# ACCREDITAION IN THE NETHERLANDS, THE VIEW OF THE UNIVERSITIES

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The years to come will be important for Higher Education in the Netherlands. June 4<sup>th</sup> 2002, the bill for the introduction of accreditation to Higher Education <sup>2</sup> was accepted by the Parliament. The Netherlands too has now an accreditation organisation (the NAO), although still only on paper. In 2003 it will become clear if the introduction of accreditation is an enhancement of the current system of quality assessment or not. Can the introduction of accreditation be seen as the finishing touch of the quality assurance system, started in 1986 or will it be a break with the past and an annihilation of a well functioning quality assurance system? The threat of a growing bureaucratising of quality assurance is real. The chance that the National Accreditation Organisation (NAO) will become a controlling organisation is not fictitious. Is the autonomy, gained in 1985, at stake and will it be undermined by standards set outside Higher Education? There is not answer yet, because the NAO has not yet started. It will depend how the concept "accreditation" will be translated into practice.

The Netherlands has an effective system for external quality assurance that also enjoys

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<sup>&</sup>lt;sup>2</sup> Eerste kamer, vergaderjaar 2001-2002, 27 920, nr 231

international recognition. However, national and international developments make it necessary that the system of external quality assurance be rounded off by the introduction of accreditation and by an accrediting body. The reasons for this introduction are, as indicated in the policy document "Keur aan Kwaliteit" (" Accreditation in Dutch Higher Education "):<sup>3</sup>

- International recognition for Dutch Higher Education
- Encouraging international benchmarking
- Encouraging transparency of the quality of the programmes on offer
- Reinforcing the independence of the quality assessment
- Clarification of the management consequences in case of lack of quality

In the bill for the introduction of accreditation to Higher Education and in the explanatory memorandum to the bill, the context within which the accreditation should take shape is sketched. November 2000 the Minister of Education, Science and Culture installed the Committee Accreditation of Dutch Higher Education. This committee published in September 2001 its final report "Activate, Achieve and Advance<sup>4</sup>. In general might be said that the ideas of the committee are characterised by a top down approach. It looks that the current quality assessment system is not functioning well and is not satisfactory. The committee looks at accreditation as a new system and a panacea and not as the 'finishing touch' of the current system. The committee sees an important role for the National Accreditation Organisation (NAO).

<sup>&</sup>lt;sup>3</sup> Ministry of Education, Science and Culture, Accreditation in Dutch Higher Education, July 2000.

<sup>&</sup>lt;sup>4</sup>Committee Accreditation of Dutch Higher Education, Activate, Achieve and Advance, Final report, September 2001

In a memorandum *"Toward a hallmark for Quality"* <sup>5</sup> the Association of Universities in the Netherlands (VSNU) developed a proposal for the establishment of accreditation in Dutch Higher Education, also taking into account the bill on Accreditation. The principles concerning the accreditation system are:

- it must further build on the document " Accreditation in Dutch Higher Education", which is endorsed by all parties;
- it must be efficient, simple and introduce as little bureaucracy as possible;
- it must build on the existing external assessment system;
- it is coupled to international developments, especially with developments within Europe;
- it is acceptable to all those involved: government, students, HE institutions, potential employers.

## 2 Accreditation as a validation of the external assessment

In the explanatory memorandum to the bill for the introduction of accreditation to Higher Education, accreditation is described as *"the granting of a hallmark that shows that certain qualitative standards have been met"*. The universities endorse this description. Accreditation is about asking what the granting of the hallmark is based on. The universities endorse the idea, laid down in the Memorandum of Explanation, that accreditation must be seen as the granting of a formal quality hallmark after verification and validation of an external assessment.

In most cases, accreditation boards, such as for example ABET, organize the external

<sup>&</sup>lt;sup>5</sup> VSNU, Toward a hallmark for Quality, September 2001

assessments and appoint committees of experts who assess the quality of a study programme on the basis of a given protocol. On the basis of the advice from this committee and its report, a decision is taken on accreditation. In the Netherlands, it has been decided to place accreditation and external assessment in different hands. Whichever system is developed for accreditation, it will always have to be based on the opinion of the external experts. Quality control, quality assessment and accreditation will always remain a matter of trusting this opinion. A modicum of suspicion is appropriate, hence the verification and validation of the external judgement s by the accrediting body.

#### 3 Requirements for the external assessment

Accreditation is based on the external assessment by experts. In order to enclose the external assessment with as many safeguards as possible, and to give a clear framework for verifying and validating the assessment, the NAO will define requirements for the external assessment based on an accreditation framework. The accreditation framework is the context within which the external assessment will be assessed.

