



Center for
Higher Education
Policy Studies

Impact of Quality Assurance on Cross-Border Higher Education

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CHEPS, Januari 2012
Kenmerk: C12DW012

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1 Introduction: Rationale and Case Selection

Quality assurance has become a standard instrument of higher education policy since the late 1980s. Quality assurance mechanisms are expected to yield better institutional performance for one of three possible reasons, (a) *compliance* with the external pressure from a quality assurance or funding agency, (b) *self-interest* represented for example by the desire to attract students and research contracts or (c) the *professional ethos*, which entails striving for quality as “excellence” (Harvey & Green, 1993). External quality assurance might produce different institutional reactions depending on whether providers focus on compliance, interest or ethos. The literature often mentions superficial “compliance culture” (van Vught, 1994) as opposed to a genuine “quality culture” (EUA, 2006). To assess the potential impacts of external quality assurance on higher education institutions—their policies and management, practices and outcomes—this report takes a closer look into cross-border higher education.

Cross-border higher education is a key element of internationalization in higher education, which is one of the main drivers of public policy worldwide. Cross-border higher education has been considered both an opportunity for excellence in dismal national higher education settings and a risk of substandard provision resulting from deficient regulation. Fears of so-called “rogue providers” are widespread especially in fast-growing markets such South East Asia where demand for good higher education exceeds an insufficient local supply. Former director of the International Institute of Education (IIE) in Việt Nam, Mark Ashwill, undoubtedly spoke for many when he pointed out that Vietnamese students often turned to international higher education institutions in the misapprehension that they are *ipso facto* centres of excellence (Việt Nam News, 2010):

in many people's eyes ‘made in the USA’ is synonymous with quality and excellence without regard to the status of the institution offering the degree programme.

Elsewhere (e.g. the Gulf region), becoming an “international higher education hub” is seen as the answer to booming student demand or to calls for a knowledge economy (Boston College Center for International Higher Education, 2010). For instance, as of 2010 the United Arab Emirates hosted 40

international branch campuses, and Qatar nine¹ (*Ibid.*). The assumption that “western” higher education is high quality (or at least superior to local) is widespread.

That internationalization is viewed as inevitable is also demonstrated by the relentless race to attract international students and academic staff across the world.² In Europe, internationalizing higher education to enhance the European Higher Education Area’s (EHEA) attractiveness has been a tenet of the Bologna process from its inception (Sursock & Smidt, pp. 76 *ff.*). European countries have been asked to take measures to sustain European global competitiveness (BFUG, 2007) and as a consequence European Union (EU) member states have been asked to describe measures taken to implement their strategies to meet “European Higher Education in a Global Setting”.³ Indeed, the long-held notion that universities are everlastingly destined to be nation-state based is increasingly being questioned (Huisman and van Vught, 2009). The national borders of higher education systems are becoming increasingly permeable while their international aspects are gaining importance (Cremonini and Westerheijden, 2008, p. 77).

In the framework of the General Agreement on Trade in Services (GATS)⁴ agreement, four modes of international provision of higher education are distinguished, including (OECD, 2004, p. 35):⁵

- I. Cross-border supply (from the territory of one country into the territory of any other)
- II. Consumption abroad (in the territory of one country to the service consumer of any other country)

¹ It has been argued that, contrary to intentions, these developments may lead to elitism and be detrimental for society. For example, in Qatar concerns have been voiced about the neglect to which Qatar University (representing over 90% of Qataris in tertiary education) has been submitted in favour of foreign providers located in Education City (Boston College Center for International Higher Education, 2010).

² There is extensive literature and statistics about this trend. See for example Widalvky, 2010 (The Great Brain Race). UNESCO’s Global Education Digest 2011 (at: http://www.uis.unesco.org/Library/Documents/global_education_digest_2011_en.pdf) provides statistics on international student mobility

³ See: http://www.ond.vlaanderen.be/hogeronderwijs/bologna/documents/WGR2007/Strategy_plus_possible_actions.pdf.

⁴ GATS is a legally enforceable set of multilateral rules covering international trade in services.

⁵ The GATS classification has often been disputed. As mentioned in the *Feasibility Study* preceding this report, many argue that there are three options for transnational or cross-border education, namely (a) demand travels (student mobility, or GATS’s Mode 2), (b) supply travels (GATS’s Mode 4 if only individual teachers travel, Mode 3 if the higher education institution sets up a branch campus etc.) or (c) the education service travels (distance education, GATS’s Mode 1).

- III. Commercial presence (by a service supplier of one country, through commercial presence in the territory of any other country)
- IV. Presence of natural persons (by a service supplier of one country, through presence of natural persons of a country in the territory of any other country)

The cases explored for this feasibility study involve Mode III of international provision according to the GATS categorization. Mode III provision was chosen for several reasons, but primarily because it is when institutions operate abroad that (a) the risk of low quality provision is highest and (b) the perception of excellence is strongest.

“Rogue providers” might exploit regulatory loopholes in the receiving country while simultaneously capitalizing on the prestige of their home country’s renowned universities—in this context external quality assurance is particularly salient for customer protection. On the other hand, the reputation that “western higher education” has on students in (*inter alia*) emerging markets is all too evident, in which case one may expect external quality assurance to uphold this reputation.

Therefore, it is assumed that institutions operating across borders are the most apt in providing answers to the study’s research aim, namely establishing (see *Feasibility study*):

the impact that cross-border external quality assurance processes of agencies have on the policies and management, practices and outcomes of the institution regarding their operations abroad.

When selecting cases to evaluate impact of external quality assurance on institutional behaviour, different choices embodying different perspectives are possible. For example, one might concentrate on the locus of the quality assurance activity, namely whether it is a requirement from the sending country, the receiving country or both (or, indeed, neither—which would transcend the scope of this study). Or the provider’s ownership (public or private) might be germane.

This study looked at a number of cases of Mode III cross-border higher education based on the institutions’ *geographical spread*. Geography can be seen as a proxy for many more significant variables such as recognition, unmet demand and income levels of potential students, historical and language ties between sending and receiving countries. Many cross-border higher education

initiatives involve North–South cooperation, whereby ‘the developed countries—especially the large English-speaking nations and, to a lesser extent, the larger E.U. countries—provide most services’ (Altbach and Knight, 2006). However, North–North cooperation (between European countries or between North America and Europe) and South–South cooperation (e.g. between Asia and South America) also takes place.

