

Review of Ontario College Quality Assurance Service

Report of the Independent, External Panel

Introduction

We were appointed by the Ontario College Quality Assurance Service to conduct a formal, external evaluation of the Service at the end of its first cycle of audits of colleges. This is our report.

Executive Summary

The two services which make up OCQAS, credentials validation and audit of college quality assurance processes, have been successful in meeting the goals and objectives set for them. In a commendably short period of time they have established themselves with the Ontario Colleges, and they are perceived by the Colleges as providing benefits, rather than imposing burdens. Colleges are able to point to a number of specific benefits, in line with those it is expected that external quality scrutiny ought to engender.

OCQAS now needs to build on this initial success by further consolidating the audit service in particular, and slightly extending its scope in ways which will enhance its effectiveness, and continue to provide constructive challenge and stimulus to the colleges.

Specifically, we recommend that the overall audit of quality processes should be extended to address two matters more explicitly. First, the way in which colleges set the learning outcomes for their programmes should be a first consideration in the audit of quality processes. The Ontario colleges are mandated to provide outcomes-led programmes, so a focus on the setting of those outcomes is appropriate. It is also a logical point from which to commence consideration of the effectiveness of quality processes in dealing with curriculum design, assessment design and resource allocation, all of which must relate to the intended learning outcomes of programmes.

Second, the audit should consider the ways in which colleges address the personal responsibilities of faculty for the delivery of quality services. For the student, quality is not about programme approval processes, but about the teaching and learning support they experience. In turn, this depends on the competence, behaviours and professionalism of faculty. External scrutiny should address how colleges develop these attributes in their teachers.

The audit process should address also potential risks to quality that are specific to individual colleges. Of these potential risks, perhaps the one presenting the greatest challenge is the delivery of programmes overseas. We suggest this is an area in which OCQAS might develop guidance for colleges.

We suggest two changes to the way in which audit reports are written. First, we propose there should be a greater use of evaluative narrative, to make clear the link between evidence and judgements reached. This would assist colleges in understanding how judgements were made, and what needs to be done if a criterion was not fully met. Second, we conclude that the “partially met” judgement, by itself, is too wide to be helpful. It should be augmented by the use of specific action points. Not only would these help the college in planning remediation, they would also make clear the relative seriousness of the considerations that led an audit team to conclude a criterion was not fully met.

We suggest that at least one member of each audit team should come from outside the Ontario college system, so as to bring wider experience to bear, and to ensure that the process does not become introspective. We suggest also that OCQAS should invest in developing the skills of a small cadre of reviewers who would act as chairs of review teams, and whose experience might be broadened by serving on review teams in other jurisdictions.

We propose that OCQAS should consult on whether full audit reports should be published, rather than the executive summaries alone. We suggest that a major determinant will be the extent to which reports may be disclosable in any event, under freedom of information legislation. We recommend that OCQAS should consider publishing short, thematic reports to promulgate good practice, drawing upon the experience of audit.

We have considered whether there should be changes to the credentials validation service, and we have concluded that this is not the right time for change. Nevertheless, OCQAS should keep under review the possibility that, as colleges mature and develop; this is a function which could be capable of devolution to college level, with safeguards provided through a greater scrutiny, through the audit process, of the way in which colleges set the learning outcomes for their programmes.

We were asked to give consideration to a number of more internal matters affecting OCQAS. We recommend the adoption of a mission statement which addresses the adherence by colleges to the role mandated for them by the Ministry, and the effectiveness of their performance in that role. We recommend a broadening of the membership of the Management Board, to include an independent chair and stakeholder representation. We conclude that, if operated fully and fairly, the systems used by OCQAS are unlikely to give rise to decisions which would be susceptible to challenge by way of judicial review. Finally, we note the substantial reliance which OCQAS has on the expertise of a single member of staff. We do not think the workload is likely to justify any increase in staff numbers, but we recommend that the Management Board should have in place a succession plan.

Finally, we considered the performance of OCQAS against the standards set for external quality assurance agencies by the International Network for Quality Assurance Agencies

in Higher Education (INQAAHE). The standards are broadly met, and where steps need to be taken to meet fully a standard, these are addressed in our recommendations.

Background and Context

The Ontario College Quality Assurance Service (OCQAS) has been operational since February 1, 2005 when it began as the Credentials Validation Service (CVS). Since that time the OCQAS has developed and implemented the Program Quality Assurance Process Audit (PQAPA) and these two services (CVS and PQAPA) have become known as the OCQAS.

When the CVS and the PQAPA were approved and implemented, it was agreed that both processes would be subject to a formal, external evaluation at the end of the first cycle of PQAPA audits. The review is intended to address the structure and operations of both the CVS and PQAPA, and to drive any changes that are required as the service moves forward and continues to grow and improve. The Management Board of OCQAS has set a number of expectations for the output of the review, and has determined that the services should be benchmarked against international standards. For the purpose of the review, the international benchmark has been taken as the Guidelines of Good Practice in Quality Assurance published by the International Network for Quality Assurance Agencies in Higher Education (INQAAHE) in August 2007.

The legislative framework within which the Ontario Colleges operate is provided by the Ontario Colleges of Applied Arts and Technology Act 2002 and, with respect to degree programmes, the Post-secondary Education Choice and Excellence Act 2000. The legislation gives considerable power to the Board of Governors of each college to approve programmes of instruction, on the basis that each college is best positioned to determine the programmes which will meet the needs of its community, and prepare graduates to meet the needs of the workplace, the economy, and society. The powers thus granted to each College must be exercised within the framework provided by the Minister's Binding Policy Directive, the current version of which came into effect on 1st April 2003.

The conduct of the review

The review team comprised John Randall, Chair (a consultant with experience of quality assurance systems in several countries around the world, and a former Chief Executive of the Quality Assurance Agency for Higher Education in the United Kingdom), Paul McQuay (who also has international consulting experience in the quality field, and who has acted as a reviewer for two of the regional accrediting bodies in the United States of America) and Huguette Blanco (auditor and francophone professor at Laurentian University in Sudbury).

In advance of the site visits, the team considered the self-study report prepared by OCQAS, earlier internal and external reports of reviews of the services, the Minister's

Binding Policy Directive, the operating manuals for both services, and other documentation. The team held two preparatory teleconference meetings.

Site visits were conducted in the period 16 – 21 June 2010. These included meetings with OCQAS staff, senior staff of Colleges Ontario, staff from the Standards and Evaluation Unit and the Colleges Unit of the Ministry of Training, Colleges and Universities, college quality assurance representatives, college curriculum and programme development representatives, chairs and members of audit panels, representatives of the Higher Education Quality Council of Ontario, senior representatives of colleges (vice-president, academic level) and members of the OCQAS management board. Visits took place to George Brown College in Toronto and to the Glendale Campus of Niagara College. The team sought also the views of students, and received written evidence from the College Student Alliance. Meetings at the colleges visited included senior management, quality assurance staff, faculty, students, governors and a former chair of a programme advisory committee. Every one of the 24 colleges had a representative present at least one meeting with members of the review team.

The team is grateful to all those it met for their helpfulness and hospitality.

In addition to the expectations set out in the terms of reference, and the benchmarks provided by the INQAAHE Guidelines, the team addressed a number of specific issues identified in the self-study as matters requiring further work or development.

In conducting the review, we were conscious that the Ontario colleges deliver their programmes in both the English and French languages, and that OCQAS has to have the capacity to provide services in either language. Our focus has been on the effectiveness and development of the OCQAS services, regardless of the language in which they are provided. We found no evidence to suggest that OCQAS was any less effective when operating in one language rather than the other, and positive evidence of effective support to the minority of colleges operating in the French language.

The structure of the report

Our report deals first with overall performance to date. We then go on to address the mission of OCQAS. The self-study highlighted the development of a mission statement as an area of work which needed to be completed, but wished to have the benefit of the conclusions of this review before finalising such a statement. It is sensible for us to address this matter first, as mission then informs the matters which follow. The report then goes on to consider the major questions of the future development of CVS and PQAPA. Thereafter we address the remaining specific matters arising from the terms of reference, the INQAAHE benchmarks, and the self-study. As there is sometimes overlap between these, some sections group a number of related matters together. Finally, we make our recommendations.

Overall performance to date

It is appropriate to start with some observations on the performance to date of both PQAPA and CVS. These are young systems. Whilst most colleges have substantial experience of CVS (because of the number of programmes submitted to it), each college has only undergone one first round audit. Given this, it was pleasing to find that the views of colleges were overwhelmingly positive, and OCQAS is to be commended on having built such a high level of acceptance and support so quickly.

