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Accreditation in the Netherlands: does accountability improve educational quality?

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ABSTRACT This article traces the changes in quality assurance within the Dutch higher education system. It starts with a brief history of the development of the Dutch accreditation system, which is the latest step in a process that started with an external quality assurance system. This is followed by an extensive description of the present accreditation system, its structure, its processes and its key players. Finally, it concludes with an attempt to summarise the pros and cons of the system and makes some suggestions as to how the system might develop in the future.

Introduction

The relationship between the government and higher education institutions (HEIs) in the Netherlands was restructured following the publication of the policy paper entitled (in translation) 'Higher Education: autonomy and quality' in 1985 (Ministerie van Onderwijs en Wetenschappen, 1985). In exchange for a greater degree of financial and managerial autonomy, the HEIs would prove to society that the education they provided had sufficient quality. The institutions were now held responsible for the quality of education. In 1990 the HEIs therefore agreed upon a system of external quality assurance (EQA). In this, independent external experts were appointed as members of visiting committees to evaluate the quality of the programmes and to put forward recommendations for improvement. The aim of EQA was to acquire insight into the quality of education and to contribute to the assurance and improvement of the quality of individual programmes. In this manner, HEIs could demonstrate their accountability concerning the quality of the education they were providing. In addition, EQA contributed to the augmentation of the social recognition of the programmes, to the qualifications obtained, and to the public information facilities. In 2003, EQA was modified into an accreditation system primarily aimed at accountability. Accreditation is essential for all educational programmes offered by an HEI. Receipt of an accreditation is very important, as this qualifies the course for government funding; students of the accredited course are eligible for study grants and the institution that provides the course is entitled to issue degree certificates that are recognised by the government.

In this article we begin with a brief history of the development of the accreditation system in the Netherlands, which is the latest step in a process that started with an external quality assurance system. This is followed by an extensive description of the accreditation system, its structure, its process and its key players. Finally, we attempt to summarise the pros and cons in the discussion section, followed by some concluding remarks.

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A Short History

In 'Higher Education: autonomy and quality' (Ministerie van Onderwijs en Wetenschappen, 1985) a sharp contrast was drawn between external and internal quality assurance. According to this document, external quality assurance was one of the responsibilities of the ministry, and the universities were accountable for their internal evaluation. However, the universities were of the opinion that quality assurance as a whole was the responsibility of the institutions themselves. As a result of negotiations, it was agreed that the institutions would be responsible for the quality assessment (internal *and* external) by way of an evaluation. In return, HEIs would receive more autonomy and be less controlled by the government. The institutions developed such a system (see Van Berkel & Wolfhagen, 2002). Greater autonomy and more freedom were welcomed. Autonomy and quality assurance as two sides of the same coin were undisputed. In brief, the system had only one goal: the improvement of the quality of education. The four core elements of the system were: a self-evaluation, a visiting committee, an on-site visit and a follow-up. These elements will be explained later in the article.

A shift occurred in 2002. Some people deemed the existing system to be too lenient and were in favour of more external pressure and the possibility of introducing sanctions against weak-performing institutions. The existing quality assurance system was also viewed as having lost some of its effectiveness. Certain habits were developed – the rules of the game became known – and the intended improvements were not always implemented. It was expected that a more severe approach would lead to a new and more effective system of quality assurance. Improvement was not enough; there was a quest for a line of accountability.

A system of accreditation was therefore introduced in the Netherlands in 2003. The Dutch definition of accreditation is (in translation): 'a formal judgement that the quality of a degree course or an institution meets certain standards' (Nederlands-Vlaamse Accreditatie Organisatie [NVAO], 2003). The accreditation system was formally introduced in 2005, in addition to the foundation of NVAO, a Dutch-Flemish accreditation organization. The task of NVAO is to decide whether higher education programmes meet legal requirements, in both the Netherlands and the Flemish part of Belgium.

According to NVAO, accreditation will not replace the existing quality assurance system; it complements it. In its opinion, the external quality assurance system can maintain its improvement function. The accreditation aspiration was proposed by the government as a condition for funding, recognition of degrees, issuing degrees and offering study grants. Therefore, by keeping in line with the opinion of NVAO, the accreditation system supplements the system of external quality assurance. We will discuss whether or not this view will become a reality.

