

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

**January 2011**

**Expert Panel**

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## **I. NATURE AND PURPOSE OF THIS REPORT**

### **I.1 Contexts for the External Evaluation**

In 2000 the Legislature of the Province of Ontario passed the *Postsecondary Education Choice and Excellence Act* (PSECE) that sets the parameters for how institutions of higher education located in and/or providing educational services to citizens of the province obtain degree-granting authority. That authority, ministerial consent, would be provided by the Minister of Training, Colleges and Universities (MTCU) either by an act of the Legislature or through an evaluation and decision-making process that culminates in a decision by the Minister to grant consent. The 2000 legislation established within the latter process the Postsecondary Education Quality Assessment Board, known by its acronym PEQAB, to be an “arms length” agency to review the applications for consent from all institutions not holding legislative mandate to award degrees or use the term “university.”

In 2009 the Board of PEQAB and its Secretariat engaged in a comprehensive self-study process to evaluate its work and through that work its contribution to quality of higher education in the province. That self-study included review of historical data, surveys of many categories of stakeholders, and contracted third party qualitative interviews of a selected group of participants and stakeholders. From this process emerged a set of recommendations accepted by the Board and almost all of which the Board and Secretariat of PEQAB endeavored to address in 2010.

PEQAB chose to conclude this major self-evaluation by holding itself open for evaluation by an external Expert Panel. The members of the three person Panel come from the United States, British Columbia, and Ontario and therefore brought to the task many years of experience in higher education quality assurance outside the province and Canada as well as extensive knowledge and

experience of higher education quality assurance in the province. Although the Expert Panel's contract is with MTCU, the PEQAB Board set its "Terms of Reference". The Expert Panel agreed to evaluate how effectively PEQAB is fulfilling its legislative mandate and to measure PEQAB against the 2007 *Guidelines for Good Practice in Quality Assurance* (hereafter referred to as *Guidelines*) promulgated by INQAAHE, the International Network of Quality Assurance in Higher Education.

To support the objectivity of the Panel's review, PEQAB called on the Quality Assurance Network in Canada to orient the Panel and to be the recipient of the report it wrote. Moreover, PEQAB contracted with a knowledgeable third party to coordinate the scheduling and conduct of the Panel's evaluation visit.

## **I.2. Conduct of the Evaluation**

The Expert Panel visited PEQAB on January 12-14, 2011, at its offices in Toronto. Weeks prior to the visit, the Panel received the 2009 "PEQAB Self-Study Report" and the follow-up "Report on Recommendations of the PEQAB Self-Study" dated November 2010. After studying those documents, the Panel approved a proposed schedule for the on-site visit as well as the list of people to be interviewed during that visit. The Panel also made use of the rich set of documents available on PEQAB's web site, and on the eve of the visit each member was provided with electronic copies of the types of resources typically placed in a resource room to support the evaluation.

During the visit, the Panel met with the Secretariat, the Board, a diverse group of Assessors, Assistant Deputy Ministers in MTCU, a diverse but representative group of institutional spokespersons (some in larger groups but several in individual meetings with the Panel), and with representatives of the Ontario Universities Council on Quality Assurance recently established by the Council of Ontario Universities (COU), the organization of the province's public universities. The greatest majority of the interviews were face-to-face, but a few relied on teleconferencing. The Panel

had excellent support and ready access to the assistance it required. It was pleased with the range of people with whom it spoke. A list of those interviewed is appended to this report (Appendix A).

### **I. 3. Purpose of the Report**

With this report the Expert Panel fulfills its responsibilities to MTCU, PEQAB, and the Quality Assurance Network. While it realizes that no single report can adequately address the complex issues, practices, and events that have shaped and continue to shape PEQAB and its work, it believes that its evaluation is reasonably complete, objective, fair, and informed. Beyond meeting the mandate for this work, the Panel hopes that its evaluation proves to be useful to the Minister and PEQAB and, ultimately, to all stakeholders in higher education quality assurance in Ontario.

## **II. Comments On The Self-Study Process**

With a small Secretariat and an on-going full business agenda, PEQAB made a bold and laudable decision to engage the young agency in a major self-evaluation. The Panel could only imagine the investment of extra time and energy needed to do the self-study and to identify the important findings emerging from it. By the end of 2009 the effort resulted in a thoughtful agenda for ongoing self-evaluation and improvement. In 2010 the continuing extra investments of time and energy went into making changes and identifying systematic self-evaluation processes to assure that internal quality assurance becomes an operational component of the agency. All of this work over two years provided sound preparation for the external review conducted by the Panel. The Panel wishes to note the following:

1. As a piece of history, the self-study report may err in ascribing to PEQAB too much credit for establishing a culture of quality assurance in Ontario. However, it is undeniable that PEQAB took the quality assurance practices already in existence and moved higher education quality

assurance to a different level and prominence in Ontario and Canada through its work on degree standards and the qualifications framework.

2. Surveys in the future need to have much better completion rates before the findings from them should be used to lay claim to accomplishments or to justify significant changes in policies and practices. However, the panel was assured that PEQAB is aware of this issue and is addressing it.

3. PEQAB advocates for transparency in process, but few of the agency's stakeholders have had access to the 2009 Self-Study and the subsequent report on its recommendations. Although PEQAB summarized in public documents the key points from the self-study, the panel recommends that those reports together with this report be made available on the PEQAB web site.

4. It would have been more useful to this particular Panel had the report been organized around the INQAAHE *Guidelines* or, at least, that an appendix was prepared to provide an explicit discussion of how the agency perceived its fulfillment of each guideline.

All that said, however, the Panel has nothing but praise for the endeavor and its outcome. Through this two-year process, PEQAB modeled for its institutions and for other agencies the utility of a comprehensive quality assurance process.

### **III. Fulfilling the Legislative Mandate**

PSECE identifies the following responsibilities for PEQAB:

- Review institutional applications for ministerial consent to offer a degree program, (including honorary *degrees*) or to use the term “university,” and to provide recommendations to the Minister on the academic rigor and organizational soundness of the applicant;
- Make recommendations to the Minister on other matters referred to it by the Minister;
- Perform such other duties as may be prescribed.