For reasons of feasibility (time, resources, and respondents’ availability to participate in the study at short notice) the cases presented here cover six cases of North–South cooperation⁶ and four cases of North–North (U.S.–Europe and Europe–Europe). The report is based on in-depth telephone interviews conducted between September and November 2011 with a variety of institutional actors in 10 providers engaged in cross-border higher education.

The North–South cases include:

1. An institution from the Netherlands in Qatar
2. An institution from Switzerland in the United Arab Emirates
3. A U.S. university in joint venture with one in China
4. A UK university in Singapore and in Hong Kong
5. An institution from Canada in Qatar
6. A Swiss-German cooperative university in Indonesia

The North–North cases include:

1. A U.S. university in Italy
2. A U.S. university in the Netherlands
3. A U.S. university in France
4. A Swedish institution in Latvia

Moreover, the cases included cover broadly two forms of cross-border higher education activities: joint ventures and physical presence abroad. The former comprise cases where two or more providers from different countries cooperate (for example by awarding joint or double degrees); the latter takes place when a higher education institution establishes a campus or branch abroad.

⁶ These include cooperation with the Gulf region (e.g. in the “education cities” in Qatar, the UAE etc.). Moreover, the use of the expression “North” mostly denotes “Western” whereas “South” is intended as “non-Western”. This is important in consideration of the point made above about the perception of excellence and the fear of “rogue providers” from the “West”.

1.1 Methodological Remarks

In our previous *feasibility study* it was confirmed that the two bodies of literature on impacts of quality assurance and on cross border higher education are separate, practically without overlap. Empirical research on impacts of quality assurance on cross-border higher education is therefore the only way to learn more about it.

To structure the study, in the feasibility study lists of potential independent and dependent variables were drawn up based on a survey of the literature, while the relationship between independent and dependent variables might be influenced by intermediate and contextual variables. Intermediate and contextual variables imply that the same 'cause' may have different impacts, depending on e.g. the type of higher education institution, on the field of study (think of controlled professions), or on legal requirements in the receiving country.

Given the complexity arising from the combination of all these variables while the study could not be too large, a case study research design was selected to take the differences of cases into account, and that rules out more 'superficial' though more standardised research methods such as surveys. Moreover, a wide variety of cases was aimed at rather than random sampling, again to cover as much ground as possible with limited resources. Research methods were telephone interviews supported by web-based information search in order to include cases from a wide geographical spread.

Issues of access limited our final set of cases to positive instances, i.e. higher education institutions that were reached by external quality assurance. Negative instances of institutions (rogue providers?) that were not taking part in external quality assurance could not be persuaded to join in this study. We will return to the possible response bias that might follow from this.

2 Quality Assurance and Cross-Border Higher Education: a Literature Review

Two sets of literature converge in the research question for this study, namely (a) literature on impact of quality assurance and (b) literature on cross-border higher education. The question of impacts of quality assurance is complex because it cannot always refer to higher education institutions as a whole, but to a large extent it is rather a question whether different impacts might be identified e.g. on curricula in different subsectors or knowledge areas of institutions *and* which of the many changes in higher education institutions can be actually ascribed to the influence of external reviews (Harvey, 2006).

Impacts of quality assurance have been studied within national higher education systems, most notably in the UK and in the Netherlands. This section provides a summary of a literature scan on impacts of quality assurance in different national settings (the UK, the Netherlands, the U.S., Hong Kong and other systems).

2.1 The United Kingdom

In the UK, there are three key developments until now, namely the Research Assessment Exercises (RAE) introduced in the 1980s, the Teaching Quality Assessment (TQA) in the 1990s, and the subject benchmarks (continued in the 2000s):

1. The RAE had positive and negative effects on research focus and productivity (Westerheijden, 2008) in the forms of refocusing research on short-term projects and “salami publishing”, but also producing more publications that were cited more often (indicating impact, hence “quality” of those publications). Moreover, another effect of the RAE was that academic staff “followed the money” (Bernstein & Woodward, 1974) and devoted more attention to their research productivity than to teaching quality (Jenkins, 1995).
2. The TQA was expected to redress the balance between education and research, despite having been criticized from the beginning (Pollitt, 1987, 1990; Race, 1993). For example, in a former polytechnic almost two-thirds of those interviewed considered audit and quality assurance mechanisms a bureaucratic practice with little impact on classroom teaching or academics' awareness of the importance of good teaching (Cheng, 2010). Another study concluded that the TQA failed to produce meaningful impact because it was

not supported by the academic community (Laughton, 2003). However, it is difficult to distinguish genuine academic arguments from resistance against what was considered an imposition (by the government) of New Public Management tools upon an unwilling community (Pollitt & Bouckaert, 1995). The academic community's stance in relation to TQA was instrumental in its replacement by institutional audit in 2001.

3. Nationwide subject benchmarks were introduced to set out the characteristics and standards of study programmes. They explicated the implicit understanding of the "gold standard" that external examiners (a typical UK/ Commonwealth phenomenon) traditionally had been expected to uphold among British higher education institutions. A national recognition scheme ensures the benchmarks' sufficiency, distinction and connectedness to the subject (and professional) community (QAA, 2010b). Although initially subject benchmarks were seen as a threat to academic freedom or institutional autonomy (Hargreaves & Christou, 2002; Hodson & Thomas, 2003; Trowler, 2004), later on there were those who judged them beneficial for raising awareness of what good education meant per field. In a way, these subject benchmarks might be seen as precursors of the learning outcomes sets defined in, until now, 24 Europe-wide "Tuning" projects.⁷

2.2 The Netherlands

In the Netherlands, studies on impacts of quality assurance focused at first (1990s) on the question whether recommendations from external reviews were used for institutional decision-making (Frederiks, Westerheijden, & Weusthof, 1993; Frederiks et al., 1994; Scheele, Maassen, & Westerheijden, 1998; Westerheijden, 1990, 1997; Westerheijden & Frederiks, 1997), and subsequently, as accreditation was introduced, on monitoring impacts (Goedegebuure, Jeliaskova, Pothof, & Weusthof, 2002; Inspectie van het Onderwijs, 2002, 2005a, b; NVAO, 2009; Westerheijden et al., 2008). Much attention was given to the issue of cost and "bureaucracy" of programme accreditation vis-à-vis quality assessment. There were higher demands on documentation of quality assurance policies on the one hand, and the serious consequences of failed accreditation made higher education institutions take implementing and documenting their quality management much more serious than before. The more official nature of accreditation (which might eventually be challenged in court) did indeed lead to more paperwork than earlier "softer" evaluation processes, which in turn led to fears that the system's cost might rise exponentially. Therefore

⁷ See: Tuning Educational Structures in Europe. At <http://tuning.unideusto.org/tuningeu>.

proposals were put forth for a “lighter touch” in the second round of accreditation (starting 2011) coupled with a focus on institutional audit.

