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**The Inter-Jurisdictional Language of Quality Assurance:
Comparing Theory and Practice¹
Le langage interjuridictionnel de l'assurance de la qualité :
comparer la théorie à la pratique**

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Abstract

This is a comparative study of two reports on the assurance of quality in higher education that appeared contemporaneously in two similar and closely connected jurisdictions. Using NVivo summative content analysis software, documentary analysis, archival records, WTO submissions, and focus groups and interviews the paper identifies and compares several recurring areas in which nomenclature is at least nominally mutual, such as: the boundary line between academic support services and student services, balancing commonality and diversity, the institution versus the basic academic unit as the focus and scope of assurance, self-regulation versus system regulation, the assurance of quality versus the enhancement of quality, the role of league ranking, performance indicators, and benchmarking, aggregation. Seen in terms of theory-driven evaluation, the study suggests that finding a trans-jurisdictional common ground for quality assurance is more advanced in theory than in practice.

Résumé

Voici une étude comparative de deux rapports sur l'assurance de la qualité dans l'enseignement supérieur qui ont été publiés en même temps dans deux juridictions similaires et en rapport étroit. À l'aide de NVivo, le logiciel d'analyse de contenu sommatif, d'analyse documentaire, de documents d'archives, de soumissions à l'OMT, ainsi que de groupes de discussion et d'entrevues, cet article identifie et compare plusieurs zones récurrentes dans lesquelles la nomenclature est au moins théoriquement commune, tel que la frontière entre les services de soutien universitaire et les services aux étudiants, en comparant et en contrastant l'institution par rapport à l'unité universitaire de base comme le point focal et l'envergure de l'assurance, l'autoréglementation par rapport à la réglementation du système, l'assurance de la qualité par rapport à l'amélioration de la qualité, le classement (des institutions), les indicateurs de performance, l'étalonnage, l'agrégation. Vue en terme d'évaluation guidée par la théorie, l'étude suggère que la découverte d'un terrain d'entente multi-juridictionnel pour l'assurance de la qualité est plus avancée en théorie qu'en pratique.

Keywords: quality assurance; accreditation; credential portability; inter-jurisdictional comparison

Mots clés : assurance de la qualité; accréditation; transférabilité des diplômes; comparaison multi-juridictionnelle

Introduction

“Quality” is a word that is as ubiquitous in higher education as it is fuzzy. Tam (2001) describes it as a “highly contested” concept. Quality assurance protocols are typically system specific, each with its own terminology and, at least, implicit understanding of “quality.” Across jurisdictions and even within jurisdictions, however, seemingly identical terms can have different meanings.

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This is not a new problem. The focus of this study is not descriptive. It is comparative, with the aim of better understanding the problem and the prospects for its solution. Some postsecondary systems may appear to be so similar that one might suppose that their respective lexicons and in turn concepts of quality assurance are reciprocally understood. Are they? Or, in terms of historical epistemology, are their “real” and “literal” meanings different? If they are different, what are the implications for assuring of quality and degree integrity across jurisdictions?

Coincidentally, two reports appeared at almost the same time and addressed the same issue in two jurisdictions that share a close history in the evolution of universities, particularly in measures taken to assure the quality of higher education. 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, but the respective governments neither participated nor sought to participate in either. Both groups began with extensive surveys of institutional opinion about existing quality assurance regimes. Both have high rates of international student enrollment; the UK ranking 2nd and Canada ranking 5th world-wide. Credential structures, student mobility, and use of the English language between the two systems have been so similar for so long that they form a comparable base in terms of the language of quality assurance as a foundation of degree portability.

A final note is necessary to define the boundaries of the study and, especially, explain what the study is not. The study’s research design has two specific points of comparative reference: time and topic. That is all. Despite an intuitive temptation to use the HEA report as a comparative proxy for the QAA vis-à-vis the Ontario Quality Assurance Council that followed the Ontario report, the study deliberately does not do so. The study, thus, is about the conceptual language or epistemology of quality assurance within a specific and, in terms of research design, “controlled” context: the same issue being discussed by comparable parties within the same context at the same time. The study is not about entire systems of quality assurance before or after the events under study.