The most important requirements to be satisfied by an external assessment are:

- independence of the opinion
- transparency of the protocol, process and working method
- protocols must guarantee that the quality is assessed in the correct manner (completeness, argumentation, consistency)
- public access to the results.

The accreditation framework will provide guidelines for tackling the external assessments. For this reason it is important that the accreditation framework is consistent with

international developments in the area of accreditation and external quality assessment.

# 4 The National Accreditation Body (NAO)

The following principles apply to the development of jobs, tasks and organization of the NAO:

- the object of accreditation is the study programme;
- the NAO does not itself carry out assessments ;
- the NAO is completely independent.

According to the universities, the job of the NAO is (by granting the quality hallmark)

- to reinforce and confirm the independence of the assessments
- to contribute to the recognition of the quality and quality assessment abroad
- to contribute to the transparency of the quality of the education offered
- to provide a clear basis for management consequences.

The main task of the NAO is in the opinion of the universities:

- to verify and validate an external assessment on the basis of the accreditation framework
- to grant a formal quality hallmark (accreditation) to those study programmes for which the external assessment has been validated
- to grant provisional accreditation to new study programmes.

If the NAO is given other tasks, care will have to be taken that these do not get in the way of the execution of the main task.

On the opinion of the Universities, the NAO must be lightly organized: a board that meets once a month to take decisions on the validation of assessments on the basis of office analyses and pre-advice and to rule on the formal accreditation.

# 5 The accreditation framework.

For the purpose of validating the external assessments, the NAO will have to develop an accreditation framework in order to check the validity of the external assessments and decide whether or not to grant a formal hallmark on the basis of the results. The accreditation framework will have to provide answers to the following questions:

• Has agreement on the assessment method and criteria been reached in advance with

the agency that has organized the external assessment?

If it involves a Dutch agency, this will normally be the case. The validation will then be concerned with how the protocol has been executed. If a foreign agency is involved, then in most cases, there will not be any agreements on the protocol used and this will first have to be checked.

• Has the quality assessment been arrived at independently?

Questions that then need to be answered concern:

- the way in which the committee was put together
- the expertise of the committee members
- the absence of conflicting interests
- independent operation of the committee.
- Does the report satisfy the agreed requirements?

(If it concerns a report from a foreign agency, the question is whether this report contains

the same information as the Dutch version.)

How has the opinion on the level (Bachelor/Master) and profile (academic/professional orientation) been arrived at?

- what framework has been used to check the level?
- have the descriptors for level/profile been correctly assessed?
- do the formulated objectives satisfy the level and profile requirements according to the assessment?
- is there sufficient evidence that the objectives will actually be achieved?

In order to assess this aspect of the accreditation framework, the NAO and the external committee need to use a clear definition of the Bachelor and Master levels. A good starting point might be the so-called Dublin descriptors. <sup>6</sup>

- How has the reference framework been arrived at and does it reflect the internationally accepted domain-specific standards?
- .Has the external committee checked the necessary quality criteria and is there
  sufficient evidence that the study programme satisfies these criteria?
- Is the overall opinion of the external committee consistent with the assessment in detail?

If the results of the verification and validation are positive, the opinion of the external committee is adopted. If the assessment is positive, the hallmark is granted; if the assessment is negative, the hallmark is withheld.

If the validation turns out to be negative, the study programme must be given the opportunity to have a new assessment carried out. It will be clear that the organizing institution cannot permit unsound assessments to be carried out.

<sup>&</sup>lt;sup>6</sup> More information about the Dublin descriptors see <u>http://www.jointquality.org/</u> or <u>http://www.bologna-berlin2003.de/en/prague\_berlin/index.htm</u>

#### 6 The accreditation framework and the protocols for external assessments

It would significantly reduce the workload of the NAO if the accreditation framework and the protocols for the external assessments were coordinated in advance. This does not mean that the NAO should impose mandatory requirements for the way in which a QA-agency should organize and carry out the external assessments. It does mean that the accreditation framework will be a guideline, because the QA-agency will not want not run the risk of an external assessment not being validated.

The NAO and institutions that organize the external assessments will therefore have to reach agreement about the protocol to be used. This protocol should in any case cover:

- the assessment framework, on which the external committee has based its opinion of the Bachelor and Master levels, which must also distinguish between the profiles (academic or professionally-oriented);
- the creation and use of the reference framework for the evaluation of domain-specific and general educational objectives;
- the quality criteria used for assessing the quality. These should satisfy the internationally accepted criteria for quality assessment;
- the form and content of the report;
- the way in which the independence of the external committee's judgement is guaranteed.