In the course of our meetings, we invited representatives of the colleges to comment on their perception of the balance between the benefits and burdens of these processes of external scrutiny. In all cases, individuals pointed overwhelmingly to benefits. Benefits mentioned included:

- The stimulus to reflection on provision provided by the need to produce the self-study.
- The sharing of good practice both within and between colleges.
- Team building through shared tasks of preparation for internal programme approval and external audit.
- The strengthening and formalisation of college quality processes.
- More effective use of programme advisory committees, as partners rather than as rubber stamps.
- The establishment and reinforcement of Province-wide standards, through CVS.
- A move from an intuitive to an evidence-based sense of quality.
- Enhancement of provision through effective use of the feedback loops provided by a good internal quality process.
- Increased professional conversations amongst faculty on teaching and learning issues, and stimulation of thinking about why faculty teach in the way that they do.
- Continuous review and improvement of processes, reflecting on what works and what does not, considering why some processes work well, and applying lessons from this.

This is an impressive list of benefits. However, it needs to be tempered by the observation that most (but not all) of the comments made came from those engaged professionally in quality assurance and curriculum development in their institutions. They could be expected to welcome an external process which enhanced the legitimacy and importance of their work. Nevertheless, that does not detract from the considerable achievement. The significance of the achievement is underlined by the views expressed in our meeting with Vice Presidents (Academic), all of which were positive in seeing significant benefits from the services.

There was an absence of the complaints, encountered in some parts of some higher education systems, that external scrutiny is burdensome and unwelcome. One reason for this may be that college faculty remain grounded in the sectors of employment which

they serve. As mentioned to us by one person to whom we spoke, in sectors such as health there are systems of inspection and audit, and in many parts of the private sector commercial competitiveness requires compliance with and audit to such standards as the ISO series. This recognition that the public expects increasingly that the quality and standards of services should be verified and reported upon makes easier the task of OCQAS.

The Credentials Validation Service is valued by both Colleges and the Ministry, and is seen as playing an important role in securing consistency in the titling and nomenclature of programmes and, where appropriate, consistency in programme learning outcomes.

Some of those to whom we spoke, particularly from the larger colleges, were keen to look ahead, to how the OCQAS services might develop in future. We share the view that the existing systems, whilst enjoying a high degree of approval from colleges, should not stand still, but must develop. We address how that might be done, in the sections which follow.

Measures of the success of CVS and PQAPA in meeting the goals and objectives established for them are, inevitably, qualitative. With respect to CVS it was clear to us, from the volume of applications handled, the positive responses of colleges to the advice provided, the value colleges place upon consistency of nomenclature and titling, and the support the service enjoys from the colleges, that the service is meeting its goals and objectives. However, the service relates to a part only of the range of programmes offered by colleges, albeit a very substantial part. Degree programmes, and programmes for which Ministry funding is not sought, do not go through CVS. Degree programmes are subject to the approval of the Postsecondary Education Quality Assessment Board (PEQAB) and in the case of self-funded programmes, it is the internal processes of the college alone which will ensure appropriate mapping of the curriculum to learning outcomes. We discuss the implications of this below.

From our discussions with college representatives, and our visits to colleges, it is clear that PQAPA has worked well with the internal processes of colleges for the approval and review of learning programmes. It certainly ensures that such processes exist and are implemented as, if processes were not in place and operating, the criteria of PQAPA could not be met. Later in this report we make a number of proposals for enhancing the effectiveness of PQAPA. The outcomes of PQAPA also have the potential to contribute to informing wider academic debate within an institution, of the type that might be expected to occur at a university senate. As the mission of the colleges is provided by the Minister's Binding Policy Statement, there may not be the same need for an internal forum to shape the academic mission of the institution. However, in observing that the internal and external processes of quality assurance appear to be effective in generating information which enables the governing body to hold the executive to account, and which facilitates continuous improvement in operational quality assurance, we can observe also that the same information has the potential to be used to inform the shaping of academic policy more generally.

The mission of OCQAS

We commence with this matter, as our views on the mission of OCQAS have a bearing on what we say below about the future development of PQAPA.

The INQAAHE Guidelines¹ note that “*there are diverse approaches to, and purposes for, external quality evaluation*”. Given this diversity, the INQAAHE Guidelines are primarily concerned with processes. However, the evaluation of any process involves a judgement in relation to its effectiveness in achieving the intended purpose for which the organisation was established. Consideration of mission must start from the overall purposes for which OCQAS was established.

The overall purposes are not as well defined as they might be, as is recognised by OCQAS in its self-study, where it identifies as an “*area of work that needs to be completed*” the “*development of a mission and vision statement*”. The mandate of OCQAS is set out in relation to CVS and PQAPA in functional terms which, whilst appropriate, would be enhanced by being placed in the context of a wider purpose.

That wider purpose is not hard to discern. The core business of the Ontario colleges is set out by the Minister in his Binding Policy Directive. The internal quality assurance arrangements of each college should be directed to ensuring that the academic and administrative systems of the college are effective in enabling the college to deliver that core business. In turn, external quality reviews should provide assurance that internal quality assurance arrangements are operating effectively, such that the college network as a whole is delivering the intended core business.

The core business of the Ontario colleges is described² as “*the delivery of programmes of instruction*”, thus distinguishing the colleges from those higher education institutions which are explicitly research led. The mandate of the colleges is “*to deliver a comprehensive program of career-oriented, postsecondary education and training that:*

- *Assists individuals in finding and keeping employment;*
- *Meets the needs of employers and the changing work environment; and*
- *Supports the economic and social development of their local and diverse communities*”.³

This is an explicitly employment-led mandate. Broadly, it may be argued that there are three main drivers of higher education provision. It may be research led (as in research-intensive universities), it may be employment led (as with the Ontario Colleges), or it may be personal development led (as in liberal arts colleges). However, these drivers rarely operate completely independently of each other. Degrees in medicine are led both

¹ “Guidelines of Good Practice in Quality Assurance”, International Network for Quality Assurance Agencies in Higher Education, August 2007

² Minister’s Binding Policy Directive, Ontario Ministry of Training, Colleges and Universities, 1st April 2003, revised 31st July 2009.

³ *Ibid*

by current research and by the requirements of professional practice in medical employment. Innovation, often informed by research, characterises many employment led programs, especially in professional fields. Attributes gained through personal intellectual development are usually of relevance also to employability; and personal development is a feature of all types of higher education.

Although all three drivers have a legitimate influence on most higher education programmes, it is common for one driver to be predominant in respect of an individual institution. Where that predominant purpose is employment led, there are often concerns that “mission drift” away from that primary purpose may occur. Institutional autonomy is important to enable colleges to design programmes to meet local needs, and to adjust the overall balance of provision to reflect the realities of the local economy. But institutional autonomy can lead to mission drift, if supply-side interests take precedence over those of users, or if the institution has an agenda of widening or altering its mission.

Quality assurance systems have an important role to play in assuring adherence to broad mission. Quality assurance is about fitness for purpose, and the overall purpose of the programmes of instruction of the Ontario Colleges is to meet employment needs. As such, it would be reasonable to expect, first, that the internal quality assurance systems of a college are effective in ensuring that programmes meet that purpose and, second, that external quality assurance provides a check on the effectiveness of the internal systems in achieving that goal.

In some countries, external quality assurance systems take as a given the self-defined mission of a higher education institution. In others, it is an explicit function of external quality assurance to check on adherence to a mandated mission. A good example of the latter approach is that of the Hong Kong University Grants Committee. Their Performance and Role-related Funding System makes judgements about both adherence to a given role, and the effectiveness of performance in that role.

Given the existence of a mandated purpose for the Ontario Colleges, it would be reasonable for a mission statement for OCQAS to be:

“To provide assurance that the Ontario Colleges are fulfilling their mandate to deliver a comprehensive programme of career-oriented education and training, and are doing so effectively”

There is an extent to which adherence to role is already addressed by OCQAS through the CVS. We will suggest below that the audit process should make more explicit reference to the setting of programme outcomes, and a new criterion could address also whether programme outcomes were consistent with the overall mandate of the Ontario Colleges.

In our discussions with colleges there was an acceptance that it was appropriate that there should be some check on adherence to role. Around the world, there are concerns that colleges with an employment led mission can migrate away from that role. If there is to

be a check on this, it is an appropriate dimension of an external quality assurance process. Adherence to an employment led role does not mean that a college should not offer higher level and degree programmes. The test is not the level, but the purpose of programmes. As occupational roles become more complex, an employment led college may legitimately offer higher level programmes to meet these needs. Nevertheless, there should be a balance of provision, such that apprenticeship and technician level programmes are not squeezed out.

From the mission suggested above it would be reasonable to expect the following three main outputs usually associated with external quality assurance.

The first is ACCOUNTABILITY. External quality assurance is the means whereby the Ministry may be assured that a college is adhering to its role, and is doing so effectively; and the public (both potential students and employers) may be assured that programmes offered are effective in delivering intended learning outcomes relevant to specific or general employment.