From the beginning policy intentions were that improvement and accountability should be equally stressed. Ownership of the external quality assurance process in the hands of the umbrella bodies of the higher education institutions was to enhance the improvement orientation by focusing on peer review rather than an inspector’s examination through a state-related agency. Nevertheless, the higher education community still pointed out that accountability and “ticking off checklists” remained an important part of the process, and certainly did not diminish after external assessments were changed into accreditation—a feeling that persisted despite attempts to emphasise the improvement orientation by several means (e.g. increased focus on the institution’s own quality management as an internal mechanism for improvement, which was often seen as taking attention away from the teaching and learning).

The external quality assurance system’s reports and recommendations were extensively used in the higher education institutions. It was found (Frederiks, 1996; Frederiks et al., 1994; Westerheijden, 1997) that higher education institutions never showed complete neglect of external evaluation reports and that “passive use” by which external evaluation reports were tabled for the next meeting of the appropriate programme-level committees and subsequently considered at higher hierarchical levels in the higher education institutions (i.e. “trickling up” to faculty Deans and central level decision-makers), quickly had become a standard procedure. In general, external evaluation reports were regarded as unbiased, externally validated information leading to external legitimation of persons’ and units’ reputations.

Research attention then shifted to further distinctions of “active use” (i.e. making decisions regarding behaviour or policy in higher education institutions based on external quality assurance reports) according to its conceptual vs. instrumental and long term vs. short term use. There may be a correlation between time and type of use: instrumental use can take place immediately or in the long run, but conceptual changes in the frameworks of thought of actors are more probable in the longer term. Instrumental use meant to address the question of whether the higher education institution implemented recommendations made in external evaluation reports. The majority of recommendations were indeed implemented (Frederiks, 1996), which is not surprising given that part of the external recommendations reflect remarks and plans in the self-evaluations and the Dutch government was among the first to

initiate a formal follow-up process to monitor institutional reactions to the external quality assurance (Scheele et al., 1998). Instrumental use flowed over into other institutional decisions, e.g. temporary staff places were awarded to well-performing units, badly-performing units were reorganised. We called this a “halo effect”: the externally validated quality reputations gave institutional management an objective tool to justify differential decisions also in matters not directly related with the issues reviewed in the evaluation process. Further studies (Jeliaskova et al., 2000), helped explain when an institution might adopt a recommendation, or when such a recommendation would lead to prolonged debate while a decisive outcome would be postponed—sometimes indefinitely.

Conceptual use concerned the frameworks that actors in higher education institutions used in thinking about their work. Interviews (Westerheijden, 1997) brought to light that decision-makers in higher education institutions, even if they said that the external quality assurance had had little (instrumental) impact on them, framed their answers in terms and categories that would have been unheard of before the introduction of external quality assurance. Thus, both the research and education processes were since then seen as matters that could be managed; quality was an operational category rather than only an ideal of “excellence”; and administrators began to turn into managers. Above all, in the egalitarian Dutch culture, excellence began to be allowed to be visible. In that sense, quality assurance has had a pervasive impact on the Dutch higher education system. Admittedly, the gamesmanship of managers in Dutch higher education institutions did not develop as quickly and in such sophisticated manners as in the UK, where especially the RAE required much managerial involvement (Westerheijden, 2008). In both countries, however, the institutional management acted as a buffer between external influences (quality assurance, funding) and internal “life” (Westerheijden, 2008).

2.3 The United States

The U.S. has the longest history of formal external quality assurance in the form of accreditation. Accordingly, long-term impacts should be visible here. However, the character and functions of accreditation have changed a lot in recent decades, mainly under the influence of federal legislation requiring more evidence of student learning in reaction to political attention to an increasing rate of loan defaults after graduates failed to obtain the type of jobs (and associated salaries) expected of them.

U.S. accreditation consists (a) institutional accreditation (necessary for higher education institutions and students to obtain federal funding), and

(b) specialised or programme accreditation which only applies to fields where professions organise themselves for this purpose. Institutional accreditation has played a role in state and federal policies regarding higher education at least since the 1944 GI Bill, but was made into a 'gatekeeper' with the Higher Education Act of 1965 (Ewell, 2007). Based on the US experience, Ewell (2007) proposed six propositions on conditions to make external quality assurance effective:

1. The likelihood that state interests will be served increases as quality approaches convey a clear and carefully delimited message about what the state values, and when consequentiality visibly reinforces this message
2. The likelihood of institutional engagement with quality initiatives increases with consequentiality (but this reaction may not always be consistent with state interests)
3. The likelihood that state interests will be served increases when quality approaches allow significant institutional discretion, and are implemented flexibly to empower local leadership and recognise significant differences in institutional circumstances
4. The likelihood that institutions will be meaningfully engaged increases when quality approaches are implemented by "quasi-governmental" third party organisations (but state interests are served only if such organisations pursue an agenda that is consistent with state objectives)
5. The likelihood that public interests will be served increases when quality approaches are open, transparent and provide meaningful public information
6. The likelihood that all interests will be served depends on the level of trust accorded to higher education institutions by states (and their agents undertaking quality reviews), and upon the level of respect accorded to quality reviewers by the academics under review

Regarding impacts of the external reviews in the U.S., a few years later Ewell (2010) wrote that "the goal of providing adequate evidence of student learning remains elusive" (Ewell, 2010).

Concerning impacts of professional accreditation on U.S. higher education, articles found in a literature search all concerned business studies and engineering. Notwithstanding its long tradition, U.S. teaching and research staff struggle with much the same problems and benefits as their colleagues in more recently established quality assurance systems. Roberts Jr. et al (2004) point out the costs and time involved in AACSB accreditation but also employers' appreciation and easier access to graduate schools, attractiveness to better-

qualified students, higher salaries for teaching staff and more emphasis on research. Beyond these direct impacts on the programme as a whole and on staff, the authors questioned whether the new, mission-driven criteria were really affecting the business. Additionally, it was found that marketing department chair holders valued research publications from AACSB accredited business schools higher than others (Heischmidt & Gordon, 1993).

