

REPORT OF AN EVALUATION OF THE  
POSTSECONDARY EDUCATION QUALITY ASSESSMENT BOARD  
IN ONTARIO, CANADA  
March 2017

With PEQAB Responses  
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## EXECUTIVE SUMMARY

The Postsecondary Education Quality Assessment Board (PEQAB) reviews the quality of degree programs offered in Ontario by institutions that do not have enabling legislation from the provincial government; this principally means Ontario Colleges offering degrees and private institutions, as well as public institutions such as universities, based out of province.

The *Post-secondary Education Choice and Excellence Act, 2000*, sets the parameters for how degree authority is obtained in the province and all applications for consent must be referred to PEQAB or another quality assurance agency for review and recommendation.

PEQAB's Internal Quality Assurance Policy requires an external evaluation at least every seven years. PEQAB underwent its first external review in 2011 and the current review (2017) is its first against the *European Standards and Guidelines*.

The 2017 review consisted of an examination of documentation including the report of the expert panel from the 2011 review, the self-assessment prepared by the PEQAB Secretariat and the PEQAB website, which includes operational manuals and handbooks as well as the status of applications for consent. A site visit, with an expert panel followed.

The 2017 review assessed the compliance with the ESG. It found that, on most areas of Sections 2 and 3, PEQAB was in full compliance but that on the following four issues there was a lack of compliance: publication of expert panel report; appeals against decisions; student membership on the expert panel; independence of the Agency.

### Panel conclusions

#### **ESG 3.1 Activities, policy, and processes for quality assurance: substantially compliant.**

Although some stakeholders are included in governance, there is a lack of student or current academic staff representatives on PEQAB's Board.

*See p. 24 for PEQAB response*

#### **ESG 3.2 Official status: fully compliant.**

#### **ESG 3.3 Independence: non-compliant.**

PEQAB is not fully independent of the Ministry of Advanced Education and Skills Development.

PEQAB claims to have full, arms-length independence for its operations and outcomes. Clearly, the PEQAB processes arranged by the Secretariat, who are employees of the Ministry, and using external assessors, are conducted with integrity and are independent of any third-party influence.

However, what is referred to PEQAB for review is dependent upon Ministerial decisions and the Minister makes the final decision. This decision is based on the PEQAB recommendation but not bound by it.

The PEQAB Board is appointed by the Minister, although Board members maintain that they act autonomously when conducting their business.

PEQAB is not an autonomous decision-making agency but a body that advises the Ministry. This

means that it is not responsible in the last resort for outcomes of its operations.

*See p. 26 for PEQAB response*

**ESG 3.4 Thematic analysis: non-compliant.**

Although non-compliant to date, PEQAB's intention is to produce the first analysis in 2017.

*See p. 27 for PEQAB response*

**ESG 3.5 Resources: fully compliant.**

**ESG 3.6 Internal quality assurance and professional conduct: fully compliant.**

**ESG 3.7 Cyclical external review of agency: fully compliant.**

**ESG 2.1 Consideration of internal quality assurance: fully compliant.**

**ESG 2.2 Designing methodologies fit for purpose: fully compliant.**

The quality assurance approach of PEQAB includes a self-study, site visit with subject experts and production of a report. The methodology is appropriate, well received by applicants and clear, with detailed specifications and standards made available in published *Handbooks*. It does however, require the institution to provide substantial documentation and it might be appropriate to review requirements.

One solution to the bureaucratic overload is the proposed Audit-Only Process for College Degrees for 'mature' colleges. This seems appropriate and would save a lot of duplication for the colleges that have considerable experience with the PEQAB process.

It might also be appropriate to reduce the number of standards in the PEQAB process, although this may present problems if it is to remain aligned to the Ontario Qualifications Framework.

While the current review reflected the 2011 review in noting the continuation of a focus on ensuring compliance with standards, the PEQAB Secretariat has shifted towards facilitating the process, with a responsive and engaging approach now being the norm.

**ESG 2.3 Implementing processes: fully compliant.**

PEQAB's processes are predefined, in detail in *Handbooks*, and are reliable and useful for institutions. The clarity of the process and the professionalism and responsiveness of PEQAB staff and appointed reviewers were praised.

Where conditions apply to consent, there is formal follow-up to ensure compliance with the conditions. There is useful informal follow-up through ongoing dialogue between senior policy advisors and institutions.

There were, though, repeated concerns about delays in the consent process, both before the application is referred to PEQAB from the Ministry and also after PEQAB has undertaken its review. The service user regards the process as a whole and so delays are of concern irrespective of who is responsible for them. The delays of most concern were from the point at which the institution comments on the expert panel report until it receives a decision from the Minister. Commonly referred to as the 'black hole', this delay, without any indication of success or otherwise of the application, can sometimes be of considerable duration, which has financial implications and

impacts on the ability of the institution to recruit staff and respond in a timely fashion to labour market needs. These delays in the process are, though, outside the control of PEQAB.

**ESG 2.4 Peer-review experts: partially compliant.**

External quality assurance is carried out by external expert panels that have subject-matter expertise as required for each program and organizational review. Site visits are well planned and experts well prepared.

However, expert panels do not include students. PEQAB is undertaking research work with a college to see how students can be engaged

*See pp. 33-34 for PEQAB response*

**ESG 2.5 Criteria for outcomes: fully compliant.**

**ESG 2.6 Reporting: non-compliant.**

Reports of expert review panels are not published. Some respondents feared that publication might be detrimental to applicants while others welcomed the possibility of full transparency.

*See p. 35 for PEQAB response*

**ESG 2.7 Complaints and appeals: non-compliant.**

PEQAB has no formal appeal process. The decision of the Minister is final and no appeal is permitted.

*See p. 36 for PEQAB response*

## INTRODUCTION

This report analyses the compliance of the Postsecondary Education Quality Assessment Board (PEQAB), with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). It is based on an external review conducted in 2017, the site visit being 21–22 March 2017.

## BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

### BACKGROUND OF THE REVIEW

ENQA's regulations require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they act in substantial compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

As this is PEQAB's first external review against the ESG, but not its first review as an agency, having been reviewed in 2011, the panel paid particular attention to the policies, procedures, and criteria in place.

### REVIEW PROCESS

The 2017 external review of PEQAB was conducted in line with the process described in the Guidelines for ENQA Agency Reviews and in accordance with the timeline set out in the Terms of Reference. The panel for the external review of PEQAB was appointed by the Ministry and composed of:

- Dr. Lee Harvey (Chair), Professor Emeritus, Copenhagen Business School, now residing in UK;
- Dr. Joy McKinnon, recently retired Vice-President (Academic) of Seneca College in Toronto, Canada;
- Mr. Philip Cameron, Director, Saskatchewan Higher Education Quality Assurance Board, Canada;
- Mr. Geoffrey King, National Director/Senior Advisor, Financial Services Industry Digitization at Cisco Canada, based in Ontario, Canada;
- Ms. Alex Rodgers, a communications professional with the Ontario Ministry of Agriculture, Food and Rural Affairs, based in Guelph, Ontario, Canada, student representative; recently graduated.

### SELF-ASSESSMENT REPORT

It is best practice for quality assurance agencies to undergo an external review at regular intervals (typically between five to seven years). Consistent with this expectation, PEQAB's Internal Quality Assurance Policy requires an external evaluation at least every seven years. Since the last external evaluation of PEQAB took place in 2011, the Board instructed the Secretariat to begin a self-study in preparation for its second external review. The Secretariat completed the self-study in January, 2017.

### SITE VISIT

The site visit involved meetings with the Board and Secretariat of PEQAB, the appropriate Assistant Deputy Minister, PEQAB applicant institutions, PEQAB assessors and representatives of other local agencies.

## HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

### HIGHER EDUCATION SYSTEM

In Ontario, degree providers fall into one of three categories: publicly assisted organizations with an act of the Ontario legislature, private organizations with an act of the Ontario legislature and consent holders. Consent holders can be private organizations (within or outside the province), public organizations (within or outside the province) and Ontario Colleges, offering degrees.

There are 22 publicly funded universities in Ontario. Each institution is governed by an act of the Ontario legislature. Most of these institutions are authorized by their acts to confer any and all degrees. Almost all federated colleges of public universities also have acts of the legislature that provide degree-granting authority.

Seventeen institutions (predominantly religious) have obtained private acts of the legislature giving them limited degree-granting authority. All private acts that provide degree authority to organizations provide restricted degree authority, primarily to award non-secular degrees.

In addition, there are 24 Ontario Colleges (21 Colleges of Applied Arts and Technology (CAATs) and 3 Institutes of Technology and Advanced Learning (ITALs)) that offer Honours Bachelor degrees pursuant to the consent of Ontario's Minister of Advanced Education and Skills Development.

### QUALITY ASSURANCE

The Ontario Universities Council on Quality Assurance (the Quality Council), established in 2010, coordinates the quality assurance activities of the publicly assisted Ontario universities with their own legislated authority to offer degree programs. The Quality Council operates at arm's length from both Ontario's publicly assisted universities and the Government of Ontario. The Quality Council is the provincial body responsible for assuring the quality of all programs offered by universities with acts that lead to degrees and graduate diplomas, including new undergraduate and graduate programs. The Council also oversees the regular audit of each university's quality assurance processes.

The Quality Council has the authority to make the final decision on whether, following the Council-mandated appraisal of any proposed new undergraduate or graduate program, such programs may commence. In addition, the Quality Council reviews the Institutional Quality Assurance Process (IQAP) for Ontario Universities as well as each institution's compliance with its own IQAP for the cyclical review of existing programs. The Quality Council has the authority to approve or not approve the auditors' report based on that internal review. The requirements for the IQAP are set out in the Quality Council's Quality Assurance Framework.

PEQAB is responsible for quality assuring degree level programming (Bachelors, Masters and PhD programs) offered by Ontario colleges, private institutions, public institutions that are based in other jurisdictions that offer degree programming in Ontario, and public universities in Ontario that are offering programs outside their legislation.

