faculty level. The result is an asymmetry between the focus of appraisal – the academic program – and the focus of many student services which are often for good reason campus-wide, or to use the QEA term across the "whole institution." The definition of "student service" can be fuzzy. Sometimes it means student development, sometimes is means student affairs, sometimes it means student counseling and assistance, or in some cases financial aid, housing, and health services, and so on.

Furthermore, not all students avail themselves of all student services, nor are they required to. But all students must meet the degree requirements of at least one academic program. The result is an asymmetry between the focus of appraisal – the degree program or the institution – and the different modalities by which student services are delivered. What all students must do is meet the degree requirements of at least one academic program, otherwise the "student experience" can to a considerable degree be a matter of student preference and choice.

This was a greater concern among the QEA respondents who worried about a Goldilocks quality assurance approach that forced value judgments about different student service modalities, some of which might be much more than necessary to enhance quality of the student experience, some of which might be much less than necessary, and some of which – depending on the university – might be just right. The QEA report defined "student experience" more broadly than its Ontario counterpart did, and appeared to be more aware of the wide variety of student preferences and, in turn, means of delivering services in response. The QEA expressed several concerns about the QAA audit process, but this one was most typical of what Scott called "seeing like a state" whereby what system planners "see" and what students and faculty "see" are different (Scott, 1998). Lucas (2014) in her critique of the QAA at large confirms that this view is broadly held beyond the population of participants in the QEA study.

Perhaps the elemental difference between the two systems is a matter of simple arithmetic. The more broadly "student experience" and "quality" are defined, the greater the variety and numbers of student service modalities. The greater the variety and number, the greater the chafing caused by "top-down" system-wide instruction, as in the case of the QAA audits, and less so in the case of the Ontario framework.

Bureaucracy, Homogeneity, and Isomorphism

A message implicit in the QEA report is that in undifferentiated systems of postsecondary education the utility value of assuring quality is not infinite. There is a point at which there can be too much. Even the QAA itself has expressed concern about "gold plating." The QEA participants were speaking mainly about process but as Skolnik (1989) persuasively demonstrated too much process can also impede performance or what the QEA

would otherwise call the enhancement of quality. This can occur in several ways. The formation of knowledge, which is a fundamental role of the university, can be defeated if allowed to become static. Knowledge is not new when it is the product of mimetic isomorphism, whereby all programs or institutions mimic or imitate a single presumably optimal model. There was evidence of this concern in the deliberations of the Ontario task force as well. This is a major issue in Lucas' later study of how university faculty view the QAA audit process (Lucas, 2014). The QEA report more particularly exhibited concerns about the potential for homogeneity to limit student choice and experience: all institutions offer the same programs in the same format to students who are admitted on the same basis. Homogeneity, in the form of normative isomorphism, may mask need for university teaching and student services to improve professional practice and, in terms of the QEA report, enhance quality. To paraphrase some of the QEA participants, it is ironically possible that certain protocols for assuring quality could impede the enhancement of quality.

The QAA audit process at the time of the comparison did not refer explicitly to what in some jurisdictions – including Canada – is called "continuous quality improvement" (CQI) but the QAA process did presume that institutions will be continually engaged in assuring and enhancing quality. Community colleges in Ontario are formally committed to CQI, but the view of universities as expressed in the QAF is almost the diametric opposite.

One reason for striking the Ontario task force was a report (Van Loon, 2007) that the prior quality assurance process was too demanding in terms of time, ignored normal academic production cycles, and failed to coordinate quality appraisals processes with accreditation protocols. Universities reported that for some programs it was literally possible that a program could be the subject of a quality assurance appraisal, an accreditation review, and an

institutionally required external review within a two or three-year period. Here it is important to explain that many Ontario universities, particularly after the Broadhurst report, have had their own requirements that mandated external reviews on the turn-over of faculty deans and department chairs. The new framework in response called for "periodic" appraisals and provided an allowance for institutions at their discretion to fold some results of accreditation reviews into their IQAPs. The Nvivo analysis did not find any references to accreditation in the QEA report, although some professional programs in ENI institutions are subject to ex parte regulation and accreditation.

