

Need for a National Quality Assurance Framework for Higher Education in light of RUSA and Mandatory Accreditation Regime.

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Introduction-

The historical initiative of Rashtriya Ucchatar Shikhsa Abhiyan [RUSA] is set to alter the landscape of Indian higher education on a massive scale with it's multiple objectives to improve access , equity and quality through planned development at the state level.The first stated objective of RUSA is to ' Improve the overall quality of existing state institutions by ensuring that all institutions conform to prescribed norms and standards and adopt accreditation as a mandatory quality assurance framework.'

RUSA is, however, not the first policy initiative that talks about accreditation as panacea for low quality higher education provisions that plagues our system in the country . The National Policy on Education (NPE, 1986) and the Programme of Action (POA, 1992) explicitly stressed about excellence of higher educational institutions (HEIs) and the need to constantly monitor and improve the quality process, participation, achievements etc. [NPE , 1986]

National Assessment and Accreditation Council set up by UGC in 1994 as outcome of these recommendations has since come a long way in spreading culture of internal and external quality assurance among Indian HEIs . The concepts of mandatory accreditation and multiple QA bodies have been brought into focus with introduction of National Accreditation Regulatory Authority in higher education [NARAHE] Bill which is pending in the parliament since May 2010 . In recent past the University Grants Commission [UGC] has come out with Regulation to make accreditation mandatory to all HEIs in the country except certain category of institutions. The National Knowledge Commission [NKC] has also stressed the need for multiple players in accreditation of HEIs. 'Instead of vesting one institution created by the state with monopoly power, the IRAHE may be empowered to license a number of accreditation agencies, public and private, to do the ratings. In doing so, the regulator would set standards for them,' says the Report to the Nation by NKC.

RUSA has reiterated need for mandatory accreditation and multiple QA agencies and come out with new idea of State Accreditation Agencies [SAA] , which is part of essential commitments to be made by state governments in order to receive support under RUSA.

Emphasis on accreditation as means of accountability is evident from various recommendations in RUSA document. For example creation of SAA as essential commitment from state, weightage for accreditation as part of quality index in target setting for states , preconditions for mandatory accreditation for HEIs to get funding.

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The RUSA document emphasises that to cater to the large number of institutions which would be applying for accreditation , role and spread of NAAC and NBA would be expanded. The RUSA document also states that accreditation should be made mandatory for individual departments and programs of the university, as well .

However , RUSA has stopped a little short of suggesting the mechanism or framework that will govern the operations of this new state level accreditation agencies vis a vis national agencies like NAAC.

It is evident that in order to realise various suggestions of RUSA regarding accreditation, country needs to put in place a credible mechanism that will ensure coordinated growth of multiple accreditation agencies in India.

The absence of regulatory or guiding framework for establishing and recognising multiple quality assurance agencies would result into confusion and chaos for stakeholders at both national and international level.

Keeping this in mind, present paper has attempted to underscore the need for setting up a national quality assurance framework for higher education, which will provide basis for creation, recognition and monitoring of multiple accreditation bodies in India taking cue from global practices.

1. Growth of accreditation in India and achievements of NAAC

Growth of accreditation in India coincides with genesis of NAAC which was established in 1994 under the UGC Act in pursuance of the recommendation contained in the National Policy on Education (NPE, 1986) and the Programme of Action (POA, 1992).

During its 19 years of existence and functioning, the NAAC has been able to deal with and make creditable achievements. NAAC developed Assessment and Accreditation instruments through nationwide seminars, workshops, discussion meetings etc. and involved senior academics of high competence from all over the country. The experience gained in evolving and implementing an acceptable methodology of external quality assurance [EQA] for India's large , diverse and complex system of higher education system has given valuable insights into many critical issues of contention in quality assurance . [Stella , 2004]

NAAC has established successful collaborations with many leading accrediting bodies of other countries. NAAC is an active member of International Network for Quality Assurance Agencies in Higher Education (**INQAAHE**) and Asia-Pacific Quality Network (**APQN**). .

National Board of Accreditation [NBA] engaged in programme accreditation of technical programmes and Accreditation Board under Indian Council of Agriculture [ICAR] focussed on quality assurance of agricultural education are two other accreditation bodies in India

which operate in specific domains. NAAC is the sole accreditation body which is involved in Assessing and Accrediting all types of HEIs coming under different Regulatory Bodies/Councils. 5115 colleges and 179 universities in the country have been accredited by NAAC even though accreditation was voluntary in nature till recently. [NAAC , 2013]

2. RUSA on accreditation

Para 4.8.6 of RUSA document stressing on mandatory accreditation acknowledges that,

‘ Assessment and Accreditation in higher education , through transparent and informed external review process, are effective means of quality assurance in higher education...Mandatory accreditation in India’s higher education sector would enable to become a part of global quality assurance system. Hence all institutions eligible for funding under RUSA would require to be accredited or have applied to accreditation . ‘

Further para 4.8.7 (x) seeks to ensure that mandatory accreditation is not limited to universities and colleges but also mandatory for departments and programs of universities. It stresses that ‘ funding should be contingent on accreditation ‘.