It is important to note that members of the Panel were familiar with the history of PEQAB and recognized that the decision of the Province to permit degrees to be granted by the Colleges of Applied Arts and Technology (CAATS) was a radical departure from the past. Therefore they were sensitive to the cultural gap between colleges and universities that PEQAB faced and has tried to overcome as it filled its mandate.

### **III.1. Review and Recommend**

To meet this component of the legislative mandate, the Board and Secretariat of PEQAB had to accomplish the following three objectives:

**(1) Create and implement processes that would give the Board credible and reliable evidence on which to base its review and recommendations.** Following good practices in higher education quality assurance, PEQAB developed processes that relied on peer review provided by competent and qualified assessors drawn largely from colleges and universities within and outside of Ontario. Although there are several ways in which PEQAB can strengthen its processes to better ensure their clarity and consistency, the Panel learned that in a short period of time PEQAB has gained credibility in Ontario with its key stakeholders. Institutions in particular commented favorably on the agency's responsiveness and fairness.

**(2) Create, promulgate, and implement degree standards that met the expectations that all degrees in Ontario would be of high quality and recognized rigor.** PEQAB drew on the expertise of many in developing its degree standards and then moved beyond that to gain a broad agreement on a qualifications framework for the province. The Panel was impressed with the growing consensus it heard that Ontario makes available to students and employers a range of degree offerings appropriate to their needs but without sacrificing the academic rigor, discipline mastery, and breadth of learning that distinguishes academic degrees from other types of certifications. Requests for consent of the use of "university" have been few, but PEQAB created and implemented acceptable rules to inform its recommendations.

**(3) Gain in short order the confidence of the Minister and the acceptance by Ontario's public colleges and universities already operating under a legislative mandate for consent.**

During the past eight years, the Minister has overwhelmingly agreed with the hundreds of recommendations made by PEQAB, the vast majority of which revolved around requests for consent for new degree programs, mainly at the bachelor's level but from time to time at the graduate level. PEQAB has always publicly posted the requests it was reviewing, integrating into its processes the comments received. It appears that the volume of comments has diminished markedly over the years, which PEQAB interprets as evidence of growing confidence in its activities. The Panel concurs. Clearly there are some long-standing issues in Ontario regarding the transfer of credit and admission to graduate education, to wit the recent announcement that the province is investing significant funds to establish improved transfer paths for students. However, from the conversations the Panel had with institutional representatives, the expansion of providers of bachelor degrees seemed less controversial than has been expected by the Panel members from their pre-reading. This is not to say that the quality assurance provided by PEQAB allays all reservations about comparability of all degrees in Ontario, since that is clearly the not case. It would seem that among those most familiar with the quality assurance process there is some comfort that appropriate standards are being maintained. However, there is a long way to go before such credentialing is fully accepted by all in the traditional public university sector. Perhaps more time and experience with the performance of graduates from such programs will help position them in the array of higher education offerings, but the impact of significant differences in the defining academic cultures of CAATs and Ontario universities will not be as easily or quickly mediated as public policy makers and students might

### **III.2. Advise Minister**

PEQAB has effectively fulfilled this component of the legislative mandate. Although the Minister has very infrequently referred other matters to it, in the few instances when it received ministerial requests for comments (e.g., advising the Minister on what kinds of institutional or program changes should trigger, as required in PSECE, a resubmission of a request for consent), PEQAB did so promptly and its advice is visible in the MTCU regulations. The Panel will comment later on whether the Minister might want to make better use of the expertise growing in PEQAB. It would seem that from its experience PEQAB might be a source of learning that could be useful in shaping broader higher education public policy agendas in Ontario.

### **III.3. Other duties**

In a paradoxical way, PEQAB has emerged on the national and international scene without having the activities that got it there identified by the Ministry as “other duties.” From the Panel’s perspective, thanks to the insightful and visionary leadership of specific individuals in the Secretariat and the PEQAB Board, the agency has come to represent the strength of higher education quality assurance in Ontario. PEQAB may at points overstate its leadership role in Ontario and Canada, but it has without a doubt played a highly visible role in discussions about and developments in Canadian and Ontario higher education quality assurance over the past decade.

### **III. 4. Panel Conclusion**

**PEQAB has effectively fulfilled its legislative mandate.**

### **IV. Fulfilling the INQAAHE *Guidelines of Good Practice in Quality Assurance*.**

In creating and promulgating these *Guidelines*, INQAAHE states that their purpose is to “promote good practice for internal and/or external quality assurance.” (p. 4). INQAAHE has established an “adherence review” process through which an agency can call on INQAAHE to conduct an external review; it has also provided guidance for external reviewers if the agency intends



to use the reviewer's report to seek explicit INQAAHE recognition of the process. At the point of the visit, PEQAB simply identified the INQAAHE *Guidelines* as the best tool through which a comprehensive and "international" view of the agency could be gained. Therefore it asked the Expert Panel to use the *Guidelines* as the organizational framework for its evaluation, understanding that in so doing, the Panel would position PEQAB in the emerging global standards of quality assurance. In this report, the Panel addresses each guideline, but it does not use the INQAAHE rubrics of judgment nor does it establish any follow-up agenda for PEQAB or INQAAHE.

The Panel also wishes to acknowledge that the INQAAHE *Guidelines*, although ostensibly flexible enough to be relevant to most higher education quality assurance agencies, are probably more easily applied to institutional than programmatic agencies and are better fitted for an agency that takes ultimate actions rather than making recommendations. Nonetheless, as PEQAB assumed, the *Guidelines* provided a useful lens through which it could be viewed and understood. They are appended to this report should any reader wish to know the full text for each guideline (Appendix B)

#### **IV.1: Governance**

PSECE provides a clear outline of the structures that define governance authority for PEQAB. Essentially, PEQAB is a creation of the Legislature with the members of its Board appointed by the Minister for specific terms. The Board interacts with the MTCU primarily through the Terms of Reference negotiated on behalf of the Board and the Minister by the Chair of the Board (who is appointed by the Lieutenant Governor in Council) and the Deputy Minister. The Chair is accountable to the Minister, but the Deputy Minister is responsible for general oversight of PEQAB. The Board is empowered to carry out the Terms of Reference as it fulfills its legislative mandate. The key documents defining PEQAB, therefore, are PSECE and the Terms of Reference. They are clear, explicit, and well understood in setting out PEQAB's mission and responsibilities.