The QAA audit process and the QEA discussion of it speak in terms of what in North American universities would be called "benchmarking" and "good practice." This is much more prevalent in the QEA report and QAA handbook than in either the Ontario QAF or its accompanying guide. The inner logic of the QEA report connects both to the enhancement of quality, which, as previously discussed, is secondary in the Ontario framework. The QEA report and QAA handbook also connect benchmarking and good practice to accountability. The QEA report cited this as an example of a shift in the allocation of institutional resources from assuring quality to enhancing quality. The QEA report speaks about "drivers" that have affected this shift and the relative emphasis on accountability through benchmarking and best practice. These drivers, including league tables, are described as being external to the institutions. The drivers in Ontario – although that term was not used except generically in NVivo terms – were almost entirely internal. League tables, which could be a basis for comparative benchmarking (Lang, 2005), were deliberately not taken into account in the design of the QAF. Ontario has a long history of university autonomy (Liu, 2015). The QAF task force was necessarily aware that individual universities had diverse and distinct missions and

mandates, and rarely had the same arrays of programs. For example, medical schools have a distinctive cost pattern that can thwart peer selection and affect quality and other input-output "good practice" assessments that are based on comparison with universities without medical schools. This is an area in which benchmarking absent systematic peer selection can send seriously erroneous signals about quality (Birnbaum, 2000; Lang, 2001), which is one reason why the Ontario task force was wary of undifferentiated league rankings.

Finally, bureaucratic homogeneity tends more in the direction of assuring compliance than in the direction enhancing quality. The QEA report acknowledged this tendency, and advocated reforms away from a then perceived "coercive and policing approach" towards a more "advisory "role for the QAA's Quality Enhancement Unit. The reports that preceded formation of the Ontario quality assurance task force warned against any movement in the direction of such policing that would curb university autonomy (Council of Ontario Universities, 2007).

Audits

The Ontario framework in order to strike a balance between institutional autonomy and accountability requires each institution to devise an "institutional quality assurance process" or IQAP. There is an absolute requirement that no university may bring forward proposals for new programs in the absence of an IQAP ratified by the Quality Assurance Council. Thus the process shifted from external to internal as that the institutions became accountable not for their performance but for the processes by which their performance was measured. A new role of auditor was created. The new system requires a periodic compliance audit conducted by external assessors (not external reviewers) appointed by the Quality Council. The purpose of the audit, unlike the Quality Assurance Agency audits but similar to those in some American states (Massy, 2013), is to determine whether or not each institution has complied with its IQAP, in

other words, to determine whether or not a university has done what it said it would do. If a university is found not to have been in compliance two very serious actions may follow. All proposals for new programs may be embargoed until an entirely new IQAP has been reviewed and approved. If the failure to comply affects the internal review and submission a new program, all programs brought forward in the respective review cycle have to be re-submitted for approval. It their discussions the Ontario task force referred to these provisions as "hammers" that would ensure compliance.

"Audit" meant something quite different to the participants in the QEA study. The QAA process was and still is more external than the Ontario process. As already noted, the audit pre- supposes a continual process of quality assessment and improvement. An even greater difference is the focus on the performance of institutions instead of the performance of individual degree programs. Thus the QEA report cites questions about how "deliberate steps [taken] at the institutional level" can effectively assess and enhance quality at the program or, in QEA terms "department" level. Some respondents went a step further and spoke about the enhancement of quality being "implicit" at the institutional level and "explicit" at the departmental level. This line of thought resonates in the Ontario IQAP model.

"Audit" in QEA terms is different from "audit" in QAF terms in at least two other significant ways. First, he effectiveness and legitimacy of an institution's IQAP under the Ontario system is examined only once – when the IQAP is submitted for ratification. After that independent "auditors" appointed by the Quality Assurance Council periodically – every eight years -- determine in an almost a fiduciary sense whether or not the university has complied with the procedural terms of its IQAP. In other words, the audit process is not continuous in CGI terms. It is, however, like the QAA process in that the audit functions at the institutional level.

It is the only part of the QAF process that does. All other aspects of the framework function at the degree program or, in QEA terms, department level. The QAA process and the QEA perception of the process see "auditors" as experts whose assessments and advice ensure that institutional processes maintain and improve standards of quality. They do assess. They do evaluate. They do determine whether or not standards of quality are being met. The Ontario framework does use and require expert "external reviewers" who are somewhat like "auditors" in the QEA sense, but who are not part of the audit process.

The second difference becomes apparent as one reads the QEA report. It is not a coincidence that QEA participants speak almost exclusively about the "student learning experience." The auditors are experts in teaching and management. Their essential remit is about student learning. Research and other aspects of advanced study are collateral. The opposite is the case under the QAF, which seeks to assure equally all aspects of academic performance. This may be because neither Ontario nor Canada has the counterpart of the Research Assessment Exercise (in 2008) and now the Research Excellence Framework.