Pursuant to the Post-secondary Education Choice and Excellence Act, 2000, the Minister of Advanced Education and Skills Development refers applications to PEQAB for review and recommendation. The current legislation gives the Minister the option of referring applications to a quality assurance body other than PEQAB but the Minister has not done so to date. The Board's criteria and processes for reviewing applications are detailed throughout this report.

To summarize the process, PEQAB reviews applications against clearly defined criteria and makes a recommendation to the Minister on the quality of the degree program or the organization's capacity

to deliver it. In the decision on consent, the Minister considers the Board's recommendation and any public policy or financial matter flowing from the granting of a consent. Should the Minister decide to grant consent, consent holders must meet regulatory requirements and additional terms and conditions of consent imposed by the Minister. The terms and conditions of consent include that the program may not change during the period of consent (except to maintain currency); the organization must provide extended access to transcripts and additional requirements that vary depending on whether the consent holder is an Ontario College, a public organization or a private institution.

There are no current provisions for private institutions with acts of the Ontario legislature to undergo quality assurance (e.g., Holy Redeemer College, Concordia Lutheran Seminary, St. Paul's United College).

### PEQAB

Degree granting in Ontario is regulated by the *Post-secondary Education Choice and Excellence Act, 2000*, (PSECE Act; the Act), proclaimed in 2001. The PSECE Act is the core component of Ontario's degree quality framework. The Act sets the parameters for how degree authority is obtained in the province (by an act of the legislature or Minister's consent), the student protection conditions attached to organizations that offer degrees pursuant to consent (e.g., financial security and access to transcripts), the requirements for quality assurance of degree programs (all applications for consent must be referred to PEQAB or another quality assurance agency for review and recommendation) and the mechanisms to address organizations that contravene the Act (fines and imprisonment).

Prior to the PSECE Act, the Degree Granting Act (DGA) was in force in Ontario. Under the DGA, private and public out-of-province organizations sought Ministerial consent to offer degree programs. In determining whether to grant consent under the DGA, the criteria considered by the Minister included one quality measure (whether the organization was accredited in its home jurisdiction) and several factors related to societal need, including:

- whether a publicly assisted university was offering, during the period for which the consent was requested, the same course of study and degree, in a manner and form consistent with the articulated and confirmed needs of the specific client group;
- whether the proposed degree program was similar to one leading to the awarding of a certificate or diploma by a college of applied arts and technology in Ontario;
- identifiable need for graduates in a specific field that was met by the program;
- employment surveys;
- letters of support;
- duration of the need.

While the DGA was in effect there were routine consultations with the Council of Ontario Universities to solicit comments on an application for consent, particularly to determine whether member institutions were planning to offer the same program of study as the applicant.

Key features of the PSECE Act include:

- all organizations require either an act of the Legislative Assembly of Ontario or the consent of the Minister to offer a degree or to use the term "university";
- the Colleges of Applied Arts and Technology (CAATs) may apply for consent to offer baccalaureate degrees in applied areas of study;

- all organizations not empowered by an act of the Ontario legislature to offer degrees are able to seek consent;
- the Minister must refer all applications for consent to PEQAB or another quality assurance agency;
- the Minister may not grant or deny consent until he or she has received a recommendation from PEQAB (or another agency);
- the Minister is required to be satisfied that private applicants have adequate student protection measures in place, specifically access to transcripts and security before giving consent;
- enforcement mechanisms were strengthened by establishing an inspection process and the powers of the inspector, as well as increasing the level of fines significantly;
- PEQAB, created in 2000 prior to the Act, was continued and made responsible for the review of applications for consent.

Pursuant to the Act, an application for consent is required to;

- grant a degree;
- provide a program or part of a program of post-secondary study leading to a degree to be conferred inside or outside Ontario;
- advertise a program or part of a program of post-secondary study offered in Ontario leading to a degree to be conferred in or outside Ontario;
- sell, offer for sale or provide by agreement for a fee, reward or other remuneration, a diploma, certificate, document or other material that indicates or implies the granting or conferring of a degree;
- operate or maintain a university;
- use or be known by a name of a university or any derivation or abbreviation of a name of a university;
- make use of the word university or any derivation or abbreviation of the word university in any advertising relating to an educational institution in Ontario.

Because the Minister's terms and conditions of consent do not permit a consent holder to change a program (unless it is to maintain the currency of the curriculum) an application for Ministerial consent or an amendment of consent is required when consent holders wish to change the program in any way (e.g., eliminate or add an admissions requirement, change degree nomenclature, alter assessment strategies).

In June 2010, the Act was amended and regulatory changes came into effect 1 January 2012.

Amendments to the Act included:

- rejecting an application without referral to PEQAB (or other body) according to prescribed circumstances and policy criteria;
- considering a prior quality assurance review as satisfying the requirement that the application be referred, and deeming approval by such a body as satisfying the requirement that the Minister receive a recommendation.

Under sections 5 and 7 of the Act, PEQAB is empowered to:

- review all applications referred by the Minister for consent under the Act;
- establish the criteria and procedures to determine the quality of post-secondary programs;
- undertake reviews of program quality and organizational capacity;
- create subject matter expert review panels, organizational review panels and advisory committees;

- undertake research as appropriate;
- provide recommendations to the Minister on applications;
- address any other matter referred to the Board by the Minister.

In fulfillment of its mandate, the Board determines the criteria and procedures for its reviews, strikes expert and advisory panels and undertakes any related research. The Board's criteria and procedures are contained in its *Handbooks* and *Submission Guidelines*, <http://www.PEQAB.ca>.

#### **PEQAB'S ORGANIZATION/STRUCTURE**

PEQAB is composed of a Chair appointed by the Lieutenant Governor in Council, a Vice-chair and up to nine other members appointed by the Minister. Board members have a mix of backgrounds and expertise. Some members have experience in the university and college sectors and others are experienced in private sectors. As of 1 January 2017, the Board has eight members, including the Chair.

#### ***Meeting Procedures***

At the discretion of the Board, meetings usually take place bi-monthly and last between two and four hours. The following items are likely to be discussed at a typical Board meeting:

- the appointment of expert panel candidates;
- the review of quality assessment reports;
- organization reviews;
- other matters referred by the Minister;
- Board criteria, policies and procedures;
- referrals and communications from the Minister;
- correspondence.

The PEQAB Secretariat prepares an electronic meeting binder for each meeting, which is shared with Board members at least seven days prior the meeting. The agenda materials include several items and draft motions as starting points for discussion. The Secretariat reviews applications and assessment reports and prepares materials for the Board's consideration. At the meeting, members are provided with an iPad that contains the Board agenda and supporting materials. The average length of an agenda is approximately 800 pages.

The Secretariat's Chief Executive and staff respect the confidentiality of Board discussions, which are conducted *in camera*. Accordingly, Board minutes and records are treated as confidential. However, the Board is subject to the *Freedom of Information and Protection of Privacy Act (1990)* and the Secretariat will respond to any requests made under the act, as *per* Ministry procedure.

#### ***Electronic Votes***

Since 2014, the PEQAB Secretariat has increasingly used electronic votes for standard items. Standard items are routine aspects of Board meetings that do not require substantive deliberation (i.e. the approval of the roster of expert panel candidates for program reviews/renewals).

#### ***The Secretariat***

The Secretariat consists of a small group of ministry employees whose purpose is to provide administrative support to the Board. Its activities include:

- drafting the Board's policies, procedures and criteria;

- management of applications for consent;
- consultations with stakeholders and other quality assurance bodies on standards and quality assessment procedures;
- advising applicants and potential applicants about the Board's requirements;
- identification of rosters of experts for selection by the Board as program quality assessors or as organization reviewers;
- liaising with government officials, professional associations and regulatory bodies;
- researching best practices in quality assurance.

Each application referred by the Minister is managed by a Senior Policy Advisor of the Secretariat who assists the applicant and expert assessors in understanding the Board's criteria and procedures to facilitate a comprehensive review.

Currently, the members of the Secretariat are:

- James Brown, PhD, Chief Executive;
- Janna Lüttmann, MPPA, Senior Policy Advisor;
- Joel Buenting, PhD, Senior Policy Advisor;
- Mary Catharine Lennon, PhD, Senior Policy Advisor;
- Jason Yeung, Research Policy Analyst;
- Rosaria Cioffi, CSC, Operations Coordinator.

Additionally, the Secretariat maintains the PEQAB website on behalf of the Board. The PEQAB website includes:

- a list of current Board members, their terms of office and brief biographies;
- the Board's mandate, meeting procedures and policies;
- PEQAB publications (*Handbooks, Submission Guidelines and Annual Reports*);
- an overview of the consent process;
- information about relevant legislation, regulation and pertinent contextual information;
- links to national and international quality assurance bodies;
- information about applications, including portions of the application, the Board's recommendation and the Minister's decision;
- contact information for the PEQAB Secretariat;
- Statement on the value of Ontario college degrees;
- Information on making requests for information related to applications for ministerial consent through *The Freedom of Information and Protection of Privacy Act (1990)*.

### **Board Vision Statement and Values**

The Board held a workshop in February 2016 to identify a new Vision Statement. The following was adopted as the new PEQAB vision:

*A stronger Ontario through high quality postsecondary student learning outcomes.*

### **Values**

The Board's values were revised by the Board at its 2014 Retreat as follows:

*Accountable  
Impartial  
Collegial*

*Transparent*  
*Dedicated to Quality & Continuous Improvement*  
*Grounded in Research Evidence & Best Practice*

## **GOVERNANCE**

### *Memorandum of Understanding*

The Government of Ontario's *Agency Establishment & Accountability Directive* requires all agencies to have a Memorandum of Understanding (MoU) between the responsible Minister and the agency that reflects the accountability framework "in order to ensure a full understanding of the relationship between the Minister and the agency".

The MoU and Directive identify the accountability framework between the Minister of Advanced Education and Skills Development and the Chair of PEQAB on behalf of the Board. In addition, they clarify the roles and responsibilities of the Minister, the Chair and the Deputy Minister and set out the expectations for the operational, administrative, financial, staffing and reporting arrangements between the Board and the Ministry. Further details about the administrative structure of the Board and Secretariat in relationship to the Ministry are provided in PEQAB's 2016–17 Self-Study Report (p.16).

