Response to Consultation on Accountability in Education Concept Note


The concept note seems very complete and the key questions the GEM Report will explore are very comprehensive. I do not have much to add to that. I have focussed on the seven approaches to accountability in education, and in particularly in what concerns higher education. As requested, I offer some comments, suggestions of relevant literature, and some examples and 'case studies'.

Accountability in higher education

Financial

The concept note says: "Finally, the GEM Report 2017 will particularly focus on the financial accountability of tertiary institutions, given the accelerating shift from government-controlled to government-supervised tertiary systems in many regions. It will review how funding streams are currently measured, and the degree to which it is possible to determine how post-secondary institutions and universities spend their resources. It will also outline key elements and considerations of accountability systems based on tertiary education finance."

I do not have much to add regarding this type of accountability. I would only point out the following facts that make the tertiary sector quite different and more heterogeneous than the other education sectors in terms of its financing:

- there is more variation in spending at the tertiary level, and the relationship between countries’ relative wealth and their expenditure levels varies as well;
- OECD countries spend, on average, around two-thirds more per student at the tertiary level than at the primary, secondary and post-secondary non-tertiary levels;
- the tertiary sector, in comparison to other educational sectors, obtains the largest proportion of funds from private sources, such as households and private enterprises: around 30% on average for OECD countries.

In addition, traditionally, higher education institutions have more autonomy than schools, and that autonomy has been increasing in many countries. This fact, may make the need for accountability more pressing, but also more difficult to steer.

Regulatory

In the concept note, it is said: "In tertiary education, regulatory accountability relies on third parties for effective implementation. The shift toward regulatory governance in higher education often involves a combination of actors, state agencies, higher education institutions, and independent supervisory agencies. Common regulatory tools include a combination of instruments rather than just one, such as accreditation mechanisms and other quality assurance frameworks. The GEM Report 2017 will review several distinctive higher education regulatory models for their particular strengths and weaknesses, and the appropriateness and efficacy of their instruments, including transnational and regional regulatory frameworks."

Regulatory accountability in higher education has been increasingly developed since the 1990s, among other things, as a counterpart of increased autonomy, but also as a response to a perceived drop in standards following the massification of higher education in many countries. Often regulatory accountability is seen as a way of restoring trust in the system. Many countries have
created national agencies of assessment and accreditation, many of which are affiliated to regional and international bodies, such as ENQA European Association for Quality Assurance in Higher Education, INQAAHE - International Network for Quality Assurance Agencies in Higher Education. Following from the Bologna Process in Europe, ENQA's ESG - The Standards and guidelines for quality assurance in the European Higher Education Area have shaped many of the national accreditation frameworks in the European Higher Education Area, constituted by 50 countries. This represents a good case study for analysing appropriateness and effectiveness of a regional regulatory framework.

Professional

The concept note states: "The GEM Report 2017 will assess how professional accountability policies have evolved at different education levels and in different countries, as well as the rationale behind these shifts. It will also discuss the intended and unintended consequences of such policies for beginning teachers, experienced teachers, mentor teachers, administrators, teacher educators, and tertiary-level institutions.

The GEM Report 2017 will discuss mechanisms at the tertiary level to strengthen the professional accountability of academic staff and university leaders who must simultaneously satisfy the competing demands of several groups, including government officials, employers, alumni, teachers, students and their parents."

Professional accountability in tertiary education has traditionally been the strongest accountability mechanism. The literature reports that academic staff often feel more accountable to their discipline and disciplinary peers, than to managers and other stakeholders. However, this accountability has often been tilted towards the research activity of academics rather than teaching. One interesting case study is that of the UK Higher Education Academy, and the development of the UK Professional Standards Framework, which is a benchmark for standards throughout the stages of an individual’s career, and its professional recognition programme which enables institutions and individuals to continuously develop teaching quality.

Managerial accountability is often weak in higher education institutions. However, the literature also reports that the situation is changing. One consequence of more autonomy for institutions has been that institutions operate in more competitive environments, where institutions are strategically positioning themselves in a market for higher education, which has strengthened the position of managers but also of other stakeholders, such as funding agencies, employers, alumni, students and their families. This shift from professional to managerial accountability will be of particular interest to study accountability in tertiary education.

Performance-based

Regarding performance-based accountability, the concept note says: "Finally, the GEM Report 2017 will examine contexts in which accountability relations are especially complex and contentious, such as in universities and other tertiary institutions. The development and widespread use of university rankings, worldwide and within countries, are among the most debated issues in accountability in higher education. The merits of these rankings will be discussed along with their limitations and alternative or complementary instruments."