Accreditation: the process

The accreditation process has a number of successive steps:

1. Searching for an agency;
2. Writing a self-evaluating report;
3. Forming a visiting committee;
4. Conducting the on-site visit;
5. Grading;
6. Writing a report to procure an accreditation;
7. NVAO makes its decision.

1. An institute searches for an agency, which steers the institute through the accreditation process. The Dutch government opted for a free market of quality assessment agencies. NVAO is responsible for selecting agencies with sufficient quality to produce assessments reports. This selection is based on records wherein the agency writes how it will operate in accordance with the guidelines, which are formulated by NVAO. Every two years a quality assessment agency undergoes an audit. Currently seven agencies have been accredited. Institutions are free to choose a quality assessment agency with which they will be able to cooperate.

The institution asks the agency to assess the quality of the programme on the basis of a written self-evaluation. Further tasks of the agency include:

- Organizing an on-site visit;
- Verifying the self-evaluation;
- Determining whether the quality of the programme meets the standards;
- Drawing up a final conclusion as part of the assessment report.

2. A self-evaluation report is written. The connection between the internal and the external quality assessment is the self-evaluation of the institution whose programme is being assessed. The self-evaluation is carried out prior to the on-site visit by the committee. Its purpose is threefold (Vroeijenstijn, 1995):

1. To stimulate internal quality management;
2. To make internal preparations for the on-site visit;
3. To provide background information to the visiting committee.

The results of the self-evaluation are set out in a report which covers the following subjects:

- Specific organisational structure and the position of the faculty/discipline within the structure of the institution;
- Number and characteristics of enrolled students, success rates and dropout rates;
- Programmes: objectives, programme subjects, etc;
- Educational processes: teaching methods, assessment procedures, etc;
- Programme organisation and management: educational policy, teaching load, internal quality management, etc;
- Graduates: level of knowledge, jobs, and unemployment rate.

(See Vroeijenstijn, 1995, for more details.) Thus, the self-evaluation is largely descriptive. In addition, there must be a clear analysis of the problems the institute experiences. The report should be submitted to the visiting committee two months prior to the actual on-site visit.

3. The agency searches for experts; these experts will form the visiting committee. Organised by the agency, a visiting committee carries out the programme assessment. The agency also selects the committee members, who must satisfy at least two important requisites: they must be an authority and expert in the field of the programme topic, and they must be independent. Committee members must not be employed by any of the faculties whose programme is being assessed. This is a difficult criterion to observe, as in one way or another an expert is usually involved with the institutions undergoing an assessment. In practice, the agency looks for foreigners who speak the Dutch language, or for retired professors. Normally, the committee will have five to seven members: a chairman; two experts in the field of the subject area; one expert in the field from the employment area interested in graduates; one expert in the field of education/learning processes; and a student. The student must be studying at another institution than the one running the programme that is being assessed and not have any involvement in that programme.

The agency acts as the secretariat of the committee. The task of the committee is to form an opinion about the programme in terms of educational content, educational process, organisation and management of the programme, and graduates. The programme should fulfil the criteria of the assessment framework, which is organized around six themes (full details of which are provided in the appendix):

1. Aims and objectives;
2. Curriculum;
3. Staff;
4. Services;
5. Internal quality assurance;
6. Results.

The framework contains the standards and the assessment rules as set out in the NVAO accreditation framework. Soon afterwards, the on-site visit committee writes a report which includes their findings, considerations and conclusions. The agency is the recipient of the report and publishes it.

The visiting committee participates in a one-day training programme beforehand. Here they learn about the backgrounds of accreditation and the assessment framework. In addition, they learn the basic principles of interview techniques.

4. The visiting committee visits the faculty. The on-site visit is now organised. The members of the committee prepare themselves individually by studying the self-evaluation and other documents. Before the on-site visit commences, the reference framework is made specifically for that domain. On the afternoon prior to the visit, the committee will study any supplementary documentation, and prepare the interviews.

