

Response of A3ES to the report of the Scientific Council

The Agency wishes to express its deep appreciation for the work developed by the Scientific Council and considers that the report produced after the visit will be a very important contribution to the further development of the Agency and the improvement of its operations. The Agency aimed at creating its own internal quality system by submitting its work to the critical appreciation of a pool of foreign experts. The Agency acknowledges that the Scientific Council has fully corresponded to its expectations.

The Agency has appreciated the very gratifying commendations of the Scientific Council's report and has taken due note of them. However, the main purpose of this response document is to serve as the basis for a follow-up. Therefore it concentrates in discussing the recommendations of the Scientific Council and describing how they will be implemented.

1. Process and learning outcomes – The Agency has no doubt that learning outcomes will be a developing area of QA and will increase attention paid to measuring outcomes due to the AHELO programme being developed by OECD. Discussions held at the last ENQA general assembly also point in this direction, while there is a move for the rapid development of a European Qualification Framework and a Multidimensional Ranking System by initiative of the Commission and the European Ministers. However, there are still considerable technical difficulties in measuring outcomes, a problem that might be solved by the development of AHELO. The Agency intends to follow international developments in this area and will commission a report on the available best practices focusing on process and outcomes.
2. Minimum information basis – The Agency will dedicate the next two academic years to discuss with the higher education institutions the implementation of internal quality assurance systems. Kells (1995) argues that it is normal for higher education institutions not to have useful and updated information about themselves and the way they function, or systems that allow for the collection, treatment and use of data. However, as Henkel (2004) reminds us “greater stress on data recording, on procedures and systems, and on the formal appraisal of academic work meant that this work was more open to scrutiny by

administrators...” For the Agency this is a recommendation to be careful when asking for institutional data in order to safeguard institutional autonomy and academic freedom. A report is already available with information about internal QA systems in use in different European countries, which will be the first basis for starting the process with institutions. When the system comes into full operation (by the end of academic year 2010/2011) those institutions with internal QA systems recognised by the Agency and with a number of performance indicators (they will be discussed with institutions in 2010) above national average will be subject only to a light touch external quality system (a possibility will be based on sampling but this will again be discussed with institutions).

It is also important to build institutional databases with a common structure and allowing direct transfer of data to the Agency’s platform to minimise institutional workload. The Agency is preparing a discussion paper on suitable performance indicators while efforts will be made to coordinate the Agency’s activities with the DGES, the FCT and the GPEARI – the bodies of the Ministry that collect the bulk of information about the higher education system, including research – and with the Ministry for Employment, to collect relevant information on labour market outcomes. The Agency is aware of the need to use mainly data already collected by the national administration in order to avoid overloading the institutions. The possible use of national questionnaires will also be discussed.

3. Training – This is an area that apparently was one of the weak points of the Quality Assurance system in operation in Portugal until 2007. The Agency will develop training initiatives at three levels: the Agency’s own cadres, external reviewers and members from higher education institutions.

The Agency personnel went through an intensive training programme in 2009 and were hired on a more permanent basis only after successful completion of the training period. For 2010 the Agency plans to give them some additional training in specific areas and to offer them the opportunity of gaining some international experience in chosen foreign agencies.

Most of the Agency’s efforts will now concentrate on training external reviewers, although there is a substantial pool of people with experience of evaluation (e.g. evaluators in the system in operation for more than 8

years until 2007; evaluators in the EUA/IEP programme; evaluators in the research evaluation exercises; evaluators working for the DGES). The Agency has already produced the Guidelines for External Evaluation that was modelled on similar guidelines from American Regional Accreditation Agencies and is planning training sessions for the evaluators which include a code of ethics for evaluators and norms to be followed when performing their duties. The Agency agrees with the Scientific Council that it is necessary to inculcate at least part of the members of the evaluation team with a process and evaluation perspective and it is planning to adapt some of the training methodologies successfully used by EUA/IEP over more than one decade.

At institutional level the Agency agrees with the recommendation made by the Scientific Council to accommodate the bulk of the training for institutions in the Second Phase of the Agency's development. In 2009 training activities for institutions were limited to one-day training courses aiming at preparing administrative personnel to use the Agency's electronic platform. As the previous accreditation guidelines follow closely the structure already used by institutions when they had to submit proposals for new study programmes to the DGES, no additional information being required, the only innovation element was the introduction of the electronic platform. This had the objective of easing the workload of institutions and eventual changes to the guidelines will be made only for the future and as consequence of the analysis of the results of the initial phase.

In the initial phase, embedding a quality culture in institutions will rely mainly in activities related to the implementation of internal quality assurance systems (see § 6).