"Pooling," Fungibility, the Level of Appraisal - The Problem of Aggregation

Scott in *Seeing Like a State* (1998) explained the special significance of process in understanding the importance of determining the level at which quality should be appraised. Scott analyzed a series of plans that not only failed but also made conditions worse by not recognizing the implications of "social simplification." The key to each of the fiascoes was a failure to understand process: what state (or system) planners "saw" and what those who had to meet the targets set by the plans "saw" were different. Quality assurance agencies often due to such simplification do not "see" the what academic administrators, faculty, students, and researchers "see."

Here are two examples. In the QEA report respondents expressed a concern that faculty members on what they called the “chalkface” did not “see” quality enhancement as an institutional or system-wide concept. The quality assurance system the preceded the QAF in Ontario “saw” only individual degrees one-by-one, but faculty and academic administrators “saw” an array of fungible academic and physical resources that were assigned to entire programs that included several degrees supported by an undifferentiated set of resources. Blau (1994), Crane (1972), and Massy (2013) might all say, albeit in different ways, that this reflects the real work of university organization and performance. These examples emphasize how essential and difficult it is to “close the loop” at the right place in assessing quality (Kirp & Roberts, 2002; Massy, 2007; Banta & Blaich, 2011).

This forces a clear choice about the level at which the quality assurance process should function: “major” for undergraduate programs and “field” for graduate programs; degree; organizational unit, for example a department, or the institution at large. Finding the right level of aggregation is as essential as it is difficult in the successful assurance of quality. As Porter (1996) said “diversified companies do not compete; only their business units do.” This applies to universities. They are very diversified. Porter’s proposition is fundamental to quality assurance. For example if we examine individual performance indicators of quality carefully, we see that most of the "performances" that the indicators measure do not really operate at the institutional level, yet the metrics of the indicators are often calculated at the level of the institution (Lang, 2016; Massy, 2007). Thus the inferior (or superior) quality of some degrees or programs may be masked and artificially offset by being “pooled” (Martin, 2011) with the superior quality of others. In terms of the assurance of quality this can impede and distort equivalency, portability, and degree integrity.

There is, however, another side to the problem. If the level of disaggregation is too low, the frequency of quality review will rise, in turn review processes will be duplicated, and the cost of quality assurance will in turn rise without necessarily there being any greater assurance of quality. Some QEA participants seemed to recognize this possibility. The final dimension of the aggregation problem involves benchmarking and peer comparison for the purpose of assuring or enhancing quality. This was certainly in the minds of those who responded to the QEA study. The QAA process does not speak about peer selection but it does have a lot to say about benchmarking. Here the problem is too little attention's being paid to peer selection in the assurance process. Sometimes nominal peers are peers in aspiration instead of in fact. Other times comparisons break down when disaggregated. For example, two universities may be authentic peers at the institutional level, but not at the program level: one of the universities might have, say, a health sciences centre with anomalous costs while the other does not. The comparison fails to indicate anything about the first university's health science programs or indeed anything about its overall fiscal strength as it affects quality.

The QAF came down on the side of assurance at the degree level for purposes of equivalency, portability, professional licensing. The QEA report and its perception of the QAA are somewhere in between, but closer to high aggregation. In practical effect, the QAF process made "pooling" impossible. Each degree must be appraised. However – and this was a major change -- degrees may be reviewed together at the institution's discretion. In other words the appraisal process may be bundled procedurally but the process must still appraise each degree individually. If an Ontario university wishes to include peer comparison in its IQAP, it must explain the process by which peers will be selected, and be held accountable for the its consistent deployment as part of the audit process. In other words, just as a university's selection

of external reviewers will be "audited" so will the process by which peers are selected for comparison and benchmarking. The QAA audit process did not and does not go this far, nor did the QEA study indicate that it should.

Jurisdiction

A reader of only the QEA report would reasonably wonder why any discussion of jurisdiction is needed. But like the dog that did not bark in the night in the Sherlock Holmes' "The Silver Blaze" the fact that the report says nothing about it is significant as a point of comparison. The Ontario framework says a lot about it. The QAA handbook has an entire section on inter-jurisdiction "collaboration." "Jurisdiction" refers to the scope of a quality assurance or quality enhancement protocol. One might say that this is easy to define: it is boundaries of a provincial or national system of university education. But it is more complex. Many Ontario universities have dual credential programs in which some instruction is provided by institutions – community colleges, for example – that are outside the university system. Some universities offer conjoint degree programs in collaboration with other universities. At the doctoral level cotutelles are becoming common in French, Australian, and Canadian universities, including several in Ontario. Some universities offer programs that are "privatized" in the sense that they are not eligible for public funding or the institution has chosen not to seek public funding for them. Distinctions between which programs are reviewed pose a problem for quality assurance: where are their boundaries?

