The First Review of the Ontario Universities Council on Quality Assurance and the Quality Assurance Framework

Spring 2018

The Steering Committee's Comments on the Issues Raised

Ontario universities began systematic, independent program reviews fifty years ago: in 1968 the Ontario Council on Graduate Studies began approving new graduate programs after expert peer review. In 1982 continuing program reviews were initiated at the graduate level. Then 14 years later, in 1996, the system set up the Undergraduate Program Review Audit Committee to carry out audits of the peer reviews of undergraduate programs. Another 14 years later, Ontario universities entered a second phase of quality assurance. In 2010 they agreed to the Quality Assurance Framework (QAF) which guides university program development, continuous program review, and audit, for both undergraduate and graduate programs. It's that Framework and the work of the Quality Council (QC) and its committees which is under review, to ensure that our policies and procedures meet or exceed international standards of quality assurance.

The members of the External Review Panel, all seasoned senior academics with wide international experience in quality assurance systems, have issued their Report setting out fifteen recommendations. Most of the recommendations cluster around three related themes: (i) the desirability of a clear statement of principles, (ii) a maturing system with greater local authority for QA issues, and (iii) a lessening of bureaucratic and regulatory burden while increasing transparency and accountability.

The core recommendation comes in #6:

> *The QC and the QAF should reflect international trends in higher education quality assurance in moving away from program to institutional accreditation, buttressed by cyclical audits. The focus would be on institutions' own internal quality processes (as the primary agents for assuring quality) and on the confidence to be placed in their operation.*

Ontario does not have a system of formal institutional accreditation, as in the US and other jurisdictions. As noted, the quality of our programs is assured by a process of independent review by expert peers, following policies and procedures agreed to by all Ontario universities. The reviewers have judged that our system is well developed and administered, so that it will be ready in the next phase to move cautiously towards placing more emphasis upon recognition, when appropriate, of an institution's ability to manage quality assurance, with periodic audit of its practices. We support the thrust of the report, and will comment on the major recommendations, followed by some brief observations about half a dozen other recommendations. For clarity's sake, we refer to the External Review Report Recommendations as #1, #2, etc., repeating them at each point of comment; and our own recommendations for implementation are labelled Steering Committee Recommendations (SCR).

i. A Clear Statement of Principles

Processes for quality assurance arise from principles and policies. The QAF has served universities and their students well, and every Ontario university has developed, and sometimes revised, its IQAP based on the QAF. As written, however, the QAF does not always articulate reasons for practices. The External Review Report refers to a 'principles-based focus' in recommendation #1:

> *The rather bureaucratic emphasis of cycle one needs to give way, in an increasingly mature system, to a sharper and more principles-based focus for the QAF and its application in cycle 2.*

The external reviewers repeat this injunction later in two additional recommendations.

> *#10. IQAPs should reflect the principles-based approach of the QAF and allow for institutional diversity; its applications should be considered at the time of cyclical audit and this, along with monitoring progress on matters identified in previous Final Audit Reports, would be a primary objective of such audits, which could operate on a five or six-year cycle*

> *#11. The QAF narrative and principles should be captured in a formal 'Quality Statement' which could be structured against Expectations, Practices and Purposes*

If there were a statement of quality assurance principles, the Framework could structure policies and practices around those fundamental principles. Accordingly we agree that:

> **SCR 1:** *There should be a Statement of Quality Assurance Principles, and the QA Framework should be recast as a set of principles with guidance about the implementation of those principles in practices that recognize institutional diversity.*

We are mindful that the universities have devoted a great deal of effort to developing and implementing their IQAPs to reflect the QAF as currently structured, and it is not our intention to require wholesale revisions of governing documents as a result of any changes made to the Framework. We propose an evolution of the system that will reinforce local responsibility within a principled understanding of the fundamental purposes of quality assurance.

ii. A Maturing System

We are grateful for the external reviewers' strong affirmation of the merits of the Ontario universities' quality assurance system, and agree that we should now move deliberately into the next phase, at an appropriate pace that keeps what works well and enhances what's good.

The External Review speaks to the desirability of more 'earned autonomy' for universities that are successful in their audits.

> *#2. A more differentiated approach to institutions should allow a greater degree of 'earned autonomy' for those with demonstrably very good or excellent quality assurance track records.*
>
> *#3. The longer-term aim for all universities is for them to become formally recognized as capable of more independent self-regulation in quality assurance and improvement, not least in the capacity for new program development as they respond to societal needs, but this need not wait until the end of the second cycle and could be introduced gradually, including following successful audits.*

This autonomy would be exercised in program development and approval, allowing universities to be more nimble and responsive, in line with Recommendation #7, which speaks of:

> "*more scope for the nimbleness, entrepreneurialism and societal responsiveness that government and the public expects of its universities,…contributing to well-being and national economic competitiveness*".

The Steering Committee endorses the direction of these recommendations. It stresses that there must be one system of quality assurance, not a two-tiered system in which some universities are subject to less scrutiny or accountability than others. If a university wants to be able to commence new programs with a streamlined approval process by the QC, the criteria for this status must be clear; and every university should have opportunity to gain this status over time. The status must be quickly and unequivocally revocable upon unsatisfactory audit. Accountability cannot be sacrificed.

