Accreditation in Western Europe: Adequate Reactions to Bologna Declaration and the General Agreement on Trade in Services?

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Challenged by globalization (especially the General Agreement on Trade in Services [GATS]) and by European developments (the Bologna process), the Netherlands will introduce program accreditation as a new form of quality assurance. Other, sometimes similar initiatives are found in other countries and at the international level. How Dutch and other (European) proposals reply to the challenges is the topic of this article. Combining GATS and the Bologna process, four design rules for quality assurance systems are derived. It is concluded that "open accreditation systems" as introduced in some countries answer the European challenges well, but it is doubted if the Bologna process itself is a sufficient reaction to the wider international developments.

Keywords: *quality assurance; accreditation; Bologna process; higher education in Europe*

The subject of this article is how the current development of accreditation in Western European—especially Dutch—higher education fits into its international policy context, in particular the challenges set by the negotiations on the General Agreement on Trade in Services (GATS), which for higher education came to a temporary end in Seattle in 1999, and by the Bologna process, which aimed to create a European higher education area. Is it an adequate response or a mismatch? The focus on the Dutch accreditation plan is chosen to illustrate national-level responses to these international challenges.

To answer the main question, I focus on the challenges set by GATS and by the Bologna Declaration and design requirements implied for quality assurance sys-

tems. After that, I zoom in on some new quality assurance arrangements (accreditation) in Western Europe, which ostensibly respond to the Bologna Declaration and—indirectly—to GATS. Finally, I come to a verdict on whether the present approaches are adequate response to the two challenges.

INTERNATIONAL CHALLENGES

GATS as the Global Challenge

The widest possible context for any phenomenon in higher education, and a buzzword at the same time, is provided by *globalization*. Not to spend too many words on an often-discussed issue, let me briefly state that I should like to concentrate on one practical element of globalization, namely, the impact of GATS on higher education in (Western) Europe. To date, very few other countries in the World Trade Organization (WTO) have made commitments freeing international trade in higher education (World Trade Organization Trade Policy Review Body, 2001). The following are the two basic principles governing GATS (Larsen, Morris, & Martin, 2001):

- the national treatment principle, which means that foreign service providers should be treated equal to national ones, and
- the most-favored nation principle, meaning that discrimination between foreign service providers is prohibited.

A highly relevant question then becomes, "Is education a service?" The answer that should be given to this question is "Yes, but . . ."—the "but" being that it is debated whether education, especially higher education, is a public service that should be exempted from trade perspectives, particularly for reasons of equity and market failures. Educational economists tend to agree that collective benefits outweigh private benefits up to secondary education; in such a situation, the public service arguments carry great weight. Educational economists equally tend to agree, conversely, that private benefits outweigh collective benefits for postgraduate courses—tellingly called "job training" in the U.S. proposals to GATS (U.S. Delegation, 1998, 2000)—focusing thoughts on the salary benefits individuals may expect to gain from obtaining, for example, a master's in business administration. This would be a situation where market regulation might be more profitable.

The moot question then is whether higher education is the borderline. The prevailing European point of view seems to be that higher education is a public good. I have the impression that European policy makers and students—who are

most vociferous in this respect—think of undergraduate higher education or rather "initial" higher education, that is, the first program entrants into the higher education system attend. This first encounter with higher education has characteristics of an "initiation," especially for first-generation entrants into higher education. Also, the first higher education program individuals experience has a "transformation" function (Harvey & Knight, 1996), making the case for expecting market failures fairly strong. Yet, already for initial higher education, private benefits seem to outweigh social ones and equity arguments are weak because students in higher education still disproportionately come from the highest socioeconomic strata.[1]

The U.S. delegation to the WTO targeted "postinitial" higher education as its proposals are focused on postgraduate "job training." It can well be maintained that one of the functions of initiation into higher education is to make young adolescents, for whom many sometimes esoteric distinctions current in academe are meaningless, into well-informed consumers[2] who know what the market of higher education programs has to offer and where to get the best education. When they enter a second program, they are much more aware of the "service" they are "purchasing." At this level then, service market mechanisms can be expected to function in a "business-as-usual" manner. In conclusion, the U.S. delegation would seem to have a valid ground for proposing GATS rules to apply for postinitial higher education. This part of higher education is becoming a major export sector for some countries, especially the United States, the United Kingdom, and Australia (van der Wende, 2002; van Vught, van der Wende, & Westerheijden, 2002).

However, the distinction between initial and postinitial higher education is analytical. On the one hand, postgraduate programs by definition are postinitial. On the other hand, programs at undergraduate levels can be students' initial experiences in higher education, but they can equally be followed by students who reenter higher education in lifelong learning (broadening rather than deepening their knowledge). It all depends on the situations of the students not on the definition of the programs. Accordingly, here is a legitimate argument to worry about the U.S. proposals for GATS: Is the U.S. proposal an only apparently innocuous "hook" by which to open all of higher education to free trade principles?

Finally, intensifying the warning that governments are losing control over their "own" higher education systems, even if only the formal regulation aspects are examined,[3] is that if a higher education provider is allowed into one European Union country, it is automatically allowed to operate in all European Union countries.