In another article on AACSB's accreditation, Hedin et al. (2005) started from the fact that in business studies, the AACSB aims to support quality improvement, but they found that the AACSB's accreditation criteria fell short of that aim, "because many are not process-based". Others pointed out that there is "[...] no core curriculum for, or minimal level of provision of, for example, ethics education" (Lowrie & Willmott, 2009). Lowrie & Willmott commented that

The exclusion of issues of content from the pyramid-style, peer-administered architecture of the AACSB's mission-linked approach stems as much from its pursuit of expansionary ambitions as from its case for diversity, innovation and inclusion

None the less, on an international scale, Lowrie & Willmott saw AACSB promote the U.S. model of business education, thus reducing diversity and strengthening elitism in the field.

In engineering, another major area of professional accreditation, ABET, the organisation for accreditation of engineering programmes, significantly changed its criteria ('EC2000') because of dissatisfaction even within ABET with the situation existing in the 1990s, blamed for protecting of the status quo and increasing legal challenges to unfavourable accreditation decisions because of too many accreditation visits (Prados *et al.*, 2005). The new criteria were more focused on continuous quality improvement, by emphasising program objectives (program differentiation rather than "cookie-cutter" uniformity) and learning outcomes (intellectual skills of graduates rather than subject-area seat time).

In an evaluation after some years of experience, the key changes reported by programme chairs and teaching staff included *inter alia* (Lattuca, *et al.*, 2006; Prados *et al.*, 2005):

- More emphasis on professional competencies (e.g. communication, teamwork, use of modern engineering tools, technical writing, lifelong learning, and engineering design)

- More use of active learning methods (e.g. group work, design projects, and case studies)
- Student assessment based on learning outcomes with a view to using the findings for program improvement

Overall, the support of teaching staff for the improvements was high and opinions whether staff incentive schemes were changed towards more rewards for education were mixed. On the student experiences, the researchers compared graduates before and after the introduction of the new criteria and found the following significant differences (Lattuca et al., 2006):

- More active engagement in their own learning;
- More interaction with instructors;
- More instructor feedback on their work;
- More time spent studying abroad;
- More international travel;
- More involvement in engineering design competitions;
- More emphasis in their programs on openness to diverse ideas and people

2.4 Hong Kong

Hong Kong's higher education system has been subject to elaborate external quality assurance since the 1990s, possibly due to the area's unique international position. Besides the accreditation of the non-university subsector and private postsecondary education by HKCAAVQ (previously HKCAA⁸), the university sector, under the auspices of the UGC, has gone through several quality assurance exercises (Massy, 2003; Massy, 2010; TLQPR Review Team, 1999). These were each designed with a somewhat different aim in mind, and all made use of lessons learnt from a wide range of international examples.

In brief, the first Teaching and Learning Process Quality Process Review (TLQPR) series until 1998 focused on universities having their internal quality assurance processes in place, the second one, in 2002-2003, on their being actually applied, while the third round of university audits in 2009-2011 emphasises their effectiveness for improving student learning. Having taken part, in some way, in all of these three rounds of external quality assurance, the

⁸ An interesting long-term impact of HKCAA's quality assurance procedures (and of its further predecessor, the British CNAAB) was the 'promotion' of several of its institutions to the university sector, e.g. Polytechnic University, City University and Baptist University. Moreover those institutions' well-formalised internal quality assurance arrangements can be traced back to the tutelage of CNAAB and HKCAA.

impression is that, starting from an in some case already strong base (legacy of the UK's CNA influence on parts of the system until the early 1990s), Hong Kong's universities have established on the whole fairly strong internal quality assurance systems and their application has become part of the organisational routines. The extent to which these measures have helped to improve student learning is a question that awaits an evaluation of the third round of audits.

2.5 Other examples

The EUA, which established the first Europe-wide quality assurance process with its Institutional Evaluation Programme (Amaral, Rovio-Johansson, Rosa, & Westerheijden, 2008; van Vught, 1991; van Vught & Westerheijden, 1996) has undertaken several monitoring exercises to ascertain the impact of its IEP (partly internal and not published, but also Hofmann, 2005; Tavares, Rosa, & Amaral, 2010). This process was a voluntary engagement by individual higher education institutions—unless national governments contracted the EUA to undertake national reviews as in e.g. Ireland, Portugal and Slovakia—which emphasised its character of 'supportive peer review' and concomitant improvement orientation. Follow-up was stimulated through several measures, such as follow-up visits by the external review team, 'alumni' meetings to present institutions' use of the IEP, and other measures (e.g. invitation to an institutional quality assurance committee for two years after the review). Tavares et al. (2010) summarised their findings as follows:

IEP evaluations generally give a precise account of problems faced by each university, identifying its strong and weak points, opportunities and threats, and presenting clear recommendations and suggestions for improvement. If properly discussed inside the university, these evaluations can form the basis for an improvement plan.

That summary, with its conditional statement, echoes the Dutch findings detailed above: impact of external quality assurance mainly depends on internal follow-up, on decision making within the higher education institution after the evaluation has taken place.

Recommendations have also been analysed in other countries: in Australian dental programme accreditation, the themes of recommendations proved to remain stable over a decade even in a changing environment; they mostly concerned staff, external relationships, funding, structure, documentation, curriculum, and communications (Arena, Kruger, & Tennant, 2007).

Private and public higher education institutions respond differently to accreditation: it was found that market niche and ties to an accrediting organization affected the responsiveness of both types of organizations. However, technical factors (potential economic gains from accreditation) had a greater effect on the responsiveness of private organizations, and institutional factors (diffusion through both social cohesion and structural equivalence) had a greater effect on the responsiveness of public organizations (Casile & Davis-Blake, 2002). A system of external quality assurance that had to deal with public and private higher education institutions, namely in Chile, was seen to have affected the higher education system in several ways (Lemaitre, 2004), for example:

- Fewer private higher education institutions were opened due to increased quality requirements
- Resistance against external oversight was overcome as institutions learned what external quality assurance involved
- Higher education institutions much under the quality threshold were closed, others upgraded in several ways to meet threshold standards, which were however seen as not high
- Collection of information on student attrition etc. helped take action on drop-outs in higher education institutions

A study looking into the 'inner life' of higher education institutions undergoing external reviews in Argentina, summarised its findings as follows (Coria, Deluca, & Martínez, 2010):

[U]niversities faced problems when they attempted to implement changes to adjust curricula to quality criteria due to individual and organisational resistance to change. The sources of resistance identified are structural inertia, resistance to resource [re-]allocation between teaching departments, lack of consensus and threats to expertise and teaching habits. However, as the accreditation process was mandatory and institutions responded to peer review, the accreditation process had a significant impact on programmes because it enabled universities to implement curricula[r] changes.