Apart from university rankings, whose merits, and more often demerits, have been widely researched, a number of countries have introduced performance-based funding. Performance-based funding has been widely used in the funding of research (see for instance, the Research Excellence Framework in the UK), where selectivity and competition for funding is continuously increasing. In terms of teaching, most funding has been formula-based, mostly on per capita terms. In some instances, funding has shifted from input factors, such as student and staff numbers, to outputs, such as graduates and credits (see for instance, the case of Denmark). More recently, there
is discussion to move funding further towards outcomes, such as in the proposed Teaching Excellence Framework in the UK.

Market

The concept note says: "At the tertiary level, market mechanisms for accountability take the form of grants and loans distributed directly to students. Cost-sharing between the government (or taxpayers) and the student (and their families) can take a number of forms including tuition (introducing tuition where it did not previously exist, raising tuition, creating a dual-track where some students pay tuition); fees (user fees for administrative services, ancillary or support services, or for specific academic programs); student loans (introduction of student loan schemes, increases in the effective cost recovery of loans); and notably, facilitating the private sector to accommodate surplus student demand. While tuition and fees alleviate a portion of governmental fiscal responsibilities, a pay-per-use system immediately raises concerns of equity: will all members of society have an equitable opportunity to access universities? The GEM Report 2017 will examine various cost-sharing models and student financial aid schemes with special attention to equitable access and affordability for the student."

Another form of market mechanism worth studying is in terms of access to higher education. In many countries, traditionally the number of places in higher education has been capped, and in some cases there is numeri clausi controlled by government. Many of these mechanisms are being lifted. When higher education institutions are free to offer the places they see fit, and students are free to choose to which institutions to go to, market mechanisms are strengthened, and there is evidence in the literature that students and their families will behave more as consumers, making more demands of higher education institutions. Some have also reported perverse effects of the student as consumer, disengaging from their role as co-producers of the teaching and learning process. This phenomenon might be worth considering as well.

Participatory

Nothing is said in the concept note on participatory accountability for tertiary education. As with other education levels, the past few years have witnessed the granting of more autonomy by central government to the universities in many countries, but often accompanied with measures for universities to be more responsive to society, promoting third mission activities (i.e. engagement with industry, government, and the third sector). The importance of participation by external stakeholders in the education process, is also relevant for tertiary education. There is evidence in the literature of higher education studies that governance reforms have been taking place all over the world regarding the strengthening of external stakeholder participation in governing bodies.

The objectives have been to improve the accountability of tertiary education providers to society. However, there is evidence in the literature that the participation of external stakeholders in the governance of higher education institutions has been lacking in weight, and is often ceremonial rather than effective. External stakeholders often do not feel motivated to participate, or if they do, they often do not feel capable of doing so, lacking expertise and finding it hard to understand the issues involved. This matter might be worth addressing in the report.

Global and national

Nothing is said specifically about tertiary education regarding global and national accountability in the concept note. However, comparative exercises are widely done for higher education, both at national and global levels, mostly derived from input factors and reputation surveys (see THE World University Rankings, QS World University Rankings, Academic Ranking of World Universities by Shanghai Jiao Tong University, US News Education Rankings, etc.). These are very different to comparative exercises done for non-higher education systems, such as the OECD PISA - Programme for International Student Assessment, which are based on skills outcomes. Comparative
assessments of outcomes in higher education are notoriously absent. The OECD PIAAC Survey of Adult Skills programme, although not specifically addressed at graduates, offers some comparative insights in terms of skills, labour market, and social outcomes of young graduates of tertiary education. In national terms, some initiatives have been developed to compare the outcomes of higher education.

The Higher Education Quality Council of Ontario (HEQCO) is conducting a pilot project to assess learning outcomes in higher education using the OECD’s **Education and Skills Online** assessment tool. Participating colleges and universities will test incoming students on their literacy, numeracy and problem-solving skills, and give the same test to the graduates as they leave (Brown, 2016). HEQCO is also exploring other ways of measuring learning outcomes through its **Learning Outcomes Assessment Consortium** (a consortium of six postsecondary institutions created in December 2012). Participating institutions are developing and piloting various assessment tools and techniques that could be scalable to the institution level in the future (HEQCO) (Goff et al., 2015).