If the NAO and the QA-agency have reached agreement over the protocol, the organizing institution will be registered by the NAO as an institution that can be expected to produce valid assessments. When verifying and validating, the discussion will be about the application of the protocol rather than about the protocol itself.

## 7 The quality criteria for the external assessment

When validating the external assessment, it is important to ask whether the judgement on the quality is valid and whether those quality criteria have been assessed to give a realistic view of the quality. To achieve this, an assessment framework that satisfies the (national and international) requirements for a quality assessment must used for the external When developing a model for checking the quality of Dutch Higher assessment. Education, it is important to take the experience of recent years into account and to be consistent with international assessment frameworks. One of the conditions for the recognition of the Dutch hallmark abroad is that the quality has been checked for the same quality aspects. Looking at the manuals and protocols in use throughout the world of Higher Education for assessing study programmes, there is a large degree of agreement on the aspects that must be assessed, even if the emphasis varies sometimes. Based on an analysis of different manuals and protocols used in different countries, it is possible to develop a quality model, or checking framework, that can be used for quality assessment. The model can be used both for self-evaluation by the study programme and as a checking framework for the external committee. The big advantage is that the quality model not only covers national quality criteria, but is also consistent with international assessment frameworks.<sup>7</sup>

<sup>&</sup>lt;sup>7</sup> The quality model is elaborated in Vroeijenstijn, A.I., Manual for self-evaluation on porgramme level, 3rd draft May 2001

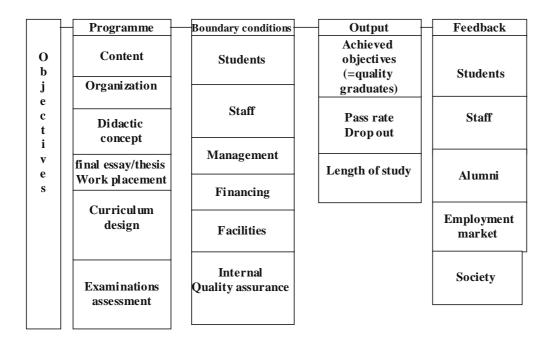


Figure 1: a quality model of Higher Education as a checking framework

## 8 A public, clear report

Since the NAO will rely on the external assessment by the external committee, reports of a high standard will be required. The report will have to be sufficiently clear and explicit that the NAO can easily form an opinion on validation. The protocol should clearly state what information is necessary.

The following items should be considered in any case:

- The composition of the external committee;
- The manner in which the external committee has checked the institution's claim;
- The reference framework used by the committee;
- An opinion on the 21 aspects mentioned in the quality model on the basis of, for example, a ++; +;0; .- or -- grade:

- An overall opinion;
- An evaluation of the external assessment;
- If several study programmes are being assessed by the same committee; a comparison of the study programmes and a description of the state of the discipline.

The report will be open to the public and will be presented to the accreditation body for verification and validation of the assessment and the award of accreditation.

## 9 An independently operating external assessment committee

An important requirement that must be placed on the external assessment is that the opinion must be arrived at in an independent manner. This means that the external assessment committee can reach an opinion on the quality without external influences. In this respect, it is not relevant whether the QA-agency is independent of the sector organization. Generally speaking, bodies that organize external quality assessments have some form of link with the sector organization (this may be the institutions, but may also be a professional association as is the case with ABET and EQUIS). It is precisely this link with the sector organization that has significant advantages for quality improvement and the development of a quality policy and provides support for substantive improvements to the study programmes.

It is not so much the question as to whether the organizing body is independent, but whether the organizing body ensures that the judgements are arrived at independently. The following requirements must be met for an independent opinion:

- The committee members have no personal interest in the assessment;
- The committee itself determines how it will work, while observing the protocol;

- The committee is responsible for the report;
- The committee is not subject to external influences.

The protocol must then clearly state how the organizing body guarantees this independence.

## 10 From external assessment to accreditation

The document "Een Keur aan Kwaliteit" clearly states that the anticipated accreditation must build on the existing external assessment system. The question is, what modifications are needed to go from external assessment to accreditation. Questions that arise here are:

- Who organizes the external assessments?
- Are the current methods and protocols sufficient?

#### **10.1** Who organizes the external assessments?

The current system for external quality assessments originated in the agreements of 1986, whereby the minister of Education, Culture and Science (OC&W) and the Higher Education Institutions agreed that Higher Education was primarily responsible for the specification of the external assessments and for organizing the external assessments by external experts. An institution is legally obliged to have the quality of its study programmes externally assessed. At the time (1985), the Higher Education institutions decided to have the assessments organized by the VSNU and the Netherlands Association of Universities of Professional Education (HBO-raad). An institution was entirely free to invite other bodies, such as for example ABET, EQUIS, ASPA or the American Veterinary Medical Association,

to carry out an external assessment. The Dutch Validation Council is also active in the validation of HBO Master's study programmes.