The second is INFORMATION. Information generated from the external review process informs choices made by students of the programmes they wish to follow and of the college they might attend; and informs decisions by employers about the colleges from which they wish to recruit graduates, and dialogue between colleges and employers.

The third is ENHANCEMENT. Improvement of programmes as a result of external quality assurance happens in a number of ways. First, the stimulus of preparing a self-study often leads, of itself, to the identification and implementation of improvements. Second, external peer reviewers learn lessons from good and poor practice which they observe, and they are then able to apply those lessons in their own institutions. Third the external quality assurance agency is able to identify and promulgate good practice, often in a thematic manner, through its own publications.

Earlier in this report we noted the significant enhancement effect that has already been experienced as a result of PQAPA. We will address issues concerning publication of information later in this report.

The future development of PQAPA and CVS

In this section we address the services provided by OCQAS, and the ways in which those services might develop. An holistic approach is appropriate for two reasons. First, it is not sensible to regard PQAPA and CVS as unrelated services. They address, in different ways, the standards and quality of the programmes and qualifications offered to students by the Ontario colleges. Their interaction is important. Second, there are limitations to external scrutiny based largely upon process. In addressing those limitations it is important to avoid the duplication of effort.

The high level of satisfaction with OCQAS services is a strength, but it also carries within it a risk. Those to whom we spoke, and especially the quality assurance professionals, are clearly comfortable with the current arrangements. For external scrutiny to fulfil its full potential it should have a function as a change agent, challenging institutions in ways which may sometimes take people outside their comfort zone. We make a number of proposals for strengthening PQAPA in particular, and a number of these, whilst being justified in their own right, have the potential to add to the challenge to colleges.

PQAPA: GOING BEYOND PROCESS

1: SETTING OUTCOME STANDARDS

It is important to have an awareness of the limitations of a system based largely on the external scrutiny of quality processes. Such processes are of vital importance, and it is right that OCQAS should seek to assure itself, through PQAPA, that processes are effective. The processes with which PQAPA is concerned are, primarily, those through which a college gives initial approval to a programme, and subsequently reviews its performance. That is right, as these processes are at the heart of the assurance of quality.

The conventional definition of a quality process is that it is one which is fit for purpose. However, that begs the prior question of whether the purpose, for which the process is fit, is the right purpose. Fitness of purpose is as important as fitness for purpose. In terms of academic programmes, fitness of purpose is about the relevance and standards of the intended learning outcomes.

The PQAPA criteria address learning outcomes in a manner that could appear disjointed. Criterion 1.2 requires learning outcomes to be clearly stated, criterion 1.3 requires them to be operationally meaningful (in relation to curriculum and assessment) and criterion 2.5 requires them to be consistent with the credential granted, provincial programme standards, and workplace expectations. These are all appropriate questions to ask, but dividing them across different criteria is not helpful in giving appropriate weight to the fundamental importance of setting the right learning outcomes, in a system which is meant to be outcomes driven.

There seem to us to be two main reasons for this apparent lack of focus. First, for the programmes followed by some 65% of students, outcomes are derived from the programme standards maintained by the Ministry. Second, in terms of alignment with the expectations of the credentials framework, CVS rather than PQAPA is seen to be the appropriate assurance mechanism. Notwithstanding these considerations, there are issues about outcomes that should be posed to programme developers in the programme approval process, and issues which, in turn, should be posed to colleges in the audit process.

In the design and approval of programmes there is a logical flow, which starts with intended learning outcomes. If outcomes are not properly set, then the curriculum, the learning opportunities and the assessment methods used will also be deficient. It would

be usual for programme designers to be asked for the evidence which showed outcomes had been set appropriately in relation to the level at which the qualification is to be offered, and the occupational requirements it is intended the programme will equip the successful graduate to meet.

Level is about the relative challenge the programme poses to the student, in terms of conceptual understanding, and complexity of knowledge and skill. The benchmarks are the descriptors of the Ontario Qualifications Framework, the Credentials Framework set out in the Minister's Binding Policy Statement, and the degree level standards established by the Postsecondary Education Quality Assessment Board (PEQAB).

Occupational requirements come from a number of sources. These include the programme standards maintained by the Ministry, the requirements of any regulatory authority, the accreditation standards of a voluntary accreditation body, the essential employability skills outcomes used in CVS, the advice of programme advisory boards and market research undertaken by the college with employers. Given that the programmes followed by 35% of all students do not have Ministry approved programme standards, the ability of programme designers to evaluate the alternative sources of evidence, and to use them to set appropriate outcomes is of great importance. It is perhaps significant that the recent report from the Ontario Ombudsman⁴ on Cambrian College was concerned with whether a programme should have run without a voluntary accreditation, a matter which would usually fall to be considered when selecting external standards to which learning outcomes should be mapped. Even where Ministry approved programme standards are available, these represent a threshold only, and actual programme outcomes may need to be set above that threshold to meet current labour market needs. Adjustments may also be needed to ensure that outcomes, based on programme standards which have not been updated for some time, meet current needs.

The audit process should be more explicit in asking the college how it satisfies itself that appropriate learning outcomes have been set for all of its programmes. Such a question goes to the competence of the college in using all of the sources of information which can inform the setting of outcomes, and not merely the ability to map programme outcomes to Ministry approved programme standards and essential employability skills outcomes. Establishing this wider competence may pose a greater challenge to colleges, but it is a competence that is essential if colleges are to remain nimble in their ability to respond to changing labour market demands.

The point at which programme outcome standards are set is also the point at which it is appropriate to ask whether those outcomes are consistent with the overall mission of the institution, as mandated by the Minister's Binding Policy Directive. Mission drift commences with the approval of programmes whose outcomes lie outside the mission. Colleges should satisfy themselves that the outcomes of programmes which they propose to offer are consistent with their employment led mission. The audit process should ask colleges how they know that their programme outcomes are consistent with mission.

⁴ "Too Cool for School Too", Ombudsman Ontario, August 2009

Once outcomes have been properly determined, the logical flow then proceeds to the question of whether intended outcomes have been clearly communicated, whether curriculum and learning opportunities are effective in enabling students to achieve the outcomes, and whether assessment is effective in measuring that achievement. Given that the determination of intended learning outcomes drives the subsequent process of curriculum and assessment development, it would be logical for there to be a new first criterion in the audit process which brought together the existing references to outcomes and the matters discussed above. A suggested wording appears in the annex to this report.

If this greater emphasis is placed on the effective and appropriate setting of outcome standards in the audit process, it calls in to question whether it is then necessary also to maintain a system of universal scrutiny of compliance with the credentials framework through CVS. We discuss this below.

PQAPA: GOING BEYOND PROCESS 2: PERSONAL RESPONSIBILITY

The emphasis of process on fitness for purpose, as opposed to fitness of purpose, is not the only limitation of a largely process based system. Quality assurance is not just about processes, it is about people, and the way in which they behave. Quality, as perceived by the student, is not just about systems, it is about the behaviour of faculty. Faculty need to take personal ownership of quality, in the delivery of their teaching and learning support. A quality process cannot, by itself, deliver quality if faculty do not take personal pride in the quality of what they do.

Criterion 4.1 could be sharpened to address this in a more challenging way, to capture some of the behaviours which it would be reasonable to expect from faculty. The requirement could be extended to include a willing acceptance by faculty of their professional responsibilities, including to:

- a. work to clear and well-structured instructional plans;
- b. provide prompt and constructive feedback to their students;
- c. promote a positive attitude to learning in their students;
- d. participate in peer- and self- assessment of their work; and
- e. undergo initial and continuing professional development to enhance their teaching skills.

Participation in peer- and self- assessment of work is a necessary pre-condition for one of the most important continuous improvement mechanisms, the review by a teaching team of a module or other course element after it has been run, and before it runs again. This is not a full review, of the type that might take place five years after a programme was approved; it is fine-tuning, making use of all available feedback, to ensure that a module

remains current and effective. It is what conscientious faculty do as a matter of course; it is appropriate for auditors to seek evidence that it happens universally.

Professional development of faculty is central to the development of these professional responsibilities. It would be appropriate for Criterion 4 to be expanded to include a requirement for effective professional development to be in place.

Acceptance of professional responsibilities is especially important when part time teachers are involved. Those who have made a career of teaching will usually take these professional responsibilities for granted. But many teachers are part time, and have often been appointed because they bring current experience of a profession or occupation. It is important that they also take a professional approach to their teaching, and are included in professional development plans and activities.

In this area also, a high level of satisfaction with quality assurance processes carries a risk. Within a college, quality assurance may come to be seen as something which is done by quality assurance and programme development specialists. In most cases, such specialists seek actively to involve faculty in the preparation for external audit. However, some faculty may regard quality as something that a quality unit does, not as something for which they have a personal responsibility. It is important that the audit process challenges such attitudes, where they exist.