The Globalization Challenge:
Who Are the Actors?

The WTO is an intergovernmental organization; in that sense, governments are the actors on the globalization scene. They interact in the WTO for a typical government responsibility, namely, to regulate (international) markets. Governments as a rule are not active in the global higher education market themselves as providers. The real actors in the global higher education market are higher education institutions (public and private) as well as the virtual or on-line universities that are appearing everywhere, the corporate "universities," and their hybrids and cooperation networks (consortia and so forth). It is important to observe that higher education providers autonomously decide whether to be "global players." Some higher education providers indeed are active as global players, others—including a good number of well-regarded public universities—find a decent way of survival as regional or national higher education institutions.

The Bologna Declaration as the European Challenge

In light of the globalization context, it may serve well to remember the following two main rationales for the Bologna Declaration (European Ministers of Education, 1999; van Vught et al., 2002; van der Wende, 2000):

- to increase the international competitiveness of the European system of higher education in the world market after losing the leading position to the United States and seeing, for example, Australia and the United Kingdom[4] becoming main higher education "exporters," and
- to promote mobility within Europe by overcoming obstacles both for the graduate labor market and for students during their studies.

At this point, it is interesting to contrast the Bologna approach with the WTO agenda (cf. van Vught et al., 2002).[5] The Bologna process is based on governmental reform of higher education systems—easily thought of as public higher education systems. The new diversification of providers, mentioned previously, seems to remain out of view in this process. Moreover, by putting priority on governmental reforms, the (public) higher education institutions in the Bologna process are seen as instruments of government policy not as autonomous actors as in the WTO agenda.

The first main aim to be reached by the change to a two-cycle structure is to arrive at comparable degrees across the European area of higher education. But what does "comparable" mean? In a maximum interpretation, it could mean similar degrees, that is, leading to graduates who are exchangeable in the labor market. In a minimum interpretation, it could mean no more than that degrees can be

compared, for example, by defining a number of dimensions or continua that can be used for their analysis. Perhaps there were diplomatic reasons, such as a degree of ambiguity, needed to attain the compromise of the Bologna Declaration.

Whatever the interpretation of "comparable," a dramatic increase in international transparency is needed as a result of this aim in the Bologna Declaration. The role for quality assessment in this framework could well be defined as being the mechanism that should provide this much-needed transparency.[6] However, the Bologna Declaration (European Ministers of Education, 1999) was conspicuously vague about quality assurance, only mentioning "promotion of European co-operation in quality assurance with a view to develop comparable criteria and methodologies." Diplomatic ambiguity abounds in this statement in almost every word but especially in the final part beginning with "with a view." First, the "view" may be close or remote; the final date for the Bologna process is known to be 2010, but can Europe wait that long to begin developing comparable criteria and methodologies if other aims of the Bologna Declaration are to be reached by that date? And in the last phrase, one can question the use of "comparable" again and wonder whether the emphasis will be on "criteria" (of what?) or on "methodologies" (for what?). The first place to look for clarification is the follow-up conference held in Prague in May 2001.

To begin with, it can be noticed that the communiqué from the Prague Conference carried no big changes from what was said in Bologna. It restated, more explicit than ever, that "higher education is perceived as a public good and governments are the agents in society that are responsible for providing public goods" (European Ministers of Education, 2001).

With regard to quality assessment, the phrase was much longer than the one in Bologna:

> Ministers recognized the vital role that quality assurance systems play in ensuring high quality standards and in facilitating the comparability of qualifications throughout Europe. They also encouraged closer cooperation between recognition and quality assurance networks. They emphasized the necessity of close European cooperation and mutual trust in and acceptance of national quality assurance systems. Further they encouraged universities and other higher education institutions to disseminate examples of best practice and to design scenarios for mutual acceptance of evaluation and accreditation/certification mechanisms. Ministers called upon the universities and other higher educations institutions, national agencies and the European Network of Quality Assurance in Higher Education (ENQA), in cooperation with corresponding bodies from countries which are not members of ENQA, to collaborate in establishing a common framework of reference and to disseminate best practice. (European Ministers of Education, 2001)

The link between recognition issues and quality issues on the international scene was recognized by the Ministers of Education, and they imported from the recognition discussion the notions of mutual trust and acceptance—as if these were the same, *quod non*. Moreover, these terms were transposed from the individual degree holder level to the level of quality assurance systems. This implies a number of (heroic) assumptions, especially:

- Quality assurance systems inform about the quality of degrees.
- Graduates with a similar degree are comparable with each other.
- The information delivered by quality assurance systems is relevant to the labor market or to higher education institutions considering accepting candidates for further studies (e.g., bachelor degree holders applying for master's studies).

Next, the ministers invited the higher education institutions to disseminate best practices, apparently adding a bottom-up approach to the Bologna process. Yet, the governmental top-down approach of cooperation to be coordinated by ENQA to establish a common framework of reference seemed to remain the main initiative. Continuing the diplomatic phrasings of Bologna, it is left in the dark what is to be referenced by this framework: criteria, methodologies (the options mentioned in Bologna), or something else? As will be shown, the actors on the European scene are acting to clarify this spot of darkness. But first, I should like to pause and reflect on what the developments mentioned until now imply for the design of a European dimension of quality assurance.