On the basis of the self-evaluation report and other information, the committee holds discussions with representatives of the faculty board, teachers, students and graduates. The goal of these discussions is to clarify, verify and gather additional information. The committee also examines the institutes' facilities, including the building, study locations, the library (or libraries), the lecture halls and other relevant facilities.

A typical schedule for a visit is presented in Table I.

Day 1
17:00 Arrival of the visiting committee, dinner and scheduling appointments
Day 2
09:00 Meeting with the authors of the self-evaluation
09:45 Meeting with students of the educational board
10:30 Break
10:45 Meeting with teachers of the educational board
11:30 Meeting with first-year students
12:15 Lunch
13:15 Meeting with students from years 2, 3 and 4
14:00 Meeting with alumni
14:45 Break
15:00 Meeting with teachers of the first year
15:45 Meeting with teachers of years 2,3 and 4
16:30 Meeting with study counsellor, coordinators of education and internships, and the chairman of the Board of Examiners
18:00 Dinner
Day 3
09:00 Preparation for the day meeting with board members
10:15 Inspection of the facilities (rooms, library, lecture halls, …)
10:45 Break
11:00 Preparation for the meeting with the board members, dean and the director of education
11:45 Meeting with the board members and the director of education
12:30 Lunch
13:30 Discussing the findings/drafting conclusions

Table I. Typical schedule of the visiting committee.

The online visits last one or two days: one day for an institute of higher professional education, and two days for a university.

5. Grading. Each theme in the assessment framework (a 'theme' is a synonym for 'an aspect of quality') must have a final grade of at least 'satisfactory'. The grading of a theme is based on the grading of the separate standards of that theme. The assessment report must clarify how the grading of the different standards led to the committee's conclusion.

The visiting committee uses a four-point scale. 'Unsatisfactory' and 'satisfactory' are the critical ratings. The quality assessment agency can also use the rankings 'good' or 'excellent' for a standard. These rankings indicate that the quality exceeds the generic quality level. In addition, these rankings can compensate for a standard within the same theme that was evaluated as 'unsatisfactory'. The highest possible ranking of 'excellent' indicates that this part of the

programme may serve as an example to other programmes. A ranking should always be given. The NVAO reviews the considerations that form the premise for the ranking.

6. *The agency writes a report*. The agency verifies the self-evaluation carried out by the institution. Verification can take place by means of the on-site visit, the report of the review committee, personal observations and discussions with students, staff, alumni and representatives of the professional practice. In conclusion, the agency writes a report in accordance with the guidelines as set out by the NVAO and outlines the procedures that were followed. All themes and standards (see Table I) must be discussed in the report. It must be evident to NVAO that the assessment rules were applied appropriately. Where possible, a comparison should be made with other programmes of the same discipline.

The report must also provide conclusive information on the quality of the visiting committee responsible for the assessment of the programme. It should include information concerning the size and composition of the committee, outlining individual knowledge and experience of the committee members, the independence of the members, and their expertise and authority (NVAO, 2003).

The key aspect is that the assessment report provides satisfactory evidence to justify the conclusion that a programme meets the criteria for quality. The report should, at the very least, assess the six themes listed in this accreditation framework, including the standards. The assessments must be substantiated by facts. The report concludes with a definitive assessment of the programme. Finally, the institution submits the assessment report to NVAO and requests an accreditation. The formal accreditation process starts with the submission of the report. NVAO evaluates the assessment report, its conclusions, the composition of the visiting committee and the methodology applied. Occasionally, NVAO will request additional information.

7. *The NVAO makes a decision with respect to the accreditation*. Usually, NVAO will reach its decision about an accreditation within three months. First, NVAO notifies the institution about its *intended* decision. The institution is given two weeks in which to react. If the programme meets the criteria, it will be granted an accreditation for a period of six years. After six years, the whole accreditation process starts again. In the event that NVAO finds the information contained in the report to be insufficient, the decision is postponed.

