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HIGHER EDUCATION QUALITY ASSURANCE: THE CASE OF THE UNITED STATES

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ABSTRACT

The purpose of this article is to provide an overview and critique of higher education quality assurance in the context of the United States (US), reviewing the US model in terms of its history, characteristics, problems and controversies, in an effort to extract lessons that are applicable to other countries, including Brazil. The study examines topics such as institutional rankings, student learning assessment, the role of government in the university accreditation process and the challenge of assuring the quality of for-profit institutions. The article concludes with a list of recommendations extracted from the US experience that could conceivably contribute to the improvement of quality assurance frameworks in other parts of the world.

KEYWORDS HIGHER EDUCATION • QUALITY ASSURANCE • UNIVERSITY ACCREDITATION.

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GARANTIA DE QUALIDADE DO ENSINO SUPERIOR: O CASO DOS ESTADOS UNIDOS

RESUMO

Neste artigo, apresenta-se um panorama crítico sobre a garantia de qualidade do ensino superior nos Estados Unidos, analisando sua história, características, problemas e controvérsias, em um esforço de buscar lições que sejam aplicáveis a outros países, como o Brasil. Foram analisados *rankings* institucionais, a avaliação de aprendizagem dos alunos, o papel dos governos no processo de acreditação das universidades e o desafio de assegurar a qualidade de instituições com fins lucrativos. Embora se reconheça que não existe um modelo ideal de avaliação de instituições de ensino superior, são relacionadas recomendações extraídas da experiência norte-americana que trazem possíveis contribuições para o aprimoramento dos marcos de garantia de qualidade em outras partes do mundo.

PALAVRAS-CHAVE ENSINO SUPERIOR • GARANTIA DE QUALIDADE • ACREDITAÇÃO UNIVERSITÁRIA.

GARANTÍA DE CALIDAD DE LA EDUCACIÓN SUPERIOR: EL CASO DE ESTADOS UNIDOS

RESUMEN

Este artículo presenta un panorama crítico sobre la garantía de calidad de la educación superior en Estados Unidos, analizando su historia, características, problemas y controversias, en un esfuerzo para extraer lecciones que sean aplicables a otros países, como Brasil. Se analizaron los *rankings* institucionales, la evaluación del aprendizaje de los estudiantes, el papel de los gobiernos en el proceso de acreditación universitaria y el desafío de asegurar la calidad de las instituciones con fines de lucro. Aunque se reconoce que no hay un modelo ideal para evaluar las instituciones de educación superior, se enumeran las recomendaciones extraídas de la experiencia norteamericana que posiblemente aporten contribuciones para mejorar los marcos de garantía de calidad en otras partes del mundo.

PALABRAS CLAVE EDUCACIÓN SUPERIOR • GARANTÍA DE CALIDAD • ACREDITACIÓN UNIVERSITARIA.

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INTRODUCTION

An international concern for the quality of higher education arose in the latter part or the 20th century. The issue remains hotly debated, as countries in all regions of the world seek to ensure that their higher education institutions meet the standards of quality necessary to meet public demands and national needs. The importance of higher education for promoting the knowledge required for economic development, social mobility, and national cohesion has long been recognized. In most parts of the world, until the mid-20th century, universities, typically the pinnacle of the higher education framework, were highly selective, reserved for those from privileged background, and geared to preparing students for elite professions in fields such as medicine, law, and engineering. In some countries, following a model first established Germany in the 19th century, the university also focused on the production of knowledge, especially that produced by scientific research. Because of its national importance and traditional association with the interests of powerful elites who strongly influence public policy, the great majority of the universities in the world have tended to be public in nature, established and maintained by national and regional governments, in the name of progress and opportunity (as least for a few). Government authorization conferred institutional legitimacy and, implicitly, assured society that the education provided was of high quality. The assumption of quality was also nurtured by the fact that universities tended to be similar in organization and structure and that they usually are highly exclusive with respect to the size and social standing of their student bodies. However, this assurance, emanating from governmental certification and social respectability, began to be undermined in the 1970s and 1980s, due to several interrelated factors.

One such factor concerns the relative massification of higher education, fueled by a burgeoning demand due to changing labor market needs and rapid secondary--school expansion. Between 1980 and 2000, higher education enrollments quadrupled internationally, and, as a result, the assumption of quality which had been previously derived from the exclusivity of higher education institutions was undermined. Higher education growth also provoked higher educational costs, because of greater competition for scarce resources. At the same time, many governments sought to reduce their spending on higher education by giving institutions in the public realm more administrative and financial autonomy, thereby adopting a policy referred to as "steering at a distance" (VIDOVICH, 2002). As a consequence, governments were forced to address greater societal demands for accountability and transparency with respect to the maintenance of public establishments (BRENNAN; SHAH, 2001; LIM, 2017).