To define the purpose and the boundaries of the study further, we can turn to two examples from the early 20th century that were contemporaneous. In 1901, in the United States, the College Entrance Examination Board (CEEB) was founded by a coalition of colleges and a few schools, much as, according to Turner (2015), informal regional consortia in the UK led to the establishment of norms for comparing the quality of academic programs that led to credentials. The quality assurance problem as the CEEB saw it was that, although secondary school, many of which at the time were “inspected,” transcripts appeared to use uniform language—for example to describe a curriculum or grading scale—the subsequent postsecondary performance of students indicated that in many cases the terms were not uniform from state to state and school board to school board as jurisdictions. This led the CEEB to devise and “recommend” curricula and ultimately to devise standardized tests for college admission (Wightman, 2003).

In 1906, the Carnegie Foundation was founded with an endowment that, in today’s USDs, was three times larger than the Gates Foundation’s. The first step in gaining access to the Carnegie funds was conditional on proof of quality (Carnegie Foundation, 1908). Colleges and universities in Canada, Newfoundland, and certain other British commonwealth countries were eligible, in addition to the United States. The first condition was what the foundation called the “admission” standard, by which was meant, in today’s terms, the final high school average

grades of students admitted to a college or university. Here the foundation bumped into to same problem that confronted the CEEB: different meanings of ostensibly uniform expressions of quality. An example of the confusion that surrounded the problem can be found in a series of letters shortly after the establishment of the foundation between the president of the University of Toronto and the president of the foundation about the university's "matriculation" standard (Falconer Papers, University of Toronto Archives, A1967-0007/158-01/3/4). The foundation had calculated university's rate as it did for American universities, including a four-year high school curriculum, instead of the five-year curriculum "matriculation" standard that was the norm in Canada. The result was a rate that the foundation thought was too low, and that the university did not understand. The two presidents finally ironed-out the differences between "admission" and "matriculation," but it took several months to do so.

The example of the misunderstanding between the Carnegie foundation and the University of Toronto leads to a more recent example about peer comparison and "benchmarked" quality. In determining that the university's admission standard was too low, the foundation, in today's terminology, benchmarked it against American institutions and in doing so compared the University of Toronto to Beloit College, an undergraduate private liberal arts college, one tenth the size of Toronto, without a research mandate or graduate education mandate, and in another jurisdiction (Brison, 2005). We now know from several research studies (Terenzini, Hartmark, Lorang, & Shirley 1980; Teeter & Christal, 1987; Lang 2001) that, as a methodology, peer comparison, especially when used to benchmark quality, encounters the same inter-jurisdictional problems of language that complicate quality assurance protocols, and often confuse reputation with quality (Lang, 2005). Students rank reputation and quality differently in choosing colleges to attend (McDonogh, 1997, Clarke, 2002; Lang & Lang 2002). Thus, the questions raised in this study are not hypothetical. They address real problems that affect quality assurance in practice: mobility of students, portability of credentials, performance benchmarks, and access to funding. They also refine understanding of "inter-jurisdictional." It is not simply a synonym for "international." There are jurisdictions within jurisdictions, for example, in federal states like Canada, as Baker and Miosi (2010) observe. Baker and Miosi also point out that there sometimes are multiple quality assurance protocols within jurisdictions. In the case of the CEEB, whose standardized testing now extends from school to undergraduate college, to postgraduate study, jurisdiction is hierarchical. Benchmarking crosses political jurisdictions in search of institutional peers, as do nongovernmental foundations.

Conceptual Context

Assuring quality in higher education has been a topic of interest for practice and policy for nearly 40 years, some say much longer (Lewis, 2003). For most of that time, there has been tension between ways and means of achieving commonality while at the same time respecting diversity among institutions (Billing, 2004; Harman, 1998; Smeby & Stensaker, 1999). More recently as the international market for students expanded, inter-jurisdictional assurance of quality and degree integrity gained specifically in interest. Comparability of process is one the Organisation for Economic Co-operation and Development's (OECD) three principles for assuring quality. The Quality Assurance Agency in Britain's test for the delivery of programs trans-jurisdictionally is that their quality assurance processes should be the "same." In Ontario, the Quality Assurance Council's test is that they should be "comparable." In other words, each jurisdiction is prepared to rely on proxies. Chandrupatla (2009) argued persuasively that for quality assurance to meet expectations set for it, quality had to be defined in predictable and

uniform terms. Dill (1995) had taken this idea a step further by pointing out that the capability to communicate with mutually accurate information was the basis of the social capital of quality assurance. There is, then, a consensus that commonality of terminology, if not process, should be sought. But we also know that there is a problem: such commonality is difficult to achieve (Thune, 1998; Thunes, 1998; Gérard, 2008; Altbach et al., 2010), and achieving it either can compromise diversity or over-simplify it (Scott, 1998) so much that it loses instead of gains inter-jurisdictional validity.