The QEA cited a QAA "collaborative provision" is about partnerships between universities and "other providers" either within or outside the United Kingdom. Such partnerships may be covered by the normally required audits or by separate audits. The separate audits provision applies to all partnerships outside the UK. In Ontario all programs

are subject to the QAF whether or not they generate public funding. Each university that confers a degree that is offered jointly with another institution of any kind must include the entire program in its IQAP, including those elements of the program that are offered by collaborating institutions. All programs that lead to degrees from Ontario universities are subject to the new framework whether or not they are delivered in Ontario. There is an exception. If a program or part of a program is delivered in another jurisdiction, and that jurisdiction has a quality assurance process equivalent to the Ontario process, the program does not have to be assessed again in Ontario.

Summary Thoughts

A first comparative thought takes classical philosophy as its reference point. The QEA report has an Aristotelian mindset in that it discusses quality mainly in terms of learning outcomes, hence the greater attention paid to league rankings than in Ontario. The Ontario model, perhaps because of its connection to public subsidies and system performance, is more Platonic it its attention to the process of learning. What about the future of enhancing quality? In terms of balance, the new Ontario system is much more about assuring quality than enhancing it. Although the QEA report cited serious concerns and doubts about how the ENI quality enhancement system works, there was a consensus about the primary and decidedly not secondary importance of quality enhancement. The differences between mimetic isomorphism and coercive isomorphism might outline the line that separates the two positions.

The new Ontario system is inherently more mimetic than coercive: each institution has virtually exclusive autonomy over mission and strategy, including particularly the selection of peers for comparison and benchmarking that are expressly part of the QAA process and were accepted by the QEA participants without significant reservation. Comparative benchmarking

peer is an especially effective device for enhancing quality (Massy, 2007; Wolff, 2007). Selecting peers for the purposes of benchmarking is, however, very difficult (Lang, 2001), but the freedom to do so, which the new Ontario framework allows can be a huge step in the direction of enhancing quality. Will institutions take that step? In the UK they must, although the QAA process was seen by the QEA participants as very problematic about peer selection. The fact that a university is free to benchmark itself does not mean that it necessarily will. Quality assurance is an inherently static concept: in both systems assurance of either quality or process occurs at a given time according to a pre-determined schedule, and always retrospectively.

Quality enhancement, especially as perceived by the QEA study, is about change: making quality better over time. The second factor thus is the motivation of change. What motivates it? There are four basic paradigms: natural selection," "resource dependence" (Birnbaum, 1983), "competition" (Ben-David, 1972; Hansmann, 1999; Burke, 2007; Fallis, 2013), and "academic status" (Blau, 1994; Crane, 1972). Academic status is inherently comparative, but tends towards mimesis, particularly in connection with league rankings (Lang, 2005). League rankings were a much greater concern of QEA respondents than the of the Ontario task force. Natural selection is more about survival and avoidance of comparison. This played no role in either report. The Ontario position is "compare if you want to." QEA and QAA approach demanded comparison.

Resource dependence requires funding regimes that somehow reward quality; very few do (Dougherty & Reddy, 2013). Ontario does, but the amounts are so small that they do not affect institutional behavior (Lang, 2016). For the decade prior to the QEA study ENI institutions had access to a Teaching Quality Enhancement Fund, which was financially more significant than its Ontario counterpart. But as the QEA study and NVivo analysis confirm, very few

respondents said anything about the TQEF. Of the four, competition motivates change the most (Massy, 2007, 2013; Burke, 2007; Fallis, 2013) in the direction of quality. This is much more manifest in the QEA report than in the QAF and the reports leading up to it. QEA respondents seemed very aware of the potential effects of various means of measuring and enhancing quality on institutional reputation and league rankings. Kirp and Roberts (2002), Burke (2007), and Massy (2007) all point out that using autonomy such as that allowed by the new system in Ontario to assure quality may or may not enhance quality. These studies, of course, pre-date either the QEA report or the QAF. But buried in the QEA report and the QAA handbook are strong hints that these studies might retroactively explain the greater attention paid to quality enhancement in the ENI system than in the then new Ontario system.

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