## **ROLES AND RESPONSIBILITIES**

### **Minister**

In general and in practice, the Minister is accountable to the Legislature for the Board's fulfilment of its mandate, its compliance with government policies, and for reporting to the Legislature on the Board's affairs.

The Minister;

- recommends to Management Board of Cabinet (MBC) the establishment and elimination of the Board and any change to the Board's mandate that needs a corresponding change to its constituting instrument;
- reports and responds to the Legislative Assembly on the affairs of the Board;
- reports and responds to Cabinet on the Board's performance and compliance with the government's operational policies and Board policy directions;
- when appropriate or necessary, takes action or directs/recommends that corrective action be taken in respect of the Board's mandate or operations;
- informs the Board's Chair of the government's priorities and broad policy directions for the Board;
- consults, as appropriate, with the Chair and others, on significant new directions and/or when the government is considering regulatory or legislative changes for the Board;
- recommends to MBC the provincial funding to be given to the Board;
- directs that a periodic review of the Board be conducted and makes subsequent recommendations to MBC.

### **Deputy Minister**

In general and in practice, the Deputy Minister is accountable to the Minister for monitoring the Board on behalf of the Minister while respecting the authority of the Board and, where warranted, for identifying the need for corrective action and recommending to the Minister ways of resolving issues. The Deputy Minister is also accountable for advising the Minister on the establishment,

elimination, consolidation, acquisition and operation of the Board and on meeting assigned ministerial responsibilities with respect to an agency.

The Deputy Minister:

- establishes a framework for reviewing and assessing Board reports;
- advises the Minister on Board documents submitted to the Minister for review and/or approval;
- advises the Minister on meeting assigned ministerial responsibilities with respect to the Board;
- undertakes reviews as directed by the Minister;
- co-operates with any periodic review directed by the Minister or MBC;
- monitors the Board on behalf of the Minister while respecting its authority, and where warranted, identifies needs for corrective action and recommends to the Minister ways of resolving issues;
- consults the Chair, as needed, on matters of mutual importance, including any services provided by the Ministry, MBC directives and ministry policies;
- meets with the Chair as needed or directed;
- seeks feedback from the Chair on the performance of the Director and;
- provides administrative, financial and other support to the Board as specified in the MoU/Directive with the Board.

#### **PEQAB Chair**

The Chair is accountable to the Minister for the performance of the Board in fulfilling its mandate and for carrying out the roles and responsibilities assigned to the Chair by Management Board Directives, the constituting instrument and the MoU.

The Chair

- keeps the Minister informed of issues or events that may concern the Minister in the exercise of the Minister's responsibilities;
- provides leadership to the Board in fulfilling its mandate;
- serves as spokesperson for the Board;
- ensures development of performance measures for the Board and monitors its performance;
- recommends financial needs for inclusion in annual requests for Board funding;
- co-operates with any periodic review directed by the Minister or MBC;
- directs that corrective action be taken if needed;
- makes decisions on Board governance consistent with the MoU for the Board;
- provides Board advice and recommendations to the Minister, as well as the Board's Annual Report.

#### **Chief Executive Officer**

Dr. James Brown was appointed in October 2013. Dr. Brown is directly accountable to the Board as its Chief Executive. He also reports to an MAESD Assistant Deputy Minister.

The core responsibility of the Chief Executive is to support the Chair and the Board in carrying out the Board's duties. The Chief Executive supports the Chair and agency by:

- managing the day-to-day operations of the Agency in accordance with the mandate of the Agency, MBC and Ministry of Finance directives, accepted business and financial practices and the MoU with the Minister;

- advising the Chair on the requirements of and compliance with the *Agency Establishment and Accountability Directive* as well as other MBC and Ministry of Finance directives and policies;
- translating the goals, objectives and strategic directions of the Agency into operational plans and activities;
- ensuring that the Agency has the oversight capacity and an effective oversight framework in place for monitoring its management and operations;
- keeping the Agency informed, through the Chair, on the implementation of policy and operations of the Agency;
- carrying out in-year monitoring of the Agency's performance and reporting on results to the Chair;
- keeping the Chair advised on issues or events that may concern the Chair in the exercise of his or her responsibilities;
- making sure that a process is in place for responding to and resolving complaints from applicants under the Act and the public with respect to matters that are the responsibility of the Agency;
- supporting the Chair in fulfilling his/her responsibility for records management in accordance with Section 11.5 of the MoU;
- consulting with the Ministry, as needed, on matters of mutual recognition, including Ministry policies/services provided to the Agency, and MBC and Ministry of Finance directives and policies;
- supporting the Chair in cooperating with a periodic review directed by the Minister or MBC;
- preparing reports as directed by the Chair for the review and approval of the Chair;
- as directed by the Chair, addressing any other matter referred to the Agency by the Minister.

### **Secretariat Staff**

Secretariat staff are accountable to the Chief Executive. The Secretariat comprises a total of six ministry staff who draft the Board's criteria and processes and manage applications for consent. The Secretariat's ongoing activities in support of the Board include:

- monitoring the degree environment for:
  - domestic and international developments in curriculum, technology, and other relevant program or institutional characteristics (e.g., requirements for inclusion of liberal arts/general education requirements in undergraduate degrees);
  - experience in other jurisdictions that may be relevant to improving the Board's criteria (e.g., degree mill activity in the United States and other jurisdictions);
- participating in interjurisdictional quality assurance activities (e.g., attendance at, and presentations to, quality assurance related conferences, participating or assisting in the establishment of regional networks to share best practices);
- developing and maintaining relationships with other quality assurance agencies in Ontario and other jurisdictions;
- drafting criteria and processes;
- monitoring quality assurance agencies' criteria and processes to ensure PEQAB criteria and processes reflect best practice (e.g., in the level and nature of training that assessors should receive; Secretariat involvement in expert panel site visits to applicant organizations);
- undertaking necessary research;

- drafting and maintaining PEQAB *Handbooks, Submission Guidelines* and *Panel Guidelines*;
- management of applications, which includes:
  - identifying potential assessors for the review of the application;
  - recommending a quality assurance strategy for the application;
  - contracting with and instructing the assessment panel;
  - clarifying standards and procedures as appropriate;
  - attending quality/organization site visits;
  - reviewing the panel report and ensuring it conforms to expectations;
  - securing the applicant's response to the panel report;
  - preparing materials for the Board's consideration;
  - preparing Board communications to the Minister;
  - notifying the applicant that a recommendation has been made.

### **PEQAB'S FUNCTIONS, ACTIVITIES, PROCEDURES**

PEQAB is responsible for reviewing applications referred to it by the Minister to:

- offer a degree program or part of a program;
- use the term university or operate as a university or university college;
- advertise degree programs in Ontario;
- amend the conditions of an existing consent.

The Board reviews applications for Bachelor, Master and Doctoral degree programs in Ontario. The majority of applications referred to the Board are for Honours Baccalaureate degree programs offered by Ontario Colleges. The Board also reviews any other matter referred to it by the Minister.

The three key review types are as follows:

1. Review of proposed programs for consent.
2. Assessment of existing programs for consent renewal.
3. Review of organizational soundness (private institutions only).

All proposed programs referred to PEQAB by the Minister are assessed against all standards and benchmarks set by PEQAB by an external expert panel. The review of an initial application for consent involves an evaluation of the program proposal.

The institution is required to submit information on a full range of matters (including curriculum, faculty credentials, admissions practices, learning and physical resources) and an external expert panel is recruited to provide its best collective judgement with respect to the quality of the program and organization, the reasons for its judgements, and be of sufficient detail to enable the Board to determine the extent to which its criteria are satisfied. The key issues are whether:

- the program meets the standards set by the Board;
- the panel thinks the program is of sufficient quality to be recommended to the Board and eventually to the students of Ontario;
- the institution has the capacity to assure program quality on an ongoing basis.

The review process is described in detail in the Board's *Handbooks* (<http://PEQAB.ca/Handbooks.html>).

### ***Assessment of existing programs***

At the time of consent renewal (typically five to seven years after the initial consent was granted), the Board (and external expert panel) evaluate the *actual delivery* of the program and the organization's implementation of policies and procedures to support program delivery. The panel

will review the organization's general policies and conduct an audit against relevant standards and benchmarks.

The assessment of an existing program involves two aspects. First, is the panel's audit of the institution's policies and procedures to ensure its ongoing quality and the implementation thereof. Most importantly, the panel will review the institution's program self-study (see *Submission Guidelines for Renewal of Consent*, <http://PEQAB.ca/Handbooks.html>). Second, is a review of samples of student work for evidence that the expected learning outcomes related to the degree-level standard have been achieved. The objective of this requirement is to assess whether the institution has appropriately assessed the level of student performance and that student performance meets the degree-level standard. Prior to the site visit, the panel is typically provided with samples of student work sorted into what the institution considers exemplary, average, and minimally acceptable performance categories to allow for the selection of samples from among these three categories.

As is the case for new programs, the panel is again asked to provide to the Board its best judgment with respect to the quality of the program, the reasons for its judgements and be of sufficient detail to enable the Board to determine the extent to which its criteria are satisfied.

### ***Review of organizational soundness (private institutions only)***

For reviews of applications submitted by private institutions, the Board also appoints an Organizational Review Panel to review the submission against the Board's criteria for organizations offering degrees in Ontario. During the organizational review, the expert panel assesses the applicant's organizational character, financial stability and student protection policies and practices against the Board's standards.

Organizational reviews are described in detail in the *Handbooks for Private Organizations* (<http://PEQAB.ca/Handbooks.html>) and *Panel Guidelines*".

### ***Audits of programs***

PEQAB is currently developing criteria and processes for advancing Ontario Colleges, which have demonstrated that they are "mature" in offering such degrees, toward an institutional quality audit-only approach.