Also, more higher education students heightened student diversity, which in turn led to more variety in higher education offerings. Thus, potential students were given

a wider range of choices to be made, and these choices required more information about the nature and quality of higher education options. Such options included for-profit enterprises and the use of distance education, which offered additional challenges for assessing and maintaining higher education quality standards. At the same time, in the light of heightened transnational mobility, a greater concern arose regarding between-country diploma equivalency. This concern was especially prevalent within the then newly-created European Union, which reduced border restrictions among the member nations. The issue received additional attention after 1999, when 29 nations signed the so-called Bologna Accords in order to promote higher education compatibility within the European continent (GASTON, 2010).

As a result of such pressures for the assurance of minimum higher education quality standards, countries in all regions of the world created national quality assurance agencies in the context of what has been labeled the "evaluation state" (NEAVE, 1998). By the early 2000s all European nations and most of those in Asia and Latin America had followed suit (BILLING, 2004; HARVEY; ASKLING, 2003; DIAS SOBRINHO, 2003). Although such agencies differ among countries, research reveals that a general model predominates with five basic characteristics: (1) coordination by a specialized, legally constituted national entity; (2) emphasis on institutional self-evaluation; (3) external evaluation by academic peers, conducted subsequently to the self-evaluation process; (4) publication of evaluation results; and (5) little or no relationship between the evaluation findings and the allocation of public resources (VAN VUGHT; WESTERHEIJDEN, 1993).

There have been many studies comparing applications of the quality assurance initiatives among European countries (ALZAFARI; URSIN, 2019; GVARAMADZE, 2008). Less prevalent, however, are analyses of frameworks adopted in other countries. The experience of the United States (US), the pioneer in the development of quality assurance frameworks, is usually omitted from such analyses, in part because it does not adhere to the general model described above. But despite its relative uniqueness, the US approach to quality assurance is instructive in the international context, as it faces problems and challenges that are commonplace from a worldwide standpoint. The purpose of this article is to provide an overview and critique of the US model, summarizing its history, characteristics, problems and controversies, in an effort to extract lessons that are applicable to other countries, including Brazil (SCHWARTZMAN, 2013; VERHINE; DANTAS, 2020).

HIGHER EDUCATION QUALITY ASSURANCE IN THE UNITED STATES

In the United States, where governmental authority tends to be both limited and decentralized, higher education quality control occurs on three levels. The first

level involves state governments, who are responsible for giving an institution legal authorization to operate. The authorization process varies from state to state, sometimes involving institutional visits and other times just based on the analysis of submitted documents, in some instances using the criteria applied to authorizing other types of businesses within the state.

The second level specifically addresses accreditation and is conducted by non-governmental agencies that may be either regional or national in scope. There are a wide variety of such agencies and, in most cases, they are created and financed by the institutions themselves, acting as a consortium. In some states, the first stage depends on the second, as accreditation is required for authorization. Almost all higher education establishments in the US display an accreditation stamp, but not all accreditation stamps ensure quality. The overall number of accreditors is great, but many do not adopt rigorous evaluation standards.

As a result, a third level exists, implemented in the 1960s, wherein the U.S. Department of Education (USDE) determines the legitimacy of the accreditation agencies, based on the rigor of their evaluation processes. It is important to note that the US does not have a Ministry of Education or other centralized authority exercising control over the quality of pos-secondary education. The key task of the USDE involves the distribution of public funds, especially in the form of student aid to higher education enrollees. Only institutions accredited by agencies that are formally "recognized" by the USDE can qualify for the receipt such funding. As of 2020, there existed a total of 17 USDE-approved organizations responsible for accrediting universities and senior (four-year) colleges. They consisted of six regional agencies and eleven national organizations, with the latter divided into two groups, dealing with career-based (mainly for-profit) enterprises and faith-based establishments, respectively (UNITED STATES DEPARTMENT OF EDUCATION – USDE, s.d.).

Institutional accreditation

The second level, that of institutional accreditation, is the one most closely associated with higher education quality assurance and is therefore the focus here.[1] The US is believed to be the first country to systemically deal with higher education quality assurance, as the first non-governmental accreditation agencies were created in the late 19th century. Unlike in most other countries, the higher education in the US is not directly controlled by the federal government and, from the outset,

1 Unless otherwise specified, the description of higher education accreditation in the US provided herein is based on Eaton (2012) and Gaston (2014), complemented by information from the USDE and regional accreditor websites and from interviews with accrediting personnel conducted by the author in 2016.