WHAT CAN AND SHOULD ACCREDITATION DO?

Some Design Requirements for
Quality Assessment After Bologna and the WTO

With its stress on attracting students and on mobility for students and degree holders, the Bologna Declaration implies at least two design requirements for quality assessment systems that could fulfill their role in this process (for a more extended list, cf. Westerheijden & van der Wende, 2001).

1. *Degree*. Although recognizing that quality management (or synonymously, quality assurance) by the higher education institution is important to ascertain quality education, the focus in the Bologna process—and arguably, the prime responsibility of governments as protectors of the citizens' (including students') interests—is on what students get out of the higher education system (i.e., the degree).
2. *Europewide transparency*. The results of quality assessment processes need to be understood across the "Bologna area." Although this already seems to be a challenge

for the professionals involved in quality assessment or in recognition of degrees across Europe, transparency is even more difficult to attain in the eyes of the external stakeholders in education, such as employers of graduates and especially (potential) students. As mentioned previously, academic distinctions may be too esoteric for external stakeholders; robust knowledge, economical to acquire, must be aimed for.

In light of the slow and cumbersome GATS negotiations, it may be audacious to think of design requirements resulting from them. Yet, the following basic principles underlying the general operation of the WTO regime will have to be accommodated whatever the final outcome of further GATS negotiations.

3. *Fair competition*. Quality assessment systems should not discriminate between national and foreign providers of higher education or between public and private ones.
4. *Consumer protection against substandard programs*. In their role of guardians of the common weal, governments may feel that it is their responsibility to ascertain that their citizens (students) will not spend time, energy, and money (from public funds) on "rogue" higher education provision.

How do such design rules lead to a "European dimension" in quality assessment? For instance, the international dimension of quality assessment systems can be sought in the following:

- applying internationally agreed criteria,
- including internationalization of the curriculum in the assessment criteria,
- using international units (programs, institutions) as comparators, and
- involving evaluators from international backgrounds.[7]

Rule 1, focusing on degrees, makes the methodological choice not to focus on the higher education institution. The use of the word *degree* rather than *program* is intentional because it implies a further focus on output quality rather than input quality or process quality, which are often at the center of attention in current program-oriented quality assessment systems. Politically, a focus on output quality at the degree level has the consequence that the quality assessment system is less directly bound to (national) regulatory frameworks than if input quality (funding, staffing, and so forth) or process quality (curriculum matters) were being assessed. Loosening the tie between the object of evaluation and national institutional frameworks makes an international—or European—dimension in the quality assessment system more readily applicable by opening the door to internationally agreed criteria.

Rule 2, calling for Europewide transparency, would go fairly directly in the direction of applying internationally agreed criteria. (Although a weaker form, in the minimum interpretation of comparability, could be envisaged as well.) Rule 3, on fair competition, would add a European dimension in the sense of pro-

moting international comparators and of applying internationally agreed criteria. The final, fourth rule about consumer protection is not about internationalization or Europeanization at all. Let me summarize in two points. First, adherence to these rules would result in quality assessment systems prone to a strong international or European dimension in most meanings of the term: application of internationally agreed criteria (to which, as mentioned in note 7, involvement of international reviewers could be added) and use of international comparators. Second, they are not connected to assessing internationalization of the curriculum.

Some Dilemmas in Accreditation

For many decision makers in European higher education, accreditation seemed to be the answer to the Bologna challenge. And judging on the basis of its sudden popularity after June 1999, there was not much of a survey of alternative policy options. Let me reassure them: Even after looking further, accreditation does seem to be a major option. Among others, accreditation has the advantage not only for higher education decision makers but also for external stakeholders of prima facie credibility, robustness, and efficiency of information due to the distinguishing characteristic of accreditation, namely, the fact that a judgment of quality is summarized in a single, simple statement, sometimes in the form of a grade (8 out of 10) but more often as a binary (yes or no) statement (Adelman, 1992; Sursock, 2001; Westerheijden, 2001; Young & Associates, 1983).

Another argument in favor of accreditation is that it gives more transparency compared with the (formative) quality assessment that was en vogue in Western Europe during the 1990s. This too is due in part to the summary judgment, which often was lacking in Western European quality assessment practices (Brennan, El-Khawas, & Shah, 1994; Westerheijden, 1997). It is also due to the fact that as a rule, accreditation judgments are made in light of predefined, published criteria.

A final argument in favor of accreditation is that it gives better consumer protection than does the traditional Western European quality assessment because a fixed quality threshold is established under which accreditation is denied. Of course, it can be debated whether the threshold is sufficiently high, whether it is relevant, and whether the higher education provision most at risk will be covered by it. Here, however, we get to the negative aspects of accreditation.