Quality depends, ultimately, on the performance of individuals. The overwhelming majority of faculty are conscientious and professional in their work. They need to be supported by appropriate mentoring and professional development. In any large organisation there may be a small minority who display inappropriate behaviours and attitudes. Quality rests on personal performance, so it is reasonable for a quality audit to enquire about the ways in which an institution addresses personal performance and behaviour. A suggested modification to the criterion appears in the annex to this report.

For the avoidance of doubt, we should make it clear that we are not proposing that audit teams themselves should undertake such activities as classroom observation. The role of audit is to seek from the college evidence that the college itself has in place processes, systems and responsibilities which ensure that appropriate behaviours are fostered and inappropriate behaviours are challenged.

PQAPA: A NEW TITLE?

In respect of both standards of learning outcomes, and personal responsibility for quality, we suggest that audit needs to go beyond scrutiny of the process of programme quality assurance. Consideration should be given to reflecting this wider approach in the title of the audit, perhaps designating it as “institutional audit”, a term that is widely used in other jurisdictions.

PQAPA: REPORTING OF JUDGEMENTS

We have two concerns about the way in which judgements are reported in audit reports.

The first is about the linkage between evidence and judgements made (conclusions on whether a criterion is met, together with commendations, affirmations and recommendations). Members of an audit team would be expected to follow a process, in respect of each criterion, of gathering evidence relevant to the criterion, evaluating that evidence, and reaching a judgement. Evaluation is at the centre of this process. It involves weighing evidence, considering its adequacy, and resolving any conflicts between individual pieces of evidence. For example, a piece of evidence may be preferred because it is better triangulated (that is, confirmed from more than one source) than another. An audit report should contain some evaluative commentary on the evidence, to demonstrate how a conclusion has been reached. This need not be lengthy, but the reader of a report, and especially readers within the college, will be greatly assisted by having some indication of the reasoning which led to a conclusion.

The current reporting format militates against this, with the overall conclusion “met”, “partially met” or “not met” being entered into the grid in which sources of evidence are listed against criteria. We recommend the adoption of a more narrative style of reporting. In some cases, especially if a criterion is met, it will be clear from the face of the evidence cited that the criterion is satisfied, and little further commentary will be required. However, in most cases narrative commentary will be of great assistance to the readers of the report.

Closely related to this is the use of the judgement “partially met”. We heard a great deal of evidence that this category was unhelpful, and even counter-productive. The problem arises because there is a wide range of circumstances in which this judgement might be used. The judgement may be counter-productive if it discourages frankness on the part of the college. If a college has identified a problem, has taken action to remedy it, but that action is not yet complete, it may be tempted to attempt to conceal the matter from auditors if it fears the consequence will be an unexplained “partially met” judgement, which might be assumed, wrongly, to indicate a near failure.

The judgement is unhelpful because it does not record the nature of the deficiency, thus making it difficult for a college to address the matter. One college representative to whom we spoke, newly appointed to a position having responsibility for quality, had to deal with the remediation of a “partially met” judgement in a report written a year before the individual took up post. The report did not enable the nature of the deficiency to be identified.

A better approach would be to identify specific matters that led the audit team to conclude the criterion was not fully met. In respect of each of these the seriousness of the shortcoming should be identified. Similarly, there may be matters to which attention could properly be given, even if a criterion is judged to have been met.

We suggest there could be five categories of action point:

- Action should be concluded.
- Action should be continued.
- Action is essential.
- Action is advisable.
- Action is desirable.

“Action should be concluded” is a category which should be used when a college has identified an issue, has put in place action to address the issue, and that action is at an advanced state of implementation. This category would be used normally only in conjunction with an overall judgement of “met”. This would encourage colleges to address shortcomings, confident that if good progress has been made by the time of the audit, no adverse judgement will be made. Obviously, the audit team should have confidence that there was no impediment to successful conclusion of the matter.

“Action should be continued” is a category to be used when a college has identified an issue, has put in place action to address it, but is at an early stage of implementation. Depending on the facts and merits of the matter, the audit team might conclude that until such time as further progress was made, the criterion could not be said to have been met, thus this point would usually be used in conjunction with a “partially met” judgement.

“Action is essential” is a category where a failing is serious, and is putting at immediate risk the quality of a programme or programmes, or the outcome standards the students must achieve. Depending on the nature and significance of the failing, the audit team might conclude that such a finding would place the college in the “not met” category. More than one “essential” finding would usually place a college in the “not met” category. An “essential” finding would usually require a progress report from the college within three months, rather than waiting for the usual 18 month follow up report.

“Action is advisable” is a category where a failing is potentially serious, but is not yet putting quality and standards at risk. However, the failing is such that, if action is not taken promptly, it would lead to the circumstances in which an “essential” finding might be made. This action point would usually be used in conjunction with a “partially met” judgement.

“Action is desirable” is a category which would usually be used only when a criterion is already met. If action is not taken (for example, because there are higher priorities elsewhere) quality and standards would not fall below an acceptable threshold. However, if the action were to be taken, it would enhance the overall quality of provision.

The use of conclusions of the type suggested would sit well with our recommendation that there should be more narrative to support findings generally. We recommend that the reporting categories set out above be adopted.

PQAPA: COLLEGE SPECIFIC RISK

As colleges diversify, and offer programmes through less conventional routes, it is appropriate for the audit process to consider risks to quality and standards that may be specific to a particular college. It is important that audit teams should take an enquiring approach to the possible range of methods the college may use to deliver its programmes.

The focus of any enquiries should remain firmly on the quality of programmes, and the standards of the intended learning outcomes. Some risks are obvious, and relatively minor. For example, if programmes are delivered across a number of remote campuses within Ontario, the audit team should satisfy itself that the programme approval and review processes are effective in addressing, with appropriate rigour, the question of whether there are adequate human and physical resources at each location to ensure successful delivery. If programmes are delivered by a blend of face to face teaching and distance learning, the audit team should satisfy itself that the programme approval and review processes are effective in addressing whether the level of face to face support is set with due regard to the likely learning skills of the students.

Other risks are more substantial, and may arise when colleges deliver programmes in partnership with organisations outside the Ontario college system. Within Ontario, this might involve delivery in partnership with a commercial training provider. Audit teams should satisfy themselves that responsibilities for quality and standards are clearly defined, and that the college retains, at all times, full responsibility for the standards of qualifications awarded in its name.

The most substantial risk arises from overseas provision, where an Ontario college is delivering programmes in another country. This is discussed more fully in relation to the INQAAHE Guidelines, later in this report.

CVS: FUNCTION AND LOCATION

Services similar to CVS are associated with a number of national systems of vocational qualifications⁵. Such systems are often accused of either slowness or superficiality, often a consequence of a relatively high volume of proposals submitted. Ontario manages to avoid these problems, largely by virtue of the relatively small scale of the operation.

CVS has two functions. First, it ensures consistency in programme nomenclature, titling and learning outcomes. Second, it is a gateway through which programme proposals must

⁵ For example, in England the former system for the approval of National Vocational Qualifications, and the current system for the admission of all non higher education qualifications to the qualifications framework.

pass before they can be considered for funding by the Ministry. Prior to the establishment of CVS the function was undertaken by the Ministry.

The volume of proposals submitted to CVS has been fairly constant, at slightly below 200 per year. Inevitably, there is some bunching of submissions, as these will follow the programme development cycle of colleges. The turnaround time for completed submissions is speedy, with submissions being turned around within a working week, and often in a few days. At first sight, this appeared to suggest a superficiality of approach. However, on enquiry of CVS staff and of colleges, it is clear that this final turnaround is the conclusion of an iterative process, as colleges usually consult CVS on early stages of draft proposals. The final submission will incorporate responses to advice offered at an earlier stage, thus enabling a quick, but soundly based decision to be taken.

The consultation that is an inherent part of this iterative process illustrates a tension between two roles. On the one hand, the CVS is seen by the Ministry as a gateway, thus it has a compliance function. On the other hand, the colleges see CVS as having a consultancy function, in that it offers them advice on the construction of their proposals. The perception of CVS as a consultancy service extends largely to the quality assurance professionals within colleges. Beyond them, faculty are more likely to perceive CVS as a gatekeeper, whose requirements must be met. On the other side, the Ministry can perceive CVS as an advocate for the colleges. It would be more accurate to see CVS as an advocate for programme proposals which have satisfied the standards laid down for approval, which is rather different, and is not inconsistent with a gatekeeper role.

Striking a balance between gate-keeping and advising is a challenge which faces all organisations and individuals with compliance, accreditation or regulatory functions. Those who wish their proposals or systems to be approved are entitled to expect some guidance, both general and in relation to any proposal they may be minded to make, from the approving body. At the same time, the public interest in effective gate-keeping must be upheld.