In Norway, a survey among institutional representatives, students and other stakeholders on the diverse methods of external evaluation used simultaneously in Norway (but audit, evaluation and accreditation apply to different situations of disciplines or institutions), came to the conclusion that whatever the method used, views and impacts on higher education institutions were broadly similar (Stensaker, Langfeldt, Harvey, Huisman, & Westerheijden, 2010), including a perception that the process was associated with control far

more than with improvement and that the impact of the process was “moderately positive” irrespective of the type of evaluation. Moreover, there was no correlation between respondents’ perception of aim and impact. However, beneficial effects differed depending on the evaluation types. In particular, institutional accreditation affected the reputation of the institution, while other evaluation types affected the education process and the quality work surrounding it. It is also interesting to note which types of effects were not mentioned that often: internal resource allocation, governance structures, involvement of staff and students in education matters, and the quality of the education on offer.

2.6 Key policy documents on quality assurance in cross-border education

The alternative to national-level policy borrowing regarding quality assurance, is internationalisation of quality assurance itself:

The accreditation process is becoming internationalized and commercialized. Bona fide national and international accreditation agencies now work in many countries. For instance, U.S. national and regional accreditors provide or sell their services in more than over 65 countries. Accreditation bodies of the professions such as ABET (engineering) from the U.S. and EQUIS (business) from Europe, also offer their services abroad. (Altbach et al., 2006)

At the international level, quality assurance in cross-border education has been the subject of extensive work in the INQAAHE and in UNESCO, particularly. UNESCO’s Guidelines are the point of departure in this discussion, almost against their professed non-normative character (UNESCO, 2005):

The Guidelines were conceived as being voluntary and non-binding in character and as providing orientation for developing national capacity and international cooperation in this area. They are neither a normative nor a standard-setting document.

UNESCO’s guidelines aim to collect international best practices in order for authorities ‘to protect students and other stakeholders from low-quality provision and disreputable providers’ (UNESCO, 2005). The operation of providers cross-nationally and the worry that low quality may be more prevalent in this area than in any other is the lead theme in the international discussions. Whereas the focus of the UNESCO Guidelines is on the quality of provision, INQAAHE, as the network of quality assurance agencies, published guidelines on the operation of external quality assurance, which might include review of cross-border higher education (INQAAHE, 2007).

UNESCO's Guidelines recommend governments to organise quality assurance (or at least registration) on both sending and receiving sides, with good information to the public, and linking with the regional conventions on recognition of qualifications. They hold open the option of bilateral recognition agreements—useful in case of large and regular 'streams' of students or credits between two countries.

Higher education institutions are first of all, in UNESCO's eyes, to:

Ensure that the programmes they deliver across borders and in their home country are of comparable quality and that they also take into account the cultural and linguistic sensitivities of the receiving country. It is desirable that a commitment to this effect should be made public;

This guideline immediately shows the dilemma of 'comparable quality' on the one hand and sensitivity to local sensitivities on the other. It might have been more pertinent to talk about local relevance perhaps, rather than sensitivities, for it has nothing to do with cultural habits, let alone political taboos, but rather with graduates being able to use the knowledge and skills acquired in the local economy and society.

Also, higher education institutions ought to have internal quality management in place, to 'respect' the local quality assurance arrangements in the receiving country, to support recognition of its qualifications, and to provide clear information about all of that (UNESCO, 2005).

For the quality assurance agencies, UNESCO recommends including cross-border higher education in their evaluation procedures (focusing on consistency and appropriateness of student assessment guidelines, standards and procedures), linking between sending and receiving countries, and informing the public about all of this. International reviewers on panels, international benchmarking of standards and procedures as well as joint assessment projects were recommended as well.

The INQAAHE Guidelines have little to add to UNESCO's as they only demand of a quality assurance agency to have 'policies relating to both imported and exported higher education. These policies may be the same as those for domestic providers and domestic provision' (INQAAHE, 2007). Other sets of standards for quality assurance agencies do not seem to address cross-border higher education to any significant extent, either (Aelterman, 2006). However, the APQN in cooperation with UNESCO developed a toolkit for

quality assessment agencies for this very purpose, to complement the UNESCO-OECD Guidelines (UNESCO & APQN, 2007).

Engineering is an area with special regulation regarding recognition of degrees, in that 13 signatories have agreed in the Washington Accord to ‘recognise the substantial equivalence of such programs in satisfying the academic requirements for the practice of engineering at the professional level’ (www.washingtonaccord.org) once these programmes have been accredited ‘within their respective national or territorial boundaries’. Accordingly, the Washington Accord does not apply to cross-border higher education directly, although the documents contain principles for quality assurance agencies in the area working internationally (cf. also Prados et al., 2005).

In a second form of internationalisation, public-policy led internationalisation of quality assurance is being experimented in Europe, with the establishment of the European Standards and Guidelines for quality assurance in higher education (ESG) in the framework of the Bologna Process (European Association for Quality Assurance in Higher Education, 2009), and based on them, a European register (EQAR) for bona fide quality assurance agencies (Westerheijden et al., 2010). It includes explicitly registration possibilities for quality assessment agencies from outside the EHEA (European Association for Quality Assurance in Higher Education, 2009). Yet attention specifically to cross-border higher education is not a feature of the demands on quality policies that higher education institutions should have to fulfil Part I of the ESG beyond specifying as a basic principle that ‘institutions should be able to demonstrate their quality at home and internationally’ (European Association for Quality Assurance in Higher Education, 2009).

The regulatory gap left by the ‘official’ quality assessment agencies has been filled by other groups, in rapid attempts to build international credibility in the fast-growing and for some lucrative market of cross-border higher education:

But new, self-appointed networks of institutions and organizations also accredit their members—a positive development when academic quality improves. But some of these networks and organizations may not offer objective assessments and may be more interested in racing for accreditation “stars” than in improving quality. A related, more worrisome development: the growth of non-recognized, illegitimate accreditation mills that “sell” accreditation without any independent assessment. (Altbach et al., 2006)

While their relationship with quality is questionable, global rankings also play a role in establishing international credibility, up to e.g. QS, one of the global ranking companies, actually commercially licensing higher education

institutions to use a 'stars' rating since 2011, predicted some years before by Altbach & Knight.