A positive accreditation means that the programme will be included in an official register. Registration is therefore very important, as this means that accredited programmes can acquire public funding and the registered students are eligible for student financial support (e.g. grants). In the event of a negative decision, the programme loses its accreditation and will be deleted from the relevant official register, so it can no longer be offered. The accreditation decision and the report are made public.

Appeal

As already mentioned, before making a final decision, NVAO notifies the institution of its 'intended decision'. The institution has two weeks in which to respond, after which the NVAO will make its final decision known. Dutch legislation states that an institution can launch an internal appeal against the NVAO decision within a period of six weeks. The institute can do that in two ways: it can submit an appeal to NVAO (internal appeal), or it can directly pursue legal action (external appeal).

Reflections on an Accreditation System

Throughout the first 15 years, the Dutch quality assurance system was mainly based on internal quality assessments. The responsibility for ensuring quality was in the hands of the HEIs. Although there was an external review committee and a meta-evaluation by the inspectorate, no important decisions were made by external agencies, so the autonomy of the institutions was respected. Peers, who were the members of the external review committee, were viewed as the most competent reviewers in a system of external quality assessment. The process was not threatening,

because there were, in practice, no formal sanctions. Nevertheless, the system had a positive influence. The self-evaluation reports were made public and there was a growing awareness about educational programmes. External review committees proposed ideas from elsewhere and there was a positive drive towards improvement (Wijnen, 2007). It turned out that the mission of improvement was very important. Exchange of ideas, cooperation, common projects and action programmes were some of the follow-up processes that took place, based on the reports of the external review committees. The reports concentrated on strengths and points of attention and not on weaknesses. Universities, at least in the Netherlands, have two tasks: conducting research and providing education for students. With the accreditation system, there was a growing interest of the institutions to put emphasis on education, as distinguished from research.

All of this changed dramatically when the external quality assessment system introduced accountability. The start of an accreditation system in association with accountability introduced a more important role for the external authorities, the governors who assumed authority over their peers. Both peers and governors are now necessary in the present system. A danger, however, is that the current governors use the weaknesses in the arguments of the peers to justify the decisions they themselves make. The director of the NVAO stated: 'An advantage for the government is that these decisions on accreditation may subsequently be used for political decisions.' This statement clearly reveals that the NVAO found it acceptable to mix educational and political decisions. Herein lies the danger, however. It seemed that the renewed accreditation system doubted the merits of peer reviews. A bureaucratic view of the accreditation organisation is seen by the NVAO as superior to the report of an external review committee made up of peers. This can lead to a vague mix of professional arguments (by peers) and governmental arguments (by NVAO). It is recognised that both sets of arguments are valuable. However, mixing the arguments in one report will probably lead to conclusions which can be interpreted in different ways (Wijnen, 2007).

Preference for a function that brings about improvement, such as the previous system did, does not necessarily mean that accountability is unimportant. Accountability, however, must specify its own criteria, which is not an impossible task. There are several possibilities for this, in terms of realised results, average costs, impact upon national and international projects, etc. Trying to transform professional criteria into political arguments is misleading and generates distrust and suspicion. Distrust seemed to be a factor in moving from improvement to accountability. We recognise the possibility that peers try to shield their colleagues. On the other hand, replacing professionals with governors leads to a mix of arguments and not to a clarification of the situation.

There are other differences with respect to the accreditation system. The accreditation system is twice as expensive as the previous one. The accountability aspect of the accreditation system needs additional procedures and more paperwork, a direct result of the possible outcomes of the final report. That is, If an institution loses its accreditation, the consequences are severe, and therefore the procedures leading to this have to be proved to be legal. Thus, the costs are higher, and the NVAO is in charge of the entire accreditation system. The amount of information that the institutions must deliver continues to grow. The regulations for institutions, external review committees, visiting and assessing institutes and accreditation organisation also continue to grow and expand. Communication between these actors is becoming increasingly complicated. Starting as an organisation with 10 employees, NVAO now has over 50 employees.