The Board meets monthly, and its members receive a small honorarium beyond having all expenses reimbursed. In PEQAB the members of the Board are often referred to as a “volunteers,” and in light of the weight and frequency of the work required of them, that is not far from true. Board membership draws on a variety of constituents, and Board leadership has been consistent since PEQAB was founded, even through different Ministers. The Board deserves credit for focusing on its work even through a recent period of unexpected diminished staff support. The Panel found members of the Board to be informed, engaged, and committed to their tasks.

PEQAB is supported by a Secretariat, at this point a staff of five all of whom are civil servants serving under the Ontario Public Service Act. While the Secretariat is accountable for the support it provides the Board, the Board does not manage it. Instead, it is led by a “Senior Manager and Chief Executive” of PEQAB (hereafter referred to as “Manager/CE”) who is appointed under the *Public Service Act* with input from the Chair of the Board. The Manager/CE as well as the staff accountable to her do not work solely for PEQAB (they are ministry employees), although they are the staff solely responsible for the effectiveness of PEQAB’s operations.

As part of its self-study process, the PEQAB Board made significant additions to its defining documents by adopting a vision statement and a set of guiding principles. The Panel suggests that the vision statement might be improved were it not to link “inspiring excellence” solely through exercising “leadership.” That is, in Ontario the future of effective higher education quality assurance might demand as much effective partnering and collaboration as it does leading. But in drawing up its own hallmarks of excellence, the Board has defined a culture of respectful regulation that bodes well for its contributions to the MTCU and to higher education in Ontario.

The panel understands that a legislative goal of PSECE was to create an agency at “arms length” from the political aspects of consent. As various points in the governance of the agency, that distance could be abridged either by the people who sit in MTCU or the people who sit on the Board. But it appears that the intent has been honored in practice, and few of PEQAB’s constituents

interviewed by the Panel expressed reservations about PEQAB's political independence. However, It may well become important that constituents have a clearer sense of who is responsible for what and when in the multi-stage consent approval process. Specifically, it would be particularly useful for PEQAB to inform the institution, if not the public at large, when PEQAB has completed its portion of the process and the recommendation it is making.

#### **IV.2. Resources**

Although it is “arms length” in its work, PEQAB is truly a creature of MTCU. Its resources are so closely bound with the Ministry that it is difficult if not impossible to untangle them. Although the Board of PEQAB has a budget to cover its costs and the fees for PEQAB evaluation processes offset the costs incurred in providing them, the investment in basic resources for the agency is difficult to determine. Some data provided to the Panel after the visit suggest that a full operating budget, including costs of processes probably runs between \$800,000 to \$1 million annually. MTCU collects \$5,000 with each application, but that revenue is not designated for PEQAB. Like all such fees, it goes into General Revenues so as to exclude linkage. The Secretariat staff is on the Ministry payroll. The Secretariat receives some funds that the Manager/CE can allocate for some projects (web management, publications, presentations in Ontario, etc.), but all out-of-province travel is under MTCU control. MTCU also controls the space allocated to PEQAB and, quite honestly, PEQAB is almost invisible to someone who might walk the 23<sup>rd</sup> floor of the Mowat Block where it is currently housed. It does not have full control over any sizable meeting space although all of its Board meetings and the conferences with institutions for the Organization Review Panel process are held in very adequate conference space on the 23<sup>rd</sup> floor. PEQAB does not appear to have much say in some basic resource decisions, especially those related to officing. Moreover, protection of privacy of its documents as well as deliberations is very inadequate for an agency intended to be arms-length.

Nonetheless, PEQAB's Board and Secretariat seem to make the best of the resources available to them and have achieved an institutional presence much beyond their physical presence. In the digital age, it is not clear that an efficient agency necessarily requires the same space that would have been needed barely a decade ago. But at some point, and it is probably close at hand, the credibility of an agency among stakeholders hinges in part on an identifiable and professional setting for the agency.

The Panel's concerns about physical space are less than its concern about the ability of the Secretariat to support PEQAB over time. The first issue is the nature of the leadership of the Secretariat. This agency provides a very critical interface between the interests of higher education public policy makers and the long-standing cultures of colleges and universities. To date the Ministry has been wise in choosing leaders for the Secretariat who understand and bridge these two related but very different worlds. And PEQAB's success to date is in large part because those leaders have provided sensitive, visionary leadership. But in titling and pay, the Ministry is possibly and quite inadvertently making that leadership position unattractive to the very people it will need to attract in the future. Moreover, the rest of the current staff, while marked by remarkable energy, commitment, and productivity lacks any significant experience in higher education. Either a different strategy of hiring or more generous support for professional development will be necessary to ensure the sustainability and long-term effectiveness of the Secretariat. In any long-term plan perhaps both will be required.

The Panel heard relatively few complaints about the fees charged by MTCU and PEQAB, except in a few notable situations where ultimate decisions seem to be particularly slow in coming. The Panel finds the honoraria paid Assessors is at this point adequate to assure that people of expected experience and competence agree to participate. PEQAB will want to monitor this in the future. It will also want to make sure that its financial remuneration of the Board assures that

PEQAB responsibilities figure highly in the priority of energy and commitment each very busy member of the Board must make.

### **IV.3. Quality Assurance**

With its major self-study process, PEQAB made a very strong start toward systematizing its internal quality assurance processes and mechanisms. From the self-study emerged a finding that the agency needed to “develop a comprehensive strategy for assuring its own continuous quality” that includes cyclical reviews, tracking and responding to internal feedback, routine gathering of evaluations of its processes from participants, conducting a comprehensive survey of stakeholders every five to seven years, and continuing the practice of having reviews from people external to the agency.