One of the principles praised in "Accreditation in Dutch Higher Education" is the promotion of a greater variety of bodies assessing quality. As can be seen in, for example, the current VSNU protocol, this is an aim that is supported. The question is however, how realistic is the expectation that more quality assessment bodies will enter the Dutch market. It is up to the institution to decide who they will ask to organize the assessment. The fact that the assessment of the study programme will have to be validated by the NAO will certainly play a role in this decision making in the future. The demand from the institutions will ultimately determine whether more bodies will interested in organizing external assessments of Higher Education in the Netherlands.

Foreign organizations will be used in a number of cases. These will mainly be American accreditation bodies such as ABET, ASPA and the Veterinary Medical Association or internationally operating bodies such as EQUIS. It is not obvious that other foreign, but in principle nationally operating bodies such as the QAA in the United Kingdom or the Akkreditierungsrat in Germany will carry out assessments in the Netherlands, unless it concerns a joint assessment such as that recently carried out in a joint project between ZeVA (Germany), the VLIR (Flanders) and the VSNU.<sup>8</sup>

#### 10.2 Is the current system of external assessment already fit to accreditation?

The current quality assessment system is not yet tailor made for accreditation at the

<sup>&</sup>lt;sup>8</sup> Cross Border Quality Assessment in Physics, Evaluationsbericht, Schriftenreihe "Lehre an Hochschulen" 24/2001, hrsg. von der ZEvA, , Hannover 2001

moment. Up to now the main purpose has been quality improvement and accountability. The protocols of the HBO-raad and the VSNU will have to be modified to be consistent with the new developments in accreditation. The protocols will have to be matched to the accreditation framework. In any case, the following changes will have to be made:

• In addition to process orientation, more attention for output orientation.

Up to now the attention has primarily been on the quality of the process, although the product quality also received attention and the level of the graduates was not entirely neglected. There will however have to be more explicit attention paid to the qualifications and the standards.

• A greater emphasis on determining the reference framework.

At the beginning of the external assessment, the reference framework for the assessment will have to be clearly and explicitly formulated, more than it is at the moment.

• An overall judgement on the study programme.

Up to now, the external committees have formed an opinion on a number of aspects. In order to lead to accreditation, the committee also have to express an overall judgement

• A closer monitoring of the independence of the assessments

The safeguards for the independence of the judgements forming will have to be made more explicit than before by the QA-agency

For the organization of the quality assessment by the VSNU and the HBO-raad, the introduction of accreditation means the development of a protocol that includes all the conditions for the external assessment mentioned in this memorandum. The protocol should have the assent of the NAO so that the VSNU and HBO-raad can be registered and the institutions have the guarantee that the external assessment can reports be submitted for validation by the accrediting body.

#### 11 Summary

In the opinion of the universities, the introduction of accreditation can be a further step on the way towards assurance and improvement of the quality of Dutch Higher Education and strengthening the competitive position with respect to other countries. This does mean that the accreditation must be supported by all interested parties, including the HEI's, and must not be experienced as an extra bureaucratic burden.

In summary, the most important points are:

- Accreditation is the final step in the quality assurance system and relies on verification and validation of the assessments from external experts.
- Verification and validation are carried out on the basis of an accreditation framework.
- The accreditation framework is not mandatory but is a guideline for the QA-agency.
- Both the Dutch organizations that currently organize the assessments and the NAO will ensure that the protocols are consistent with the accreditation framework.
- The accreditation framework contains criteria for the verification of:
- the independence of the assessment
- the quality criteria that have been assessed
- the BAMA framework used
- the discipline-related reference framework used
- the clarity and consistency of the report
- the consistency of the overall judgement.
- The accreditation framework will be developed in stages, with the help of all interested parties.
- The development of the accreditation framework and the assessment protocols (including the BAMA framework) of the bodies that organize the assessments will be

carried out in the light of international developments to ensure international recognition.

The year to come will be important. The bill on Accreditation has been accepted. The real work still has to be done. It is important to build upon the current system and to make it as less as bureaucratic as possible. All stakeholders must support it. If the NAO will have no support from Higher Education and if accreditation is felt as something "from above", the system is doomed to fail. And in the same time destroying all the benefits of 16 years external quality assessment.

The guardian of the quality is not the NAO. The guardian of the quality are all parties concerned: the universities (by means of internal quality assurance), the VSNU (by means of external quality assessment) and the NAO( by means of the formal quality label). Quality assurance should be based on trust and not on a bureaucratic control system.