the private sector has been important. Initially the great majority of higher education institutions were created and maintained by religious groups, to promote their theological teachings and to prepare a select few for the assumption of leadership roles within both the church and the wider community. In the latter 19th century, rapid industrial expansion created a demand for professionals trained in science and the use of applied knowledge, which led some wealthy entrepreneurs, such as John Rockefeller, Leland Stanford and Johns Hopkins, to create non-denomination institutions to foster learning relevant for capitalist development. At the same time, states, with the support of the federal government, began to establish their own universities, often with the purpose of promoting expertise in the teaching, mechanical and agricultural fields. This myriad of different institutions, with no overarching authority, created demands for both greater standardization and a modicum of quality assurance. Fearing (and distrusting) governmental intrusion, universities banded together on a regional bases, starting with the creation in 1885 of the New England Association. By 1895, four of the six accreditation that function today had been established, and most of the procedures that were implemented then remain in place today. The regional approach was supported by the existence in the US of "regional cultures" and also by the fact that, at the time, interinstitutional proximity was necessary due to the difficulties of travel. In 1952, the governmental intrusion, that had once been rejected, was introduced, as the federal government determined that federal funding, first provided in the aftermath of WWII to support the study of returning veterans, could be only allotted to institutions that were formally accredited.

Today almost all so-called "traditional" colleges and universities, offering a four-year undergraduate degree, are accredited by a regional agency. For the most part, accredited institutions pay annual dues to their accrediting association. Those applying for initial accreditation usually pay an application fee. In most cases, on-site evaluation visits are paid for by the hosting institution.

The six regional accreditors rely on protocols that are similar among themselves and are now commonplace throughout the world. An institution seeking accreditation first receives confirmation that the application is appropriate. The process then leads to a self-analysis report produced by the institution, which, along with other documentation, is reviewed by trained peer evaluators working off-site, on-site, or both. The recommendations presented by the review committee are scrutinized by a board of directors which then decides whether or not accreditation should be granted. Once an institution is accredited, it remains the subject of oversight and further review according to a regular cycle. Although accrediting organizations promulgate standards to ensure and promote educational quality, they have no legal control over institutions that they assess.

The on-site peer visits, like those found in many other countries, typically include four elements. First, before making a visit, the review team evaluates the self-evaluation findings and complementary information in light of the both the quality standards established by the accrediting organization and the mission and objectives of institution in question. The team often discusses these materials in conference calls, both among themselves and with authorities representing the host institution. Second, once on the review site, team members pursue specific assignments, conduct interviews with relevant actors, and plan periodic team discussions. On-site visits generally last two to four days. Third, the team convenes to compare findings, to reach consensus, and to outline or draft the report that will be submitted to the accreditation agency. Finally, the team, or a portion thereof, meets with institutional representatives to provide a briefing of its findings and recommendations. It has been estimated that nationally, approximately 55,000 college administrators and faculty members volunteer annually to take part in on--site visitation processes (COUNCIL FOR HIGHER EDUCATION ACCREDITATION – CHEA, s.d.).

For an accrediting agency to be recognized by the USDE, the process is similar to the accreditation process described above, involving formal application, a self--study report and a site visit. Recognition is usually for a five-year period. To be initially recognized, an organization must function for at least two years, accredit institutions that seek to participate in governmental programs, and establish that it has gained wide acceptance among educational leaders regarding its standards, methods of evaluation, and accreditation decisions. The accrediting organization must be separate and independent, meaning that (1) members of the decision--making body cannot be selected by an affiliated institution, (2) at least one-seventh of the decision-making body are representatives of the wider public, (3) the agency has established guidelines for avoiding conflicts of interest among its decision--makers, and (4) the agency determines its own budget. Moreover, the agency must have quality standards that address dimensions such as student success, curriculum, physical facilities, fiscal and administrative capacity, student support services, and recruiting and admission standards, along with proof of having met USDE loan requirements pertaining, for example, to student loan default rate and levels gainful employment after graduation (UNITED STATES DEPARTMENT OF EDUCATION – USDE, s.d.).

The Senior College and University Division (WSCUC)

For a better understanding of higher education quality assurance in the US, it is useful to examine more carefully one of the six regional agencies, in this instance, the Senior College and University Division (WSCUC) of the Western Association of

Schools and Colleges (WASC). The WSCUC was created in 1962 to accredit colleges and universities in California, Hawaii and five Pacific-island territories controlled by the US The official mission of WSCUC is to assure the public that institutions act with integrity, yield high quality educational outcomes, and are committed to continuous improvement. Among the documents available on the WSCUC website is a detailed Handbook of Accreditation (WESTERN ASSOCIATION OF SCHOOLS AND COLLEGES – WASC, 2013) designed to present the organization's core commitments and standards, guide institutions through the review process, and assist evaluation teams at each stage of the review. The contents of the 54-page Handbook provide a code of good practice and ethical conduct and give information about the meaning of accreditation, the values underlying the accreditation process, and the standards used to assess institutional quality. It also offers a detailed overview of the review process, addressing the self-study report, the off-site review and the onsite visit. It then discusses the possible decisions that the agency can make based on the evidence accumulated. The Handbook concludes with a detailed glossary of terms related to the accreditation process.