Among the 15 prerequisites or essential commitments from state, the fourth one is to create a state accreditation agency.

The targets stipulated for states based on various indicators has weightage of 4 % for percentage of institutions accredited by NAAC or state accreditation agency, 3.5 % for average rating of universities and 3.5 % for average rating for colleges.

These and various other provisions in RUSA document has clearly provided incentives and disincentives for institutions as well as states for efforts or lack of it towards quality assurance of higher education provisions.

3. Case for mandatory accreditation and multiple QA bodies-

Experience of NAAC in India and that of other bodies across globe points out that in developing countries ,where higher education is largely funded or subsidised by the governments, accreditation works if it is mandatory or linked with funding. A large number of colleges in states of Maharashtra, Karnataka , Assam, etc came forward to accreditation by NAAC when respective state governments made it compulsory. Many universities , which were reluctant to opt for NAAC, had to go for accreditation as UGC pulled the strings of funding purse. Even in developed countries like Australia, government brought in legislation to ensure that all universities conform to national standards. In USA , accreditation is voluntary but federal funds for students are given to only those universities which have been accredited by recognised agencies.

Given the large size of Indian higher education system, the biggest in world in terms of number of HEIs [695 universities and 35539 colleges], it is obvious that if accreditation is made mandatory, then country would need a large number of accreditation agencies.

4. Challenges of multiple accreditation bodies.

While setting up of multiple QA bodies could accelerate pace of accreditation in the country, there are concerns about it's feasibility and impact. Some of the concerns are listed below.

1. Absence of role and domain clarity of multiple agencies including state level agencies
2. Competition of QA bodies might result in unfair practices
3. If different agencies adopt different methods and outcomes, stakeholders may get confused
4. Compatibility of already accredited 6000 plus HEIs could be an issue
5. Fear of dilution of quality and rigour in accreditation process
6. Lack of trained human resource in quality assurance

It is therefore vital that a proper mechanism needs to be put in place to ensure that there is coordination and consistency in operation of multiple accreditation agencies . We need not reinvent the wheel, but we can take cue from global practices and try to adopt it to Indian situation.

5. International practices-

Over 150 countries have some kind of accreditation mechanism to ensure quality in higher education. Most the QA bodies in developing countries are supported directly or indirectly by the respective governments.

The International Network for Quality Assurance Agencies in Higher Education (INQAAHE) is a world-wide association of over 200 organisations active in the theory and practice of quality assurance in higher education. INQAAHE has provided guidelines for good practices (GGP) to be followed by the QA bodies.

Asia Pacific Quality Network (APQN) is formed to enhance the quality of higher education in Asia and the Pacific region through strengthening the work of quality assurance agencies and extending the cooperation between them. APQN has provided criteria and guidelines for it's members which are QA bodies in Asia and Pacific. Including NAAC of India, APQN has over 120 member institutions from over 40 countries having interest in quality assurance.

A good number of countries have multiple QA bodies. Some examples are given below.

United States of America [USA]-

In USA , institutional accreditation is done by 6 Regional independent QA bodies.

Programme accreditation is done at national level by various speciality councils as well as faith based organisations. **COUNCIL FOR HIGHER EDUCATION ACCREDITATION (CHEA)** is

an association of 3,000 degree-granting colleges and universities and recognizes 60 institutional and programmatic accrediting organizations. It's a mechanism for self-regulation of academic quality through accreditation. Recognition by CHEA affirms that the standards and processes of the accrediting organization are consistent with the academic quality, eligibility standards, improvement, accountability and expectations.

Philippines-

In Philippines , voluntary accreditation of all higher education institutions is subject to the policies of the Commission on Higher Education. Voluntary accrediting agencies in the private sector operate under the umbrella of the Federation of Accrediting Agencies of the Philippines (FAAP), which itself is the certifying agency authorized by CHED. Accreditation can be either of programs or of institutions.

Accrediting agencies for government-supported institutions formed the National Network of Quality Assurance Agencies (NNQAA) as the certifying agency for government-sponsored institutions. However NNQAA does not certify all government-sponsored institutions.

