

**FOURTH REPORT OF THE SCIENTIFIC COUNCIL
TO
A3ES**

MEETING OF 25 NOVEMBER 2013

The Scientific Council (SC) hereby submits its fourth Report to the A3ES – the Agency for the Evaluation and Accreditation of Higher Education in Portugal. As in the past, we appreciate both the invitation to discuss the current and future state of affairs regarding quality assurance in Portugal, as well as the willingness of the Agency and its leadership to engage frankly and openly in a comprehensive and wide-ranging exchange about how the system in place may be enhanced and strengthened.

The current Report varies from its three predecessors. The Scientific Council was presented with the Self-Evaluation Report conducted by A3ES in preparation for the required external review of the agency by the European Network for Quality Assurance (ENQA). This Self-Evaluation examines the activities and progress of the agency since its inception, assesses its strengths and weaknesses in light of the European Standards and Guidelines for Quality Assurance, and outlines its future plans. We therefore begin by offering some brief comments on the self-study as a means of better helping the agency prepare for its external review. We follow these comments as in past reports with commendations on the overall development of the agency, particularly relevant at this moment of external review, and conclude our comments with a discussion of some future-oriented questions. Here we also make some recommendations that we hope may prove beneficial to the Agency in its development of the Nation's system of higher education.

Comments on Self-Evaluation Report for ENQA Coordinated External Review

The members of the Scientific Council were impressed by the Self-Evaluation prepared by A3ES for the ENQA review. The self-evaluation is very well organized, accurately reflects the history and development of the agency as we have experienced it since its inception, and responds effectively to the ENQA criteria while providing very useful and informative appendices with detailed information about the Agency and its activities.

In reviewing the self-study we identified the following issues, which may assist the Agency in preparing for this external review (Section numbers refer to the Self Evaluation Draft of July 2013):

Section 2.6:

- Of the universities now functioning as Foundation Universities, is there any evidence that they have been more active or more responsive in improving academic quality?
- Are any universities now operating as foundations under the 2007 Legal Framework for HEIs and if so is there any evidence that these universities have been more active or responsive in improving academic quality?

- Section 3.3: Will the future emphasis on a “lighter touch” accreditation procedure, for those institutions with effective internal quality assurance systems, disadvantage smaller institutions with more modest administrative organizations, and if so, how might this be addressed?
- Section 3.8: With regard the Office of Research and Analysis can evidence of the specific contributions of their activities to the effective development of the agency be provided?
- Section 4.1: While the existence and use of effective methods for evaluating teaching/instruction and student learning should be an essential guideline for the assessment and accreditation of study programs, the specific listing of student satisfaction surveys may be too prescriptive and/or limiting. While such surveys have become a requirement internationally, they have known flaws: sampling problems, student biases in assessment such as the gender and/or personality of the instructor, as well as creating incentives for the inflation or compression of marks in modules with continuous assessment. Given the increasing complexity of instructional technology in higher education, stressing the need for more valid and reliable means for evaluating instruction, which might also include student interviews, peer reviews of instruction, videotaping of instructors, etc., may be warranted.
- Section 6: To what extent are identified problems with the Electronic Platform user-caused and to what extent may they be flaws in the system?
- Section 7: A number of countries that have also implemented effective and influential systems of subject assessment or accreditation, such as Germany and the Netherlands, have discovered that such processes are exhausting and diminish in effectiveness over time. As a consequence, like A3ES, these nations are considering a greater focus on auditing institutional processes for academic quality assurance. Academic audits appear to be most effective if they focus less on the existence of institutional processes and more on whether there is proof that evidence-based judgements about academic program quality have been made through these institutional processes that have resulted in selective scrutiny, effective support, and observable improvement in identified programs.¹ This may require analysis of both institutional processes and their impact upon a sample of academic programs, as is done in the Hong Kong Academic Audit process.²

Commendations

The Self-Evaluation for the ENQA review prepared by the Agency also permitted us to assess in detail the development and activities of the agency. We therefore wish to commend the following noteworthy aspects of the governance, organization, and management of A3ES:

- The Bologna Education ministers, in adopting a governance design for academic quality assurance agencies in their respective countries, specified that a national QA agency must be able to demonstrate that “(i)ts operational independence from higher education institutions and governments is guaranteed in official documentation (e.g. instruments of governance or legislative acts)” and that “(t)he definition and operation of its procedures and methods, the nomination and appointment of external experts

¹ Dill, D. D and Beerkens, M. (2013) Designing the Framework Conditions for Assuring Academic Standards: Lessons Learned about Professional, Market, and Government Regulation of Academic Quality. *Higher Education*, 65(3): 341-357.