Indeed, there are disadvantages to accreditation that should not be brushed aside lightly. First, there are methodical disadvantages associated with the predefined criteria. They would lead to increased homogeneity instead of the diversity of approaches and competencies needed in the present-day "massified"

higher education systems and in the emerging knowledge economy. Besides, adaptation of published criteria is a time-consuming process so accreditation continuously runs the risk of falling behind the state of the art. Then again, accreditation criteria tend to be a compromise among the participants in the decision-making process of the accreditation organization, leading to the criteria being a *communis opinio* but not challenging for further innovation of the "best" programs. Finally, as accreditation judgments are based on passing threshold criteria, they would tend to discourage innovation and quality improvement. Innovative approaches to accreditation criteria and processes can overcome such disadvantages, at least partly, as shown, for example, in current practices in the European Quality Improvement System (see http://www.efmd.be), in the American engineering accreditor, Accreditation Board for Engineering and Technology (see http://www.abet.org/eac/eac2000.htm), as well as in the U.S. regional accreditor the Western Association of Schools and Colleges (see http://www.wascweb.org).

I should like to focus, however, on two other disadvantages of accreditation. The first of these is expressed in the following dilemma: "Without the expectation of real consequences, the incentives to organise quality assessment are lacking; with the expectation of real consequences, quality assessment will turn into a power game" (Westerheijden, 1990, p. 206).[8] With the introduction of accreditation and the very real consequences often associated with it, such as recognition of degrees and eligibility for funding, the stakes of the quality game become distinctly higher than before. Accordingly, the risk of strategic game behavior rises considerably.

The other is that because of all of this, the dynamics of the evaluation process change. First, there is a change in the role of the self-evaluation of higher education institutions. If in formative quality assessment a real self-evaluation is possible (which, however, is already doubtful; cf. Harvey & Knight, 1996), in a strategic game to gain accreditation, it tends to become pure "self-selling" (Frazer, 1997). Weak points that could put accreditation in jeopardy would be hidden as far as possible.[9] By the same token, the role of external reviewers changes from peers (as equals in the disciplinary field) or consultants with whom quality problems and improvements can be discussed to experts who have superior knowledge of the accreditation criteria and who must act as judges in an inquisitive process to discover the reality behind the façade of what possibly is a self-selling report. Consequently, I sincerely doubt the possibility of maintaining the quality improvement aspect of external quality assessment in an accreditation system, although that is the official goal in inter alia, the Dutch accreditation organ introduced in 2003 (see http://www.nao-ho.nl).

NATIONAL RESPONSES: ALL MOVING TOWARD ACCREDITATION

How did the different countries in Europe design their quality assessment and accreditation mechanisms in response to the emerging European higher education area and—indirectly—to the GATS challenge?

Central and Eastern Europe

Elsewhere, I have argued that the Central and Eastern European accreditation systems were introduced in reaction to a particular problem situation, namely, the transformation of study programs throughout the higher education system and the simultaneous rise—sometimes "mushrooming"—of new providers of higher education (Westerheijden, 2001). That is a different context than the one we are facing now in the Bologna process. Accordingly, I maintained that the Central and Eastern European experience of the early 1990s is of limited value for the design of new quality assessments and accreditation systems in the West and, I should add, for the adaptation of Central and Eastern European systems to this new context. So, let us turn to some Western European countries.

Germany

Germany was the first country to start an accreditation council (*Akkreditierungsrat*) after the Sorbonne Declaration. Its main function is to recognize agencies that do the real accreditation on a regional, professional, or disciplinary basis (see http://www.akkreditierungsrat.de). Let me highlight briefly that I think that this council is interesting for an international audience, particularly for the following three reasons.

- The Accreditation Council is not (so much[10]) accrediting programs by itself but is limited mostly to recognizing accreditation agencies. This shows a rather modest approach to the higher education system level: The council does not try to do everything itself but trusts (and checks!) the experts.
- The system is open: Accreditation agencies are free to ask for recognition without any limitation. The only limitations are, in principle, in assuring the credibility and independence of accreditation processes (cf. the following idea of an "open" or "multiple" accreditation system borrowed from van Vught, 1994; Westerheijden & van der Wende, 2001).
- The Accreditation Council focuses on program accreditation.

Admittedly, things are not all so rosy and simple; thus, for instance, the agencies recognized so far are all based in Germany, and until February 2002, only 4% of the bachelor's and 10% of the master's programs had been accredited (cf. Klemperer,

van der Wende, & Witte, 2002). Yet, here I would like to focus on the principles that could be seen internationally as good practice in light of the design requirements previously discussed.

The Netherlands

The Netherlands introduced an accreditation system in 2003 with similar principles as those applied in Germany (Commissie Accreditatie Hoger Onderwijs, 2001): All programs will need accreditation. Differences with Germany stem from the fact that all of Dutch higher education is going to be organized along the bachelor-master model (van der Wende & Lub, 2001), and the reform plans include mandatory accreditation for programs

- to award recognized bachelor's and master's degrees,
- to make their students eligible for study grants and loans, and
- to get state funding (for public higher education institutions only).

Implicit in these principles is that programs from private higher education institutions will be included in this procedure on an equal footing with public ones apart from government funding. That is a way in which the Dutch higher education system will be opened up more than before for globalization forces. Yet, the Dutch higher education system was already far from impenetrable to such forces (Kokosalakis, 1999; Machado dos Santos, 2000; Westerheijden, 2000).