#### Qualifying Criteria for College Degree Audit-Only Status

Colleges would apply through the Ministry to PEQAB for assessment for Degree Audit-Only status ("Audit-Only" status). It is proposed that in order to qualify for an institutional Quality Audit-Only Process Ontario Colleges will first have to show that they have an effective internal Quality Management System (QMS) for degrees—as determined by the PEQAB Board, based on a Board-appointed special panel. Other qualifying criteria for Degree Audit-Only Status will likely include that the Ontario College has a minimum number of degree programs that have received consent renewal. Best practice is for the quality assurance agency (PEQAB) to re-review the QMS itself on a regular basis (5-7 years). PEQAB intends to reflect this best practice.

#### Institutional Audit-Only Process for Programs

Those Colleges having received Ministry approval for Audit-Only status through a successful application would have available to them an expedited PEQAB Audit-Only review process for all continuing degree programs (i.e., degree programs previously reviewed by PEQAB) and new degree programs.

New degree programs from colleges with Audit-Only status would undergo an *expedited review process* which would likely include only a desk review of the proposed course outlines, a self-study of the institution's readiness to offer the proposed program, and an assessment of the self-study by an expert or panel of experts in the field.

The focus of the audit for *continuing degree programs* would be the review of its internal QMS through an audit of the institution's self-study and related documents and results of learning outcomes assessments.

PEQAB is empowered by the Act to establish the procedures and criteria that it will apply in reviewing applications referred to it. The criteria established by the Board must:

- be in accordance with educational standards recognized in Ontario and other jurisdictions;
- comply with such policy directions as may be given by the Minister.

#### **PEQAB'S HANDBOOKS AND SUBMISSION GUIDELINES**

PEQAB has published criteria for the review of organizations, programs, and the use of the terms "university" and "university college". Its criteria are published in its three *Handbooks* for Public Organizations, Private Organizations, and Ontario Colleges to guide applicants through the submission and consent process. The *Handbooks* outline the mandate of PEQAB and its procedures for review of applications for consent to offer or advertise degree programs in Ontario, and use of the terms "university" and "university college". For instructions on what to include in a submission to the Board, applicants consult the Board's *Submission Guidelines* (for *Public Organizations: New Programs and Renewal of Consent*, for *Private Organizations: New Programs and Renewal of Consent*, and for *Ontario Colleges: New Programs and Renewal of Consent*).

The Board's *Handbooks* and *Submission Guidelines* are updated annually by 1 August of each year, along with a corresponding *Record of Change*.

#### **Organization Review Criteria (private applicants only)**

Private applicants undergo two PEQAB reviews: Organization and Program. These normally occur in sequence, but may, at the request of the applicant, proceed concurrently. The overarching goal of the Organization Review is to assess the applicant's organizational soundness (i.e., the "organizational character and student protection policies and practices"). PEQAB has eight standards against which it assesses the organization.

1. Mission Statement and Academic Goals
2. Administrative Capacity
3. Ethical Conduct
4. Student Protection
5. Academic Freedom and Integrity
6. Financial Stability
7. Dispute Resolution
8. Organization Evaluation

The review is undertaken by members of the Board's Organization Review Committee. Standards and benchmarks assess a range of institutional matters, including:

- governance structure of the organization;
- administrative capacity;
- financial stability;

- long-term business plan demonstrating required resources to deliver and sustain programs;
- coordination of academic and business plans;
- relation of programs to the mission of the institution;
- policy environment, including those related to faculty, students, grading, dispute resolution, academic freedom and integrity, ongoing internal quality assurance curriculum development;
- resources to provide degree programs and support services.

For each standard, the Board identifies benchmarks that represent the threshold the applicant must meet to achieve the standard, and/or the evidence required to support a demonstration that the applicant can meet or exceed the standard.

### ***Program Review Criteria (all Applicants)***

All applicants (public, private, and CAATs) are subject to a program review. The overarching goals of the Program Review are to assess academic rigour of the program, its degree level and the applicant's capacity to deliver the program. PEQAB currently has eleven standards against which it assesses programs proposed by public organizations<sup>1</sup>

1. Degree Level
2. Admission, Promotion and Graduation
3. Program Content
4. Program Delivery
5. Capacity to Deliver
6. Credential Recognition
7. Regulation and Accreditation
8. Nomenclature
9. Program Evaluation
10. Academic Freedom and Integrity
11. Student Protection.

Assessments are undertaken by a panel of academic peers (the "External Expert Panel" or the "Panel") and includes a site visit. Standards and benchmarks assess a range of program matters, including:

- degree standards included in the Ontario Qualifications Framework (<http://www.tcu.gov.on.ca/pepg/programs/oqf/>);
- curriculum design, level, and content for each program offered leading to the respective degrees;
- program delivery;
- requirements for admission, promotion and graduation;
- resources to provide degree program;
- academic capacity;
- assessment of student work;
- faculty qualifications.

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<sup>1</sup> Until November 2016, PEQAB had two additional standards (*Economic Need* and *Non-Duplication*). In response to a long-standing request from the Board, Minister Matthews submitted a letter to the PEQAB Chair in the fall of 2016 requesting that the Board remove these standards. The letter indicates that the Ministry reviews applications for Economic Need and Non-Duplication on policy grounds prior to referring an application to PEQAB and following a PEQAB review. Accordingly, an additional PEQAB assessment is unnecessary.

For each program standard, the Board specifies benchmarks that identify the threshold the applicant must meet to achieve the standard and/or the evidence required to support a demonstration that the applicant can meet or exceed the standard.

The Board seeks advice from experts on applications for consent. For each application, the Board considers candidates for the review panel as well as the assessment strategy. On behalf of the Board, the Secretariat develops and provides each expert review panel with *Panel Guidelines* including relevant standards and benchmarks for writing the panel report.

#### **STANDING COMMITTEES**

Some dimensions of program and organization reviews require specialized expertise beyond the subject-matter experts consulted for each review. Accordingly, the Board has two standing committees.

##### ***Organization Review Committee***

The Board's Organization Review Committee reviews the organizational soundness and capacity of private applicants. The Board strikes an Organization Review Panel from among the members of the Organization Review Committee to review each application from a private organization.

Organization reviewers are selected by the Board to reflect the several dimensions of student protection and organization quality, including but not limited to financial analysis, admission processes, registrarial functions, learning resources and educational management. Organization Reviewers may include persons with:

- accounting certification and experience in corporate financial management;
- experience in admissions/registrarial responsibilities, including admissions policies and academic records management in a degree-granting institution;
- experience in managing learning resources;
- senior management experience in a degree-granting institution;
- experience with professional, accrediting and regulatory bodies for higher education within and outside of Ontario.

Organization reviewers must be free of any conflict of interest and be recognized by their peers for having a broad outlook, open mind, and sound judgment.

Depending on the nature and complexity of the application for a private organization, the organization review panel will normally have between one and three members.

##### ***Breadth/Liberal Arts Committee***

The Board's undergraduate *Degree Level* and *Program Content* standards require that graduates achieve a certain depth and breadth of knowledge outside of their main field of study. This is normally achieved through studying a liberal arts curriculum within the institution.

The Board has appointed a small standing committee of individuals with expertise in liberal arts as a pedagogical issue, and a record of scholarship that reflected an interest and understanding of the purpose and outcomes of a liberal arts curriculum.

#### **SUBJECT-MATTER EXPERTS**

A unique expert panel consisting of subject-matter experts is appointed to each program review. Depending on the nature and complexity of the application, the panel will normally have between two and three members, with one member appointed as panel chair.

The applicant may nominate up to three qualified persons from whom the Board may choose one or more to serve on the panel. The Board has sole discretion, however, to select all quality assessors for the application without regard to the applicant's nominees.

### ***Criteria for Expert Assessors***

Expert assessors will possess qualifications and personal qualities that engender the confidence of the Board, the Minister, the public, accrediting bodies, relevant regulatory bodies and degree granting institutions. They must:

- be committed to the principles and practices of quality assurance in post-secondary education;
- be recognized by their peers for having a broad outlook, an open mind and sound judgment;
- be free of any conflict of interest, in accordance with the Board's policy on conflict of interest for assessors and applicants;
- have demonstrated skills in oral and written communication, preferably including experience writing formal reports to deadlines.

The Board will seek to select highly qualified assessors who possess:

- an advanced academic credential related to the subject area under review (normally at the terminal level in the field);<sup>2</sup>
- required or desired professional credentials and/or related work experience of substantial depth and range;
- relevant academic experience such as administration, teaching, curriculum design and/or quality assessment experience (e.g., as appraisers for accrediting bodies or as reviewers of degree programs);
- a record of active scholarship, normally having achieved the rank of associate or full professor.

At its July 2011 meeting, the Board considered the criteria for the selection of quality assessors with the aim of being more inclusive of faculty members who are either experts in teaching and learning in their disciplines or who have a high degree of understanding of college-level degrees in their disciplines. A motion was carried that the Board may consider, on a case-by-case basis, such academics as candidates for quality assessment panels for the review of applications for new, and renewal of, undergraduate programs.

Assessors of graduate program proposals will have experience in graduate teaching and, as appropriate, in graduate thesis supervision or in the supervision of clinical or applied studies at the graduate level. In addition to the qualities of panel members, panel chairs will normally be experienced in the administration of higher education, and will be experienced committee members who can function objectively and effectively as chair of an assessment committee.

Panel chairs for graduate program proposals will normally also be experienced in the administration of graduate programs (e.g., as chair of a department with graduate programs, graduate program coordinator, chair of a graduate committee, member of a faculty graduate or research council or committee).

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<sup>2</sup> The doctorate is normally the terminal academic credential in all fields or disciplines with the exception of studio disciplines where a master degree in the field/discipline is more typical. The Board expects that the assessors will hold the terminal academic credential: (a) in the same field/discipline area as the proposed program area or (b) in a field/discipline that can be shown to be closely related in content.

The Board strives to name panels that reflect an appropriate mix of academic/professional credentials and experience related to the field. In establishing its roster of quality assessors, the Board seeks qualified individuals from a wide variety of constituencies, including but not limited to the following:

- Ontario Council on Graduate Studies;
- Ontario universities;
- Ontario colleges;
- professional, accrediting and regulatory bodies within and outside of Ontario;
- post-secondary educational institutions outside Ontario, including the United States and Europe.

