

Sixth Report of the Scientific Committee
to
A3ES

Meeting of 26-27 October 2015

The Scientific Council hereby submits its sixth Report to A3ES, the Agency for the Evaluation and Accreditation of Higher Education in Portugal.

The Agency's Activity Plan for 2016 constituted the main point in the agenda of this year's Scientific Council meeting. Within the European Higher Education Area, A3ES is fast becoming a mature agency. Bearing this in mind, the Council takes the opportunity the Activity Report presents to set out its views and recommendations for the Agency's current and future activities. The Council reflects upon the Agency's achievements on completing the first cycle of programme accreditations and institutional assessments. It elaborates further on a number of reflections and invitations for dialogue, laid out in the detailed and informative Agency reports, which form the basis of our visit and our work. Finally, suggestions are offered as the Agency turns its attention to new activities together with a shift in evaluation methods for the years ahead.

Achievements and Acknowledgements

As several of our previous reports make clear, the Scientific Council has been duly impressed by the development of A3ES since its inception as too by the role and standing it has acquired within higher education in Portugal. The Council would single out important achievements in three areas.

First, higher education in Portugal has been through a turbulent decade, which has had substantial impact on its dynamic. Despite marked downward fluctuations in overall student numbers since 2003 and again since 2010/11, nevertheless growth in programmes may be viewed as a positive development and as a clear sign of higher education being alert to new opportunities. From the perspective of quality assurance, however, this latter development raises concern about the quality of the provision for student learning and research. Under these conditions, A3ES has taken on an important role as actor mediating in this situation. It has – through its accreditation procedures – provided a dimension both necessary and unifying to Portuguese higher education in difficult times.

Second, while quality as part of the Bologna Process has become both a central feature in European higher education and an integral part of its enhanced globalization, within Portugal academic quality assurance historically was treated in a more implicit manner. From the outset, A3ES set out to make academic quality an issue overtly explicit, which within Portugal is today more openly and critically discussed. By dint of studies insightful, research-based and covering a range of quality issues, through the

conferences it organizes, and not least through its rigorous accreditation procedures, A3ES has placed quality firmly on the agenda of higher education institutions. (HEIs)

Third, quality assurance expresses the growing public interest in higher education. It reflects the concerns both of the Nation's representatives and the general public about how higher education utilizes its resources and how it imparts societal value. Public interest in higher education is positive, despite the fact that some measures have not always been conducive to the long-term development of universities and polytechnics. Translating external interest and public concern about higher education into procedures for vetting and assuring academic quality, which are viewed as legitimate and sustainable by those weighed in the balance, is delicate. In the Council's considered opinion, A3ES has been highly sensitive, capable and creative in building institutional support for the activities and actions it has launched. This, in turn, has generated trust throughout higher education in Portugal.

To the minds of some, these achievements may appear soft and difficult to measure with hard indicators. Nonetheless, they are among the most difficult accomplishments a quality assurance agency may hope to achieve. In terms both of its effectiveness and efficiency, A3ES stands out in Europe as one of the cutting-edge quality assurance agencies.

Current Challenges

While applauding A3ES' accomplishments to date, the Agency, it may be suggested, cannot rely upon previous practices alone in drawing up its future activities. Here, the Council would draw the Agency's attention to two major and future challenges.

First, the years ahead will require the introduction and rolling out of a new form of evaluation. The organizational capacity of A3ES will come under no little pressure. It will have to maintain its focus on programme accreditation while simultaneously introducing institutional assessment. Currently, A3ES is considering integrating the certification of institutional quality systems as part of institutional assessment. However, since only a few institutions have come forward and received certification for their internal systems, the launching of a new mode of evaluation, focused on academic processes as yet not fully implemented among Portuguese universities and polytechnics, poses a major challenge. Put succinctly, A3ES as an agency seeks to move from programme *accreditation* to emphasizing *institutional* responsibility for quality assurance.