Four paradigmatic approaches can be taken to understand the nature and scale of this problem as a representative case study made possible by a common location of time and topic. Deming's famous model of quality assurance (1986) held that "good quality means a predictable degree of uniformity and dependability." The model, as applied to higher education, is essentially about the quality of input and output, and mutual understanding between the two. Deming observed that mutual understanding is often impeded by insufficient information (Dill, 1995). Insufficiency of information in Deming's terms can be extended to be an example of Knight's theory of uncertainty (1921), which more recently is popularized as the theory of "knowns and unknowns," and which Cooper (2007) identifies specifically as a problem in quality assurance. In respect of trans-jurisdictional commonality in quality assurance, institutions and quality assurance agencies may not "know" that certain terminologies that appear to be the same are so functionally different that they are in practice what in Knightian terms can be called "unknown unknowns." Akerlof (1978) demonstrated that market uncertainty makes it difficult to separate good quality from bad, and one reason for Spence's (2001) conclusion that higher education is a highly asymmetric market, the international market even more so.

Scott's anthropological model (Scott, 1998) for "seeing like a state" in the public sector may also be part of the conceptual context, particularly in respect to momentum in the direction of commonality. In Scott's model, "social simplification" explains why policy-makers at the system level sometimes do not "see" what practitioners "see" at the institutional level. The pressure to find commonality within the lexicon of quality assurance may be so great that assurers of quality over-simplify terms so that fundamental differences are "unseen."

Theory-driven evaluation can also provide a methodological prism for an investigation of commonality and diversity in the language of quality assurance. Theory-driven evaluation has been described as a means of testing the plausibility of how theory works in practice (Coryn, Noakes, & Westine, 2011; Walshe, 2007), or, in this case, the extent to which the language of quality assurance can or cannot deliver commonality in actual practice.

Comparative Context

The reports compared 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 10 recommendations. The motivation for the report was to provide a framework of discussion for a national conference, held later in the same year. 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-à-vis quality enhancement. A further example is noteworthy because it might be unexpected.

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 about what the term meant in practice.

The background in Ontario is different. The report is in two parts: the Ontario Quality Assurance Framework (QAF) report and an accompanying proposed Guide to the Ontario Quality Assurance Framework. In 2007 a review commissioned by the Council of Ontario Universities, with endorsement of the provincial government (Steenkamp, 2008; Newman, 2010) recommended that a Quality Assurance Transition/Implementation 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’s universities already had arrangements for assuring the quality of university education, in the case of graduate programs since 1974, and for undergraduate programs since 2005 (Ontario Council of Vice-presidents Academic, 2005). The task force’s remit applied to both systems with a single system as the ultimate objective.

A final contextual note has to do with the composition of the two models of higher education to which the comparisons apply. The Ontario model compared to the England and Northern Ireland (ENI) model is homogenous. The quality assurance process applies only to universities, conventionally defined. Colleges and other specialized postsecondary institutions are covered by other processes (Skolnik, 2010). 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.

The fact that two reports addressing nearly identical issues appeared at the same time in two highly comparable jurisdictions was a fortuitous coincidence, as was the OECD’s and WTO’s growing attention to international measures for assuring quality across borders. Other reports could have been considered, but none of them shared the same context in terms of time. Time is essential to the research design. Clark’s paradigmatic “triangle” (Clark, 1983) provides a reliable test of their comparability. Complete *ceteris paribus* is not possible, but in occupying the same contextual space in time reduces the possible number of explanatory variables to *ceteris paribus proxime* (“most things being equal”). The elemental research question in terms of comparison is whether or not in discussing quality assurance the two bodies that prepared reports were using the same lexicons to discuss different concepts, or the reverse: the same concepts discussed in different terms at the same time and in comparable contexts. 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? Regardless of similarities or differences in terminology, concept, or vision, what generic themes emerge from both reports?

NVivo N12 software was used to code 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, to the relevant sections of which NVivo was also applied.

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. NVivo was applied also to all the proceedings, records, and other documentation of the Quality Assurance Transition/Implementation Task Force that devised the new Ontario Quality

Assurance Framework.