## **EXTERNAL EXPERT PANEL REPORTS**

The primary obligation of a panel appointed by the Board is to perform a review and provide its best judgement on the quality of a proposed program or the organizational soundness of an applicant institution. To this end, the panel is asked to assess applications against the standards and benchmarks set by PEQAB and, when members of the panel deem it appropriate, to identify and address any other quality related issues arising from the proposal.

Under the coordination of the panel chair, members of the expert panels will develop a Panel Report (or "Report") that includes at least the following information:

- a description of the review procedure, the panel's overall recommendation, any recommended conditions of consent and any identified good practices;
- an assessment of the application against each of the Board's standards and benchmarks;
- an assessment of the sufficiency, reliability and validity of the evidence provided by the applicant;
- if applicable, an assessment of evidence found during any site visit;
- a recommendation, with reasons, on whether the proposed program meets the Board's standards and is of sufficient academic quality to be offered to the people of Ontario.

To ensure a transparent and fair assessment process, once the panel submits its Report, the Board provides the applicant institution with the opportunity to respond to the panel's Report. In some cases, the Board may ask the panel to respond to the organization's remarks.

In formulating its recommendation, the Board will consider

- the organization's submission
- the findings of the panel
- the organization's response to the Panel Report
- any additional materials provided by the applicant to the Board and
- any commitments made by the organization during the review process

The Board will communicate its recommendation to the Minister (and identify any proposed conditions of consent, should consent be granted). The Minister considers the Board's recommendation and any public policy matters, and makes a decision about consent.

Panel Reports are currently accessible to the public through *Freedom of Information and Protection of Privacy Act (1990)* requests.

### **PEQAB'S FUNDING**

The Postsecondary Education Quality Assessment Board (PEQAB) is budgeted and supported through a Secretariat that is a Branch within the Ontario Public Service, in the Province of Ontario (Canada). The Branch has six full-time staff members (FTEs): three at the level of Senior Policy Advisor, one at the level of Research Policy Analyst, an Operations Coordinator and a CEO. All six are filled with full-time permanent employees. PEQAB's operating budget is approximately \$670,000 for 2017–18. This budget, allowing for inflation, has been at approximately this level since PEQAB's inception in 2002–03. PEQAB continues to be generously budgeted, with this \$670,000 fully supporting the salary, benefits, travel, and professional development of its staff. PEQAB's office space and the associated utilities, heat and light are also provided by the Province of Ontario outside of this budget and at no cost to PEQAB. The corresponding actuals for PEQAB's budgeted \$670,000 in 2015–16 (final figures for 2016–17 are not yet available) were \$495,000 in expense: PEQAB has generally been "underspent" at approximately this level since inception and will be again for 2016–17.

In addition to this FTE count, PEQAB does hire summer students under the Summer Student Employment Office program. PEQAB also uses temporary placement agencies, through a vendor of record list when the need arises for specialized areas of expertise or specific work projects. These costs are also absorbed through and reflected in the operating budget allocation.

In addition to the operating budget above, PEQAB is budgeted to contribute (and does contribute) approximately \$120,000 in revenue from the application fees year over year. For 2017–18, this budgeted figure is \$125,000.

## FINDINGS: COMPLIANCE OF PEQAB WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG)

### ESG PART 3: QUALITY ASSURANCE AGENCIES

#### ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

Standard:

Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.

PEQAB undertakes program quality and organizational reviews that are referred to it by the Minister (see page 5 HIGHER EDUCATION SYSTEM). These reviews have clear published objectives and standards, which are specified in the Board's published *Handbooks* (see page 13 PEQAB'S FUNCTIONS, ACTIVITIES, PROCEDURES). These reviews constitute the daily work of the Agency. The degree standards are those included in the Ontario Qualifications Framework.

PEQAB has a Board that comprises eight members with various experience of the college, university and private sectors (see page 8 PEQAB'S ORGANIZATION/STRUCTURE). This Board, appointed by the Lieutenant Governor in Council (in the case of the Chair) and the Minister (for other members), has responsibility for making recommendations to the Minister, following the review activity of PEQAB.

The Board does not include any student or current academic faculty appointments. However, the Board does receive feedback from the sector, especially through PEQAB's interaction with the Private and Out-Of-Province Degree Operating Group (POPDOG) and the College Degree Operating Group (CDOG).

#### **Panel conclusion: substantially compliant**

The panel considers PEQAB compliant in all respects except the involvement of stakeholders in its governance. While some stakeholders are included in governance, there is a lack of student or current academic staff representatives on its Board.

#### **PEQAB Response:**

*We agree that we are only substantially compliant here. PEQAB is currently anticipating the appointment of a recent student to the Board. The Board will consider the possibility of seeking the appointment of a current student, both in terms of its advisability and its practicability within Ontario's framework for appointments to agencies. See also PEQAB's response to ESG 2.4 below.*

#### ESG 3.2 OFFICIAL STATUS

Standard:

Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.

Degree granting in Ontario is regulated by the *Post-secondary Education Choice and Excellence Act, 2000*, which, *inter alia*, established PEQAB as the agency to deal with applications for consent to award degrees outside the university system (see page 6, PEQAB)

However, it seems that the Minister could choose to refer an application to a body other than PEQAB, although to date that has not occurred. It was not clear under what circumstances this might occur.

**Panel conclusion: fully compliant**

**ESG 3.3 INDEPENDENCE**

Standard:

Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.

PEQAB claims to have full, arms-length independence for its operations and outcomes. However, the PEQAB personnel are Ministry employees and their workspace is co-located with the Ministry (MAESD), despite attempts to create separation.

The 2011 external panel review questioned PEQAB's independence from the Ministry and that concern remains given that PEQAB is based in a government complex and the Secretariat staff are government employees.

The Board is appointed by the Minister (see page 8 PEQAB'S ORGANIZATION/STRUCTURE). However, Board members vociferously maintain that they act autonomously when conducting their business, uninfluenced by the Minister. Members assert that they have had no direct contact with the Ministry. At the individual level, Board members were scrupulous in just addressing the issues in front of them irrespective of any political considerations.

Clearly, the PEQAB processes arranged by the Secretariat and using external assessors are conducted with integrity and are independent of any third-party influence. However, what is referred to PEQAB for review is dependent upon Ministerial decisions and the Minister makes the final decision based on the recommendation that comes from the PEQAB Board. However, the Minister is not bound by the PEQAB Board recommendation.

The self-study report suggests that the Secretariat may have considerable influence over the PEQAB Board (p. 6, #6; p. 52, 3<sup>rd</sup> bullet). The discussions with the Board reinforced this. The Board members remarked on the quality of the briefings by the Secretariat. The detailed papers and commentary prepared for the Board meeting helps guide the Board members in dealing with the large amount of documentation related to the recommendations for approval that they need to make to the Minister.

PEQAB is not an autonomous decision-making agency but a body that advises the Ministry. This means that it is not responsible in the last resort for outcomes of its operations. However, if the role of PEQAB is taken narrowly, as a review body, and the outcome of its operations is a report, then it could be argued that this is undertaken in an entirely independent manner. Thus, one might argue for operational independence of PEQAB but not organizational or financial independence. Neither the allocation of reviews, nor the final outcome of PEQAB's work, are independent of government.

Thus:

- (1) it would seem that PEQAB does not comply with the ESG.
- (2) it would seem that PEQAB cannot become more independent without legislative changes. This

would include, for example, (a) the approval process being fundamentally changed; (b) PEQAB employing its own staff.

**Panel conclusion: non-compliant**

**PEQAB Response:**

*We believe we are compliant with the Independence principle as stated in the standard above. There are two poles to the question of a quality assurance agency's independence. One is "How independent is it from government/political influence?" and this is the focus of the Panel's concern. Here we would just first respectfully disagree with one aspect of the Panel's interpretation of the standard: the fact that the Legislative Assembly of Ontario has not granted PEQAB the power to directly make the final decision as to whether a degree program has consent to be offered in Ontario should not preclude a judgement that PEQAB "acts autonomously and has full responsibility for its operations and outcomes" within the context of making that recommendation. We would in fact, as the Panel suggests, argue that the independence of PEQAB is more appropriately assessed within its legislated powers as a "review" and advisory body.*

*The second kind of independence—its other pole—is "How independent is the agency from the institutions which it quality assures?" We take the Panel's point above: "Clearly, the PEQAB processes arranged by the Secretariat and using external assessors are conducted with integrity and are independent of any third-party influence" as an acknowledgement of this kind of independence for PEQAB—which we would have thought is a very significant form of independence. Certainly if it were lacking—i.e. if the agency's judgements of quality WERE shown to be significantly influenceable by the interests of institutions it quality assures—that would raise the gravest concerns about that agency's independence. We are therefore surprised by the Panel's overall judgment of PEQAB's complete "non-compliance" with this standard and would have thought "full compliance within PEQAB's legislated powers" a more appropriate response to the standard as written, or at least "partial compliance within an expanded legislative framework," given the Panel's concerns about PEQAB's more limited legislated powers and the structure of its secretariat.*

**ESG 3.4 THEMATIC ANALYSIS**

Standard:

Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.

Apart from some references to the work undertaken by PEQAB in its annual report there have been, to date, no sector-wide analyses of PEQAB's work. The intention is to undertake an analysis later in 2017 and a research plan is in place to take this forward. The *Post-secondary Education Choice and Excellence Act, 2000*, empowers PEQAB to undertake research.

**Panel conclusion: non-compliant**

Although non-compliant to date, the intention is to produce the first analysis in 2017.