Also similar to the German Akkreditierungsrat, the Dutch National Accreditation Organisation is not going to execute the fieldwork of visiting programs itself. Rather, visiting and validating institutions will do so; international visiting and validating institutions are allowed in the system. Therefore, the Dutch also apply principles of an open accreditation system. A potential problem that comes out even more clearly in the Dutch than in the German case is the question of to what extent the official openness of the registry of the Accreditation Organization for foreign visiting and validating institutions will be realized. Will, for instance, American accreditation agencies be willing to bend their processes and standards to comply with rules of such a small country as the Netherlands? A too detailed institutional arrangement may stand in the way of fulfilling the promises of the principle.

Switzerland

Next, I should like to turn to Switzerland. My reason for mentioning the recently installed Accreditation and Quality Organisation is that the Swiss chose a different approach than did Germany and the Netherlands.

In the Bologna discussion, emphasis is placed on study programs and degrees, as discussed previously in the design rules. Such a program or degree approach also is in line with a neoliberal, distant position of government—which is behind these national accreditation organs—in the higher education system, relying more on the self-organizing capacity of the higher education system than on central steering and control models. It is up to the higher education institutions, in their own autonomy, to organize themselves to assure good educational "products." The Swiss accreditation approach, in contrast, is to evaluate and recognize institutional units as being of a sufficient level, especially regarding their quality management to guarantee good education. This could be interpreted as a welfare state approach: The state guarantees good provision. The liberal element in this arrangement is the freedom left to the student to make good use of this provision.

A question, however, is how the Swiss approach will fit into the emerging trend in Europe for degree- or program-level accreditation. The design requirements apart, will it be accepted by other ENQA members when they make arrangements for mutual recognition of quality assessment and accreditation judgments?

Flanders:
Too Small for Its Own Accreditation?

Finally, in this short list selected to highlight some options without making even an attempt at completeness, follows Flanders. This is the only higher education system that has had the courage to claim it is too small to maintain its own accreditation system. Rather, the Flemish decision makers opt for cooperation with the Netherlands' accreditation organ. Simultaneously, this will mean that the Dutch National Accreditation Organization will not be a national organ at all but an international one.

Considering that the Flemish community counts 6 to 7 million inhabitants and that it has eight universities and close to 30 colleges, what would be the implications of the smallness argument for Norway or Slovenia, for example? Thus, the Flemish case is mentioned here to show that a national approach is not the only option.

Potential Problems of National Responses

Previously, I pointed to some interesting principles and different approaches and to some potential problems inherent in these different approaches. Now, I

would like to address some elements of whether national responses as such can be adequate at all in light of the design requirements previously discussed.

Transparency and Harmonization

The first question is whether national responses lead to more transparency and harmonization in Europe or if only the differences among national higher education systems stand out more clearly?

Earlier, I posed the question, "What is meant by 'comparable degrees'?" The answer to this question may have consequences for the answer to the question of transparency and harmonization. The more one agrees with the minimum interpretation that comparability means only to have dimensions of comparison, the more one may agree that articulating national frameworks for accreditation helps to make such transparency possible.

On the other hand, the more one follows the maximum interpretation that sees comparability as similarity, the more one would tend to say that an agreed European framework is necessary for transparency or harmonization. Takers of the latter view would probably find that national responses tend to bring out national differences more clearly but do not solve the question of whether a bachelor's degree from country x will be accepted by a higher education institution in country y for entry into its master's program.

Will National Accreditation Lead to Less Diversity Within Countries?

Another potential problem of the development of national frameworks for judging study programs may be that they create pressure toward harmonization within countries. At this time—as stated before—it is claimed that diversity is needed more than ever because of "massification" of higher education (countries are setting ever higher participation targets, sometimes above 50% of the relevant age cohort) because different types of students have different learning needs and because in the emerging knowledge society, the roles of higher education are multiplying, leading to the need to respond in different ways to different demands.

The latter point, by the way, may also indicate a limitation of not only the accreditation schemes developed but also much of the discussion in the Bologna process. The idea of the knowledge society is closely linked with lifelong learn-

ing, whereas for the most part, lifelong learning and the new demands it sets for higher education seem to be left out of the Bologna process.

Continuing in that direction, one may wonder if it is useful at the national level to design accreditation schemes at all. Are the limitations to formal degree programs (excluding much of lifelong learning) and the stifling of diversity inherent in accreditation schemes? I am not going to delve deeper in that direction in this article.

Open Accreditation Systems: Are They a Solution?

Some of the disadvantages of accreditation, especially those connected with undue uniformity, could be evaded in what have variously been termed *open* or *multiple accreditation systems* (van Vught, 1994; Westerheijden & van der Wende, 2001). In an open accreditation system, study programs (to remain close to the focus of the Bologna process) are free to choose an accreditation that suits their profile (e.g., research oriented or taught through problem-based learning). At the same time, accreditors are free to offer their respective accreditations to the programs. To prevent occurrence of a "jungle" of accreditations, a "gate-keeper" such as a national accreditation council could set methodical or similar barriers for market entry. Moreover, governments could set their own standards (preferably the same as those by the accreditation council[11]) before attaching their own consequences to accreditation decisions made within the system. The German and Dutch schemes previously discussed are examples of such open accreditation systems.