NVivo “key word” and “node” word search functions were used to conduct a summative content analysis to identify generic patterns, usage, and contextual understandings across both cases. Overall, 65 “key words” and “nodes” were identified and used in the analysis. Some “key words” for example were “accreditation,” “planning,” “standards,” and “services.” Some examples of “nodes” were “student learning,” “regulated profession,” “league table,” and “institutional mission.”

The next step was to follow up in focus group discussions at an international symposium at which the preliminary NVivo results were presented. The symposium was attended by participants from Canada, the United Kingdom, the United States, Australia, and Ireland. The discussions began by outlining a problem, issue, or point of contention that arose from analysis, and then described the resolution (or lack of one) that each jurisdiction applied to that question. NVivo was also applied to audio transcriptions of the focus group sessions to determine whether certain terms were used more or less often, within contexts, by participants from different jurisdictions.

Contemporaneous with the appearance of the two reports, nations began making submissions to the World Trade Organization (WTO) about the inclusion of postsecondary education in General Agreement on Trade in Services (GATS). To give the study a broader reference point, submissions to the WTO from the United States, Canada, Japan, New Zealand, United Kingdom, and Australia—all high “import” nations in the international student market—were also analyzed using NVivo, beginning with the “key words” and “nodes” identified in the prior application of NVivo to the two reports and the focus group transcriptions.

Focus: Institution or Program?

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, and on disciplines instead of institutions. The process was comparative and mainly external. The vocabulary was as much a lexicon of planning as of assuring quality. 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. The logic of the Ontario focus was that the quality of the system and each institution was the sum of its parts. The new 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 at the expense of the basic unit.”

In terms of student mobility, the assumption (Quality Assurance Transition/Implementation Task Force, 2008) was that, with the exception of general arts and science programs, students more often select programs first and institutions second (McDonough, 1997; Hossler, Schmidt, & Vespu, 1999; King & Warren, 2006; Chen, 2007; Lang, 2009). The consequent operational

effect was that the quality of students, domestic and international, would be adjudicated at the program level. Whether or not that assumption was correct, it continued as a preference for programs over institutions in quality assurance that was at the time of the task force's deliberations nearly 50 years old. As a further matter, Ontario, like the rest of Canada, has no history of American-style institutional accreditation but does have program accreditation (Weinrib & Jones, 2014), Vanderburg (2005), following on Deming, took this a step further by observing that the "quality movement" is an inherently subsidiary function that decentralizes decisions to the level where applicable knowledge, relevant experience, and consensus about quality most reside.

Terms like "bottom-up/top-down," "isomorphism," "homogeneity," "coercive," and "mimetic" appear rarely or not at all in the QEA report. Some *de facto* concerns in that direction were, nevertheless, expressed in interviews and focus groups by institutional participants, more from the UK than Canada, and more often about the potential for coercion. The QEA participants in the focus groups, however, either favoured a bottom-up institutional focus or believed that there was no practical alternative to it within the overall QAA framework. Canadian participants, perhaps because of the extensive autonomy ceded to universities (Weinrib & Jones, 2014) took bottom-up as normal, as if the question was not open to debate. This, then, is an aspect of quality assurance in which the two mindsets are far apart.

Quality Enhancement versus Quality Assurance

As Williams (2016) explains, while "quality enhancement" and "quality assurance" may seem synonymous, they are distinctly different. The meaning of "quality enhancement" provides an example of the fundamental difference between an institutional versus a program approach quality assurance. The QAA had put forward a definition: "evidence to plan, implement and evaluate deliberate steps intended to improve the student learning experience" of which, according to the report, almost all participants knew. Focus group discussion confirmed this. But there were many in the focus groups who believed that, in terms of the conduct of QAA audits, evidence of "quality enhancement" should not only be allowed to vary from institution to institution, but should be promoted. In this, the UK participants were joined by Canadian participants who were surprised to learn that variation was not regarded as normal and desirable. 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 no workable system-wide definition was possible, a view recently confirmed by Williams (2016). In terms of focus the difference can be described as being between means and ends. Seen from the perspective of students who wish to cross borders to study (Joseph & Joseph, 2000; Mazzarol & Soutar, 2002; Chen, 2007) a system-wide definition of quality, even if attainable, would have little "pull" effect on their choice of program.

The term "quality enhancement" occurs over and over again in the QEA report. 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 almost entirely about ends. There every university is, with the sanction of government (Steenkamp, 2008), required by the Council on Quality Assurance "top down" to submit for prior approval an Institutional Quality Assurance Process (IQAP) that complies procedurally with the new framework. Thus, the means are "bottom up." They can vary from institution to institution as long as they comply with the Framework.