3 Impacts of External Quality Assurance in Cross-Border Higher Education

The prior sections outlined the report's goals and its methodology, and provided a cursory overview of essential quality assurance-related literature and policy documents, which might shape institutional practices. However, at the heart of this research lies the empirical evidence elicited from the 10 cases to ascertain whether and how external quality assurance affects cross-border higher education provision and related institutional behaviour. This section provides the findings, albeit without the pretence of dealing exhaustively with all the intricacies of such complex questions.

The research covered a number of themes, including:

1. The provider's ownership (public vs. private)
2. The institution's reasons for providing cross-border higher education
3. The nature of quality assurance practices (i.e. whether programmatic or institutional)
4. The relationship between quality assurance requirements in the sending and host country (e.g. whether there are conflicts—real or apparent)
5. The recognition of qualifications awarded by the provider in the sending and host country
6. The provider's external and internal quality assurance practices
7. The awareness and receptiveness of international organizations' directives or codes of practice
8. The effects of evaluation on cross-border higher education provision and other institutional choices

3.1 Impacts of external quality assurance on providers of cross-border higher education

Accreditation is usually the end point of external quality assurance. In principle, in cross-border higher education it can be conferred:

- (a) by an agency representing the sending country,
- (b) by an agency representing the receiving country
- (c) agencies from both countries together ("dual accreditation")
- (d) agencies from both countries separately ("double accreditation")

In fact, the cases examined showed that more often than not the accreditation process is done by the sending country or it is double. The receiving country

may, however, have to give permission to operate, or openly “invite” institutions to operate on its soil (e.g. in Qatar), and its demanding local accreditation (case b) does occur even if less frequently. Moreover, accreditation from the sending country can be a requirement to operate in the receiving country.

In general, accreditation in cross-border higher education is compulsory, either as a formal requirement, e.g. in the case of the Swedish institution, where there is an established system required by the Latvian government and involving the Swedish institution in quality assurance-related meetings, or in Indonesia where all programmes must be accredited locally and, in the case of double degrees, also in the sending country. Or accreditation is a *de facto* requirement, i.e. technically voluntary but necessary for the programmes to be recognized. The cases suggest that truly voluntary accreditation occurs if this is dual (i.e. both in the sending and the receiving country). For example, the US institution in the Netherlands engages voluntarily with the Dutch Flemish Accreditation Organization (Nederlands-Vlaamse Accreditatie Organisatie, or NVAO) in addition to U.S. accreditation. Voluntary accreditation is then mainly justified on reputational grounds or because it benefits students, who can point to the fact that their degrees are recognized in the country where they have studied.

Respondents from all higher education institutions in our study acknowledged the need for external quality assurance. In general, they were keener to emphasize the positive effects on educational provision (e.g. curriculum improvement) than the negative ones (such as reduced time for research or teaching). However, the cases suggest that positives and negatives in fact coexist, with quality assurance often seen as a requirement to reach wider goals (e.g. reputation). Arguably, the importance of quality assurance in institutional and programme performance is, today, widely recognized; but the case of cross-border higher education reveals a set of more specific benefits at (at least) four levels (see also Chart 1).

First, at the student level, there is a general agreement that student experience and teaching and learning generally benefit from external quality assurance, also as result of the continued dialogue on teaching standards and techniques, as mentioned for example in the case of the U.S. university in Italy.

Second, at the institutional level, as mentioned before, the perceived need for consumer protection is stronger in cross-border higher education than in a purely national setting, chiefly because of the danger of “rogue providers” taking advantage of suboptimal regulatory environments. Hence, external

quality assurance and accreditation strengthen the institution's reputation in the receiving country and are often given due visibility. For instance, in Qatar the accreditation process of foreign higher education institutions such as the Canadian and the Dutch institutions in our study culminates in a public event attended by sponsors and widely publicized in the local press. Moreover, such improved reputation is also seen as a means to solicit funds from different sources (in other words, it makes the application for funding more convincing). Respondents reported that interest in quality is strongly related to a "reputation drive" and can be effectively a "branding tool" that supports an institution's internationalization. Still, two distinctions must be made to complement this contention, namely:

- The North–South vs. North–North cooperation and (especially) the joint nature of the cooperation vs. "true" physical presence abroad. From the cases considered here, it becomes apparent that systemic reputation and the relative weight of those participating in the venture are crucial. U.S. or European accreditation from the home country is often considered a seal of excellence in North–South cooperation such as the cases mentioned above (hence the high profile public events) but is often merely sufficient in North–North cooperation. For example, the American institution in Italy is accredited by the Middle States Commission on Higher Education in the U.S. only. *Ad hoc* agreements are made for degree recognition to allow graduates to sit specific national exams (such as for diplomatic service) and with universities in those countries where equivalent degrees exist. The U.S. university in the Netherlands voluntarily engages in NVAO accreditation mainly for the benefit of students and to reduce bureaucratic hurdles.
- In cases where two or more parties co-participate in a venture (e.g. the university in Indonesia in our study), dual accreditation may be imposed, i.e. both from the sending and the receiving countries.

Third, at the level of the sending country, for a branch located in another country, being active in external quality assurance may contribute to "stay[ing] connected and remind[ing] the home campus that we are an important partner" (case in Qatar). In other words, although accreditation might be a requirement, it has the potential to yield positive effects in the relationship between home base and branch campus.

Finally, at the level of internationalization more broadly, as was pointed out by U.S. branch in Italy, external quality assurance in cross-border higher education can improve the understanding of both the host country and its pedagogical techniques (which might differ substantially from those of the sending country),

and (as mentioned by the Canadian respondent in Qatar) the local labour market, because sharing information and good practices with local stakeholders seems to be facilitated by external quality assurance practices. To use OECD's framework on the rationales⁹ for engaging in cross-border higher education (OECD, 2004, pp. 220 *ff.*), one could argue that from the point of view of the sending country external quality assurance in cross-border higher education supports mutual understanding approach and, for the receiving country, to the capacity building approach.¹⁰

Chart 1 depicts the possible levels of impact of external quality assurance in cross-border higher education.

The negative effects of quality assurance requirements reported by respondents are not altogether surprising, including increased administrative burden, higher costs for internal quality assurance to comply with external requirements, and time. While sheer compliance might fall short of ensuring quality, it was pointed out that *demonstrating compliance* risks compounding the paperwork, loss of time for research and teaching, thus reducing the marginal improvement that compliance is supposed to achieve.