In our judgement, based on our discussions with the Ministry, colleges and the CVS, and our scrutiny of proposals submitted to CVS, and a sample of the correspondence leading up to the submission of proposals, CVS strikes a balance which enables it to uphold the wider public interest whilst being appropriately helpful to the colleges.

A review of any centralised system of this nature must ask whether it would be more efficient, but equally effective, to delegate all or part of the authority to approve programme proposals from the centre. We have recommended above that, in future, the audit process should address more explicitly the way in which colleges set the intended learning outcomes of their programmes. That could provide an important part of a framework of safeguards within which delegation of the power to certify compliance with programme nomenclature, titling and outcomes could be granted to colleges.

We sought reactions to the possibility of colleges being able to earn a measure of delegation in this area. The Ministry was not enthusiastic, and pointed to issues of

fairness, in that larger colleges, with strong curriculum and programme development units, would be able more readily to earn delegated authority than smaller colleges. Most college quality staff were content to leave the system as it is, often saying that the requirement to satisfy CVS helped them to ensure that those responsible for programmes complied with requirements for consistency between similar qualifications offered by different colleges. However, a minority of colleges, mostly the larger ones, thought delegation should be considered in the next phase of development of both OCQAS and the colleges themselves.

We are not persuaded by the fairness argument. Colleges are different, and are at different stages of development. Change should not happen only at the speed of the slowest. Two things matter. The first is that there should be public assurance that there is consistency of standards and titling across all colleges in Ontario. The second is that this assurance should be provided at no greater cost than is necessary. It should be at least considered whether adequate assurance could be provided through the audit mechanism.

There is also an issue of the developing maturity of colleges. Mature institutions should be able to earn a greater degree of self-regulation in academic matters.

We make no recommendation for immediate change to the location of the responsibility now discharged by CVS. There is no consensus in support of change, and there would need to be experience gained of the greater scrutiny of the standard setting functions we have suggested should be included in the audit process. However, we do suggest that consideration should be given to the possibility of an eventual delegation of greater responsibility to the colleges. Over the next three to five years OCQAS should:

- Keep under review the effectiveness of a revised audit process in addressing issues of outcome standards.
- Review with the Ministry the nature of their requirements for assurance as to consistency of standards and titling of qualifications.
- Review with colleges the nature of the advisory support they might require if there were to be delegation, and arrangements for maintaining an accessible database of precedents.
- Consider whether measures short of full delegation might be adopted, for example requiring formal scrutiny of a sample only of programme submissions.

CVS is working well under its current management. However, the experience of other countries suggests that the risks of superficiality of scrutiny, or bureaucratic slowness in response are real. It is sensible to keep an open mind on alternative means of delivery, based on delegation within a framework of audit checks.

JUDICIAL REVIEW

We were asked specifically to consider the extent to which the CVS and PQAPA processes would be likely to meet a judicial review's test for procedural fairness.

Judicial review considers whether public authorities have exercised their powers in a lawful and reasonable manner. It is largely about process – working within the scope of powers and exercising those powers reasonably. If this is done, courts are usually slow to interfere with the resultant professional/expert judgement made.

A common approach when considering a challenge made by way of judicial review is for the court to consider three matters: *vires*, reasonableness and consultation.

Vires is straightforward. An action taken is either within the powers of the organisation (*intra vires*) or it is not (*ultra vires*). The mandate for the CVS is provided by the Minister’s Binding Policy Directive which states, in D(iv), that “*colleges are to establish a system-wide credentials validation service*”. The mandate for PQAPA comes from a decision of the Committee of Presidents of Ontario colleges in April 2005 to establish a self-regulating quality assurance process. This followed recommendations of a working group involving representatives of the colleges and the Ministry.

Challenges arise most frequently in relation to **reasonableness**. The doctrine of judicial review developed first in the English courts, and the common test applied is whether an action is “*Wednesbury unreasonable*”. This comes from a leading case in the 1950s involving the Borough of Wednesbury, which was held to have exercised its powers in a way that no reasonable authority, which had properly directed itself, should have done. Specifically, the use of a power is likely to be found unreasonable if the power has been used for a purpose other than that for which it was granted.

In this context, the powers of OCQAS are likely to have been used reasonably if, in the course of an audit of a college, or the consideration of a submission to CVS, the review team and/or OCQAS have:

- Considered all relevant evidence
- Disregarded irrelevant material
- Used powers in a proportionate manner
- Provided opportunity for the college to state its case, and to address any emerging findings (especially if these are adverse)

There are three further characteristics of a process likely to be found reasonable.

First, the process must not be tainted by conflict, bias or corruption. Peer review systems are used to dealing with conflict, which can arise if a team member has a current or recent connection with the institution being reviewed, or is a direct competitor. Bias may arise because of animosity between a team member and key staff of the institution being reviewed or, conversely, from a desire to show favouritism. Corruption may be financial, but is more likely to take the form of making a favourable judgement in return for a reviewer from that institution making a similarly favourable judgement in the institution from which the team member comes.

Second, there must be an arrangement in place for review of a decision, if requested by the institution, by a body or individual independent of those who took the decision at first instance. Such a review process can be internal to OCQAS, it does not necessarily have to be external.

Third, those conducting the review must be competent, by virtue of experience and training, to make the judgements required.

Consultation is fairly straightforward, and is of importance when an accreditation scheme is first introduced or amended. Those affected by a scheme have a legitimate expectation that they will be consulted about it, and OCQAS needs to ensure that all legitimate expectations of consultation have been met, and due regard has been had to what was said in that consultation.

We have reviewed the documentation for both CVS and OCQAS, and discussed with auditors and OCQAS staff the issues set out above. The documentation deals adequately with the proper collection and use of evidence. There are proper mechanisms in place to guard against conflict or bias, not least the ability of colleges to object to names of persons proposed as audit team members, there is appropriate training for those who act as members of review teams, there is provision for appeal against decisions, to a body independent of the first instance decision makers, and there is consultation on the criteria and procedures used by OCQAS.

In our judgement, if the systems used by OCQAS are operated fully and fairly, they would be unlikely to give rise to decisions which would be susceptible to challenge by way of judicial review.

Governance

We were invited to consider the membership of the Management Board. OCQAS is unusual in having a management board comprised solely of representatives of the colleges subject to its services. It is more usual for the composition of a governing body to be representative of a wider community of stakeholders. For a quality assurance body to have credibility, its judgements must be seen to be impartial and independent. The composition of the governing body can ensure both the reality and the perception of impartiality and independence.

We recommend that the chair of the Management Board should be a person independent both of the colleges and of the Ministry. Experience of the colleges would be desirable, with such experience having been gained as, for example, the chair of a programme advisory board, or as an independent member or chair of the governing body of a college. An independent chair can speak with authority in dealings with the Ministry and other parts of the Ontario education system.

It would be expected that a Board of this nature would take its decisions by consensus, rather than by majority vote. Nevertheless, the perception of independence is enhanced by providing that college representatives should not be in a majority. We suggest that they might hold 50% of the seats (other than the chair). The remaining half of the Board might be drawn largely from organisations representative of the first destinations of college students. In most cases this would indicate employer interests, but a person from a university background might be appointed.

The Board should consider the case for a student representative serving on the Board. A number of national quality assurance bodies have such representation and have found it helpful. Student representatives serve on college governing bodies, and students are the prime beneficiaries of good quality educational provision. There is a strong case for their voice to be heard.

Finally, the Board may wish to consider inviting a representative of the Ministry to attend meetings in an observer or assessor capacity. This is a potentially sensitive issue, but it is one which should be considered. There is usually an implicit or explicit link between quality and public funding. In the case of OCQAS this link takes the form of the requirement for CVS approval before a programme can be considered for funding. A complete divorce between the quality assurance and funding bodies is not sensible, and the experience of a number of quality assurance bodies is that there is benefit in establishing machinery for dialogue. The quality assurance body is often the main beneficiary of the arrangement, in that it provides a means of testing likely Ministerial reactions before a policy commitment is made. However, there are circumstances in which a quality assurance body will wish to have private discussions, without a Ministry representative being present. For this reason, it is recommended that a Ministry representative should not be a full member of the Board, so that the Board retains the option of meeting in closed session.

The INQAAHE Guidelines and other issues

In the foregoing sections of this report we have addressed primarily the expectations for the outcomes of our review set out in our terms of reference. We are asked to consider also the performance of OCQAS against the benchmark of the INQAAHE Guidelines. We need to address some matters arising from the self-study, and a number of issues which arose from our meetings with colleges and others.

In this part of our report we address the INQAAHE Guidelines, sequentially. The box which precedes each section contains a précis of the INQAAHE standard and, where appropriate, a reference to related matters from our terms of reference or the self-study.

Finally, we deal with a number of free-standing matters.

GOVERNANCE

INQAAHE: The organisation has a written mission statement or set of objectives. The statement of objectives is implemented pursuant to a practical management plan. The ownership and governance structure is appropriate for the objectives of the organisation.