Here we see the most fundamental and frequent issue between the two reports and the documentation that surrounds them. Is quality enhancement the bedrock of quality assurance—the predominant view among QEA participants? Or, taking the predominant Ontario view, should quality enhancement be understood as only a collateral extension of quality assurance? Seen in terms of Deming’s model, this question could be restated as: Which is the input—quality assurance which then makes quality enhancement possible as an output—or is it the reverse—enhancement assures quality? Williams (2016) poses the question similarly. Notably, however, while most of the NVivo word searches of submissions to the WTO spoke about quality, none spoke about the improvement or enhancement of quality.

Quality enhancement, according to the QAA may be continuous or a series of steps taken over time to improve student learning. Quality assurance, in contrast, is an inherently static *tranche de vie* in time. In both protocols, quality occurs periodically and retrospectively at given times according to predetermined schedules and procedures. Quality enhancement, however, is not only a process, it is a continual process, an attribute favoured by Deming. Although the audits of the ENI system are periodic, the process of quality enhancement *per se* is continual and, at least notionally, infinite. This, too, can confound inter-jurisdictional comparisons and impede commonality. International students consistently seek quality over quality enhancement (Mazzarol & Soutar, 2002; Marginson & McBurnie, 2003; Chen, 2007).

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 regarding the “student learning experience.” As an NVivo theme, the term appears to have meant “enhancement of the entire student experience,” without valuing certain experiences above others. On the Ontario side, the boundary of “student experience” stopped at only those aspects of “student experience” that directly affected the assurance of academic quality, which was significantly short of the QEA meaning (Council of Ontario Universities, Quality Assurance Transition/Implementation Task Force, 2009). In contrast, the QEA meaning, which mirrored the QAA audit process (Quality Assurance Agency for Higher Education, 2011), was broadly 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? In Deming’s model this question can be restated as: Does every input lead to a related output, and, if it doesn’t, should quality assurance protocols assume that it does, and in turn create a Knightian uncertainty? From the Ontario point of view the quality assurance process includes only those student services, however defined and wherever offered, that directly affect the academic quality of student performance degree program by degree program (Quality Assurance Framework, Section 1.3, 2009). In other words, the test is not a universal definition of a given student service. Instead, it is the connection of the service to the academic experience.

In fact, according to the NVivo word frequency searches 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. Given much conventional wisdom about the connections between student performance and student experience, this solution might seem shortsighted. 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, did not require use of NSSE results. Some QEA respondents expressed doubts about the utility of the NSSE in enhancing quality. In the focus groups, some of them said the same about the NSSE. Application of theory-driven evaluation identifies this as a trans-jurisdictional area in which theory and practice, so far, do not align. Practitioners from all jurisdictions in the focus groups evidently understood and often agreed with the theoretical foundation of the issue for assuring quality, but were doubtful about the means of actualizing the theory. Participants with direct experience in using NSSE, for example, reported how difficult it was to use and interpret below the institutional level. Here, then, we have an example of conceptual or epistemological issue being understood inter-jurisdictionally, but difficult to resolve or deliver on in practice, and even more difficult for international students to discern.

The other axis is an example of the discussion of focus. This might seem to be a semantic technicality, but based on the NVivo analysis it appears to be genuine boundary issue. It is a problem of organizational dissonance. Quality assurance fundamentally, although in many different ways, is oriented to programs of academic study. 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.”

In the focus groups, this was a question around which there was uncertainty that verged on confusion. The definition of “student service” is uncertain throughout the reports and focus group discussions. Sometimes, it means student development, sometimes it means student affairs, sometimes it means student counselling and assistance, or in some cases financial aid, housing, and health services. 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 or “uncertainty” in Knightian terms 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. The result, which was recognized by all participants in the focus groups, is desirable diversity that can confound inter-jurisdictional commonality and students’ capability to make informed choices.

This was a greater concern among the QEA respondents, many of whom worried about a Goldilocks approach to quality assurance which might force value judgments about otherwise legitimately optional choices among 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 being typical of what Scott (1998) called “seeing like a state” whereby what system planners “see” and what students, faculty, and student service professionals “see” can be different. An example, cited in focus groups, was differing appreciations of the cost-benefit of certain interventions to improve student performance from program to program, and student population to student population. Lucas (2014) in her critique of the QAA at large confirms that this view was broadly held beyond the population of participants in the QEA study. In terms of “push” and “pull” effects on quality assurance in the international student market, what students and faculty “see” is paramount.