The freedom of accreditors to enter a higher education system in particular should ensure that for any study program, more than one option exists so there is not necessarily a uniformity of accreditation criteria.[12] On the diversity dimension then, open accreditation systems should score better than accreditation systems completely dominated by a single accreditation agency, such as the state-controlled systems in Central and Eastern Europe. However, the number of competing disciplinary accreditation agencies is very limited in practice. In the United States, for instance, in business studies and in teacher training only two competing agencies are active.[13] In Germany, there is as yet only a single disciplinary agency in any knowledge field. However, there is a real option of choosing among several regional agencies; thus, for example, the consortium of universities collected in the Nordverbund does not opt for the regionally nearest agency of the Central Evaluation and Accreditation Agency in Hannover (Niedersachsen) but rather for the Accreditation, Certification, and Quality Assurance Institute (based in the Southern German states of Bayern and Thüringen).

INTERNATIONAL INITIATIVES

Worldwide Initiatives

I should like to begin a brief account of international quality initiatives at the global level like I did when sketching the context. Again, I emphasize that this short overview aims to indicate a range of options; it is not intended as anything even approaching completeness.

First, there are review programs aiming at international aspects of the higher education provision. One is the Internationalisation Quality Review organized by the European University Association (EUA) in cooperation with the Organization of Economic Cooperation and Development's IMHE and the Academic Co-Operation Association (cf. the EUA Web site at http://www.unige.ch/eua). The object of evaluation is the internationalization policy of the higher education institution. In Europe, special attention could be given to the European dimension of education. Similarly, for some years, the Global Alliance for Transnational Education (GATE) offered a review process to judge the provision of education in higher education institutions overseas (Lenn & Campos, 1998). The GATE reviews ended prematurely when the main sponsor of GATE decided to change the organization's character in 1998.

A recent, more comprehensive initiative concerns the introduction of a worldwide quality label (Van Damme, 2002). This is meant as "proof" of quality for quality assessment and accreditation agencies operating internationally. It could be seen as part of a global version of an open accreditation system and is supported by the international network of quality assessment agencies, by an international organization of university presidents, and by the United Nations Educational, Scientific, and Cultural Organization (cf. Marshall, 2002).[14]

A major premise of GATE before 1998 was that quality assurance needed to internationalize because the labor markets and the fields of knowledge were internationalizing, especially in the professions. Indeed, in some professions, accreditation agencies have been or are becoming active at an international level. Engineering would be the prime example, with the Washington Accord showing that an approach based on mutual recognition of accreditation judgments can work (*Recognition of Equivalency of Accredited Engineering Education Programs Leading to the Engineering Degree*, 1989). Business studies is another example, with both the United States–based Association to Advance Collegiate Schools of Business and the Europe-based European Quality Improvement System offering their "kite marks" to higher education in business schools on a global scale. The European Quality Improvement System example shows that accreditation is not necessarily synonymous with U.S. organizations. Indeed,

the fear that "the Americans are coming" does not seem to hold ground: There seems to be more international demand for accreditations from U.S. accreditation bodies than they are willing to offer, although some are more eager to enter the international business of accreditation than are others.

More or less similar to accreditation agencies, international consortia of higher education institutions function to facilitate movement of students among their member institutions, in this way taking some important first steps toward breaking down barriers for student mobility.

In all these initiatives, the higher education providers are present as the main stakeholders or at least among the main stakeholders. Mostly, this means public higher education institutions as through the EUA and the International Organization of University Presidents; in GATE, however, private higher education providers were also present (and after its change, for-profit private institutions were the only ones). Quality assessment and accreditation agencies play a role in the worldwide quality label initiative. These agencies often are quasi-(non)governmental. Governmental stakeholders are also represented in some of these initiatives at some distance through the United Nations Educational, Scientific, and Cultural Organization and the Organization for Economic Cooperation and Development. Almost absent, except perhaps in the professional accreditation agencies, is one category of customers, namely, employers. Worse, the other main category of customers, that is, students, are completely absent from these initiatives.[15]

European Initiatives

From the early 1990s until the 2001 Prague conference, quality assessment was a field in which European developments were hesitant and slow (Westerheijden, 2003).

Networks in a Platform

In the couple of years since its formation, ENQA could not yet move mountains. Yet, it is taking a central place in a number of European initiatives inter alia in the Bologna process, as previously mentioned. Thus, for instance, ENQA together with the EUA and the National Unions of Students in Europe embarked on a number of study projects, forming a platform to discuss issues of quality assessment and quality assurance at the European level as proposed in the EUA study reported in Sursock (2001). It is interesting that in this initiative of ENQA, the EUA, and the National Unions of Students in Europe, students are repre-

sented; on the other hand, employers or professions are not. Getting together all types of stakeholders in a single platform apparently remains a daunting task.