Other countries have developed or used a range of instruments in relation to the assessment of learning outcomes in higher education. The Australian Learning and Teaching Council (ALTC) funded the **Assessing and Assuring Graduate Learning Outcomes** (AAGLO) project to gather evidence about the type of assessment tasks and assurance processes that provide convincing evidence of student achievement of and progress towards graduate learning outcomes. AAGLO was one of a number of projects and initiatives that reflect increasing international attention to the quality of student learning outcomes (Barrie et al., 2011). The UK Quality Assurance Agency (QAA) developed statements of expected learning outcomes called **Subject Benchmark Statements** for different disciplines. The Higher Education Funding Council for England (HEFCE) is currently funding pilot projects to develop measures of **learning gain** in higher education. In the context of the Bologna Process, the **Tuning Project** developed threshold-level learning outcomes and competences for disciplines such as history, chemistry, nursing and business. A subsequent activity was the development of the **Dublin Descriptors**, which are broad statements of learning outcomes that distinguish among bachelor, master, and doctoral level awards in five areas of learning. Other **Tuning** initiatives were developed for Latin America and the USA. The USA has also expanded the use of standardised instruments such as the Collegiate Learning Assessment (CLA) to assess graduate achievement - the **CLA +**. Similar developments are taking place in Europe with the recent **Measuring and Comparing Achievements of Learning Outcomes in Higher Education in Europe (CALOHEE)** project, which builds on the Tuning Project and is looking at the feasibility of measuring and comparing achievements of learning outcomes in higher education in Europe.

The concept note states that **equity** must be an essential component of any national and global accountability mechanisms. Equity is also a concern in higher education, clearly voiced by the OECD Informal Working Group on Higher Education. The study of equity needs the collection of disaggregated data on groups of interest: gender, socioeconomic status, migrant status, ethnicity, disability, etc. This is a challenge for the study of equity in higher education. The collection of disaggregated data will be more expensive and time consuming, and the small dimension of some groups (migrant status, ethnicity, disability, etc.) raises statistical problems. Thus, the report might want to discuss these issues.

As a final note, it might be worth having a look at **accountability in the health sector**, and comparisons that have been made to the education sector. The two sectors are similar in a number of respects: highly regulated by the state; more recently increased market steering mechanisms; and a strong tradition of professional autonomy. However, it seems that evidence-based policy has been more easily introduced in health than in education; possibly because of the dominant (hard)science paradigm among health professions, which is not the case in the education professions. This issue was discussed during the OECD Governing Complex Education Systems International Conference: "Understanding Complexity: The Future of Education Governance", 10 February 2014, in Oslo.
Relevant literature:
Regarding the concept of accountability and its evolution in the public sector, especially in professional services such as health and education, I suggest the following books:

**Managing Performance: International Comparisons**
- **Title**: Managing Performance: International Comparisons
- **Authors**: Geert Bouckaert, John Halligan
- **Edition**: illustrated
- **Publisher**: Routledge, 2008
- **ISBN**: 0415423953, 9780415423953

**Theories of Performance: Organizational and Service Improvement in the Public Domain**
- **Title**: Theories of Performance: Organizational and Service Improvement in the Public Domain
- **Author**: Colin Talbot
- **Publisher**: OUP Oxford, 2010
- **ISBN**: 0191614629, 9780191614620

**Public Management Reform: A Comparative Analysis - New Public Management, Governance, and the Neo-Weberian State**
- **Title**: Public Management Reform: A Comparative Analysis - New Public Management, Governance, and the Neo-Weberian State
- **Authors**: Christopher Pollitt, Geert Bouckaert
- **Edition**: illustrated
- **Publisher**: OUP Oxford, 2011
- **ISBN**: 0199595089, 9780199595082

**Performance Management in the Public Sector**
- **Title**: Performance Management in the Public Sector
- **Authors**: Wouter Van Dooren, Geert Bouckaert, Professor of Public Management and Director of the Public Management Institute Geert Bouckaert, John Halligan
- **Edition**: revised
- **Publisher**: Routledge, 2015
- **ISBN**: 1317814169, 9781317814160

Regarding accountability in higher education, I recommend the following two volumes:

**Accountability in Higher Education: Global Perspectives on Trust and Power**
- **Title**: Accountability in Higher Education: Global Perspectives on Trust and Power
- **Editors**: Bjorn Stensaker, Lee Harvey
- **Publisher**: Routledge, 2010
<table>
<thead>
<tr>
<th>ISBN</th>
<th>1136932372, 9781136932373</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title</td>
<td>Achieving Accountability in Higher Education: Balancing Public, Academic, and Market Demands</td>
</tr>
<tr>
<td></td>
<td>Jossey-Bass adult and higher education series</td>
</tr>
<tr>
<td></td>
<td>Jossey-Bass higher and adult education series</td>
</tr>
<tr>
<td>Editor</td>
<td>Joseph C. Burke</td>
</tr>
<tr>
<td>Edition</td>
<td>illustrated</td>
</tr>
<tr>
<td>Publisher</td>
<td>Wiley, 2005</td>
</tr>
<tr>
<td>Original from</td>
<td>the University of Michigan</td>
</tr>
<tr>
<td>Digitized</td>
<td>3 Nov 2008</td>
</tr>
<tr>
<td>ISBN</td>
<td>0787972428, 9780787972424</td>
</tr>
</tbody>
</table>