Terms of reference: Suggest changes in the membership of the management board that are justified by evidence or emerging needs.

Self-study areas for improvement: membership and makeup of the Management Board to ensure adequate and independent representation and operation. The development of a mission and vision statement.

All of these matters have been addressed in foregoing sections, save that of the ownership of OCQAS. OCQAS does not have legal personality separate from that of its parent body, Colleges Ontario. Given the very small size of OCQAS we do not think it sensible for a separate legal entity to be established. Our recommendations for changes to the composition of the OCQAS Board of Management address to a very large extent the necessary independence of decision making which OCQAS should enjoy.

It would be appropriate, once a new Management Board is constituted, for that Board to be provided with an undertaking from Colleges Ontario (CO) that CO would respect the operational independence of OCQAS.

RESOURCES

INQAAHE: The organisation has adequate and accessible human and financial resources.

OCQAS is run in an extremely efficient manner. Commendably, PQAPA review teams have been kept to three members. We do not consider there is any need for teams to be larger.

Our major concern is with human resources. Tim Klassen, the manager, is the only full-time member of staff. He handles personally all CVS applications, save for those submitted in the French language, which are handled by a part-time member of staff based in Ottawa. He is responsible for all arrangements for PQAPA reviews. He is a significant repository of expertise, especially on CVS matters.

As organised, the work is capable of being handled by one executive. There are 24 colleges with which to deal, 5 PQAPA reviews to organise each year, and a little under 200 CVS applications submitted annually. It would not be sensible for us to propose the addition of a member of staff, simply to provide back-up. The cost could not be justified.

Tim Klassen has particular expertise and authority in the CVS area. As long as the work is organised as it is, if he were to leave, the organisation would be vulnerable. However, if, as we suggest above, over time colleges were granted a greater authority with respect to CVS matters, the loss of a key member of staff would not be so critical. PQAPA work is not so dependent on Ontario-specific expertise, as the processes are based on international practice, and there is an international, as well as a domestic market, of individuals capable of running such systems.

We recommend that the Board gives urgent consideration to succession planning, so that if Tim Klassen were to leave, they would have a plan for covering the work in the interim, and for recruiting a permanent successor.

QUALITY ASSURANCE OF THE ORGANISATION

INQAAHE: The organisation has a system of continuous quality assurance of its own activities, and is subject to external reviews at regular intervals.

For a young organisation, OCQAS has been subject to a considerable amount of both internal and external review. This is systematic, in that each of its services has been subject to review after an initial period of operation. Given the relatively small size of the organisation, it is perhaps inevitable that all review of its activities will be external. The current review is the third external review in five years, following the initial reviews of CVS and PQAPA.

REPORTING PUBLIC INFORMATION

INQAAHE: The organisation informs and responds to the public, including disclosing its policies, procedures and criteria. The organisation demonstrates public accountability by reporting its decisions about higher education institutions and programmes. The organisation discloses to the public the decisions about itself resulting from any external review of its own performance.

Self-study areas for improvement: Further consideration is required of the public nature of the Final Audit Reports and results of the audits.

The OCQAS website includes information about policies, procedures and criteria. The website also contains the Executive Summaries of all PQAPA audit reports. There are three issues for consideration.

First, should information be published about CVS applications? In our view this is not necessary. Full details of the criteria, and a copy of the application form are available on the website. CVS acts as a gateway, which permits an application for the funding of a programme to proceed to the Ministry. Almost all funding applications which satisfy CVS result in funding. At the point at which the programme has funding and is open for applications all of the information submitted to CVS will be available from the college in question. No further publication by OCQAS is necessary.

Second, should the full PQAPA audit report be published? There are two publication traditions, operated by external quality assurance agencies in different countries. One is to regard reports of this nature as confidential between the agency and the institution. This is claimed to encourage frankness in the exchanges with the institution. The other tradition is full publication of all reports. This is claimed to meet requirements for openness and accountability. Both traditions have their advocates, and members of the review team have worked with both reporting traditions.

However, the argument between the two approaches has been overtaken, increasingly, by freedom of information legislation applicable to public bodies. If an audit report is liable to be disclosed in response to a freedom of information request, any benefit of frankness resulting from confidentiality will be lost anyway. In these circumstances a policy of publication of full reports on the OCQAS website is probably appropriate.

A further consideration is the change we have recommended in the reporting of judgements, so as to distinguish between the circumstances in which a “partially met” judgement might be made. We have recommended more explicit narrative, and a new reporting system. Some of the narrative that provides reassurance about the nature of a “partially met” rating would be in the full report, rather than the summary.

OCQAS should consult with colleges and other stakeholders on publication policy, once the new audit criteria we have recommended have been agreed.

The third issue is that of the publication of thematic reports, drawing lessons from the experience of audit, as a means of disseminating best practice. A number of quality assurance bodies around the world publish short good practice guides, on a variety of topics, drawing largely on the experience of the reviews they conduct at programme and institutional level. We recommend that OCQAS gives consideration to this.

Finally, we see no reason why this report should not be published on the OCQAS website, following consideration of it by the Management Board.

RELATIONS WITH COLLEGES

INQAAHE: The organisation:

- 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 programmes;
- 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.

It is clear to us from our consideration of the PQAPA and CVS documentation, our discussions with members of audit teams, and our discussions with representatives of the colleges that OCQAS meets fully these requirements. Should OCQAS accept recommendations for change made in this report, and particularly those that alter the audit criteria, we would expect these to be the subject of consultation with stakeholders.

REQUIREMENTS FOR INSTITUTIONAL/PROGRAMME PERFORMANCE

INQAAHE: The organisation has documents which indicate clearly what it expects of the institution, including the standards against which institutions will be judged. Documentation concerning self-evaluation explains to the institutions of higher education the purposes, procedures, process and expectations in the self-evaluation process.

The existing CVS and PQAPA documentation fully meets the first requirement. In its self-study, OCQAS acknowledged that the Orientation Manual might benefit from a fuller treatment of the self-study. Whilst the current section of the Manual is adequate, it could be fuller. If our recommendations for some extension of the scope of audit are adopted, fuller guidance on how these new areas should be addressed in the self-study would be appropriate.

REVIEW STANDARDS AND REVIEWERS

INQAAHE: The organisation has clear documentation covering standards used, assessment methods and processes, decision criteria and other information necessary for external review. The system ensures that:

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

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

As discussed earlier in the report, we are content that the documentation is adequate. We have expressed our concerns about the precision of conclusions reported, and recommended changes.

There is one issue arising from this part of the INQAAHE Guidance that requires consideration, and that is the use of reviewers from outside the Ontario college system. The overwhelming majority (but not all) reviewers are current or former staff of the Ontario colleges. We do not think this is satisfactory.

The Ontario college system is relatively small. Drawing teams wholly or mainly from those with a background in the colleges carries dangers of the process becoming introspective and too comfortable. The element of constructive challenge could be diluted, and the risk of conflict of interest is enhanced. A system with 200 institutions of higher education within it would probably have little need to draw on reviewers from outside its jurisdiction, as there would be a sufficient spread of experience and background to make up robust teams. A system with 12 higher education institutions within it would usually look outside its borders for most of its reviewers⁶.

We recommend that one member of every review team should come from outside the Ontario college system. Managed sensibly, this should not add significantly to cost. Reviewers could be drawn from adjoining Canadian provinces, and also from the United States of America. There are experienced reviewers, working for the regional accreditation bodies in the United States, based, for example, in northern New York State (Middle States Association of Colleges and Schools) and eastern Michigan (North Central Association of Colleges and Schools).

An external perspective is of great value in injecting new thinking and different experiences in to the process, and thus enhancing its potential to be an agent of change.

Consideration needs to be given to the selection and training of auditors. This worked reasonably well in the first round, but should now be refined in the light of experience and of the recommendations of this report. If our recommendations are accepted, the changes made to the criteria will require revised training for those who will act as auditors in the second round. OCQAS should give particular consideration to the development of the skills of those who chair audit teams. OCQAS is at a stage at which it would be reasonable for it to invest in the development of the skills of a small cadre of its audit team members, from whom chairs would usually be selected. OCQAS should consider the potential benefits, in terms of perceptions of independence and authority, of chairs being able to draw on a wide experience of quality assurance in tertiary education. There should be additional training for chairs, focused on the particular skills of leading a review team, and of taking the lead in report writing. Report writing skills become of added importance if our recommendation that reports contain more evaluative narrative is accepted. Consideration should be given to encouraging chairs to gain experience of review processes in other jurisdictions, by serving as members of review teams in those jurisdictions. INQAAHE contacts may be able to be used to facilitate this.

Promoting an increased professionalism on the part of audit chairs, and facilitating a widening of their experience, both in Ontario and more widely, is likely to result in a greatly increased reliability and consistency of judgements between audit teams. Given the lean staffing of the OCQAS office, the audit process is substantially led by the chairs of the audit teams, thus investment in developing their skills will enhance the effectiveness and reliability of the audit process as a whole.