There is also a fear that accreditation will lead to uniformity and might restrict the innovative power of institutions. It is therefore easier and much safer to 'play the game' and conform to traditional patterns because these traditional patterns are generally accepted and the chance of gaining accreditation increases. In this view, accreditation hinders innovation. To avoid taking risks, institutions prefer traditional and generally accepted approaches. In risky situations, institutions like to play the game safely. The credo seems to be 'No losing'. After successfully overcoming the accreditation hurdle, it is very likely that institutions will lie back for several years. 'We did it, let's take a rest' is a familiar expression heard after successfully passing an accreditation process; it is an attitude that kills innovation and quality development.

In addition, the internal quality assessment systems are not often embedded in the institutions. NVAO states that having an internal quality assessment system is very important. Consequently, all institutions created such a system, not because they felt it necessary, but merely because NVAO recommended that they do so. In other words, inside many institutions a total quality culture is missing.

We do not wish to denounce the need for accountability here. Society has the right to investigate whether its investment in education is well spent. Our criticism is related to the combination of improvement and accountability in one and the same system. The introduction of an accreditation system is a barrier to improvement. In 1995, Vroeijenstijn's book *Improvement and Accountability: navigating between Scylla and Charibdis* indicated that it is almost impossible to merge improvement and accountability in one system. The two functions require two different approaches.

Future Scenarios

The Dutch government has recently made plans to change the accreditation system, at least partly. As previously mentioned, audits are carried out at the level of a single programme. In all these programmes, quality must be investigated. As can be deduced from the assessment framework (see Table I), some themes and standards are organised at the level of the university. For instance, such facilities as libraries, housing, etc., and the internal quality system fall to a large degree under the responsibility of the university board and are the same for every programme. It is therefore unnecessary that every visiting committee audits these specific programme characteristics; at the very least, this is not efficient. For this reason, it was decided that some of the themes and standards mentioned in Table I would be audited only once. The outcomes of this *university accreditation* are valid for every programme accreditation. However, universities fear that this means the efforts to pass an accreditation process will escalate, as, first, much effort must be spent by the university to obtain a university accreditation, and second, the regular audits of programmes will continue at the same time.

It is apparent that government thinking with regard to quality assurance is constantly changing, or, to put it more positively, is constantly developing. Maybe the time has come to start discussions on whether or not it is worthwhile to develop an identical accreditation system for all European HEIs. Such a system would, hopefully, guarantee that government influence would decrease. The Bologna Declaration proved that it is possible to create some harmony within the programmes. Why is it not possible to create more unity in the different accreditation systems?

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APPENDIX
The Assessment Framework: themes, standards and criteria (NVAO, 2003)

Themes:

Aims and Objectives (three standards)

Standard 1: Subject-/discipline- specific requirements
Criterion: The intended learning outcomes correspond with the requirements as set down by professional colleagues, both nationally and internationally and the relevant domain concerned (subject/discipline and/or professional practice).

Standard 2: Bachelor and Master levels
Criterion: The intended learning outcomes correspond with the general, internationally accepted descriptions of a Bachelor's qualification or a Master's qualification

Standard 3: Professional orientation/Academic orientation
Criteria: The intended learning outcomes correspond with the following descriptions of a Bachelor's and a Master's qualification:

Professional orientation

- The intended learning outcomes are also based on the professional profiles and/or professional competences drawn up by (or in collaboration with) the relevant professional field.
- A professional bachelor has the qualifications at the level of a commencing professional in a specific profession or professional field for which professional higher education is required or useful.
- A professional master has the qualifications at the level of an independent and/or managerial professional in a profession or professional field, or the level required to perform adequately in a multidisciplinary environment for which professional higher education is required or useful.

Academic orientation

- The intended learning outcomes are derived from requirements set down by the scientific discipline, the international scientific practice and, for the applicable programme, the practice in the relevant professional field.
- An academic bachelor has the qualifications that allow access to at least one additional programme at an academic master's level and the option to enter the labour market.
- An academic master has the qualifications to conduct independent research or to solve multidisciplinary and interdisciplinary questions in a professional field for which academic higher education is required or useful.