Some components of this ambitious continuous quality program have existed within the agency, but they lacked consistency and periodic review. Over the years the agency has listened to several constituencies and tried to be responsive, but it did so in a relatively unstructured way. Some components of this overall program will need to be created and their implementation will require dedicated funding, particularly for development of reliable surveys and third party administration of them. Some staff time, energy, and capacity, particularly in creating useful reports and recommendations for Board consideration, will be important to the program as well. Nonetheless, the plans for continuous quality improvement look appropriate and ambitious. Only the future can tell whether the internal capacity and resources exist to maintain the schedule, cover the costs, and assure the focus needed to learn from and then implement appropriate changes.

The Panel notes that several of the people it interviewed did not know much about the 2009 Self-Study and its recommendations. An effective internal quality assurance program always includes effective strategies to communicate to stakeholders what the agency is learning about its work and how it is translating that learning into policies, procedures, and practices. Therefore the Panel draws attention to the fact that there is a difference between getting input from representative

voices and actually engaging those participants in the agency's continuous quality improvement. People who complete surveys and participate in interviews are more likely to continue to provide useful and thoughtful input when they know how it is understood and used. Perhaps the PEQAB Annual Report, already an excellent document, can be used for these purposes, but as the Panel suggests below, PEQAB should consider ways to be more proactive in its communication strategies.

#### **IV.4. Public Information**

PEQAB implements a sound digital strategy for providing appropriate public information. The PEQAB web site is easy to navigate and it gives access to almost all of the documents basic to understand and/or engage in PEQAB processes. Institutions have easy access to published guidebooks and manuals, as do Assessors. Most institutions reported that they routinely use the web site to learn about changes in policy or procedures. Assessors seem less likely to be frequent users. The Panel did not learn what PEQAB might know about how Ontario students and other constituencies use the site.

The Panel concurs with the decision made by PEQAB and MTCU to keep confidential the reports made by Assessors, whether by an Organizational Review Panel or a Quality Assessment Panel, two of the key groupings of Assessors in PEQAB processes. But the most remarkable aspect of the site is the transparency it provides about PEQAB's role in the ministerial consent process. Not only does PEQAB post the full application papers to inform invited third party comment in the process, but once a process is completed, it provides a public log of the entire process that includes the PEQAB letter of recommendation and the ultimate letter from the Minister granting or denying consent. Although it lacks the kind of search possibilities that someone working on a research project might desire, it is a rich resource to institutions new to the PEQAB process, institutions wishing to compare ministerial response to similar kinds of programs, and to any who simply want to know more about the kinds of quality issues addressed in the process. Moreover, PEQAB informed

the Panel that this is the only public tracking of the process and public listing of the Minister's decisions on consent.

Transparency suffers, however, when the listing of applications raises more questions than it answers. For example, there are currently several applications for which the time for third party comment is long past, and within the application documents one can find evidence that the Minister's decision is past due. The Panel learned that in almost all of those situations, PEQAB has actually done its review and forwarded its recommendation. But the full documentation of a process is only posted at its conclusion. For these lengthy unfinished processes, the web site simply fails to inform anyone very adequately of the state of affairs. For institutions seeking renewal of consent, this delay has many direct and indirect costs; their current and prospective students are unsure about how they should understand the delay.

The agency more than meets the spirit of INQAAHE's expectations for public information. Nonetheless, the Panel suggests that PEQAB may wish to be more proactive in how it interacts with the publics it serves. Although it appears that someone from the agency often participates in programs sponsored by other organizations, PEQAB does not appear to set up its own conferences or training sessions. While understanding that any such activity requires investment of time, money, and energy, the Panel suggests that PEQAB might want to study the cost-benefit ratio of supporting more programming. Moreover, the Panel heard several stories about institutional and student confusion over the meaning of ministerial consent, particularly about the comparability of degrees among institutions in Ontario. PEQAB has relied on institutions to explain this; perhaps it should strengthen its FAQ's on the web site to be more useful to consumers (students, parents, and employers) in understanding the unique issues of comparability.

#### **IV.5. Relationships with Institutions**

PEQAB's mandate is to work with a wide variety of institutions: all out-of province providers, both public and private; public Colleges of Applied Arts and Technology (CAAT); and all

private institutions, both non-profit and for-profit. Although PSECE allows for differentiation between public and private institutions, it still expects PEQAB to provide a review process that is fair and equitable for the institutions. In the 2009 self-study, PEQAB learned that some institutions felt that they experienced a different level of evaluative rigor than others, but the Panel heard few such comments. In fact, the stated reservations about equity in the consent process typically encompassed all of it, not just PEQAB's portion of it.

While all institutional representatives claimed to value the external evaluation required in the PEQAB's process and claimed that the institution and/or its programs benefited from the evaluation, some chafed at having PEQAB serve as an Academic Dean. That is, as institutions gained more and more experience in creating and mounting effective academic programs, they disliked having to respond to PEQAB as though they had not developed any stronger expertise in self-management. This tension undoubtedly will be more pronounced as more and more programs return for renewed consent. It seems likely that PEQAB, MTCU, and, perhaps, the Legislature will need to review the efficacy of policy and existing required processes to assure that they do not calcify into unnecessary bureaucratic approaches for PEQAB's quality review. Most institutions claimed that their independence in self-governance was recognized and honored, but some suggested that without some modifications, the processes appropriate for 2002 would become unduly duplicative and restrictive to institutions of 2012.

This INQAAHE guideline speaks to engagement of institutions in the agency's quality processes. The 2009 Self-Study is remarkably silent on the major contributions of many educators and institutions to the creation of PEQAB and its standards. At least it was reported orally that several committees shared in that seminal work. But when in 2010 PEQAB had the opportunity to engage institutions in the review of its Criteria, it appeared not to do so. Instead it seemed to do a desk check of PEQAB Criteria against the criteria of a few other quality assurance agencies. More institutional involvement is especially important at this time because the basis of the quality



standards for PEQAB, the Panel was told, is the existing understanding of academic standards in Ontario. It can be expected that those change and evolve over time so that a check with institutions would be reassuring to all stakeholders. Effective continuous quality improvement includes periodic comprehensive review of the appropriateness of quality standards (PEQAB's Criteria), and such review and subsequent revision should include input from institutions and programs.