A second challenge is posed by A3ES' role as a source of information on the quality of higher education in Portugal. While A3ES enjoys high legitimacy within Portuguese higher education, the general public has less knowledge about the Agency, and more importantly, about the information the Agency holds which bears on the quality of higher education. Both the Yerevan Declaration of the European Council of Ministers of Education (2015) and the recent updating of the European Standards and Guidelines (ESG) drew attention to the public responsibility of quality assurance agencies. In all likelihood, this responsibility will weigh more heavily on A3ES in the years to come. As the provider of information reliable and trustworthy, on higher education, the expectations placed on A3ES are rising and, as an additional task may well place the existing capacities of the Agency under severe strain. Since both old and new forms of

evaluation are to be conducted in parallel, this situation is compounded. While much information has been gathered from the many accreditations and research projects the Agency has initiated, taking on additional responsibility of information provision is likely to be greatly demanding in time, resources and effort.

Recommendations

Prior to examining the implications these two issues may pose for A3ES, some current and specific points our discussion raised with Agency representatives are addressed.

1. European Standards and Guidelines for Quality Assurance

The first arises from recent revisions to the European Standards and Guidelines for Quality Assurance endorsed in the Yerevan Communiqué of May 2015 and very particularly the implications it would appear to pose for existing reports and public communications from A3ES. Agency leadership takes the view that the new guidelines for public communication are overly specific and needlessly rigid, more especially so given A3ES’ remit to accredit and assess both academic programmes and the processes of institutional quality assurance. Under its current mandate, A3ES publishes over 1,000 reports. Revised guidelines could add significantly to both complexities and time in bringing these publications out. The Scientific Council’s review of the formal standards and guidelines formally set down at Yerevan – – see Table A – – might hint at greater flexibility than A3ES is prepared to credit. However, further interpretation of these guidelines by the European Network of Quality Assurance (ENQA) may well turn out to be yet more restrictive.

Table A
<p>2.6 Reporting</p> <p>Standard: Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.</p> <p>Guidelines: The report by the experts is the basis for the institution’s follow-up action of the external evaluation and it provides information to society regarding the activities of an institution. In order for the report to be used as the basis for action to be taken, it needs to be clear and concise in its structure and language and to cover</p> <ul style="list-style-type: none"> <input type="checkbox"/> context description (to help locate the higher education institution in its specific context); <input type="checkbox"/> description of the individual procedure, including experts involved; <input type="checkbox"/> evidence, analysis and findings; <input type="checkbox"/> conclusions; <input type="checkbox"/> features of good practice, demonstrated by the institution; <input type="checkbox"/> recommendations for follow-up action. <p>The preparation of a summary report may be useful. The factual accuracy of a report is improved if the institution is given the opportunity to point out errors of fact before the report is finalised.</p> <p><i>Standards and guidelines for quality assurance in the European Higher Education Area (ESG). Approved by the Ministerial Conference in Yerevan. 14-15 May 2015. p. 16.</i></p>

In the sphere of societal communication, these guidelines have been set out to ensure that QA agencies fulfill their mandate, namely, to convey accurately and unambiguously to the public how the agencies' obligation to uphold and improve academic quality is being met. Stated thus, it does not seem necessary that every report published by A3ES be expressly drafted for, or wholly addressed to, the public at large. Rather, this task is best balanced against that other mission the Agency expects to undertake in the years ahead – namely, furthering the development of systems for academic quality assurance *within* individual institutions of higher education. This is an important and strategic undertaking. For its part, the Scientific Council takes the view that this substantive point should be brought clearly and unambiguously to the attention of the Ministers of Education meeting within the Bologna Process, to their designated representatives and to ENQA. For, if one size may indeed be called upon to fit all, circumstances, as lawyers know full well, alter cases! It follows from this that A3ES publications might be tailored to meet the conditions set out below:

- Within published programme accreditation reports, a “context description” should figure as a brief account written by each institution as part of its programme submission. A3ES may wish, for instance, to set out guidance for HEIs in the form of exemplars, templates or sample outlines. The “context description” as furnished by the individual university or polytechnic would figure as appropriate in the relevant section of each accreditation report published.
- Subject reports or cluster evaluations, newly planned to summarize the insights learned from Programme Accreditations, might be treated with the view explicitly to inform the general public better. Here, it is worth taking note of an earlier and not dissimilar approach, employed by the Dutch *Vereniging van Universiteiten* (VSNU). Summary reports of subject reviews, published by the Dutch Agency, disseminated information to faculty members about instructional developments in their particular field.¹ The summary reports were generally well regarded by academic staff.
- In addition, two new types of public documentation might be considered: the first, a succinct report to the general public that concentrates on institutional quality assurance systems that have undergone evaluation. This report would rank institutional processes on a developmental basis. One example of this latter technique is the “maturity index” of QA systems, initially designed and applied by Professor William Massy to higher education in Hong Kong.² While ranking *institutions* and *academic programmes* has debatable validity, reliability, and

¹ VSNU. *Quality Assessment Made to Measure: Protocol for External Assessment of Educational P0-2007* Utrecht: 1999, VSNU.

² Massy, W.F. Graham, S.W.. & Short, P.M. *Academic Quality Work: a Handbook for Improvement*, San Francisco, CA, 2007, Jossey-Bass

public value, ranking *systems* of institutional quality assurance is less common. It has, at least in principle, a further advantage: namely as a potential incentive for institutions both to develop and improve their internal quality assurance processes. Second, based on data currently collected and maintained by A3ES report cards on institutional academic programmes might be considered as a more effective way of informing applicants to higher education about the educational characteristics and qualities of the area of study they plan to take up. “College Scorecards” produced by the US Department of Education³; or the quick-fact leaflets produced in the Netherlands⁴ may serve as useful pointers to the form such statements might assume.

- Finally, in view of the remit, activities, and public audience of A3ES, publishing exclusively via Internet those reports that have relevance for both institutions and the public at large merits serious consideration. Costs would be reduced, production time cut back, editorial corrections and revisions, facilitated.

2. Accrediting Alternative Medicine

The second issue the Scientific Council discussed related to the prospect of A3ES accrediting new and emerging academic programmes in Alternative Medicine. Identifying appropriately qualified and experienced professionals to evaluate these fields is no small task. One possibility would be to seek out faculty members from related academic programmes in other developed States, which may be more accustomed, and/or exercised in identifying parallel and comparable professional associations on an international basis. Another possibility might be to seek individuals in other developed countries as potential sources of expertise and experience. Some Scandinavian countries – notably Norway and Denmark - when evaluating or assessing other newly emerging fields, have regularly had recourse to individuals expert in academic programme design and evaluation. Included as part of external review teams, they ensure that such programmes under review are effectively well structured and dispense an educational experience that has been tested and validated.

Two Challenges in the Offing.

Other recommendations, to which the Scientific Council would draw the attention of A3ES, relate to the two challenges A3ES now faces. They were outlined earlier. These recommendations are made in the firm conviction they shall assist the Agency to think boldly and creatively about its future strategies and about the lines of action to be laid out in both.

1. Institutional Assessments

In its move towards implementing a new form of evaluation procedure – institutional assessments – A3ES’ intention is to launch an initiative that in time will bring a “lighter touch” to evaluating those universities and polytechnics, which take their responsibility

³ <https://collegescorecard.ed.gov/>

⁴ <http://www.studiekeuzeinformatie.nl/studieincijfers/verantwoording> (with English-language options)).

for quality assurance seriously. This we both share and applaud. At present, those universities and polytechnics in Portugal, which opt to have their systems of internal quality assurance certified by A3ES, do so on a basis that is entirely voluntary. Such an approach is realistic. It respects the autonomy of HEIs. It takes account of the pressures they are under in adapting to an environment that is rapidly changing.

Even so, as the Council understands matters, only a minority - approximately some 15% of all HEIs - currently holds such a certificate. Options possible – and appropriate - are not lacking. Bearing in mind the established procedures and practices to which A3ES sets both store and weight, the Council would suggest priority be placed on those initiatives that set priority on stimulating and urging institutions to step forward and develop their internal systems of quality assurance. Such initiatives may mean that the first round in the institutional assessment cycle is on balance, formative. Emphasis at this juncture lies on developing the institution's potential to shape and design its own specific systems. Here, applying some form of Massy's (2007) "maturity index" might possibly be explored as a potential adjunct to this process. Amongst other options A3ES might entertain is the setting of deadlines and cut-off points by which institutions must submit their proposed internal QA-system. Incentives may be devised to reward internal QA systems able to demonstrate proven effectiveness. One powerful incentive would be to prolong the period of programme accreditations for those HEIs where certification of the institutional QA system has been granted.