However, one point emerged with particular emphasis in cross-border higher education, that is, the possible inconsistent nature and requirements of external evaluations in sending systems vis-à-vis receiving systems (often exacerbated in the case of double accreditations) and the ensuing friction between compliance, improvement, and reputation. Respondents suggested that, though there are no contradictory messages on what is perceived as "quality", different accreditations are not always easy to combine, as they generally are moulded to different educational systems. A practical example mentioned by the American institution in the Netherlands is that of accrediting a strictly academic U.S. course at the University of Applied Sciences level (*Hoger beroepsonderwijs* or HBO) in the Netherlands. Furthermore, the criteria set by external quality assurance agencies are not *per se* suited to the needs of the programme and the

⁹ The four rationales include (a) mutual understanding, by which countries seek openness to the world and better ties with other countries through the creation of international networks of political and business élites. It is often considered the common historical basis of internationalization policies in higher education; (b) skilled migration, by which skilled students are attracted in view of becoming skilled migrants; (c) revenue generating, by which education is seen (also) as a short-term revenue option, e.g. by charging full fees; and (d) capacity building, which is typical for emerging economies, by which higher education is seen under an importers' perspective as a means to meet unmet demand and build capacity and quality.

¹⁰ Naturally this does not exclude the other rationales for cross-border higher education ("revenue generating" and "skilled migration"). Rather, we point out that *these* rationales seem to apply most to the quality assurance discourse.

locality. For example, the European university in Indonesia offers Master programmes to top and middle managers. Generally, such students wish to be imbued with extensive professional experiences but accreditation requires that only Ph.D. holders may lecture this Master. Yet, lecturers holding both a Doctorate *and* 20+ years of experience in industry are rare.

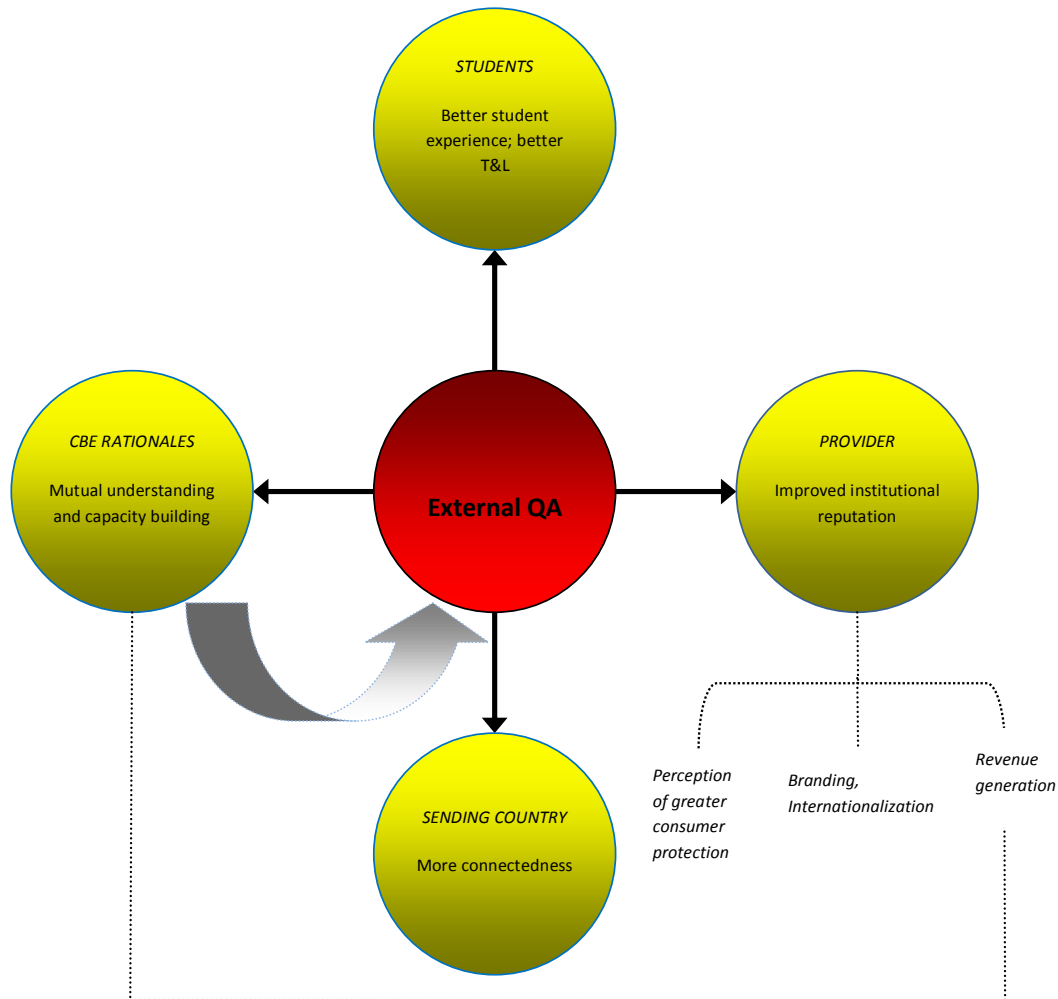


Chart 1. Possible levels of impact of external quality assurance in cross-border higher education

3.2 Impact on institutional practices

The cases showed scant evidence of meaningful intra-institutional process and governance changes with regards to higher education institutions' cross-border higher education activities resulting specifically from cross-border external quality assurance. In other words, external quality assurance appears to have marginal effects on how higher education institutions manage their internal

processes in a cross-border higher education setting vis-à-vis a national setting—the national quality assurance setting remains prevalent. The explanation probably lies in the fact that, also in cross-border higher education, quality assurance and accreditation frequently follow the national requirements of the sending country (see above).

In general, it appears from our cases that external quality assurance is used for institutional branding in the host country, or to facilitate funding applications but does not overhaul institutional governance practices.¹¹ External quality assurance plays a marginal role as an external regulatory pressure. International codes such as the UNESCO ones were at times not known in the institutions in our study.