#### **IV. 6. Requirements for Institutional/Program Performance**

PEQAB does not provide an institutional quality assurance program, although for private institutions, its processes for program review require an initial screening for the health, stability, and integrity of the institution itself. This review, conducted through a face-to-face interview process by a PEQAB Organizational Review Panel, must be approved by the Board (both in setting the Panel and acting on the Panel's findings) and must occur before the on-site review for degree consent and/or for subsequent renewal of that consent. To fulfill this institutional process, PEQAB established a set of organizational standards and benchmarks that appear to have been well received by institutions, although in meeting them institutions submit very significant amounts of paper. And resubmission every five years will become unnecessarily burdensome. Private institutions did not argue that the standards and benchmarks are inequitable, but instead, that they seemed to be almost too comprehensive yet did not include some documentation only required by MTCU. In short, private institutions believe that their consent decisions are held up by a post-PEQAB MTCU review of documents also related to institutional integrity and stability. Nonetheless, thanks to the PEQAB contribution to the ministerial consent process, Ontario appears to have countered effectively any movement into the province of noticeably weak and marginally credible providers.

The criteria for degree program consent are also comprehensive, perhaps more so than those used in other provinces. For the most part institutions applaud them. The expectations they set for degrees appear to go far in making PEQAB review a credible step in ministerial consent.

PEQAB drew on existing standards in Ontario, revised, updated, and added components related to

learning outcomes. In short, they developed program standards that both informed and aligned well with program standards used by others in Ontario. This is not a minor achievement, for PEQAB was in part a legislative response to the concern that the value of Ontario's degrees was about to be diminished as a result of non-universities and non-public providers that sought to offer them.

There is some concern from institutions that existing standards are over-weighted toward the academic culture of research universities, particularly in defining requirements for faculty credentials. There is likely to be even broader disagreement when PEQAB is confronted with new types of non-research doctoral degrees being created and delivered in other provinces and the U.S.

Institutions and programs that have received ministerial consent after successful PEQAB review believe that the quality of their offerings and the quality of student learning have benefitted from evaluation against rigorous standards. It appears that many stakeholders in PEQAB's work would agree.

#### **IV.7. Institutional Self-Evaluation and Reporting**

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 judgments based on institutional self-reflection. Institutions anticipate that the next generation of reviews will use different evaluative tools, and the Secretariat is anxious to create and implement those tools. Although empowered to create its own criteria and processes, PEQAB's next generation of processes will inevitably balance institutional hopes for a less paper-laden review and PEQAB's need to be perceived within MTCU as dependable, complete, and rigorous.

Now institutions receive clear directions from the agency's handbooks; in fact, they commented favorably on PEQAB's responsiveness in clarifying those directions from time to time.

There was almost uniform praise for the assistance provided on request from PEQAB staff. While the posting of applications and actions on the web site allows institutions to learn from experiences of other institutions, PEQAB has yet to formalize a way to tap the potential for shared learning among institutions. Workshops for several institutions, for example, might be beneficial. Using effective leaders from institutions to “share the story” of success and growth through PEQAB’s processes might also be beneficial for all who engage in those processes.

One theme from institutions that was sounded a bit too much was that they were not being informed of important changes in PEQAB processes. PEQAB apparently does not have a very robust system of on-going communication. For example, in the electronic documents on the web site changes are not black lined or highlighted in any other manner that would call attention to an important change. This publication of information seems to rely too much on the initiative of PEQAB’s stakeholders to go to the web site and then determine if there are any changes germane to their status or interests. Particularly if PEQAB begins to move away from a “one size fits all” approach to its reviews, its capacity to customize communication with institutions will become critical. It is important for the agency to study carefully the apparent discrepancy between what the institutions report—inadequate communication—and what the Secretariat believes it should be achieving with its current communication strategies.

#### **IV. 8. Evaluation of Institution and/or Program**

PEQAB’s processes are clear, effectively described, and well understood. PEQAB has also made a good faith effort to conduct its activities in keeping with those stated processes. However, there can be some confusion on the institutions’ part when the consent approval process, a mixture of ministerial and PEQAB activities, seems to bog down.

PEQAB’s recommendations rely heavily on the findings of its peer processes. PEQAB draws on academics from within Ontario, across Canada, and from the U.S. to serve as Assessors. Its willingness to tap people from a distance is laudable. It appears that the PEQAB screen for conflict

of interest is robust and effective. As a program review agency, it strives to ensure that its processes engage people with recognized expertise in the field of study. PEQAB also needs to have Assessors who are qualified to evaluate the breadth and depth of general education components of the degrees, who know whether distance education programs (e-Learning) are well-conceived and effectively delivered, and who can evaluate institutional management in private institutions. Recently PEQAB has created small groups of experts to draw on for the review of breadth and distance education, thereby intending to ensure consistency in the agency's evaluation of both. Almost all institutions reported that the Assessors they experienced were well prepared and appropriately engaged in their work. Only a few suggested that Assessors from outside Ontario are challenged to understand some of the higher education issues unique to the province.

The Secretariat plays a major role in identifying and vetting potential Assessors, but the Board retains the responsibility for choosing the Assessors for the various steps in the review processes. This is a useful double-check to ensure particularly that site teams (Quality Assessment Panels) have a good balance of experience and expertise.

This Expert Panel believes that PEQAB has been somewhat fortunate in its peer review processes. While the Secretariat historically responded promptly to questions from Assessors, only recently has the agency begun to implement a uniform process for training Assessors. Those who have participated in it, even those with previous PEQAB experience, testify to its usefulness. While PEQAB says it has weeded out Assessors who prove to be inadequate and while few institutions complained about the Assessors they have had, the Assessors themselves seemed rather disconnected when it comes to evaluation of their work. That is, they accepted an invitation and they did the review (and, if a chair, filed a report) but they received no feedback on their efforts. Unless they went to the PEQAB web site to discover MTCU action, they did not know the ultimate result of their work. This is changing, the Expert Panel was told. But the fact is that PEQAB has not made much of the opportunity to strengthen its Assessors individually or collectively. PEQAB has been using

Assessors long enough that it has a competent and experienced pool that can contribute to the on-going development of Assessors; right now that pool is a largely untapped resource to the agency.