Curriculum (eight standards)
Standard 1: Requirements for Professional / Academic orientation
Criteria: The proposed curriculum meets the following criteria for a professional or an academic orientation:

Professional orientation

- Students develop their knowledge through the study of professionalliterature, by the study of materials derived from the professional practice and by interaction with the professional field and/or (applied) research.
- The curriculum has verifiable links with current developments in the professional field/the discipline.
- The curriculum ensures the development of professional competences and has verifiable links with current professional practice.

Academic orientation

- The students develop their knowledge through the interaction between education and research within the relevant disciplines.
- The curriculum corresponds with current developments in the relevant discipline(s) by verifiable links with current scientific theories.
- The programme ensures the development of competences in the field of research.
- Where appropriate, the curriculum has verifiable links with the current relevant professional practice.

Standard 2: Correspondence between the aims and objectives and the curriculum
Criteria:

- The curriculum is an adequate realization of the intended learning outcomes of the programme with regard to the level, the orientation and the subject-/discipline-specific requirements.
- The intended learning outcomes are adequately transferred into the educational goals of the curriculum or parts thereof.
- The contents of the curriculum ensure the students' achievement of the intended learning outcomes.

Standard 3: Consistency of the curriculum

Criterion: The contents of the curriculum are internally consistent

Standard 4: Workload
Criterion: The curriculum can be successfully completed within the set time, as certain programme-related factors that may be an impediment in view of study progress are eliminated where possible.

Standard 5: Admission requirements
Criteria: The structure and contents of the intended curriculum are in line with the qualifications of the incoming students:

- Professional bachelor's programme: pre-university education, higher general secondary education, middle management training or specialist training or similar qualifications, as demonstrated in the admission process.
- Academic bachelor's programme: pre-university education, *propaedeutic* certificate from a professional higher education institute or similar qualifications, as demonstrated in the admission process.
- Master's programme: a bachelor's degree and possibly a selection (with a view on the contents of the discipline).

Standard 6: Credits
Criteria: The programme meets the legal requirements regarding the range of credits:

- Professional bachelor's programme: 240 credits.
- Academic bachelor's programme: 180 credits.
- Professional master's programme: a minimum of 60 credits.
- Academic master's programme: a minimum of 60 credits.

Standard 7: Coherence of structure and contents
Criterion: The educational concept is in line with the aims and objectives and the study methods correspond with the educational concept.

Standard 8: Learning assessment
Criterion: By means of evaluations, tests and examinations, the students are assessed in an adequate and insightful manner to determine whether they have achieved the intended learning outcomes of the programmes or parts thereof.

Staff (three standards)
Standard 1: Requirements for professional/Academic orientation
Criteria: The programme meets the following criteria for the deployment of staff for a programme with a professional or academic orientation:

Professional orientation
Teaching is principally provided by staff who link the programme to professional practice

Academic orientation
Teaching is principally provided by researchers who contribute to the development of the subject/discipline

Standard 2: Number of personnel
Criterion: A sufficient number of staff are deployed to realize the desired quality of the programme

Standard 3: Quality of staff
Criterion: Staff members are sufficiently qualified to ensure that the aims and objectives regarding the content, didactics and organization of the programme are achieved

Services (two standards)
Standard 1: Facilities
Criterion: Housing and facilities are adequate enough to achieve the learning outcomes

Standard 2: Tutoring
Criteria:

- Tutoring and information provision for students are adequate in view of study progress.

- Tutoring and information provision for students correspond with the students' needs.

Internal quality assurance (three standards)
Standard 1: Periodical evaluations
Criterion: The curriculum is periodically evaluated in the light of verifiable objectives and other measures

Standard 2: Measures for improvement
Criterion: The outcomes of the evaluation form the basis of verifiable measures for improvement that contribute to the achievement of the objectives

Standard 3: Involvement of staff, students, alumni and the professional field
Criterion: Staff, students, alumni and the relevant professional field will be actively involved in the internal quality assurance system

Results (two standards)
Standard 1: Achieved learning outcomes
Criterion: The achieved learning outcomes correspond with the aims and objectives regarding level, orientation and subject-/discipline-specific requirements

Standard 2: Study progress
Criteria:
- Target figures that are comparable to other relevant programmes are formulated to express the expected success rate.
- The programme's success rate complies with these target figures.

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