**PEQAB Response:**

*We believe we are at least partially compliant with this standard. According to the standard, agencies compliant with the 2015 ESG are ones that, in addition to publishing reports regularly, both*

*(a) describe the general findings of their quality assurance activities, and*

*(b) analyze the general findings of their quality assurance activities.*

*PEQAB's Self-Study included PEQAB's Annual Report of 2015/16 (Appendix 12, pp. 254-295) as an example of its "regularly published reports, that describe and analyze the general findings of [its] quality assurance activities."*

**PEQAB's Descriptive Reporting Activities**

*In addition to publishing reports annually since inception, each of PEQAB's fifteen Annual Reports thoroughly describes the general findings of its quality assurance activities. Annual Reports identify in-year referrals from applicants, including the nature of the institution (e.g. CAAT, Private, Public-In/Out-of-Province), name of the institution, the application under the Act (i.e. new program, renewal, amendment) and the submission itself. Annual Reports also identify in-year Board recommendations, including the nature of the institution, the applicant name, submission, Board recommendation and Minister's decision. Finally, Annual Reports identify current applications under review, including the nature of the institution, applicant name, referral date and the application under the Act.*

*In addition to detailed descriptions concerning referrals, PEQAB has published in-year accomplishments in its Annual Reports since 2014/15 (see AR 2014/15, p. 5; AR 2015/16, p.5). In-year accomplishments describe any modifications, changes and developments related to its quality assurance practices throughout the reporting year. Since 2014/15, PEQAB has also published Annual Goals to highlight aspirational features of its quality assurance practices (see 2014/15 AR, pp.6-7, 2015/16 AR, pp. 6-7). Progress against previously identified goals are reported in subsequent Annual Reports (see 2015/16 AR, pp. 3-4, AR 2016/17).*

**PEQAB's Analytical Reporting Activities**

*PEQAB's Annual Reports, as included in the Self-Study, do also analyze referral data in the form of performance measures and application timelines. Data has been used to identify trends concerning application timelines for new programs, program renewals and amendments. PEQAB has also established target timelines for its reviews based on this data, and has published the results in its subsequent Annual Reports. Additionally, PEQAB has established performance measures based on levels of client satisfaction from its survey process.*

*As noted by the External Review Panel, PEQAB is currently in the process of analyzing more detailed referral data to identify trends in its referral and review processes. This data will be an ongoing reporting feature and is included in its Annual Report 2016/17 at <http://www.peqab.ca/AnnualReport.html>.*

**ESG 3.5 RESOURCES**

Standard:

Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.

The previous review in 2011 questioned the resourcing and commented on the lack of higher education sector experience of the Secretariat. The current review had no reason to suppose that resourcing was inadequate. However, PEQAB might consider staff secondment in appropriate academic institutions to further enhance experience of, and understanding of, the sector.

It is notable that respondents to the current review indicated that PEQAB staff were responsive and acted in a timely manner, suggesting adequate resources.

The intention is to undertake all activities electronically in future and this may impact on the technology requirements and, thus, resources.

**Panel conclusion: fully compliant**

### **ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT**

Standard:

Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.

PEQAB undertakes internal annual self-reflection exercises through regular retreats, which offer the opportunity to engage in reflection, analysis and critique of processes.

PEQAB has undertaken a self-study for this external review in 2017 and for a previous review in 2011.

The panel noted that the self-study was light on self-reflection and critique and rather more focused on compliance. Perhaps a summary report of annual discussions/retreats with recommended actions for improvement would enhance the self-assessment process.

**Panel conclusion: fully compliant**

### **ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES**

Standard:

Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.

PEQAB underwent a review in 2011 (under a different set of criteria to that of the ESG) and again, with this review, in 2017. The reviews have been chaired by international experts and included members from outside the province of Ontario. A detailed report, in both cases, is provided for consideration by the agency.

**Panel conclusion: fully compliant**

## ESG PART 2: EXTERNAL QUALITY ASSURANCE

### ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

Standard:

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

PEQAB undertakes evaluations as specified on page 8 above: PEQAB'S FUNCTIONS, ACTIVITIES, PROCEDURES.

These evaluations explore, *inter alia*, the effectiveness of institutional quality assurance processes, where appropriate, the assurance of programs, as well as the academic standard of the work of degree students (for renewal of consent).

The aim is to ensure continuous improvement.

Commentary on the effectiveness and efficiency of PEQAB's processes is detailed under the various sections below.

**Panel conclusion: fully compliant**

### ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

Standard:

External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.

The quality assurance approach of PEQAB has been designed to meet its purpose and requirements. The methodology includes a self-study, site visit with subject experts and production of a report. These are seen as appropriate to evaluate the degree-awarding applications by institutions.

Subsequent renewal involves directly assessing student work. PEQAB explains that a renewal review reassesses student work to test for appropriate standards: "we ask the assessor to re-evaluate the work of students submitted in the terminal stages (third and fourth year) of the degree program under review". It is unusual for an agency to undertake this direct assessment task but it is a welcome and laudable approach to ensuring standards.

A similar methodology is used to assess the institution's quality procedures and standing when evaluating private institutions (see pp. 13 PEQAB'S FUNCTIONS, ACTIVITIES, PROCEDURES).

The applicants to PEQAB who responded to the 2017 review were unanimous that the PEQAB methodology is appropriate and clear, with detailed specifications and standards made available in published *Handbooks*.

PEQAB is aware that the requirements for approval are considerable, consuming substantial resources of time and energy in making an application. The Self Study (p. 74) states: "PEQAB's current full review processes, in at least in some cases, absorb amounts of time, energy and other resources which are disproportionate to any real risk of sub-standard degrees otherwise being offered in Ontario."

The methodology does require the institution to provide substantial documentation and it might be appropriate if this was streamlined in some way. A review of what exactly is necessary and in what form could be timely. One example suggested, is to provide very short summaries of the teaching faculty qualifications and experience rather than full, often lengthy, *curriculum vitae*.

One solution to the bureaucratic overload is the proposed Audit-Only Process for College Degrees for 'mature' colleges. This seems appropriate and reflects practices elsewhere in the world. It would save a lot of duplication for the colleges that have considerable experience with the PEQAB process.

However, PEQAB may want to consider other reductions in the bureaucratic load for less experienced applicants, especially when the organization is small and seeking approval for one or two programs. Some respondents indicated that small institutions have to divert a large proportion of administrator and faculty time to prepare PEQAB-required documentation.

It might be appropriate to review the standards in the PEQAB process as respondents variously suggested that (a) the number of standards could be reduced (b) the large number of standards reduce the flexibility that reviewers have during site visits (c) that reviewers are not clear about the function of some standards and how they aid in determining the quality of the application to award a degree. Reducing the number of standards, however, may be a problem if they are to remain aligned to the Ontario Qualifications Framework.

PEQAB's focus continues to be on compliance. This issue was also raised in the 2011 report: "PEQAB's current processes consist less of self-study than completing documentation of compliance with criteria and benchmarks. Perhaps the new application for renewal of consent will follow the more traditional patterns of self-study, but institutions still report that the process is unduly bureaucratic in its approach. To date PEQAB's expectations of institutional preparation and assessors' completion of reports smack much more of compliance than judgements based on institutional self-reflection."

The response of PEQAB in 2011 does not address the spirit of this point: *viz.* reflection by the institution rather than cataloguing compliance.

While the current review noted the continuation of a focus on ensuring compliance with standards there is a shift towards facilitating the process on the part of the Secretariat, with a responsive and engaging approach now being the norm. According to evidence from institutions presented to the 2017 review, PEQAB officers are approachable and helpful in moving applications forward through dialogue, aided by having senior policy advisors attend site visits. Assessors also provide useful feedback on compliance to institutions during the site visit.

There may still be room, though, for encouraging more self-critical reflection on the part of institutions rather than focusing on supplying compliance information. This may be particularly germane in the proposed Audit-only approach for 'mature' colleges.

The 2011 Panel Report cited "concern from institutions that existing standards are over-weighted toward the academic culture of research universities, particularly in defining requirements for faculty credentials". PEQAB's requirement that "at least 50% of the students' experience in the professional or main field of study is in courses taught by a faculty member holding the terminal academic credential in the field or in a closely related field/discipline" still causes undue hardship for colleges and private institutions and seems to exceed the standards in place for universities

delivering degree programs. In some areas, such as aboriginal languages, identifying an appropriate terminal qualification is more problematic.

This situation remains, to some extent, despite what appears to be more flexibility by PEQAB in areas where terminal qualifications do not meet the usual academic practice of a PhD. PEQAB's response in the self-study report, that it has published a footnote that "clarifies how this percentage can be calculated" provided more clarity regarding this requirement. However, this does not seem to fully address the underlying concern raised by colleges and private institutions. Perhaps something could be done, by the Board, about the wording of the appropriate standard to reduce ambiguity over this academic staffing requirement.

The qualification requirement seems to some extent to undervalue the importance of the practical field/industry/professional experience of faculty and to some extent does not seem to be well aligned with the spirit of ESG 1.5, which suggests that the teaching role of higher education faculty is changing with more focus on student-centred learning. However, it is acknowledged by the sector that faculty qualifications are a significant element in the determination of the standard of degrees.

The 2011 Review Report called for more institutional involvement. PEQAB is to be applauded for its active and increased consultation with stakeholders including the College Degree Operating Group (CDOG) and the Private and Out-Of-Province Degree Operating Group (POPDOG). CDOG is an operating group rather than a senior decision-making body within the Ontario College System and its members are Directors/Deans of Program Quality Assurance rather than Academic Vice Presidents (VPAs) or Deans responsible for the development and delivery of programs. It is helpful that a College VPA serves as the liaison between CDOG and the Coordinating Committee of Vice Presidents Academic (CCVPA). It is also important that the PEQAB Secretariat continue its practice of providing regular updates to the CCVPA, and directly engage in dialogue with this group that represents the senior academic officers of the Ontario College System.

The input from stakeholders has been noted and included in some modification of processes and more flexible approach. Respondents to the 2017 review mentioned the willingness of PEQAB staff to improve; that they are collegial, listen to and communicate well with the sector. There seems, though, to be little input from students into any process of continuous improvement.

**Panel conclusion: fully compliant**

**ESG 2.3 IMPLEMENTING PROCESSES**

Standard: External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include: <ul style="list-style-type: none"><li>- a self-assessment or equivalent</li><li>- an external assessment normally including a site visit</li><li>- a report resulting from the external assessment</li><li>- a consistent follow-up</li></ul>
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Based upon the feedback the panel received, it is clear that PEQAB's processes are predefined, in detail, reliable and useful for institutions. Requirements are published in *Handbooks*. Respondents to the 2017 panel review, as noted above, praised the clarity of the process and the professionalism of PEQAB staff and appointed reviewers.