One part of the evaluation process not well understood by Assessors and institutions is the integration into it of invited external third party comment. While the Secretariat seems clear on how this is accomplished, participants in the process are somewhat confused. Without much effort, PEQAB can rectify this situation.

#### **IV.9. Independence of Decisions**

PSECE establishes the nature and structure of PEQAB to protect the agency's ability to do its work free of ministerial involvement or intervention. The leaders of the Board and Secretariat have labored to maintain the clear line of demarcation between the broader public policy concerns of MTCU and the specific responsibilities of PEQAB. Structurally there are several vulnerable points to this separation. For example, the Board Chair meets directly with the Minister, and the Manager/CE of the Secretariat has dual accountability that includes reporting to MTCU. Ministerial leverage could be applied in various ways, but it seems not to be. This is a testimony of good faith by all parties.

The Panel believes that there might be a couple of significant challenges to this state of affairs:

**Lack of an Effective Process for Follow Up.** Currently the PEQAB recommendation is either for granting or denying ministerial consent. But PEQAB is confronting several situations in which it wants to make its recommendation conditional or in which it would make a stronger positive recommendation if it knew that promised implementation steps could be monitored. MTCU has no formal way to implement follow-up in either situation. Sometimes recommendations that are less than wholeheartedly positive, just sit with no action. In both situations PEQAB might be quite right in its concerns, but current policy and practice fail to provide ways for either PEQAB or the Minister to implement a useful program of follow up. If the Minister prefers recommendations that are either

up or down, MTCU may wish to modify the PEQAB processes to allow for some follow-up at that level in the process, or in the granting of consent the Minister might choose to include follow up reporting to PEQAB.

**Role of MTCU in Decisions.** The Panel heard that several requests for consent, in the words of one institutional leader, had entered a “black hole.” That is, although the institution has no official information regarding PEQAB’s action on the request, it has concluded that a recommendation is being processed somewhere in MTCU. The length of the list of “Applications under Review” suggests that right now too many recommendations are in the “black hole. Unfortunately, the extended nature of some decisions is causing some observers of the process and several of the participants in it to question the independence of PEQAB. .” PEQAB is a young agency whose reputation is not yet settled and this perception is neither warranted nor helpful.

Since MTCU handles an application for consent both before and after the PEQAB review, the Expert Panel agrees with the proposal that the pre-PEQAB review should involve all of the key issues related to policy and to legal matters. It does not make much sense to put through a PEQAB process a request that will not meet with the Minister’s approval for matters other than those appropriate to PEQAB’s quality review. If MTCU has particular public policy issues that will figure into approval, it should consider integrating them into the pre-PEQAB screening. Examples include limiting specific types of programs or specific types of institutions in the province, or rejecting programs that do not fit the Ontario job market. Only when MTCU has completed that very important screening should an institution be invited to develop full proposals that would be forwarded to PEQAB for the quality review.

#### **IV. 10. Appeals**

PEQAB makes a recommendation, not a decision. The Minister makes the decision and has made clear that the decision is final and not open to appeal.

The Panel does not recommend that PEQAB try to create an appellate process, for it would not really fit appropriately in the existing decision-making processes for ministerial consent. However, PEQAB might propose that it be allowed to share a negative recommendation so an institution would have the opportunity to withdraw the request or revise its materials for another Board review. At this point, it appears that MTCU staff contact some institutions confronting a potential ministerial denial of consent to see if the institution would prefer to withdraw the request. This appears to be an ad hoc approach to the situation rather than one imbedded in policy. If quality concerns are basic to the withdrawal, confusion can only result about who is making the basic quality evaluation in the consent process, PEQAB or MTCU.

#### **IV.11. Collaboration**

For such a young agency, PEQAB has been a very visible player in Ontario, Canada, and internationally. Some of that engagement has been necessary simply to ensure that its educational standards meet the test of being accepted in Ontario and in Canada. Some has been by dint of engagement by the people who have led and/or now lead the agency, both the chair of the Board and the Manager/CE of the Secretariat.

In its Self-Study, PEQAB makes much of the impact of its degree standards and qualification framework on quality assurance in Ontario and across Canada. And it does appear that significant consensus is emerging about the nature of credentials within Canada as evidenced by the *Ministerial Statement on Quality Assurance of Degree Education in Canada* (April, 2007). PEQAB's work is quite evident in that consensus. Moreover, PEQAB hosted some of the early cross-provincial meetings that helped to shape the Canadian discussions.

“Harmonizing” the degree standards in Ontario and across Canada will always be a challenge as long as the responsibility for higher education quality assurance remains as decentralized and distributed as it is today, in Ontario and across the nation. But in lieu of different structures and/or federalization, both highly unlikely, “harmonization” will be critically important.

PEQAB has shown its capacity to contribute to, if not lead major harmonization efforts. It appears that communication channels are open and functioning between PEQAB and the other major quality assurance process in Ontario, the Council on Quality Assurance of the Ontario Universities Council. Since PEQAB has drawn extensively on the previously existing COU standards this has been reassuring to the universities leading to a narrowing of the cultural gap between the two groups of institutions. The recent restructuring of the quality assurance programs used by Ontario universities, particularly the merger of undergraduate and graduate evaluations into one organization, may test harmonization, especially as PEQAB is faced with applications for consent for graduate degrees, including new varieties of doctoral programs. Within the Canadian scene, the head of the Secretariat communicates monthly with leaders of other Canadian provincial quality assurance agencies (Canadian Quality Assurance Network). She also is a member of the Canadian Ministers of Education Canada (CMEC) quality assurance subcommittee.