Europe-

European countries have moved faster in terms of liberalising accreditation practices. In many European countries, higher education institutions or programmes are subject to regular external review by a quality assurance agency. The **European Quality Assurance Register for Higher Education** (EQAR) is a register of such agencies, listing those that substantially comply with a common set of principles for quality assurance in Europe known as the **European Standards and Guidelines for Quality Assurance**. Some countries have not only multiple QA bodies but also have freedom to choose any agency listed on EQAR.

Other examples-

Another recent example of multiple QA bodies is from Pakistan. Higher Education Commission of Pakistan has primary responsibility of QA in Pakistan. However, it has recently promoted establishment of specialised accreditation councils namely National Accreditation Council for Teacher Education, National Agriculture Education Accreditation Council and National Business Education Accreditation Council.

7. Structure of state QA bodies under NQAF-

In the backdrop of above information, it is proposed that under National Quality Assurance Framework, a structure of state accreditation bodies need to be formulated on the lines of national and international practices.

State QA bodies can have a similar structure as that of NAAC or it can function as autonomous body under the state higher education council [KSHEC]

- Each of the Accreditation Bodies should be registered as non profit society in respective State.

- It shall be an autonomous society with arms length from the government.
- Each of these Accreditation Bodies shall follow the Methodology, Criteria and Procedure developed by NAAC.
- It shall have Executive Committee with Director and core academic Staff on pattern of NAAC.
- Members of the EC to include academicians within the state and outside the state.
- State QA body would have nominees of NAAC and UGC as ex-officio members
- Appeal against decision made by State accreditation body would be considered by the NAAC.
- Adequate office space and training infrastructure should be provided to state QA body.
- In the long run, State QA bodies would be self-financing and sustain mainly out of accreditation fees received from HEIs. However State governments need to provide initial seed funding for infrastructure and staff possibly with matching contribution under RUSA.

[Note- Some of these suggestion have been made by NAAC earlier]

Kerala State Higher Education Council has become the first such council in India which has articulated structure and function of State accreditation body with help of NAAC.

8. Recognition and Standards for state and other accreditation bodies.

Globalization, regional integration, and the ever-increasing mobility of students and scholars have emphasized the need for transparent quality assurance arrangements that can be understood across borders. [Altbach ,2011]

It is evident that ,accreditation in higher education has global implications for many stakeholders. Hence QA bodies world over are expected to follow international standards which are prescribed by international professional bodies and networks such as INQAAHE and APQN. Countries like USA having multiple QA bodies also have professional regulators or associations that take care of recognition and maintenance of standards. The guidelines and standards of these bodies are given in the annexure. As a member of APQN and INQAAHE, NAAC follows these guidelines. This is one of the reason for wide international acceptance of NAAC's accreditations process.

State QA bodies need to comply with these international requirements and a professional body like CHEA can develop recognition guidelines required in Indian context. Basic features of this could be as reflected in NAHAHE bill provision given below.

“21. No application for grant of a certificate of registration under section 20 shall be considered by the Authority, unless the applicant satisfies the following conditions, namely:—

(a) the applicant is—

(i) a company registered under section 25 of the Companies Act, 1956 or

a society formed and registered under the Societies Registration Act, 1860 or a trust formed under the Indian Trusts Act, 1882 or any other law for the time being in force;

(ii) such company, society or trust is formed or controlled by the Central Government or a State Government or any authority or board or institution established under any Central or State Act;

(b) the applicant is a non-profit organisation;

(c) the applicant has, in its memorandum of association or in the trust deed, specified accreditation of higher educational institutions as one of its main objects;

(d) the applicant has adequate infrastructure, to enable it to provide accreditation services in accordance with the provisions of this Act or such infrastructure as may be specified by regulations;

(e) the applicant and the promoters of the applicant, have professional competence, financial soundness and general reputation of fairness and integrity to the satisfaction of the Authority;

(f) the applicant, or its promoters, or any member of the governing body of the applicant or its promoter, is not involved in any legal proceeding connected with any higher educational institution except in course of any accreditation proceedings carried out in pursuance of the provisions of this Act and regulations made thereunder;

(g) the applicant, or its promoters, or any director, or member, or trustee has, at any time in the past, not been convicted of any offence involving moral turpitude or any economic offence;

(h) the applicant has, in its employment, persons having adequate professional and other relevant experience to the satisfaction of the Authority; “

[NARAHE Bill, 2010]

These provisions in NARAHE bill could be complimented with a set of professional standards as prescribed by international bodies.