Student Engagement in Quality Assurance

The focus group discussions identified an issue of nomenclature that did not arise from any other aspect of the study, although from previous research (Harvey, 2008) there could have been a reasonable expectation that it would. What does “student engagement in quality assurance” mean? After relatively little discussion, focus group participants themselves recognized that the term “student engagement” was being used in two different ways. One saw student engagement as a means of engaging students as stakeholders in the design and administration of the process of assuring quality (Coates, 2005; Garwe, 2015). In this sense a relatively small number of students are engaged collectively to represent student interests and views at large, and to contribute to improvement of the process, for example by specifying how students should be engaged based on their direct experience at the program level, in advising on identifying the best means by which student experience could be brought into the process. This was the predominant view of focus group participants from the UK and Ireland.

The other saw student engagement as a source—in fact, the only source—of first-hand evaluative information about quality based on the individual experiences of large numbers of students at the program level (Elassy, 2013). Cousins (2007) calls this “participatory evaluation.” This was the predominant view of focus group participants from North America.

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 (2010) 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. That this potential could become real may or may not be inter-jurisdictionally practical, but it is an important concern

behind reliance on quality assurance processes across jurisdictions, as both the Ontario and ENI do. All the WTO submissions that were analyzed expressed the same concern, even more strongly. 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. To a theory-driven evaluator this would appear as a clash of theories that impedes progress towards commonality in practice.

One reason for striking the Ontario task force was a report commissioned by the Council of Ontario Universities in 2007 (Council on Quality Assurance, 2012) that found the then existing quality assurance process failed to coordinate quality appraisal(s) processes with accreditation protocols. Most professional programs in Canada are accredited. Ontario universities have long 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 quality assurance protocols. The NVivo word frequency searches 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 (van der Wende & Middlehurst, 2003). However, the NVivo analysis of WTO submissions found frequent references to accreditation, institutional and professional. Some countries—Colombia and Mexico, for example—have formally adopted accreditation as their quality assurance model. In the case of Mexico, the American model of accreditation has been adopted voluntarily by several universities with inter-jurisdictional degree recognition and reputation expressly in mind. The conflation of quality assurance and accreditation has a long history. Accreditation in the name of quality assurance in the United States can be traced back to the formation of regional “associations of schools” in 1885 (Lewis, 2003) and the College Entrance Examination Board in 1899, both of which were aimed at assuring quality across jurisdictional borders and between private and public institutions.

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 the Ontario QAF. The inner logic of the QEA report connects both to the enhancement of quality, which 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, 2001) and to which international students pay attention, were deliberately not taken into account in the design of the QAF. Ontario has a long history of university autonomy (DeLuca, 2015; 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 Deming-like 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 erroneous “unknown known” signals about quality which is one reason why the Ontario task force was wary of league rankings.

Academic status, which plays an inherently forceful “pull” role in the international mobility of students and faculty, is inherently comparative, but tends towards mimesis, particularly in connection with league rankings (Birnbaum, 2000; Lang, 2005). Based on the QEA report’s interview summaries, the minutes of the Quality Assurance Implementation/Transition Task Force, and the focus group discussions, league rankings were of much greater concern of QEA respondents than of the Ontario task force. The Ontario position is “compare if you want to.” The QEA and QAA approach in theory demands comparison, a fact about which the QEA respondents as practitioners were keenly aware and doubtful.

The actual effect of league rankings may or may not lead to the migration of “good practices” from jurisdiction to jurisdiction, and they might not reliably assure quality (Dill, 2005; Cooper, 2007). To the extent that research performance determines league rank, reputation maybe a surrogate for quality (Lang, 2005). The reputational effect of league rankings in the international student market is, nevertheless, powerful. This was very prominent among ENI participants in the focus groups. That this was the case should not be surprising, because league rankings are mainly institutional. Some WTO submissions, based on NVivo word searches and node analysis identified protection of market reputation as a recurring theme. According to Mazzarol and Soutar (2002), Marginson and McBurnie (2003), and Chen (2007), reputation is the most powerful of all the “push” and “pull” factors that influence international student choice.