Nor is this all. Securing institutional 'responsiveness' and the expeditious build-up of certified *internal* QA systems may well require that A3ES develop an explicit 'pedagogic' dimension in addition to its current regulatory perspective. There are good reasons to justify this *constat*. One of the earliest "perverse effects" that followed the setting up of external QA systems was the emergence amongst HEIs of a "culture of compliance."⁵ HEIs hastened to fulfill the "letter of the law" but often did so by contenting themselves with superficial, token or administrative changes. They avoided putting in place rigorous and effective collegial processes for upholding and improving instruction or student learning at the programme level.

Despite the carefully crafted institutional assessments A3ES conducts, such tokenism, we feel, may not be absent in Portugal, not least because for many Portuguese HEIs systems of *internal institutional* QA have little if any precedent.

In saying this, the Scientific Council is the first to pay tribute to the professional commitment, energy and initiative A3ES has constantly shown in the conferences it has called and sponsored on Academic Quality in Portugal. These conferences focused on sensitizing the higher education constituency to the appropriate framework rules of public policy, and within them on the process, procedures and criteria underwriting *external* QA. These marker events, in which some of our number participated, were the *conditio sine qua non* for firmly seating a Quality Culture in Portugal's establishments of higher learning, for advancing Academia's awareness of quality regulation in the EU and for A3ES to win international standing.

⁵. Jacob P. Scheele, Peter A.M. Maassen & Don F Westerheijden [Eds] *To Be Continued...follow up of Quality Assurance in Higher Education*, The Hague, 1998, Elsevier/De Tijdstroom,

Nevertheless, it remains unclear to the Scientific Council to what extent Conferences to date have prepared Portuguese higher education for putting in place effective QA systems *internal* to the individual institution. Hence, the Council's suggestion for what was alluded to earlier as a reinforced 'pedagogic dimension' in A3ES strategy over the years ahead. Further publications, workshops, and conferences expressly directed at those responsible for, or working both with and in, QA *at the institutional level* cannot, the Council believes, be other than key to A3ES's accomplishing the mission that now lies before it. Further underpinning to sustain a healthy momentum in building up internally based institutional QA systems may be facilitated further by applying techniques and procedures that have been developed in other QA systems outside Portugal. Here, the Scientific Council has in mind a number of examples that might serve A3ES as 'food for thought':

- Drawing on external reviews of institutional QA systems already certified in Portugal, practices pragmatic and workable could form the basis of a synthesis report to inform and guide other institutions seeking to develop effective internal QA systems. From the UK, the series of documents "Learning from Audit", published in the early years of Academic Audit may provide a useful template.
- Publications analyzing the challenges and issues encountered at the developmental stage by institutional QA systems, which subsequently proved influential in the US, may be mentioned. For Shavelson (2010) implementing effective institutional QA systems required developing a 'culture of evidence' constructed around four key features. It was grounded in the accepted canons of scholarly inquiry. It implemented rigorous peer accountability for the quality of academic programmes. It recognized the validity of unit-level academic decision-making. It systematically identified and disseminated best practice to improve teaching and student learning in all subject fields.⁶

In principle, these same procedures would appear to apply to all academic institutions, public or private, whether university, polytechnic, or distance-learning. Similarly Massy's (2007) book on Quality Audit adapted the Hong Kong Academic Audit to US academic institutions. He also showed how institutional quality reviews may uphold the quality of both instruction and research.

- Likewise, A3ES conferences and workshops could be organized specifically to motivate and thus spur on the numbers created and the subsequent development of effective institutional QA systems. Given its intimate knowledge about QA practices elsewhere in the EU, the Agency is well placed to identify universities, polytechnics, and distance learning institutions public and private, which already have developed and implemented exemplary QA systems. Key and expert staff from the institutions thus identified could be invited to present case studies of the processes they developed at a conference targeted explicitly at A3ES member institutions.