Following three Tables give gist of recognition or good practices criteria followed by major international networks of quality assurance bodies in higher education-

Box 1-Asia Pacific Quality Network, APQN Criteria for recognition and acceptance of full members

Criterion 1: Nature of the operations of the agency: The agency is responsible for reviews at institutional or program level of post-secondary education institutions or post-secondary quality assurance agencies.

Criterion 2: Mission statement and objectives: The agency has formulated a mission statement and objectives which are consistent with the nature of the agency.

Criterion 3: Agency staff (Numbers, Profile, Roles): The profile of the staff is consistent with the Mission Statement.

Criterion 4: Profile of reviewers: The profile of the reviewers is consistent with the Mission Statement.

Criterion 5: Independence: The judgements and recommendations of the agency's reports cannot be changed by third parties.

Criterion 6: Resources: The agency has sufficient resources to run its operations in accordance with its mission statement and objectives.

Criterion 7: External quality assurance criteria and processes: The description of the processes and criteria applied should be transparent and publicly available and normally include: self evaluation, site visit, public report and follow-up measure.

Criterion 8: Quality assurance: The agency has quality assurance measures in place and is subject to occasional review.

Box 2 -INQAAHE guidelines for Good Practices [GGP] for QAAs

These are quite elaborate guidelines . Following are the titles broad criteria used for GGP alignment.

Section I: The EQAA: Accountability, Transparency and Resources

1. The Governance of the EQAA
2. Resources
3. Quality Assurance of the EQAA
4. Reporting Public Information

Section II: Institutions of Higher Education and the EQAA: Relationship, Standards and Internal Reviews

5. The Relationship Between the EQAA and Higher Education Institutions
6. The EQAA's Requirements for Institutional/Program Performance
7. The EQAA's Requirements Institutional Self-Evaluation and Reporting to the EQAA
8. The EQAA's Evaluation of the Institution and/or Program

9. Decisions

Section III: EQAA Review of Institutions: Evaluation, Decision and Appeals

10. Appeals

Section IV: External Activities: Collaboration with Other Agencies and Transnational/Cross-Border Education.

11. Collaboration

12. Transnational/Cross-Border Higher Education

Box 3-Eligibility and Recognition standards of CHEA of USA

Accrediting organizations that seek recognition by CHEA must demonstrate that they meet CHEA eligibility requirements and recognition standards.

ELIGIBILITY. To be eligible for CHEA recognition, the accreditation organization must:

- demonstrate that the organization's mission and scope are consistent with the CHEA *Institutional Eligibility and Recognition Policy* , including that a majority of the institutions and programs accredited by the organization grant higher education degrees. The *Policy* provides, in part, that the recognition process will place increasing emphasis on the effectiveness of accrediting organizations in assuring academic quality of institutions;

- be non-governmental;
- accredit institutions that have legal authority to confer higher education degrees;
- have written procedures that describe, officially and publicly, the organization's decision-making processes, policies, and procedures, that lead to accreditation actions, and the scope of accreditation that may be granted, evaluative criteria (standards or characteristics) used, and levels of accreditation status conferred;
- have procedures that include a self-evaluation by the institution and on-site review by a visiting team, or have alternative processes that CHEA considers to be valid;
- demonstrate independence from any parent entity or sponsoring entity for making judgments related to accreditation status; and
- have a specified and fair appeals process that authorizes continuation of current accreditation status of the institution until an appeal decision is rendered.

RECOGNITION STANDARDS of CHEA.

When seeking recognition, the accrediting organization must address five CHEA standards that correspond to CHEA purposes:

- A. Advances academic quality;
- B. Demonstrates accountability;
- C. Encourages purposeful change and needed improvement;
- D. Employs appropriate and fair procedures in decision-making; and Continually reassesses accreditation practices

9. Operational features of proposed NQAF-

Objective-

The main objective of National Quality Assurance Framework will be to provide a frame of reference for establishment, recognition and monitoring of accreditation agencies to ensure that all types of HEIs and programs are covered under mandatory accreditation on cyclical basis and that accreditation agencies follow globally acceptable professional standards.