⁶ For example, Denmark draws most of its reviewers from neighbouring European countries.

DECISIONS

INQAAHE: Evaluations address the institution's own self-assessment and external reference points. Decisions are impartial, rigorous, thorough, fair and consistent.

Based on our review of documentation, our scrutiny of a number of reports, and our discussions with auditors we consider that, in general, these requirements are met. The one exception is with respect to consistency, where we consider that the "partially met" judgement is too broad to be used consistently. We have made recommendations to remedy this.

APPEALS

INQAAHE: The organisation 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.

The CVS process does not lend itself to a formal appeal process, given its iterative nature. In practice, an application would go through however many iterations were necessary to enable the proposal to be forwarded to the Ministry. However, if a formal appeal were to be made it would lie from the Manager of the service, who takes the first instance decisions, to the Board of OCQAS.

Audit reports go to the Board of OCQAS for final approval. As such, there is not a body superior to the Board which could act as an appellate body. Accordingly, the appeal process involves the matter being referred to a differently constituted review panel. In these circumstances it would be necessary for the Board to bind itself, in advance, to accept the decision of the new review panel.

INTERNATIONAL

INQAAHE: The organisation collaborates with other agencies, if possible, including with respect to the provision of transnational education. The organisation has policies relating to both imported and exported higher education.

As noted in an earlier section of this report, there is specific and substantial risk to the maintenance of quality and standards when programmes are delivered overseas. This is a very large subject, and it is beyond the scope of this report to give a full consideration of the risks which exist, and the safeguards a quality agency should be putting in place.

The prime consideration is that a college remains fully responsible, at all times for the standards of the qualifications awarded in its name. It is important that an audit team should be able to satisfy itself that the programme approval process has addressed fully the particular risks associated with overseas delivery. These arise from the challenges of operating with overseas partners, in a different cultural environment, subject to a different legal jurisdiction, and potentially different student expectations. There are problems

which can arise from the use of agents to recruit students, with risks of misrepresentation of entry requirements and progression routes. There are challenges in exercising proper control over the assessment of students. There are challenges in resolving problems at a distance of several thousand miles, and of applying college regulations designed on the assumption that students are based in Ontario.

OCQAS has to audit all aspects of academic quality, including those associated with international provision. The reputational risk of overseas provision going wrong is substantial. There are many examples of colleges and universities doing themselves financial and reputational damage through ill considered overseas ventures.

We recommend that OCQAS should use its membership of INQAAHE to establish relationships with the national or regional quality assurance agencies in the countries in which Ontario colleges have overseas operations.

We recommend that OCQAS should produce guidance to Ontario colleges on addressing the risks to quality and standards of provision which can arise from overseas operations, drawing on best international experience.

Other matters

In this section we comment on matters not mentioned specifically in our terms of reference, but raised in the course of our review.

REVIEWING THE CREDENTIAL FRAMEWORK

A number of points were made to us about the Credentials Framework and, to a lesser extent, the Qualifications Framework. We were struck by the extent to which these were regarded as elements over which colleges had little influence. A number of college staff told us they were unsure of any mechanism through which changes might be made to the Credentials Framework, for example to accommodate new and differently structured qualifications. It was understood clearly that the Framework was owned by the Ministry, through the Minister's Binding Policy Directive, but it was not understood through what process changes to it might be made.

It would be appropriate for OCQAS to raise with the Ministry the desirability of there being a mechanism for review of the Framework, of which colleges would be aware, and in which they could participate.

CREDIT TRANSFER BETWEEN COLLEGES AND UNIVERSITIES

Several people to whom we spoke raised the issue of the extent to which it was reasonable for colleges to expect that universities within Ontario should give students advanced standing on their degree programmes, by reference to the credit gained on college programmes. In our view there were some misconceptions about the way in which credit systems can work between different institutions. Automatic transfer of credit

usually only occurs within a managed credit framework. An example is the relationship between some American state universities, and the community colleges within the same state. In a number of states credits can transfer from a college to the university; in essence they are a part of the same credit framework.

However, in most cases, credit for prior learning depends upon a match of content. Credit alone is just a numerical representation of a volume of learning, it cannot attest to the match between what was learned in the two years of a college programme, and what would be learned in the first two years of a university degree programme. Rather than seeking a system of universal recognition of credit within Ontario, it would be better for colleges to seek individual articulation arrangements between particular college programmes, and related programmes of a university. Such an approach is more likely to facilitate progression.

ACCREDITATION

A number of those to whom we spoke raised with us the question of whether there should be a system of institutional accreditation, which would allow Ontario colleges to hold themselves out as accredited institutions. We are aware that accredited status is taking on a greater importance. Potential students are becoming wary of bogus “diploma mills”, particularly those offering qualifications over the internet. Some colleges thought it would strengthen their position in a global market for the recruitment of students if they were able to hold themselves out as being accredited.

Whether there should be such an accreditation scheme is a matter of policy, which is not for us. However, there is no difference of substance in the matters considered in most institutional accreditation systems of which we are aware, and the matters considered in the PQAPA process, especially if it were to be broadened in the manner we have suggested above. As such, if it were to be decided that accredited status should be granted to colleges, no additional mechanism would be needed to enable this to be done.

Recommendations

1. That the mission of OCQAS be: ***“to provide assurance that the Ontario Colleges are fulfilling their mandate to deliver a comprehensive programme of career-oriented education and training, and are doing so effectively.”***
2. That the audit process should incorporate a new first criterion to address the effectiveness of college processes in setting programme learning outcomes which are consistent with college mission, and which are appropriate to the level at which the qualification is to be offered and to the occupational requirements it is intended the programme will equip the successful graduate to meet
3. That the audit process should address the effectiveness of college processes in enhancing the personal performance and effectiveness of behaviours of faculty.

4. That consideration be given to re-titling PQAPA as “institutional audit”.
5. That there should be greater evaluative narrative in audit reports to demonstrate how conclusions have been reached.
6. That the judgements “met”, “partially met” and “not met” should be made more explicit by the appropriate use of the action points:
 - Action should be concluded
 - Action should be continued
 - Action is essential
 - Action is advisable
 - Action is desirable
7. That audit teams should be alert to specific risks to quality arising from the circumstances in which individual colleges deliver programmes, especially when these are delivered overseas.
8. That there should be no immediate change to the location of the responsibility now discharged by CVS, but OCQAS should keep under review the possibility of an eventual delegation of greater responsibility to the colleges.
9. That the Management Board be reformed by the appointment of an independent chair, and a division of the remaining seats between colleges and other stakeholders, including employers and a student representative.
10. That the Ministry of Training, Colleges and Universities be invited to send an observer to meetings of the Management Board.
11. That OCQAS should remain a part of Colleges Ontario, but a reformed Management Board should be provided with an undertaking from Colleges Ontario that the operational independence of OCQAS will be respected.
12. That the Management Board gives urgent consideration to succession planning in respect of the position of the Manager of OCQAS.
13. That the Management Board should consider, and consult on, the question of whether full audit reports should be publicly available.
14. That the Management Board should give consideration to the publication of short, thematic good practice guides, drawing on the lessons learnt from audit.

15. That when the audit Orientation Manual is revised, to take account of the recommendations of this report, that the section dealing with the preparation of the self-study be expanded to give greater guidance to colleges.
16. That one member of every audit review team should come from outside the Ontario college system.
17. That steps should be taken to develop a cadre of more experienced reviewers to act as chairs of audit teams, with such individuals receiving additional training, and opportunities to experience review processes in other jurisdictions.
18. That OCQAS should use its membership of INQAAHE to establish relationships with the national or regional quality assurance agencies in the countries in which Ontario colleges have overseas operations.
19. That OCQAS should produce guidance to Ontario colleges on the risks to quality and standards of provision which can arise from overseas operations.
20. That OCQAS should raise with the Ministry of Training, Colleges and Universities the desirability of there being a mechanism for review of the Credentials Framework, of which colleges would be aware, and in which they could participate.

John Randall
Paul McQuay
Huguette Blanco

28th June 2010

Annex

PROPOSED CHANGES TO THE ORIENTATION MANUAL AND THE PQAPA CRITERIA

It is not within the remit of the review team to re-draft the Orientation Manual. Preparation of a revised draft will depend upon decisions of the Management Board on the recommendations we have made, and consultation with the colleges and other stakeholders. Nevertheless, it may be helpful to point to changes which could be made to the Orientation Manual, and to the criteria contained therein, so as to implement our recommendations.

References to page and paragraph numbers in the Orientation Manual are to the revised version of the Manual published in August 2009.

Page 7: the criteria

Insert a new first criterion as follows:

Criterion 1. The college sets appropriate learning outcomes for its programmes.