This is an area in which the dividing line between quality assurance and accreditation gains in importance. International students often see, or, at least, wish to see, compliance as a form of consumer protection, which accreditation formally delivers. The United States requires accreditation for federal student financial aid to follow students across national borders. Japan, which usually ranks 8th or 9th in international student enrollment, has an unusually high proportion of self-supported students and a large private higher education sector. In its submissions to the WTO, Japan speaks expressly about “consumer protection” as necessary part of any international quality assurance protocol. The conceptual difference between quality assurance and accreditation in these contexts is that accreditation plays a fiduciary role that quality assurance does not, which may in turn explain the role of audits in quality assurance.

Audits

In order to strike a balance between institutional autonomy and accountability, the Ontario framework 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. A new role of externally appointed “auditor” was created to ensure compliance. 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 not, serious consequences followed. In their discussions, the Ontario task force referred to these provisions as “hammers” that would ensure compliance. In the focus group discussion, participants from Ireland characterized this role as “box checking” or the “fire wall.”

“Audit” meant something different to the participants in the QEA study. The QAA process was more external than the Ontario process, and audit presupposed 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.

“Audit” in QEA terms is different from “audit” in QAF terms in at least two other significant ways. First, the 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 determine whether or not the university has complied with the procedural terms of its IQAP. The QEA perception of the QAA process sees “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 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.

This leads to a fundamental question: for the purposes of assuring quality inter-jurisdictionally, how inclusive need the audit processes be, or, as Deming might have asked, “where does the input-output quality assurance process begin and, especially, end?” Improving quality, as important as it might be, is conceptually a local issue, of interest primarily to systems and governors of individual institutions. Except for benchmarking, it does not cross borders. For prospective students, the issue is confined to immediate, not future, quality, nor are they concerned about future long-term returns of public investments in postsecondary education. In terms of the “pull” effects on the quality of international students, faculty and admissions committees are, as well, concerned about the present and short-term future, as opposed to a long-term moving target.

“Pooling,” Fungibility, the Level of Appraisal—The Problem of Aggregation

Scott (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,” or over-simplification in the interest of commonality. Key to each failure was a mistranslation of 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 may not “see” what system planners, academic administrators, and especially faculty, and students “see.” In the QEA report respondents expressed a concern that faculty members on what they called the “chalk face” did not “see” quality enhancement as an institutional or system-wide concept.

The quality assurance system that 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” in assessing quality (Kirp & Roberts, 2002; Massy, 2007; Banta & Blaich, 2010).

This forces a 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 was a major issue for the Ontario task force, as it is in Europe (van der Wende & Middlehurst, 2003). As Porter said “diversified companies do not compete; only their business units do” (Porter, 1996). This applies to universities. They are very diversified, a fact that resonates throughout the WTO submissions that were analyzed. For example, the QAF task force examined individual performance indicators of quality carefully, and saw that most of the “performances” that the indicators measure in use at the time did not operate at the institutional level, yet the metrics of the indicators were often calculated at the level of the institution (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. Yet, it is the quality of degrees that is of “pull” concern to international students and “push” concern to governments that promote study abroad.

In terms of the assurance of quality, the QAF task force was concerned that pooling would distort equivalency and degree integrity to the extent that, like the parable of the three blind men and the elephant, all interested parties believe that they are seeing something different. In Knightian terms of uncertainty, this would be an “unknown known”: the quality assurers know something, but they do not know it is erroneous, or that there could be an entirely different set of facts known by some but not by all (Akerlof, 1978; Spence, 2001).

QEA participants, however, recognized 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.

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. 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. In Deming’s terms, information about quality in this case is insufficient because a reliable connection between input and output is never made, and, if it were, it would be hard to find by any interested audience outside the respective university, especially by an international audience.

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. 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 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, but some ENI focus group participants from nominally prestigious universities thought otherwise.

Jurisdiction and Inter-Jurisdictional Portability

A reader of only the QEA report could reasonably wonder why any discussion of jurisdiction is needed. But like Sherlock Holmes's dog that did not bark in the night, the fact that the report says nothing about it is significant as a point of comparison. The Ontario framework says a lot about it, so did most of the WTO submissions that were analyzed. "Jurisdiction" refers to the scope of a quality assurance or quality enhancement protocol. One might say that this is easy to define in theory, but complex to apply in practice. 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. Some universities offer programs that are "privatized" in the sense that they are not eligible for public funding.