Structure-

Global practices suggest that task of monitoring and recognition of professional QA bodies can best be undertaken by themselves through a network or federation . In a developing country like India where government is the largest sponsor / promoter of higher education, it's presence in such body is essential. Till NARAHE bill sees the light of the day, it would be worthwhile to set up a body under UGC or MHRD which will commission this NQAF. NAAC is best suited to provide the professional expertise and be NQAF's first secretariat to roll out plan of action. Idea of positioning NAAC as Umbrella organisation for accreditation in India has been mooted since last few years . The NAAC has been advocating the formation

of regional and/or specialized accreditation agencies that will operate under NAAC guidelines and be responsible for accrediting different HEI categories. In this respect, the NAAC would operate as an umbrella organization for accreditation organizations not unlike the U.S. Council on Higher Education Accreditation (CHEA). [Patil, 2006]

However there is also an argument that NAAC cannot play a dual role of being an accreditation agency and also regulator at the same time. Hence , in future, an elected council of accreditation agencies should take over ownership of NQAF and advise the government on establishment and recognition of accreditation bodies in the country.

Functions-

Council of accreditation agencies shall maintain National Quality Assurance Register [NQAR] wherein all accreditation bodies will be listed after review and recognition.

Under the National Quality assurance Framework , proposed council can envisage following activities

- Developing guidelines and procedures for setting up new QA bodies at state and national level.
- Consider applications for setting up new QA bodies. Procedure outlined in draft bill of National accreditation regulatory authority in higher education for recognition coupled with international standards can be applied for this purpose.
- Provide guidance and academic resources to new agencies about assessment and accreditation process.
- Develop a consultative mechanism wherein new QA bodies could have interface with experienced QA bodies .
- Facilitate national and international exposure to new QA bodies

Domain Specifications-

NQAF needs to identify domains for all accreditation agencies to ensure that there is neither unhealthy competition nor lack of clarity among stakeholder about role of various accreditation bodies and HEIs in their respective ambits. Following is one possibility of domain specification.

a. Institutional accreditation-

When the NQAF comes into force under mandatory accreditation regime, state accreditation agencies will undertake institutional accreditation of all types of colleges while NAAC will continue institutional accreditation of all universities in the country. State accreditation agencies will normally operate in jurisdiction of respective state and shall engage services of assessors from other states for accreditation related activities. In small states where independent accreditation agency is not feasible, state accreditation agency of nearby states can be recognised to carry out accreditation task. There shall be no private players [for profit]in institutional accreditation nor there will be competition among accreditation bodies.

b. Programme accreditation-

Various regulatory and professional councils such as NCTE, BCI, PCI, MCI, DCI, etc will promote accreditation agencies under their respective ambits on lines of National Board of Accreditation NBA of AICTE.

Programme based accreditation bodies will work at the national level. Sector of programme based accreditation will be open for other not for profit players from within country and option of recognised international accreditation bodies would be available to, provided these agencies are registered on proposed NQAR.

10. Other possibilities

As stated earlier , the proposal above is one of the many possible approaches.

There would be off course other ways to define the domains within framework and alternate ideas to reach the target of mandatory accreditation in stipulated time. In light of UGC Regulation on Mandatory accreditation, NAAC itself has made ambitious plan to accredit all eligible HEIs in the country by setting up regional offices and expanding it's human resource base. There are also concerns about one size fit all formula of accreditation and plan about having different pattern of assessment for premier institutes such as IITs and IIMs is under consideration . Credit rating agencies like CRISIL are already in market [?] of accreditation.

Media based rankings are gaining popularity despite several limitations and concerns about their methodology and coverage.

Scholars have also argued in favour of ‘ need to initiate and facilitate setting up of membership based accreditation agencies for institutional accreditation as a means of self regulation on the pattern in the US.’ [Agarwal,2009]

All these developments and discussions in different directions only reinforce the need for well articulated policy framework for accreditation in higher education.

11. Putting horse before the Cart-

RUSA has provided an impetus to mandatory accreditation and introduction of state QA agencies which is aimed to address issue of quality gaps at level state education where more than 90 percent of action in higher education happens.

The success of this ambitious mission with great intent will not only depend on cooperation from states , HEIs and other stakeholders but also on quality and rigour of systems put in place . As Nilekani stresses in his Imagining India, “.... An empowered, independent regulator must focus on monitoring the quality of institutional output such as patents, papers published and the employability of graduating students. And most importantly, such a regulator must be allowed to rate and derecognize institutions on the basis of these criteria.” [Nilekani, 2008]

State Accreditation Agency is certainly a good approach of decentralisation of existing accreditation system. But we need to be aware of the fact that there are other approaches of accreditation already underway and any delay in evolving policy at national level could result into confusion among stakeholders.

A mechanism for coordinated growth of multiple QA bodies at state as well as national level with appropriate standards needs to be put in place by before setting up new QA bodies to ensure that horse is before the cart and not otherwise.

End Note-

Even as authors have relied on resources and documents of NAAC and other bodies, views expressed in this article are personal.

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