However, some key issues mentioned throughout the interviews include:

- Institutions strive for a positive external evaluation, while internal evaluation remains more important for improvement. The external evaluation is concerned with compliance (and mainly with requirements of the sending country rather than the host) and reputation.
- Graduate success was mentioned as the key indicator for assessing cross-border higher education higher education institutions' success. While this indicator is naturally very relevant in national settings too, it was stressed that where a higher education institution invests its reputation abroad (especially in less developed or emerging markets) this is particularly important as a seal of quality.
- Collaboration with local providers and other stakeholders is critical. Positive accreditation facilitates this.
- Accreditation is a matter of accountability, as it is nationally.
- Personnel policies may be affected inasmuch as national-based requirements to operate and/or be accredited in the host country include very specific issues, such as what subjects must be included in the syllabus and thus which specialisations staff must have to be appointed. Most respondents stated that while external quality assurance does not reduce teaching or research time substantially, it does improve internal collaboration amongst staff members who strive for a common and visible goal. That said, it was also pointed out on one occasion that *demonstrating compliance* can be

¹¹ For example, adopting Burton Clark's (1983) analysis of different modes of governance in higher education—and looking for instance at institutional leadership—it is apparent that U.S. higher education institutions maintain stronger institutional leadership (than e.g. European higher education institutions) regardless whether they operate abroad.

excessively cumbersome and a weakness of most European systems of external quality assurance (see above).

- In one case it was mentioned that external quality assurance in cross-border higher education is relevant to improving the higher education institution's standing in global rankings.
- Any improvement in student experiences was not attributed to international external quality assurance but simply to the practices already in force in the institutions also in its home country.
- Aside from compliance, the internal quality assurance processes is said to improve as a result of external requirements.
- When it is not a double degree, degrees are usually issued from the sending country and recognized also in the receiving country, either automatically or through *ad hoc* recognition agreements.
- A positive effect not to be ignored is that quality assurance in cross-border higher education is not forgotten. Minimum standards are guaranteed, at least by the sending country.

4 Conclusions and Further Research

This report began with the premise that quality assurance is expected to contribute to institutional improvement either because higher education institutions need to *comply* with external pressures from quality assurance or funding agencies, for *self-interest* (e.g. to attract students and research contracts) or for *professional ethos*, (i.e. striving for “excellence”). The critical case of cross-border higher education was chosen because in this context impacts of external quality assurance should be most evident. Indeed, cross-border higher education providers could offer quality education in systems that would otherwise not be conducive to excellence but, by the same token, they might exploit the weaknesses of such systems while capitalizing on their own “national reputation”.

The report is based on a number of interviews conducted with ten providers actively engaged in cross-border higher education. The outcomes provided heretofore are indicative of the importance of quality assurance in cross-border higher education. This section cautions the readers on the study’s limitations and points at the further steps we believe are crucial to deepen the understanding in the field.

In general, there are three key limitations, which must be borne in mind. First, the study is based on a limited number of interviews with a limited number of providers. The chief goal of this endeavour was to get a feel of how external quality assurance in cross-border higher education affects institutional activities and whether quality assurance is in fact an important issue in cross-border higher education. The sense is that it is indeed (see also below), as was confirmed by all interviewees. However, we call for a broader analysis of the issue, possibly engaging in other research methodologies as well, e.g. comparative and historical analysis of institutions involved, and their performance.¹²

A second limitation is the impossibility of drawing general conclusions based on the systems’ “geographical spread”. In other words, within the scope of this study, a detailed look into the effects of external quality assurance based on the

¹² Moreover, Australia should definitively be included in any future study on quality assurance in cross-border higher education. For this study we were unable to secure any Australian provider to participate.

location of sending and receiving countries was not possible. Therefore, the report cannot generalize with any certainty on whether and how different forms of cooperation (North–North, North–South, South–South) produce different institutional behaviours. We did not have a chance to study South–South cases empirically. Regarding the other two types, tentatively our impression is that Western–Non-Western is the perhaps politically incorrect but more apt description of the relationship between sending and receiving countries' higher education institutions: institutions active in cross-border higher education seem to bank on the high reputation of higher education from a core of Western countries.

The third limitation is a matter of bias in the sample. As we had to rely on voluntary cooperation of higher education institutions to respond in our interviews, only institutions involved in external quality assurance were willing to take part. Our respondents may thus well have been biased towards quality assurance, and results of a more systematic sample including institutions that are not under the purview of external quality assurance, such as institutions in 'educational free zones' let alone 'rogue providers' might have looked rather different.

However, we suggest that four important conclusions can be drawn, which justify our call for initiating a far more intensive and all-inclusive study on the issue of external quality assurance in cross-border higher education:

First, quality assurance in cross-border higher education is not forgotten. Minimum standards are typically guaranteed. All institutions taking part in this study had quality assurance mechanisms in place or were putting them in place at the moment of study. This seemed to be linked to being a cross-border higher education provider: in other words, they themselves considered it important, giving their special situation, but also the home base required internal quality management provisions in order to protect the good standing of the home institution.

Second, although quality assurance in cross-border higher education was never "discarded", the cases covered in this report point to different attitudes as to its value. The main differences concerned the level to which external evaluations imply *proof of compliance vis-à-vis improvement*. Unsurprisingly, no provider rejected the need for "excellence", so that ensuring quality as part of *professional ethos* did not seem in question. But the heart of the problem remains to what extent external quality assurance, requiring proof of compliance, is effective in

the achievement of excellence (an issue that is not unique to cross-border higher education).

Third, cross-border higher education is still mainly seen as a protrusion of national higher education. The cases suggest that quality assurance arrangements are based largely on the sending country's requirements and that institutional governance is as much as possible the same as at home. Nevertheless, in some cases local partner representatives were involved in internal quality assurance mechanisms, which indicated an institutionalised effort to offer locally relevant education.

Fourth and as a consequence of the mainly national frame of mind in which quality assurance was seen in our cases, international guidelines and codes of practice such as the works of UNESCO, OECD etc., were not universally known. Nevertheless, most of the quality assurance practices mentioned in our case study institutions would seem to fit at least some of those guidelines' principles, in particular:

- take into account the cultural and linguistic sensitivities of the receiving country;
- have internal quality management in place, to 'respect' the local quality assurance arrangements in the receiving country, to support recognition of its qualifications.

Moreover, interviewed institutions were aware of issues around quality assurance agencies linking between sending and receiving countries, e.g. through international members on evaluation panels.

Our research could not go into the underlying reasons, the potentialities or desirability of this situation or of changing it, the effects on different forms of cross-border higher education etc. Yet these would be interesting questions to address, because they fit into the broader question that also underlies the current study: "does quality assurance help in cross-border higher education and how?"

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