The approach includes self-assessment, a site visit by appropriate experts and a report from the expert panel. It was remarked that the reviews were good and that they help to provide indications of strengths and weaknesses.

Where conditions apply to consent, there is formal follow-up to ensure compliance with the conditions. There is no need for formal follow-up for programs given consent without conditions. All programs given consent are formally reviewed after a specified period (five to seven years).

There is informal follow-up through ongoing dialogue between senior policy advisors and institutions. It also helps having a senior policy advisor attending the site visit.

The respondents to the 2017 review were unanimous in applauding the responsiveness of the PEQAB officers.

There are, however, some problems with the process that are outside the control of PEQAB. There were repeated concerns about delays in the consent process, both before the application is referred to PEQAB from the Ministry and also after PEQAB has undertaken its review and the report has been sent to the Minister from the PEQAB Board. However, the service user regards the process as a whole and so delays are of concern irrespective of who is responsible for them.

In the latter case, respondents are simply told a recommendation has been made to the Minister. The institution will have seen and commented on the expert panel report but, at this point, do not know (a) whether any corrections of fact have been made to the report (b) what the recommendation of the PEQAB Board is to the Minister (bearing in mind the Board may not accept the recommendation of the expert panel) (c) what conditions have been attached to the recommendation from the Board to the Minister. After an indeterminate period of time, the institution receives a decision letter from the Minister, against which there is no appeal. This process, from the point at which the institution comments on the expert panel report until it receives a decision from the Minister is commonly referred to as the 'black hole' in the process. This black hole can sometimes be of considerable duration, which has financial implications and impacts on the ability of the institution to recruit staff and respond in a timely fashion to labour market needs. It seems the disgruntlement with this black hole is perhaps more vehement than PEQAB or the Ministry is aware.

PEQAB assessors commented on a similar 'black hole' with respect to their recommendations for program applications and renewals. Following their site visits and completion of their report, they are unaware of the results of their work. There was some frustration surrounding this process, suggesting that a debrief following their assessment would be beneficial to judge the quality of their work and its outcomes.

The 2017 review panel was also told of concerns about the 'front-end' delays in the process from application to referral to PEQAB. Some of these delays involve a lack of expedition of the process in the Ministry, some as the result of incomplete documentation provided by the applicants and some as a result of the time of year the application is made, given that the site visit needs to take place while students are on site.

The 2011 review report had also pointed to the lack of information and transparency about time scales and the reasons for delays in the approval of applications for consent and consent renewal. PEQAB subsequently reported that implemented changes (including shorter timelines for the preparation of Expert Panel reports and institutional responses) have shortened review timelines such that it can deliver quality assurance from Ministry referral to recommendation to the Minister in seven months. However, the Applications for Consent on PEQAB's web site, suggest that there are still significant time delays in the consent and consent renewal process, a point reinforced time and again by respondents to the 2017 review. Time delay issues serve to further exacerbate the concern about "the time and energy that goes into an application".

So, it seems that very little has changed on the issue of delays and lack of communication of the final decision on an application.

**Panel conclusion: fully compliant**

**ESG 2.4 PEER-REVIEW EXPERTS**

Standard:

External quality assurance should be carried out by groups of external experts that include (a) student member(s).

External quality assurance is carried out by external expert panels that have subject-matter expertise as required for each program review (see Page 17 SUBJECT MATTER REVIEWS)

Site visits were well planned and external reviewers were well prepared.

To date, PEQAB external expert panels do not include student members. There is discussion about the incorporation of student members and PEQAB is undertaking research work with Seneca College to see how students can be engaged. (The Scottish model might be one to examine).

Thus, PEQAB does not comply with the ESG as it stands. However, irrespective of compliance, this standard raises issues of engagement.

Page 2 of EQAR notes that stakeholders are to cover all actors within an institution, including staff and students. The only direct interaction with students appears to be during site visits. The self-study report (p. 77) states: "it has been recognized that current PEQAB standards and procedures do not go far in promoting student engagement in quality assurance activities".

On another issue, it is important that peer-review experts are fully aware of the honours degree standards of college-awarded degrees. PEQAB has a filtering process for the selection of experts that attempts to identify whether potential experts fully comprehend the status and standard of college degrees. There is also some induction for new assessors.

**Panel conclusion: partially compliant**

External experts are on panels but to date these do not include students.

**PEQAB Response:**

*We agree that we are only partially compliant here, and recognising the value of student participation in quality assurance, PEQAB has undertaken empirical research on how best to incorporate students into all facets of internal institutional quality assurance practices as well as*

*PEQAB's external quality assurance practices. The research, done in partnership with Seneca College, surveyed Canadian colleges and universities in February 2017 and has provided significant information on the current activities engaging students in institutional QA activities. The international literature and best practice review has also revealed promising ways to integrate students into PEQAB's processes. Changes currently under consideration include involving of students on PEQAB's external review panels, involving students on the Program Evaluation Committees, and requiring demonstration of student involvement in on-going program level quality enhancement, such as curriculum design activities.*

#### **ESG 2.5 CRITERIA FOR OUTCOMES**

Standard:

Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.

The outcomes of the PEQAB process are based on explicit and published criteria. These criteria are acknowledged by applicants as being very clear and explicit (although, as noted above, ESG2.2, the number of standards could be reduced).

Furthermore, the criteria are applied consistently and the process is described as highly professional and scrupulous.

The process leads to a report to the PEQAB Board and recommendation from the Board to the Minister.

**Panel conclusion: fully compliant**

#### **ESG 2.6 REPORTING**

Standard:

Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.

At present, PEQAB does not publish expert panel reports. They are confidential reports from the expert panel to the PEQAB Board.

Technically, one could argue that PEQAB does not take any formal decisions (only advises) and, therefore, that the issue of publication of expert panel reports should be an issue for the Ministry. However, that would then raise issues of agency independence.

The concern, in this setting in Ontario, is that publication may present some institutions in a poor light, which would reflect badly on them and possibly impact on recruitment. In tandem with this is the concern that, if the expert panel reports are public documents, there may be some reticence on the part of the panel to be frank and critical, to the detriment of the process.

On the other hand, some respondents to the 2017 review panel favoured openness and transparency. The expert panel report is a key element of the recommendation made by PEQAB to the Minister and should be part of an open transparent process.

In addition, publication of the report would provide useful information for prospective applicants.

As it stands, the report is not completely confidential as:

- external expert panel reports may be publicly requested under the Government of Ontario's *Freedom of Information and Privacy Protection Act*, (FIPPA);
- external expert panel reports are returned to the applicant institution for response, prior to Board consideration, and PEQAB's expectation is that these will be shared within the institution as widely as possible, which potentially compromises confidentiality;
- PEQAB intends to encourage institutions to place the external expert panel reports on their own websites.

Should changes in publication policy occur, this might require additional training for assessors.

**Panel conclusion: non-compliant**

**PEQAB Response:**

*We believe we are at least partially compliant, as the Panel acknowledges, full external expert panel reports may be publicly requested under the Government of Ontario's Freedom of Information and Privacy Protection Act, (FIPPA).*

## **ESG 2.7 COMPLAINTS AND APPEALS**

Standard:

Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.

The EQAR further states that it should be possible to appeal any decision.

PEQAB has no formal appeal process. The decision of the Minister is final and no appeal is permitted.

As far as process goes (irrespective of compliance to the ESG) the following issues arise.

- PEQAB is an advisory agency and therefore, in principle, appeals would be to the Ministry (again the issue of independence).
- If the Minister disagrees with the recommendation from PEQAB might this be appealed (other precedents exist within Canada).
- A lack of appeals process, despite PEQAB being an advisory agency, appears to be counter to natural justice.

An appeals process would need to be in two parts in the PEQAB setting.

First, an appeal to PEQAB if the expert panel rejects an application. This would require prior communication of the expert panel decision to the applicant, following the Board meeting, which does not happen currently.

Second, if the PEQAB expert panel accepts the application and the Minister declines it, then the appeal would need to be to the Minister.

The Secretariat is preparing a framework for an appeals process, should the decision be made to adopt one, which would include the two parts suggested above, plus the possibility of appealing against conditions applied to consent.

It also appears that the complaints procedure is *ad hoc* and informal, which seems to work but the nature of it appears not to be clearly specified.

#### **Panel conclusion: non-compliant**

#### **PEQAB Response:**

*We agree we are currently non-compliant, and this is an area related to the Board's value of "transparency"--one in which it is very interested in moving forward. As preparation for an Appeals process, the Board has explored with the Ministry the possibility of changing current reporting so that the detailed "Background Report," which now goes to the Minister as an accompaniment and elaboration of the Board's recommendation, would be made available to the applicant institution at the same time. This report incorporates the external expert panel's conclusions and comments as well as the institutions responses. Concurrently the Board would rename the Background Report as a "PEQAB Final Report." We anticipate having this revised process in place as of September 15, 2017.*

*Applicant institutions, receiving this Report immediately after the PEQAB Board meeting and prior to any Ministry action, would also allow for the establishment of an Appeals Process for PEQAB Recommendations.*

*PEQAB will now also consult with the Ministry on the scope and implementation of an appeals process consistent with the terms of its founding legislation, The Post-secondary Excellence and Choice Act (2000). As the Minister's decision is legislatively identified there as final, the basis of institutional appeals would be restricted to the Board's recommendation. If agreement is reached to make the "PEQAB Final Report" available to the applicant institution immediately after the Board meeting, and prior to any Ministry action on the report, it would be possible for an applicant institution to appeal PEQAB's recommendation for denial of consent and/or conditions of consent. In such a circumstance, the appeals process could comprise the Board and the applicant institution agreeing on an additional independent expert external reviewer to adjudicate. If the adjudicator found for the applicant, the Board would reconsider and may revise its recommendation to the Minister. This process, once established, will be fully documented and communicated to the sector through the appropriate Submission Guidelines on the PEQAB website.*

#### **ADDITIONAL OBSERVATIONS**

##### **WITHDRAWAL**

The withdrawal process for applicants appears to be rather *ad hoc*. Because the decision is the Ministry's, PEQAB can't share a decision yet it seems "the Universities Unit now provides applicants with the opportunity to withdraw their submission, if facing a negative recommendation". Much of this seems to be based on informal communication from PEQAB, or perhaps even assessors. It appears also to be linked to the institution receiving a critical/negative expert panel report. To an

outsider, it seems, the withdrawal process needs some formalisation, although those within the system seem to understand it.