It is of concern to the Panel that this important task—provincial and national—appears not to be formalized in legislation and/or ministerial directive in Ontario. Moreover, the funds to underwrite it, particularly those related to travel, are either lacking or out of the agency's direct control. It is important that the contributions of this young agency in these vital endeavors be understood and supported in the future. This calls for clearer delegation of responsibility underwritten with funding, but in the meantime it calls for doing nothing that undercuts the current credibility of the agency in the eyes of the academy and the public policy makers in Ontario and across Canada.

#### **IV.12. Transnational/Cross-Border Higher Education**

PEQAB has an interestingly strong reputation for its engagement in issues related to higher education quality assurance internationally. It has been an active participant in the International Network for Quality Assurance in Higher Education. In 2007 it joined with the Province of Ontario in hosting INQAAHE's biennial conference, bringing to Toronto over 250



people engaged around the world in providing higher education quality assurance. Its Board Chair currently serves on the INQAAHE board. But lack of control over its travel budget has greatly limited the agency's capacity to be present at important and useful international meetings and conferences.

To meet its legislative mandate, PEQAB has had to address the challenges and opportunities of transnational and cross-border education. Colleges and universities from other provinces have to use the PEQAB process to procure ministerial consent for degrees they offer or want to offer in Ontario. This includes degrees offered on-site and degrees offered through the Internet. Some U.S. institutions, particularly in border states, held ministerial consent for years, but with the introduction of the PSECE Act had to use the PEQAB processes to gain renewal of consent. Australian universities have also sought and won ministerial consent for their degree offerings through PEQAB.

Perhaps in the future the Legislature or the Minister may decide to limit access to the Ontario higher education marketplace, but at this point, PEQAB's role has been to assure the quality of the degrees from out-of-province providers. From the Panel's perspective, PEQAB has been fair and impartial in its evaluation of these providers whether they were public or private. The Panel heard from a variety of constituents a sense of uncertainty over the continued openness of Ontario to out-of-province providers. It would be better for institutions and PEQAB alike if the implications of "system design thinking" for such institutions were clarified as soon as possible.

The 2010 Amendments to PSECE has provided the Minister with other avenues through which to consider an application for consent. To some extent this apparently emerged from PEQAB's insistence on rigorous and consistent processes (program and institutional review) even when major research universities outside of Ontario were required to gain consent to partner in degrees with Ontario universities. Deference to some other external quality assurance body—even Canadian—probably should not be unexamined, but lacking any agreed-upon hallmarks of practice

in quality assurance it is difficult to determine a protocol on how to include in the PEQAB process the actions of other quality assurance bodies. Nonetheless, this is one area where PEQAB and MTCU should work together to find a common-sense solution.

#### **IV. 13. Panel Conclusion**

In this report, the Panel has not explicitly addressed whether each INQAAHE guideline is fulfilled; the discussions under each should be sufficient to inform any interested reader. Nor has the Panel provided a set of follow-up recommendations related directly to organizational strengthening that might be needed to assure stronger alignment with the guidelines. In short, the report does not follow INQAAHE directions for a formal alignment process. But the Panel expects that those who read this report will conclude that:

- PEQAB is a legal, respected, and valued agency providing an essential quality assurance service in the province of Ontario, Canada;
- PEQAB has incorporated into its activities policies and practices that enable it to be fair, transparent, free from conflict, consistent, and appropriately independent from intervention from any of its stakeholders;
- PEQAB has created and implemented rigorous academic standards accepted by institutions, readily understood by peer reviewers, and acknowledged as appropriate within and without Ontario.
- PEQAB has been and continues to be engaged in collaborative and cooperative activities necessary to make higher education quality assurance a useful tool in regional, national, and international contexts.

PEQAB, however, is a very small and young agency, and its reputation and effectiveness is not completely in its own hands. Its presence and activities have been vital in helping Ontario

adjust to significant changes in the higher education environment and marketplace. But the tide of change in higher education continues to rise, and the full force of it will be felt for years to come. PEQAB's success in effectively riding the tide rather than being swept away by it will rest with (1) the quality of its leadership and staff; (2) the commitment of resources to assure PEQAB's capacity to fulfill its mandate, including its commitment to transparency of process; and (3) the willingness of the higher education community in Ontario to share responsibility for accepted and effective harmonization of degrees.

## **APPENDIX A**

### **INTERVIEWEES**

Dr. Virginia Hatchette  
Chief Executive, PEQAB

Charlotte McCloskey  
Senior Policy Advisor, PEQAB

Naomi Silver  
Senior Policy Advisor, PEQAB

Janna Luettmann  
Research Policy Analyst, PEQAB

Rosaria Cioffi  
Administrative Coordinator, PEQAB

Dale Patterson  
Chair, PEQAB Board

Maureen Morton  
Vice Chair, PEQAB Board

Dr. Richard Barham  
PEQAB Board Member

Dr. Ashok Dalvi  
PEQAB Board Member

.

Dr. Dianne Kieren  
PEQAB Board Member

Jane Blackwell  
PEQAB Board Member

Dr. Carole Stewart  
Former Dean, College of Arts  
University of Guelph

Dr. Suzanne MacDonald  
Graduate Program Director  
York University

Dr. Paul Ranieri  
Associate Professor of English  
Ball State University

Dr. John ApSimon  
Interim Dean of the Faculty of Public  
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Dr. Lane Trotter  
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Cindy Hazel  
Vice President Academic  
Seneca College

Cheryl Jensen  
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Mohawk College

Dr. Marjorie McColm  
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Associate Dean, Program  
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Dr. James Parker  
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Dr. Donna Woolcott  
Executive Director  
Ontario Universities Council on  
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Dr. Sam Scully  
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Ontario Universities Council on  
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Dr. Jean Moss  
President  
Canadian Memorial Chiropractic  
College

Brenda Smith  
Vice President  
Administration and Institutional  
Planning  
Canadian Memorial Chiropractic  
College

Dr. Rick Davey  
President  
RCC Institute of Technology

Dr. Debra Colley  
Dean of the College of Education  
Niagara University

## **Appendix B**

### **INQAAHE GUIDELINES OF GOOD PRACTICE**

#### **SECTION I. THE EQAA: ACCOUNTABILITY, TRANSPARENCY, AND RESOURCES**

##### **1. The Governance of the EQAA**

The EQAA has a written mission statement or set of objectives that takes into account the cultural and historical context of the EQAA. The statement explicitly provides that external quality assurance is a major activity of the EQAA, and it requires a systematic approach to achieving the mission or objectives of the EQAA. There is evidence that the statement of objectives is implemented pursuant to a practical management plan that is linked to EQAA resources. The ownership and governance structure is appropriate for the objectives of the agency.