Cross-Border Evaluations

The theme of cross-border evaluation pilot projects was not new when the European Union embarked on it in 1995. In fact, during the past decade, a series of such international projects have taken place, one of the first (in about 1991) being a pilot project to develop a method for judging comparative quality of economics curricula in the Netherlands, Germany, and the United Kingdom (Brennan, Goedegebuure, Shah, Westerheijden, & Weusthof, 1992). To avoid the costly apparatus of many site visits in many countries, this project relied on an analysis of curricula, with a peer review team making judgments on the basis of written materials and meeting representatives of the study programs involved in a single location. A major outcome of this project was, nevertheless, the clear distinction between the level of a British bachelor in comparison with the German and Dutch first degrees. The latter were much more geared to (long) education in the Humboldtian philosophy, educating specialists ready to enter working life, whereas the British bachelor was educated much more briefly in the Newmannian philosophy of forming individuals with generic capacities whose professional capacities mainly would be formed through on-the-job training. For judging the "average" quality of higher education programs across countries, the approach in the Brennan et al. (1992) project proved to be insufficiently robust. Equally, it fell short in credibility for judging the quality of the individual programs involved. Most of the subsequent cross-border projects accordingly either applied the general model with self-evaluation and peer review through site visits (van Vught & Westerheijden, 1994) or limited themselves to curriculum comparisons.

In the first strand, the International Program Review Electrical Engineering stands out for its application of relatively clearly defined standards, leading to a judgment for all participating programs stating whether they merited awarding degrees equivalent to master's in electrical engineering (Vroeijenstijn, Waumans, & Wijmans, 1992). The 12 participating programs were located in six Western European countries. It is interesting that the two British programs withdrew before the summary judgments were passed to avoid interference with their national accreditation.

Another early project in the same strand was the Center for Higher Education Policy Studies and Accreditation Board for Engineering and Technology study on the three fields of chemical, civil, and mechanical engineering (Goedege-

buure, Maassen, Phillips, & Smits, 1993). This one stood out for its scope because it included three fields and 21 institutions in five Western European countries. This study was instrumental in making the policy decision in the Netherlands adjust the formal program length of university engineering programs from 4 to 5 years, as this reflected better international practice.

Sadly, more recent projects, such as the cross-border evaluation of physics programs (*Evaluation-Report: Cross Border Quality Assessment in Physics*, 2001), did not show significant methodical advancements compared with the earlier projects. This should be amended in the Trans-National European Evaluation Projects running from 2002 to 2003 and sponsored by the European Union.

In the second strand, I was involved in a comparison of technical programs in higher education in the Netherlands and Flanders. This study (Westerheijden & Lugthart, 1999) used a method of two-dimensional graphical analyses of curricula showing inter alia the different pedagogical approaches prevalent in the two higher education systems (more lecture based in Flanders and more project-learning based in the Netherlands), the larger autonomy in educational matters in the Netherlands (shown in the higher dispersion of Dutch higher education institutions whereas Flemish institutions tended to form tighter clusters), and the larger focus on research-oriented subjects in the Flemish engineering programs compared with their Dutch counterparts. In addition, a panel of experts made a blind judgment of final thesis reports to reach relative consensus conclusions, which were hotly debated politically on the professional and academic competencies of graduates from those programmes. The experts saw major parallels between Flemish and Dutch university engineers and between Flemish and Dutch *hogeschool* engineers. The Flemish single-cycle *hogeschool* "graduate" degrees were of a clearly different type and of a lower level. Among the engineers, Flemish graduates *grosso modo* showed more "academic" interest than did their more practically oriented Dutch counterparts.

Competencies: A Promise for the Future?

The expert judgments of final-level papers mentioned in the previous section foreshadowed the current emphasis on competency approaches. The outstanding example of large-scale application of a competency approach in Europe was the SOCRATES-funded project Tuning Educational Structures in Europe,[16] which was completed in 2002. It aimed to develop bottom-up agreement in the disciplines on European standards or what in the United Kingdom are known as subject benchmarks. Perhaps a major outcome of the Tuning project is that apparently, academic teachers and researchers reach a high level of agreement

on the competencies expected from their graduates, whereas previous projects focusing more on input and process indicators—which can be expressed in more objective indicators—were markedly less successful. The competency approach seems promising for the European higher education area.

Equally based on a competency approach is the final initiative I would like to mention in this list, the Joint Quality Initiative, which was started in 2001. At the higher education systems level, it mirrors the Tuning project. Collected in the Joint Quality Initiative are a small but growing number of (northwestern) European countries' governments and public quality assessment agencies that share a particular approach to quality assessment,[17] namely, a focus on the program level and on output rather than input. Both choices are in line with the intentions of the Bologna Declaration. Broader interest in the Joint Quality Initiative's approach might therefore be expected in the coming years. Results until late 2002 included a consensus on competencies underlying bachelor's and master's degrees generally (the "Dublin descriptors"[18]). Next to political impact and status, there are of course many methodical questions that need to be solved to move beyond the Dublin descriptors, but the actors in the Joint Quality Initiative are progressing in the methodical respect.

VERDICT AND CONCLUDING OBSERVATIONS

From the global "threat" of GATS negotiations and the European "opportunity" of the Bologna process, several design requirements for quality assessment systems in Europe have been derived. A focus on the program level and on safeguarding a minimum level of provision, often through accreditation, seems to be a warranted methodical choice in this respect. In a number of European countries, adaptations of previously existing quality assessment arrangements—sometimes marginal and sometimes radical, as in Germany and in the Netherlands—could be noticed.