⁶ Shavelson, R. J. *Measuring College Learning Responsibly: Accountability in a New Era*. Stanford, CA, 2010.

Furthermore, the Scientific Council would urge A3ES earnestly to consider sponsoring a future conference wholly focused on the results of its own current research into assessing and assuring learning outcomes.

Learning outcomes are a critical issue for institutional QA systems, a point which Shavelson (2010) also stressed. Evidence from Norway reinforces our argument. There, academic staff face challenge on two fronts: improving instruction on the one hand, increasing modularization of study programmes, on the other. Focusing on learning outcomes is held by academic staff to be more constructive than time-honoured practices rooted in external quality assurance.⁷

A further conference featuring current international research on this issue should, the Scientific Council believes, be viewed as a significant step in the strategy of mobilizing higher education in Portugal for the improvement of academic quality at the institutional base.

Information Dissemination and the A3ES Data Base

The second challenge over the next few years lies in the external profiling of A3ES and, in particular, making more effective use of the information the Agency has amassed on academic quality. The Agency's current initiative of producing "meta-reports" covering whole subjects and disciplinary areas, the Council applauds wholeheartedly. As we stated earlier, in other countries such reports are valuable sources of information for the general public. They are, furthermore especially helpful for those members of academic staff responsible for maintaining and improving academic quality within academic programmes. In the years to come, public concern with issues related to academic quality, from newspapers through to those engaged in manipulating rankings, league tables and similar exercises not least, will obey a very ancient injunction: It will 'go forth and multiply.' (Genesis 1:28) The demand – and thus the need to supply - more knowledge, solid, trustworthy, current and relating both academic programmes and institutions, will follow the same trajectory.

From the outset, one of A3ES very special hallmarks is its creative and intense use of digital technology and, most markedly, the development of a highly comprehensive database, currently a vital tool for the accrediting A3ES conducts. For its part, the Scientific Council retains the impression that the database carries much information, potentially of high interest to the public at large, but is as yet largely 'un-mined'. The Council feels a case may be made for having this information more easily accessible. The value of the database as a source of 'public intelligence' is clear. Less clear, however, are the necessary adjustments to make it so, even assuming A3ES resources and time were not already fully engaged.

Yet, as our discussion noted, to make available to parents or to students applying to higher education such data as pertain to student progression rates, completion rates,

⁷. Aamodt, P. O., Frølich, N., & Stensaker, B. Learning Outcomes – A Useful Tool in Quality Assurance? Views from Academic Staff. *Paper presented at CHER 28th Annual Conference*, Lisbon, Portugal, 7-9 September 2015.

graduate outcome, life-time earnings etc is no small undertaking though the point may be made that in some countries – England and Australia are noteworthy in this respect - such items are in the public domain and accessible. However, the basic dilemma remains intact: how accessible, to whom and how would the cost of “going public” be born? More to the point, by whom?

There is, however, an alternative option. It is less ambitious but no less important. It may be seen as an intermediary step to broadening public access to A3ES’ data-base. This option, if taken up, would in the opinion of the Scientific Council call for strengthened ties between A3ES and CIPES as its research arm. Knowledge about the current state of higher education is at a premium above all when new strategic priorities stand in the offing, as they do. From this perspective, A3ES will, the Council believes, render itself no small service by strengthening its research nexus to feed further into the task of policy monitoring, policy elaboration and supplying system intelligence. Second, though in a different form, such findings as research drawing on A3ES data might reveal, may be made to serve a complementary but equally weighty function. That function is to keep the public abreast and alert to the latest developments, performance and achievements of the Nation’s system of higher education. This second function is no less important though whether it should be outsourced to other instances of public communication is a matter on which the Council keeps an open mind.

Conclusion

The Scientific Council expresses its deep appreciation to A3ES for the renewed opportunity to explore issues current and future that the Agency must address. As always, the exchange was open, frank and fully in keeping with the mission, goals and conduct of A3ES. It was, as expected, an exchange of high quality.

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