Japan, because of its large numbers of private universities and of self-supported students, sees expansion of jurisdiction to include all universities as an important step in the direction of quality assurance inter-jurisdictionally (Kimura, Yonezawa, & Ohmari, 2003). The United States could have the same problem were its version of universal accreditation not seen as an extension of quality assurance.

Which programs are reviewed and which are not, then, poses a problem for inter-jurisdictional quality assurance, and particularly, in WTO terms, the portability of credentials. In the QEA report and in the focus group discussions, references were made to QAA's "collaborative provision" which requires that partnerships between universities and "other providers" either within or outside the United Kingdom be covered by the normally required audits or by separate audits that are procedurally the same. In Ontario, all programs are subject to the QAF whether they generate public funding or not. 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 comparable to but not the same as the Ontario process, the program does not have to be assessed again in Ontario. Exemplary of theory-driven evaluation, nations are seeking pan-jurisdictional commonality for the same reasons in theory but are taking different approaches in practice, with the result that assurances of quality may be hit or miss across borders.

Summary Thoughts

Language makes a profound difference in terms of a conceptual understanding of inter-jurisdictional quality assurance. The roots are deeper than positivist definitions. In terms of historical epistemology, the two jurisdictions in the study have deep roots, as deep as classical Greece (Turner, 2015). The Ontario *quality assurance* perception has an Aristotelian mindset in that it assures quality at fixed points in time, and mainly in terms of learning inputs, outputs, and, like accreditation, fixed curricula. The QEA *quality enhancement* mindset has a Platonic bent in its attention to the process of learning, and perceives enhancement as an infinite rate of change without absolute values. These are not semantic differences. They are evidence of different meanings—both of which are legitimate with what Heap (2013) would call the "embeddedness of philosophical claims in natural language"—having different effects on the assurance of quality across jurisdictions.

An almost universal rationale for the introduction of quality assurance protocols is to facilitate commonality in the recognition of credentials across jurisdictions. The Erasmus Charter and the Bologna Process promoted the mobility of students mainly by mandating standardization of higher educational credentials, but Bologna could only call for a quality assurance mandate, which it has not yet delivered (Abelson, 2005). Nor have the last three rounds of GATS negotiations. There still are unanswered questions surrounding subsidiarity within the Bologna Process that have to do with the input-output connections between quality and cost (Gerard, 2008), which is at the centre of Deming's model.

Taking the empirical examples of the GATS, Erasmus, and Bologna, we see that the movement of students within an international market has been a major point of negotiation. The UK and Canada are both major participants in the competition for international students. This reinforces Altbach's (2010) argument that quality assurance is a precondition for a truly international system of credential recognition. Yet, as the study demonstrates, quality assurance and quality enhancement cannot and should not be conflated. One focus group participant made the point more simply: "Having processes for enhancing quality is not an indicator of quality," which echoes Turner's (2015) metaphor of the difference between how a person learns to drive and whether or not he or she passes the driving test. Restated in Knightian terms, the process may be positively "known" but the result may still be pragmatically "unknown." Even two jurisdictions as similar and closely-tied as those in this study interpret an elementary term like "audit" completely differently.

The assurance of inter-jurisdictional quality is a pan-jurisdictional problem for which there might never be a truly pan-jurisdictional solution. Research and sovereignty are examples of this possibility. Although research is a dominant factor in international league rankings, it had very little evidentiary inter-jurisdictional prominence in the study. This may be because peer-adjudicated research is inherently international already. National sovereignty may be a larger impediment than it so far has been seen to be. The great achievement of the Bologna Process has been the standardization of curriculum and degree credentials. The analysis of the national submissions to the WTO, however, demonstrates that curriculum and admission requirements are areas over which nations are insistent they will not cede control. Nielson's (2003) OECD report in the state of GATS negotiations came to a similar conclusion. The WTO submissions also reveal a preference for "multilateral" over "international." New Zealand's position, for example, took a very selective view of the international student market, favouring matches between student "push and pull" towards domestic program infrastructure, a strategic policy that needs a multilateral language and protocol for assuring quality more than an international one.

A lesson to be considered from this study is that Heap's "embeddedness of philosophical claims in natural language" is real and has such different effects on the assurance of quality across jurisdictions that further research towards a Theory of Everything definition of quality and quality assurance may do no more than to prove the law of diminishing returns. Effort might better be redirected to an attainable typology of quality assurance protocols that jurisdictions, institutions, and students as stakeholders can use bilaterally to identify peer quality assurance processes.

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