² Massy, W. F. (2010) Education Quality Audit as Applied in Hong Kong. In D. D. Dill and M. Beerkens (eds.) *Public Policy for Academic Quality: Analyses of Innovative Policy Instruments*. Dordrecht: Springer.

and the determination of the outcomes of its quality assurance processes are undertaken autonomously and independently from governments, higher education institutions, and organs of political influence.”³ As outlined in the Self Evaluation, A3Es has been very effectively designed to assure its independence from both government and the higher education institutions.

- The establishment and use of the Office of Research and Analysis was a wise and well implemented decision that appears to provide a comparative advantage to the Agency among its QA peers.
- The preliminary accreditation process was very thoughtfully planned and intelligently implemented, effectively winnowing out weaker academic programs in the overall higher education system, while at the same time helping to affirm the reputation of the Agency.
- Through its activities and conduct the Agency appears to be achieving a growing acceptance within the Portuguese academic community.
- The positive financial balances for the Agency as well as the Agency’s consultation with advisory groups about effective expenditure of reserves and pricing of services suggest very effective financial management.
- The Code of Ethics adopted by the Agency and the norms governing External Assessment Teams are a particularly noteworthy contribution to the higher education system.
- Finally, the members of the Scientific Council are particularly impressed by the high productivity of what is by international standards a small Agency staff.

RECOMMENDATIONS

Following our review of the A3ES Self-Evaluation as well as our discussions with Agency staff, we have several recommendations about future plans.

In many nations policymakers are increasingly concerned not only about the rising costs of higher education, but also about assuring academic standards, particularly the effective and reliable measure of student learning outcomes. With the massification of higher education there has been renewed interest in several countries in the traditional British model of academic quality assurance through external subject examiners, versions of which also exist in Norway and Denmark.⁴ Could such a system for assuring academic standards be envisaged for Portugal, which has had no previous experience with such examiners?

Traditionally English universities administered cumulative examinations to candidates for honors degrees. The academic standards of these exams as well as the performance of representative students were assured by independent external subject examiners appointed from peer universities. The external examiner provided an overall judgement on student performance, on the rigour and equity of the assessment processes and their administration and on the quality and standard of the relevant programme via a written report to the department on main strengths and weaknesses. The report was (and still is) based upon direct access to samples of students’ assessed work and observation of the assessment processes in action.

³ ENQA (2005) *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (Helsinki: European Association for Quality Assurance in Higher Education), p. 25.

⁴ The difference between the UK/Norwegian approach and the Danish model is that Denmark has national external examination commissions, which do not leave it up to each university to appoint examiners.

However, the recent expansion of the English university system, the creation of many new interdisciplinary and multi-disciplinary subjects, and the adoption of modular degrees as well as continuous assessment practices in many institutions have compromised to some extent the effectiveness of the traditional subject external examiners⁵ and led to the establishment of a more rigorous national framework for the design and management of external examination systems that puts more emphasis on the responsibilities of institutions.⁶ This could be said to represent an attempt to retain some strengths of the external examination system in a changing context: its focus on evidence of student outputs and its embeddedness in academic values and practices. That said, the challenges to the system presented by the scale and complexities of contemporary higher education provision have led to the argument that external examiners should conduct “meta-evaluations,” which audit the adequacy of university-based processes for assuring the validity of subject-level evaluations and marking.⁷

Whether the focus should be on validating existing comprehensive subject examinations or validating institutional means of assuring subject examinations, a pilot project designed to experiment with the concept of external examining and crafted to fit the Portuguese academic system could prove of benefit. Such a project could reinforce the professional responsibility and obligation for all academic staff to assure academic standards.