#### ROLE OF STANDING COMMITTEES

PEQAB has standing committees comprising seasoned assessors with whom the Secretariat works frequently. Terms of Reference have been provided for two Standing Committees: Organizational Review and Breadth/Liberal Arts. However, very little additional information is provided about the activity level and engagement of these committees.

#### STANDARDIZED TESTING

The Self-Study report (P. 76) notes that PEQAB has been interested in incorporating large-scale “Standardized tests of critical thinking, problem-solving and communications skills of students graduating from the program”, especially for the proposed “Institutional Quality Audit-Only Process”.

This raises issues about assessment and diverting effort and resources away from institutions’ current procedures. The comments from respondents to the review suggested that the standardized testing would not be welcome. Colleges already use an array of assessments at various points in the student learning experience. By proposing standardized testing, PEQAB could be seen as intervening in program delivery. There is also the likelihood that the introduction of such external tests would lead to ‘teaching to the test’, which diverts time and attention away from the degree subject. It seems that PEQAB has had some initial consultation on this issue with the sector, particularly the mature colleges, and is aware of the reservations.

#### FUNDING LINK TO QUALITY

The idea arose, in discussions with the review panel, that funding might be linked to quality through an additional element in the funding formula. While not a direct element of the PEQAB review, this is indirectly linked to PEQAB and would focus a spotlight on PEQAB processes. The measurement of quality in such a context is a perilous process and experience elsewhere has suggested that performance indicators backfire. Measuring quality, through devices such as teaching quality assessment or research quality assessment are expensive and time-consuming devices. Measuring academic outcomes is a measurement of standards rather than quality. Measuring dropouts can be misleading and not necessarily an indication of quality and similarly using employment of graduates as a measure has a range of problems. Most effective approaches tend to be single issue funding initiatives, such as rewarding specific targeted developments: the work experience and employability plans in Wales, for example, or the annual enhancement theme in Scotland, both effectively focused attention on specific issues.

## CONCLUSION

### OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

#### Panel conclusions

ESG 3.1 Activities, policy, and processes for quality assurance: substantially compliant. Although some stakeholders are included in governance, there is a lack of student or current academic staff representatives on its Board.

ESG 3.2 Official status: fully compliant.

ESG 3.3 Independence: non-compliant. The agency is not fully independent of the Ministry.

ESG 3.4 Thematic analysis: non-compliant. Although non-compliant to date, the intention is to produce the first analysis in 2017.

ESG 3.5 Resources: fully compliant.

ESG 3.6 Internal quality assurance and professional conduct: fully compliant.

ESG 3.7 Cyclical external review of agency: fully compliant.

ESG 2.1 Consideration of internal quality assurance: fully compliant.

ESG 2.2 Designing methodologies fit for purpose: fully compliant.

ESG 2.3 Implementing processes: fully compliant.

ESG 2.4 Peer-review experts: partially compliant. External experts are on panels but, to date, these do not include students.

ESG 2.5 Criteria for outcomes: fully compliant.

ESG 2.6 Reporting: non-compliant. Reports of expert review panels are not published.

ESG 2.7 Complaints and appeals: non-compliant. There is no appeal against the decision of the Minister.

In light of the documentary and oral evidence considered by it, the review panel considers that, in the performance of its functions, PEQAB does not comply with all the standards in parts 2 and 3 of the ESG. The Agency is recommended to take appropriate action where possible to achieve at least substantial compliance in all standards although the panel is aware that in some respects action will be need to be taken by the Ministry, which may not be possible and would involve legislative changes.

#### SUGGESTIONS FOR FURTHER DEVELOPMENT

The PEQAB approach is scrupulous, clear and professional. It is well regarded in the sector and the work of the Secretariat is highly regarded.

The process is somewhat burdensome and it might be appropriate to review the documentation required for an application for degree granting powers.

The PEQAB Board might also review the number of standards to which the institutions have to demonstrate compliance with consideration of possible reduction.

Further clarity might be given to the specification of terminal qualification in different degree subjects.

The delays in the process, which tend to be before and after PEQAB undertakes its work, should be examined and a way found to reduce them.

PEQAB should take forward the research into student representation on expert panels with a view to possibly including students as soon as possible.

The Ministry might want to consider the adoption of an appeals process.

Publication of expert panel reports is required for compliance to the ESG and, although there are issues given the way PEQAB is established, the Board and the Ministry might want to find a way to publish the reports to increase the transparency of the process.

PEQAB advises, and is not independent of, the Ministry. It is difficult to envisage how this could change without a fundamental change in the structure and role of PEQAB, which would require legislative changes.

## ANNEXES

ANNEX 1: PROGRAMME OF THE SITE VISIT

PEQAB Expert Panel Site Visit, Mowat Block, 23<sup>rd</sup> floor, 900 Bay Street, Toronto March 20–21, 2017

<b>Monday, 20 March 2017</b>	<b>Interviews</b>
8:30 – 9:15am	Panel members convene Orientation: security cards; network access etc. Plans for the day
9:15 – 10:45am	Meeting with PEQAB staff: Dr. James Brown Chief Executive, PEQAB Others TBD
10:45 – 11:00am	BREAK
11:00 – 11:45am	Dr. Celia Ross, Interim President Algoma University (Sault Ste. Marie ON)
11:45am – 1:00pm	LUNCH
1:00 – 1:45pm	Ontario Universities Council on Quality Assurance Brian Timney, Executive Director
2:00 – 2:45pm	John G. LaBrie, EdD Founding Principal Northeastern University, Toronto campus (secretary of POPDOG - Private and Out-of-Province Degree Operating Group)
2:45 – 3:45pm	BREAK
3:45 – 4:30pm	Dr. Jean Paul Boudreau [subject matter expert for PEQAB] Professor of Psychology, Ryerson University (in Toronto)

**TUESDAY, MARCH 21: Mowat Block, 23<sup>rd</sup> floor, room 2332C**

<b>Tuesday, 21 March 2017</b>	<b>Interviews</b>
8:30 -- 9:00am	Dr. Sam Scully [organizational reviewer for PEQAB] Former Vice-President Academic, Dalhousie University
9:00 – 9:45am	Ms. Phyllis Clark [organizational reviewer for PEQAB] Former Vice-President (Finance & Administration) and Chief Financial Officer, University of Alberta  Dr. Karen Grant [organizational reviewer for PEQAB] Department of Sociology University of Manitoba, and former Vice President Academic, Mount Allison University

<b>Tuesday, 21 March 2017</b>	<b>Interviews</b>
9:45– 10:30am	Dr. David Wickes, President, Canadian Memorial Chiropractic College (Toronto ON) (chair of POPDOG - Private and Out-of-Province Degree Operating Group)
10:30 – 10:45am	BREAK
10:45 – 11:45am	Ontario colleges Spencer Dickson, Vice President Corporate Performance & Employee Relations, Lambton College Gail Thornton, Program Development Consultant, Humber College Monica Reilly, Senior Research & Policy Advisor, Colleges Ontario
11:45am – 12:15pm	Ontario colleges Waseem Habash, Vice President, Academic, St. Clair College Dr. Melanie Spence-Ariemma, Vice Provost, Sheridan College (liaison to college vice presidents academic for the College Degree Operating Group – CDOG) Dr. Tracy Gedies, Director, Centre for Academic Excellence, Fanshawe College (co-chair of CDOG) Lynn Casimiro, Vice-présidente, Enseignement et réussite scolaire, La Cité
12:15 – 1:15pm	LUNCH
1:15— 2:00pm	Dr. Rick Davey, President, RCC Institute of Technology (Toronto ON), and President, Yorkville University
2:00—2:45pm	Maureen J. Morton Chair, PEQAB
2:45 – 3:30pm	Board members, PEQAB Maureen J. Morton Richard Barham Catherine Chandler-Crichlow Dianne Kieren Patricia Lang Alexandre Laurin Robert (Squee) Gordon
3:30 – 3:45 pm	BREAK -- move to room 2341B
3:45 – 4:30pm	Glenn Craney Assistant Deputy Minister, Strategic Policy and Programs Division, MAESD
4:30—5:45pm	Wrap-up discussion: Key findings for the panel’s report

## ANNEX 2: GLOSSARY

CAAT Colleges of Applied Arts and Technology  
CCVPA Coordinating Committee of Vice Presidents Academic  
CDOG College Degree Operating Group  
DGA Degree Granting Act  
ENQA European Association for Quality Assurance in Higher Education  
EQAR European Quality Assurance Register  
ESG *Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015*  
IQAP Institutional Quality Assurance Process  
ITAL Institutes of Technology and Advanced Learning  
MAESD Ministry of Advanced Education and Skills Development  
MBC Management Board of Cabinet  
MoU Memorandum of Understanding  
PEQAB Postsecondary Education Quality Assessment Board  
POPDOG Private and Out-Of-Province Degree Operating Group  
PSECE Act *Post-secondary Education Choice and Excellence Act, 2000*

### ANNEX 3. DOCUMENTS TO SUPPORT THE REVIEW

Documents provided by PEQAB:

*Report of an Evaluation of the Postsecondary Education Quality Assessment Board in Ontario, Canada, January 2011.*

*External Review of the Postsecondary Education Quality Assessment Board  
2016-17 Self-Study*

PEQAB Handbooks, Submission Guidelines and Panel Guidelines available at the PEQAB website,  
<http://PEQAB.ca/Handbooks.html>.