Given the considered deliberation which these recommendations require, we propose that:

> **SCR 2**: *A more nimble process for program approval should be considered, with criteria for a university to use such a process for some or all program approvals. The process and criteria should be fully discussed by OCAV, the QC, and the Ministry of Advanced Education and Skills Development. Ultimate approval should continue to rest with the QC.*

iii.   A Lighter Burden

In addition to #1 (above), the External Review Report mentions bureaucratic practices and requirements twice more:

> *#4. Current very extensive information requirements laid on institutions, notably for audits, should be reduced to only those directly relevant and essential to consideration of the IQAPs. Greater use should be made of institutions' own data reports and, where available and appropriate, the findings of professional accreditation bodies. Open-ended invitations to provide "relevant" data and material for new program proposals, cyclical reviews and audits should be avoided.*
>
> *#7. In addition to quality assurance itself, an overriding objective must be to reduce unnecessary regulatory burdens on both universities and the QC in order to allow more scope for the nimbleness, entrepreneurialism and societal responsiveness that*

government and the public expects of its universities, and in contributing to well-being and national economic competitiveness.

This concern is echoed in many of the submissions and comments from the universities. The number of iterations between the Appraisal Committee and a university for some program submissions can be large; the documentation for an audit, for instance, can run to thousands of pages.

Deciding on the nature and amount of information required is directly related to the two previous recommendations about principles and maturing status. We propose, then, that:

> **SCR 3.** *The procedures for new program appraisal and audit should focus on articulated principles as in SCR1 above, and not impose unnecessary administrative burdens on universities and the system.*

Brief Observations:

Of the recommendations tangential to the three major themes of the report, we note the desirability of enhanced communication, especially in the Quality Council's public presence. The quality assurance system for Ontario universities which has been developed over many years may not be widely understood, or its rigour appreciated. We understand the spirit of #5:

> *The QC should demonstrate its independence of action and decision, with only broad accountability to the COU through OCAV, perhaps by way of an annual report or when it specifically seeks COU advice on particular matters. The Chair and Executive Director are key contacts in such communications. The issue of QC incorporation could be considered.*

We observe that the QC has in practice operated independently since its inception, and its authority has been established in the way universities have accepted its decisions — though on occasion only after discussion and negotiation. However, the QC could do more to promote better understanding of its mandate, independence and mechanisms of accountability. That is reflected in recommendation #8:

> *As a self-governing system, the QC may wish to consider whether its commitment to wider public norms may be more explicitly stated, in its Framework (access and social mobility, for example), in the composition of its main committee, and in an increased emphasis in the role of the Executive Director on external communication*

Further, the independent authority of the QC could be buttressed by sanctions explicitly stated, as noted in #13.

> *To be effective and authoritative, and to enjoy public support, the enforcement strategies of the QC should be persuasion, negotiation, education and guidance, while carrying a 'big stick,' i.e., have clear recourse to substantial sanctions for use where necessary*

We recommend, then, that:

SCR 4: *OCAV and the QC should come to a formally approved agreement on how the authority of the QC is exercised, and the QC should attend to the public understanding of its role and authority.*

There is a specific observation about how the QC's Audit function is carried out in #14:

> *The Audit function should comprise a (smaller) Audit Committee and a separate and larger or Pool of Auditors available to serve on institutional audit Panels).*

Currently, the auditors are both a committee and a panel. Implementing other recommendations will mean that the audit function will be increasingly important in the next cycle, which will necessitate a larger number of auditors with a deep understanding of university administrative experience. We agree with this recommendation, so we propose that:

SCR 5: *The Audit Committee should be restructured into a smaller committee with responsibility for oversight of the process, and a larger panel of experienced auditors who could be called upon for duty as required.*

Although it's common for reviews to recommend additional resources, we wholeheartedly agree with #9:

> *An additional quality assurance administrative staff member is needed in the Secretariat and the position of Executive Director should remain full-time or full time equivalent. The difficulties in asking members for additional resources need to be redressed around the need to regularly demonstrate the robustness of a self-governing system.*

The QC will need a full time academic leader, especially given the work of implementing the recommendations of this review, and the secretariat is understaffed by any measure.

As for #12:

> *The Key Contacts could become a more formal group affiliated group of the QC, similar to the affiliates of the COU*

As well as the last sentence of #5 (above) about the possible incorporation of the QC, we suggest that such developments should be considered in the course of implementing other recommendations as appropriate. We acknowledge the desirability of increased collaboration with HEQCO (#15), and with the endorsement of OCAV and the QC, engagement with HEQCO should be undertaken to put this into effect.

Other Issues Raised in Submissions

In response to the invitation sent to the universities and other interested parties, the submissions referred to in section V above raised a series of issues, many mirrored in the External Review Report, and about the QAF and the processes it requires. Some of those

questions will be addressed by clarification of the language in the Framework, or by revisions and additions to the Guide. Rather than offer responses in this Report on each of the issues raised, the implementation process should ensure that there is ample opportunity to discuss proposed revisions to policy and procedures, in order to ensure that any continuing concerns of the Ontario universities are addressed.

Next Steps

Effective quality assurance depends upon honest reflection and assessment, and knowledgeable independent peer review. The Steering Committee is grateful for the care and effort that the Ontario universities have taken in their submissions and interactions in this review; we also acknowledge with deep appreciation the wise counsel of our External Review Panel.

It is an opportune time to move deliberately to the next phase of quality assurance for Ontario universities. That phase, we repeatedly stress, must be an evolution. It would be ironic if, in the effort to reduce bureaucratic burdens, the implementation of our recommendations were to require even more work from universities. Nevertheless, the directions in which this review points are, we urge, both desirable and achievable. Hence we ask for agreement with the following:

OCAV and the QC affirm in principle the spirit of the Steering Committee recommendations, as stated herein, on the understanding that any change to the QAF or the QC and its committees will require the formal approval of both bodies, as well as consultation with the Ministry. Further, an implementation team should be struck, with members from OCAV, from the QC, and from the Secretariat (those in the positions currently titled Executive Director and Manager). The team's primary task will be the detailed work involved in implementing the Steering Committee's recommendations. In doing so, it will consult appropriately, and report at least every two months to both bodies. It will aim to complete its work by 30 June 2019.