##### **2. Resources**

The EQAA has adequate and accessible human and financial resources to conduct external evaluation effectively and efficiently in accordance with its mission statement and its methodological approach. The EQAA's resources are also adequate for the appropriate development of the agency.

##### **3. Quality Assurance of the EQAA**

The EQAA has a system of continuous quality assurance of its own activities that emphasises flexibility in response to the changing nature of higher education, the effectiveness of its operations, and its contribution towards the achievement of its objectives.

The EQAA conducts internal self-review of its own activities, including consideration of its own effects and value. The review includes data and analysis.

The EQAA is subject to external reviews at regular intervals. There is evidence that any required actions are implemented and disclosed.

##### **4. Reporting Public Information**

The EQAA informs and responds to the public in accordance with applicable legislation and the cultural context of the EQAA. This includes full and clear disclosures of its relevant documentation such as policies, procedures and criteria.

The EQAA also demonstrates public accountability by reporting its decisions about higher education institutions and programs. The content and extent of reporting may vary with cultural context and applicable legal and other requirements.

If the external evaluation leads to a decision about the higher education institution or program, the procedures applied and the criteria for decision-making are public, and the criteria for review are transparent, public, and ensure equality of treatment.

The EQAA also discloses to the public the decisions about the EQAA resulting from any external review of its own performance.

## **SECTION II. INSTITUTIONS OF HIGHER EDUCATION AND THE EQAA: RELATIONSHIP, STANDARDS, AND INTERNAL REVIEWS**

### **5. The Relationship Between the EQAA and Higher Education Institutions**

The EQAA:

- recognises that institutional and programmatic quality and quality assurance are primarily the responsibility of the higher education institutions themselves;
- respects the academic autonomy, identity and integrity of the institutions or programs;
- applies standards or criteria that have been subject to reasonable consultation with stakeholders; and
- aims to contribute to both quality improvement and accountability of the institution.

### **6. The EQAA's Requirements for Institutional/Program Performance**

The EQAA has documents that indicate clearly what the EQAA expects of the institution.

Those expectations (which may for example be called standards or factors or precepts) are appropriate for the core activities of an institution of higher education or program. The standards should explicitly address all areas of institutional activity that fall within the EQAA's scope, such as teaching, learning, research, community work, etc. and necessary resources such as finances, staff/faculty, and learning resources. Standards may refer to specific areas, levels of achievement, relative benchmarking and types of measures, and may provide general guidelines. They may also include specific learning goals.

### **7. The EQAA's Requirements Institutional Self-Evaluation and Reporting to the EQAA**

The documentation concerning self-evaluation explains to the institutions of higher education the purposes, procedures, process and expectations in the self-evaluation

process. The documents also include the standards used, the decision criteria, the reporting format, and other information needed by the higher education institution.

Typically, an EQAA review process includes a self-evaluation through self-study by the institution or program, external peer review, and a follow-up procedure.

As necessary and appropriate, the EQAA guides the institution or program in the application of the procedures of the quality assurance process, such as self-evaluation, external review, or solicitation of assessment/feedback from the public, students, and other constituents.

### **SECTION III. EQAA REVIEW OF INSTITUTIONS: EVALUATION, DECISION, AND APPEALS**

#### **8. The EQAA's Evaluation of the Institution and/or Program**

The EQAA has clear documentation concerning the external evaluation that states the standards used, assessment methods and processes, decision criteria, and other information necessary for external review. The EQAA also has specifications on the characteristics, selection and training of reviewers. The EQAA's system must ensure that each institution or program will be evaluated in an equivalent way, even if the external panels, teams, or committees (together, the "external panels") are different.

The system ensures that:

- The external reviewers meet the EQAA specifications, and the external reviewers are adequate to the tasks to be accomplished.
- External reviewers have no conflicts of interest.
- External reviewers receive necessary training
- External reviewers' reports are evidence-based and clear, with precisely stated conclusions.

When practicable, the EQAA should include at least one external reviewer from another country or jurisdiction in the external panel.

#### **9. Decisions**

The EQAA evaluations address both the higher education institution's own self-assessment and external reference points, such as judgments by knowledgeable peers or relevant legislation. An EQAA must be independent, i.e. it has autonomous responsibility for its operations, and its judgments cannot be influenced by third



parties. The EQAA's decisions must be impartial, rigorous, thorough, fair, and consistent, even if the judgments are made by different panels. Consistency in decision-making includes consistency and transparency in processes and actions for imposing recommendations for follow-up action. The EQAA's reported decisions are clear and precise.

When the EQAA advises the government or other public bodies, the decisions made by each agency should be made as independently as practicable.

## **10. Appeals**

The EQAA has appropriate methods and policies for appeals. Appeals should be conducted by reviewers who were not responsible for the original decision and who have no conflict of interest, but appeals need not necessarily be conducted outside the EQAA.

## **SECTION IV. EXTERNAL ACTIVITIES: COLLABORATION WITH OTHER AGENCIES AND TRANSNATIONAL/CROSS-BORDER EDUCATION**

### **11. Collaboration**

The EQAA collaborates with other EQAAs, if possible, in areas such as exchange of good practices, capacity building, review of decisions, provision of transnational education, joint projects, and staff exchanges.

### **12. Transnational/Cross-Border Higher Education**

The EQAA has policies relating to both imported and exported higher education. These policies may be the same as those for domestic providers and domestic provision. In formulating its policies and practices, the EQAA should consider relevant guidelines issued by international agencies and other associations. All EQAAs should consult with appropriate local agencies in the exporting or importing countries, although this might not be possible or appropriate in situations such as those involving distance learning or small enrollment.