Both the German Akkreditierungsrat and the Dutch National Accreditation Organisation would seem to reply well to most design rules derived: program focus, European transparency, consumer protection, and fair competition (in Germany, between universities and Fachhochschulen; in the Netherlands, between public and private providers). However, one may wonder if the detailed institutional arrangements do not imply undue barriers to entry for international accreditors. In summary, the German and Dutch responses seem to be adequate nation-level responses in the framework of the Bologna process. However, as previously mentioned, there are limitations inherent in national approaches that may need to be addressed at the international (or supranational) level.

At that level, the Bologna process is giving rise to increased international activities in the field, of which the Joint Quality Initiative may become a notable

example. The Netherlands plays an important role in this initiative, witnessing its desire to keep occupying an avant-garde position in European higher education policies. As Van Vught et al. (2002) have argued, however, it may be doubted if the Bologna process, with its emphasis on European cooperation, is an adequate response to the challenges of worldwide competition (i.e., the challenges of globalization) of which the GATS has been singled out as the most directly relevant element in this article (van Vught et al., 2002). Accordingly, from a European perspective, the Dutch approach to accreditation—and similar approaches in other countries—look fairly good, but from a global perspective, it may be doubted if all of European higher education policy, focused on the Bologna process, does not look rather like a quixotical fight against globalization.

NOTES

1. Bourdieu's concept of "cultural capital" to explain differential participation in higher education comes to mind (Bourdieu & Passeron, 1990).

2. Invariably, students protest against being called "consumers." I should like to point out that by analyzing the relation between providers of higher education and students as if they were suppliers and consumers, I am applying a partial, theoretical analysis. All theoretical analyses are of an "as if" nature (Friedman, 1953; Popper, 1980), and they do not imply a reductionist ontology that students would be nothing but consumers—on the contrary.

3. In addition, higher education institutions are pushing the denationalization of higher education by their own international strategies (van Vught et al., 2002)—a point to which I shall return in a moment.

4. It is interesting that the United Kingdom is at the same time a "founding member" of the Sorbonne and Bologna Declarations.

5. The authors of that publication contrast the World Trade Organization's competition principle with the European rhetoric of cooperation.

6. By way of working definitions, I use *quality assessment* to denote the (internal and/or external) judgment of quality. *Quality assurance* is used then as the function of ascertaining to other actors that there is quality. The activities that higher education institutions perform for this assurance I call *quality management* (or *quality work*).

7. One could maintain that involving evaluators from foreign countries is a proxy to applying internationally agreed criteria, but then it is without the need to make those criteria explicit—which is one of the strengths of peer review.

8. This is a consequence of Heisenberg's uncertainty principle, reputedly introduced in social science discourse first in Campbell (1975).

9. For some of the consequences of high-stakes quality assessment, see also the reactions to the research assessment exercises in the United Kingdom

(Curran, 2000; Elton, 2000; Henkel & Little, 1999; Mace, 2000; McNay, 1997, 1999; Talib Ameen, 2000, 2001; Thomas, 2001).

10. In exceptional circumstances, the *Akkreditierungsrat* did accredit programs by itself in its experimental first 3 years of existence.

11. In the United States, the umbrella organization Council for Higher Education Accreditation and the federal Department of Education use different standards for recognition, leading to slightly diverging lists of recognized accreditation agencies (Council for Higher Education Accreditation, 1999).

12. On the other hand, there seems to be an insurmountable tendency among higher education decision makers to compare themselves with others along the same dimension, indicating high demand for standardization and for single accreditation agencies per field of knowledge. The point in our description of an "open accreditation system" is that authorities do not prescribe standardization but leave it to the self-organization of the higher education system to find its appropriate degree of uniformity.

13. These agencies are (a) in business studies, the Association to Advance Collegiate Schools of Business and the Association of Collegiate Business Schools and Programs and (b) in teacher training, the National Council for Accreditation of Teacher Education and the Teacher Education Accreditation Council.

14. In the emerging international evaluation and accreditation "system," it is difficult to judge the credibility of each new player entering the arena. For example, regarding the global quality label initiative, it is to be awaited whether the support of the well-established international network of quality assessment agencies and the well-known United Nations Educational, Scientific, and Cultural Organization, which has all of the United Nations Organization somehow behind it but did not enter the evaluation and accreditation field until now, outweighs the doubts some observers have about the importance and power of the international organization of university presidents.

15. For higher education institutions as a whole, the European University Association offers its institutional evaluation program (van Vught & Westerheijden, 1996) internationally (in cooperation with other rectors' conference organizations also outside Europe). As institutional quality assurance is not our primary focus in this article, I shall not treat it as a part of the initiatives mentioned here.

16. For more information, see http://odur.let.rug.nl/TuningProject/index. htm.

17. For more information, see http://www.jointquality.org.

18. For more information, see the Web site mentioned in note 17. Look under "Agenda" and browse the Amsterdam conference information for "shared descriptors" (Westerheijden & Leegwater, 2003).

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