Re-number criteria 1 – 5 as 2 – 6.

Page 9 et seq: the criteria

Insert a new first criterion as follows:

Criterion 1. To what extent does your college's quality assurance process ensure that appropriate learning outcomes are set for all programmes?

	<i>Requirement</i>	<i>Explanation</i>
1.1	<i>Learning outcomes are set for all programmes which are:</i> <ul style="list-style-type: none"><i>consistent with the mission of the college;</i><i>set appropriately in relation to the level at which the qualification is to be offered;</i><i>set appropriately in relation to the Credentials Framework; and</i><i>set appropriately in relation to the occupational requirements it is intended the programme will equip the successful graduate to meet.</i>	<i>Subsequent quality processes are concerned with fitness for purpose. Setting the right learning outcome is about ensuring that the purpose itself is right.</i> <i>The sum total of programme learning outcomes are the practical manifestation of the mission of the college, so getting the outcomes right is an important part of fulfilling the mission.</i> <i>Effective processes of programme</i>

		<i>design, curriculum development, assessment design and resource allocation all stem from the learning outcomes it is intended the learner should achieve.</i>
1.2	<i>Clear statements of learning outcomes exist for all programmes offered by the college, and are communicated effectively to students and faculty.</i>	<p><i>Students will benefit from a clear statement of what they are expected to achieve in their studies.</i></p> <p><i>Faculty will benefit from a clear statement of the objective to which their teaching and learning support is to lead.</i></p> <p><i>Employers will benefit from a clear statement of what they can expect from graduates recruited by them.</i></p>
1.3	<p><i>Programme learning outcomes are operationally meaningful in that they:</i></p> <ul style="list-style-type: none"> <i>• provide a sound basis for curriculum development and the design of student learning assessment; and</i> <i>• are internalised and used in the day-to-day work of programme faculty.</i> 	<p><i>For learning outcomes to be operationally meaningful, their achievement must be capable of being measured through student assessment.</i></p> <p><i>To be operationally meaningful, learning outcomes must also be stated in a manner that enables them to be used readily by programme faculty.</i></p>
1.4	<i>Student requirements and obligations state for each programme are derived from, and flow coherently from, the programme's stated learning outcomes.</i>	<i>This requirement supports informed student choice and facilitates the fair, efficient and effective attainment of learning outcomes.</i>
1.5	<p><i>Programme learning outcomes are consistent with the credential granted, the title of the credential awarded, the provincial programme standards (where these apply), and the minimum essential expectations of the workplace. They are:</i></p> <ul style="list-style-type: none"> <i>• reflected in the course outlines; and</i> <i>• used in prior learning assessment.</i> 	<i>This requirement relates programme outcomes to curriculum design, prior learning assessment, workplace expectations and requirements for province-wide consistency.</i>
1.6	<i>Programme learning outcomes are consistent with MTCU Provincial Programme Standards where these exist.</i>	<i>This is in keeping with Ministry policy as expressed in the Framework for Programmes of Instruction.</i>
1.7	<i>Programme outcomes are kept under review to ensure they remain relevant, changes are made when necessary, together with consequential changes to</i>	<i>Changes are made to reflect changes in workplace expectations, emergence of new knowledge, changes in law or regulation, etc. Changes are</i>

	<i>programmes, courses and assessments.</i>	<i>communicated clearly to students and the relevance of such changes to learning and employment are explained.</i>
1.8	<i>The capabilities of programme graduates, including knowledge, understanding, skills and attitudes are consistent with the intended programme outcomes.</i>	<i>Looking at graduate achievement provides evidence that intended programme outcomes are being attained.</i>

Re-number existing criterion 1 as new criterion 2. Remove existing sub-criteria 1.2, 1.3 and 1.4 as the material is now included in new criterion 1 as sub-criteria 1.2, 1.3 and 1.4.

Re-number existing criterion 2 as new criterion 3. Remove existing sub-criteria 2.5, 2.6 and 2.8 as the material is now included in new criterion 1 as sub-criteria 1.5, 1.6 and 1.7.

Re-number existing criterion 3 as new criterion 4. Remove existing sub-criteria 3.4 as the material is now included in new criterion 1 as sub-criterion 1.8.

Re-number existing criteria 4 and 5 as new criteria 5 and 6.

Criterion 3.1 (new criterion 4.1): In the “explanation” column add the words: *Particular attention should be paid to the measures taken to ensure quality and standards when programmes are delivered overseas.*

Criterion 4 (new criterion 5): insert new sub-criterion 4.2 as follows, and re-number existing sub-criteria 4.2 – 4.4 as 4.3 – 4.5 (new 5.3 – 5.5):

4.2 (new 5.2)	<p><i>Teaching staff involved in the programme accept willingly their professional responsibilities, including to:</i></p> <ul style="list-style-type: none"> <i>• work to clear and well-structured instructional plans;</i> <i>• provide prompt and constructive feedback to their students;</i> <i>• promote a positive attitude to learning in their students;</i> <p><i>participate in peer- and self- assessment of their work; and</i></p> <ul style="list-style-type: none"> <i>• undergo initial and continuing professional</i> 	<p><i>Effective teaching goes beyond technical competence. It requires also a commitment to and professional pride in continuous personal development; and behaviours which promote student learning. College staff development strategies should promote this.</i></p>
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	<i>development to enhance their teaching skills.</i>	
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The same changes should be made to the criteria when they are re-stated in Parts IV and V of the Orientation Manual.

Page 20

Insert at the end of the final paragraph or 3.5.2:

“The Panel should be alert to any activities of the college which may present specific risks to quality and standards. In particular, the panel should satisfy itself as to the arrangements made in respect of any programmes offered overseas.”

Page 21

Insert after the first paragraph of 4.2:

“In respect of all conclusions reached and judgements made, the Report must contain sufficient evaluative narrative to demonstrate the reasoning which led the Panel to its view. Particularly if any remediation is required, the college must be able to understand, from the report, the nature of the weakness to be addressed.”

Page 23

Insert a new paragraph following the bullet points which end at the top of page 23:

“When stating the overall findings of the Panel in relation to whether each criterion is “met”, “partially met” or “not met” the Panel should make use, where appropriate, of the following action points:

“Action should be concluded” is a category which should be used when a college has identified an issue, has put in place action to address the issue, and that action is at an advanced state of implementation. This category would be used normally only in conjunction with an overall judgement of “met”. This would encourage colleges to address shortcomings, confident that if good progress has been made by the time of the audit, no adverse judgement will be made. Obviously, the audit team should have confidence that there was no impediment to successful conclusion of the matter.

“Acton should be continued” is a category to be used when a college has identified an issue, has put in place action to address it, but is at an early stage of implementation. Depending on the facts and merits of the matter, the audit team might conclude that until such time as further progress was made, the criterion

could not be said to have been met, thus this point would usually be used in conjunction with a “partially met” judgement.

“**Action is essential**” is a category where a failing is serious, and is putting at immediate risk the quality of a programme or programmes, or the outcome standards the students must achieve. Depending on the nature and significance of the failing, the audit team might conclude that such a finding would place the college in the “not met” category. More than one “essential” finding would usually place a college in the “not met” category. An “essential” finding would usually require a progress report from the college within three months, rather than waiting for the usual 18 month follow up report.

“**Action is advisable**” is a category where a failing is potentially serious, but is not yet putting quality and standards at risk. However, the failing is such that, if action is not taken promptly, it would lead to the circumstances in which an “essential” finding might be made. This action point would usually be used in conjunction with a “partially met” judgement.

“**Action is desirable**” is a category which would usually be used only when a criterion is already met. If action is not taken (for example, because there are higher priorities elsewhere) quality and standards would not fall below an acceptable threshold. However, if the action were to be taken, it would enhance the overall quality of provision.”

Page 28

In **B** extend the number of criteria to 6. Add after the table in **B**:

Following the table the report should add action points from the list:

- *Action should be concluded*
- *Action should be continued*
- *Action is essential*
- *Action is advisable*
- *Action is desirable*

as appropriate.

This should take the form: “In respect of the judgement of ‘partially met’ in relation to criterion x, action is advisable to ...”; or “In respect of the judgement of “met” in relation to criterion y action should be concluded to ...”; or “In respect of the judgement of “not met” in relation to criterion z, action is essential to ...”; etc.

Page 29

Add at the end of B:

Specific areas of potential risk arising from any unique characteristic should be commented upon, for example, any risk which may exist in provision of programmes overseas.

Page 32

Add a new paragraph at the foot of the page as follows:

The Panel should always consider if it would be appropriate to use one of the five action points set out in section 4.2 above to augment the reporting of its judgement against each criterion. This is particularly important when a judgement of “partially met” is made. In such cases the part of the requirement which has not been met should be identified, and the appropriate action point selected to indicate the nature and relative seriousness of any shortcoming.