4. Identify and verify information relevant to academic quality – The agency plans to organise a number of visits to well-established QA Agencies and to commission a research centre to collect the relevant information that might be useful for improving the quality of the Agency's activities.
5. Workload – For Neave (2004) “the creation of new model accreditation agencies added further to the apparatus of verification”. The Agency is well aware of the problems of an excessive impact of accreditation processes on the general workload of institutions and this aspect will be a permanent concern of the agency. This is made even more relevant as Portuguese higher education institutions are now going through a deep

and generalised set of reforms that already represents a considerable addition to their daily workload. This is why in 2010-2011 only a small percentage (10-15%) of the programmes – those that may not comply with the minimum standards – will go through a formal accreditation process. And the system in full operation is planned to adopt a light touch process for institutions and programmes of quality above the country's average (see § 2). At the same time, the Agency is planning to make the life of institutions easier by developing electronic institutional data bases easily transferable to the Agency's platform whenever necessary (see § 2; see also § 4).

6. Embedding a quality culture – It is the Agency's opinion that the most effective way to embed a quality culture in institutions will depend on the effective implementation of the internal quality assurance systems. The Agency will invest considerable time and effort in encouraging institutions to implement effective internal systems of quality assurance, including with the preparation of guidelines to set up such systems and discussions on the requirements for internal systems to be externally validated by the Agency. The Agency strongly believes that the key to the successful development of an institutional quality culture will depend on how well these systems are designed and implemented and on how much they will contribute to reinforce the social capital of institutions that has been significantly reduced by fragmentation of disciplines, excessive specialisation, “emphasis on individualism, as well as a significant degree of internal competition” (Coate 1993; Youssef et al. 1998; Kells 1995). As referred by David Dill in “Through Deming's Eyes”, “...assuring quality in academic programmes ... will also require re-weaving the collegial fabric of academic communities, the collective mechanisms by which faculty members control and improve the quality of academic programmes and research”.
7. Lessons from past experience – Until the end of 2009 higher education institutions will submit their proposal for new study programmes to a “previous accreditation” by the Agency. Until March/April 2010 all institutions must declare which study programmes already in operation or approved by the Ministry they want to offer in 2010/2011, and submit them to a “preliminary accreditation”. This latter process is well described in the 2009 Activity Plan and will not be repeated in the following years. Therefore, in 2010 the Agency will collect information

both from institutions and their actors and from the members of review teams about the “previous accreditation” process. The Agency has already asked its Analysis Unit to start preparing a suitable instrument for collecting the necessary information. The information will be carefully analysed and used to improve the guidelines for previous accreditation of new programmes and the electronic platform for the next round of accreditations. A similar methodology will be used to collect information about the full accreditation processes that will be run in academic year 2010/2011. This latter information will be used to improve the accreditation process before it initiates its full operation.

8. Funding. The Agency fully understands the recommendation of the Scientific Council and will convey it to the Minister. However the Agency has no power to change the law.

Acronyms:

AHELO – Assessment of Higher Education Learning Outcomes

CIPES – Centre for Research on Higher Education Policies

DGES – Directorate General for Higher Education

ENQA – European Association for Quality Assurance in Higher Education

EUA – European Universities Association

FCT – Foundation for Science and Technology

GPEARI – Office for Planning, Strategy, Assessment and International Relations

IEP – Institutional Evaluation Programme

References

Amaral, A. (2009). “Impact of Quality Assurance on Learning Efficiency”, invited paper presented at the XVI International Seminar Calidad de los Egresados, Responsabilidad Institucional Ineludible, Consejo Nacional de Acreditación, 21 and 22 October, Santiago de Chile.

Coate, E. (1993). “The Introduction of Total Quality Management at Oregon State University.” *Higher Education* 25: 303–320.

Dill, D.D. (1995). “Through Deming’s Eyes: A Cross-national Analysis of Quality Assurance Policies in Higher Education.” *Quality in Higher Education* 1.1: 95–110.

Henkel, M. (2004). "The Impacts of Evaluation upon Academic Identities and the Links with Managerialism." *Managerialism and Evaluation in Higher Education*. UNESCO Forum Occasional Paper Series, n.º 7. Paris: UNESCO, 2004, 86–101.

Kells, H. (1995). "Creating a Culture of Evaluation and Self-regulation in Higher Education Organizations." *Total Quality Management* 6.5/6: 457–467.

Neave, G. (2004). "The Bologna Process and the Evaluative State: a Viticultural Parable." *Managerialism and Evaluation in Higher Education*, UNESCO Forum Occasional Paper Series, no. 7, Paris, November 2004 (ED-2006/WS/47), pp. 11-34.

Youssef, M., P. Libby, A. Al-Khafaji and G. Sawyer (1998). "TQM Implementation Barriers in Academe: A Framework for Further Investigation." *International Journal of Technology Management* 16.4/6: 584–593.

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