A second issue warranting future attention is the use of ranking systems in Portuguese higher education. University rankings at the national and now global level have become ubiquitous and are clearly influencing academic behavior, frequently in ineffective ways. Whatever may be said about the validity of global university rankings, none of them are based upon a testable model of educational performance. Furthermore, by ranking all universities on a common standard, these league tables create incentives for all institutions to invest in an expensive academic arms race for research prestige.

In a country such as Portugal, which has sought to develop institutional diversity in higher education through creation of both public and private sectors, implementation of a binary system, and encouragement of “foundation” universities, the institutional homogenization encouraged by poorly developed ranking systems may be particularly destructive.

However, well designed and valid peer comparisons or institutional benchmarks can be helpful to institutional leaders and academic staff in improving academic quality. The recent U-Map data developed by the Center for Higher Education Policy Studies (CHEPS) at the University of Twente in association with their project to develop a more valid system of University classification therefore may offer a valuable opportunity for A3ES to develop comparative institutional profiles of value in improving academic quality. The Agency may wish to capitalize upon the existing Portuguese U-Map data in combination with its own information base to develop benchmarks for Portuguese higher education focused on the educational profile of comparable, peer institutions.

⁵ Lewis, R. (2010) External Examiner System in the United Kingdom. In D. D. Dill and M. Beerkens (eds.) *Public Policy for Academic Quality: Analyses of Innovative Policy Instruments*. Dordrecht: Springer.

⁶ See, for example, Quality Assurance Agency, 2011, *UK Quality Code for Higher Education - Chapter B7: External Examining* (<http://www.qaa.ac.uk/Publications/InformationAndGuidance/Pages/quality-code-B7.aspx>); Higher Education Academy (n.d.), *A Handbook for External Examining* (<http://www.heacademy.ac.uk/external-examining>).

⁷ Stensaker, B., Brandt, E., Solum, N. H. (2008). Changing Systems of External Examination. *Quality Assurance in Education*, 16(3), 211–223.

Third, as the A3ES turns its attention more toward the development of effective internal quality assurance systems within Portuguese institutions of higher education, the issue of public reporting of effective progress becomes more complex. What is the best way to describe or categorize more effective systems of institutional academic quality assurance? Numerical rankings may be significantly misleading, particularly in Portugal, where many institutions may be developing internal systems of academic quality assurance for the first time. Massy,⁸ who designed the original Academic Audit process in Hong Kong, has developed a useful and informative model of quality process “maturity,” which may have applications in the Portuguese system of higher education. This model includes five levels of quality process maturity from a beginning category of “no effort,” characterized by unmonitored quality assurance, to “mature effort,” featuring the planning, tracking, and performance evaluation of academic quality processes.

Finally in our discussion with the Agency staff we also explored the changing nature of instruction in higher education, particularly the emergence of “Massive Open On-Line Courses” or “MOOCS” and Internet-based providers of higher education who may easily cross borders and challenge national attempts to sustain and improve academic quality. However, the innovations of information technology are not only altering global access to academic content, but also are transforming the conduct of academic research and scholarship, academic publication, and the nature of teaching and student learning within traditional institutions of higher education. Several recent studies by leading US economists⁹ have explored the implications of the new information technology for instruction and student learning in US higher education and have suggested traditional academic practices may be undermining the efficiency and educational performance of US colleges and universities. A careful analysis of these and related studies in the EU may prove of value to the future efforts of A3ES to improve academic quality in Portuguese higher education.

We remain,
Yours very truly,

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⁸ Massy, W. F., Graham, S. W., and Short, P. M. (2007) *Academic Quality Work: A Handbook for Improvement*. San Francisco: Jossey-Bass.

⁹ Bowen, W. G. (2012) *The “Cost Disease” in Higher Education: Is Technology the Answer?* The Tanner Lectures, Stanford University, Palo Alto, CA. (<http://www.ithaka.org/sites/default/files/files/ITHAKA-TheCostDiseaseinHigherEducation.pdf>); Ehrenberg, R.G. (2012) American Higher Education in Transition. *Journal of Economic Perspectives*, 26(1): 193-216.

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