WSCUC's Standards of Accreditation consist of four broad, holistic statements that reflect widely accepted good-practices in higher education, while respecting institutional diversity and autonomy. The four standards involve defining institutional purposes and objectives, achieving educational objectives through core functions, developing and applying resources to ensure quality and sustainability, and creating an organization committed to quality assurance, institutional learning and continual improvement. Thirty-nine Criteria for Review are distributed across the four Standards and are meant to be used by institutions in their institutional report, by peer reviewers in evaluating the institution, and by the WSCUC decision--makers in making a final determination. Each standard is defined and a guideline is provided to enable the institution and the reviewers to assess whether the standard has been met.

The assessment process involves the submission of an institution report of 12,000 to 18,000 words submitted 10 weeks prior to the offsite review, an offsite review including video conference with institutional representatives (1 day), a preliminary team report, an institutional visit conducted 6 months after the off-site review (3 days), final report, and a confidential team recommendation is transmitted to WSCUC's governing council. WSCUC provides information and guidance for preparing the institution for the review process, including conferences, consultations, and specific self-study instruments, such as an informational worksheet and an inventory of effectiveness indicators. The self-study report should address, among other components, institutional context, student learning, financial sustainability, and internal polices for quality assurance and improvement. For each component,

prompts in the form of questions are provided within the WASC/WSCUC Handbook to promote reflective thinking on the institutional level

WSCUC's governing body makes the accreditation decision based on the team report and complementary documents. It can reaffirm accreditation for 6, 8 or 10 years, with initial accreditation usually being for 6 years and renewed accreditation typically lasting for 10 years. The Commission can also deny or withdraw accreditation, defer action, issue a formal notice of concern, or establish a sanction in the form of a warning, a probation period (usually for two years), or a requirement for the institution to "show cause" as to why accreditation should not be terminated. All decisions, including sanctions, are published on the WASC website.

The challenge posed by the for-profit sector

A major challenge in the United States pertains to the assurance of quality within the private, for-profit sector of higher education. For-profits establishments pose a special problem because substantial evidence suggests that profit-seeking and educational quality do not go hand in hand. Whereas some argue that market forces generate healthy competitions that encourage educational establishments to seek to attract students by offering an attractive product, others contend that profit--maximization leads to excessive cost-cutting, overly high student-faculty ratios, and unscrupulous business practices. Many countries, especially those in Europe, do not permit for-profit higher education. Such institutions are commonplace in many Asian countries, such as China, Malaysia and the Philippines (KINSER; LEVY, 2007), but they are rare in South America, legally allowed only in Peru and, since 1997, in Brazil (KNOBEL; VERHINE, 2017).

In the US, on the other hand, for-profit higher education enterprises, often referred to as proprietary or career institution, have existed since the 1800s, when they responded to demands for a practical, job related form of higher education that was not then supplied by most traditional establishments, where an abstract form of classical education was emphasized. The sector grew rapidly after World War II, and, in the early 1970s, national legislation enabled students in for-profit establishments to receive federally-funded student loans, and, in the 1990s, the sector underwent processes of financialization, with invested capital increasingly derived from private equity funds and stock-market participation (ANGULO, 2016). Between 2000 and 2010, the undergraduate enrollments in the for-profit sector in the US increased by 329%, to nearly 2 million students, representing about 10% of all higher education students in the country (HENTSCHKE; LECHUGA; TIERNEY, 2010). This rapid growth was fueled by the demand of students typically excluded from traditional institutions, such as those already employed, those from minority

groups and/or those who had recently returned from military service. It was also promoted by the extensive use of distance education which, according the U.S. Department of Education, now constitutes about 60% of all for-profit higher offering in the country (UNITED STATES DEPARTMENT OF EDUCATION – USDE, s.d).

However, since their inception in the 1800, for-profit establishments have received widespread criticism for fraud and other forms of unethical business behavior. In recent years, lawsuits by unhappy students and disciplinary action by states and the federal government against components of the for-profit industry have been commonplace. The ethical problem is especially evident with respect to the recruiting processes, in which high pressure tactics are used to entice new students, whereby exaggerated promises are made regarding the level educational quality, the likelihood of graduation, and probability of eventually getting a good job. Studies reveal, however, that a large number of students fail to complete their studies, do not obtain the employment they expect, and are saddled with huge debt obligations. Thus, according to a recent book by A. J. Angulo (2016), for-profit institutions in the US have stiffed students, taxpayers and the American dream. A second book, this one by David Halperin (2014), makes a similar accusation, arguing that they scam taxpayers and ruin student lives. A prestigious U.S. Senate commission came to a similar conclusion, contending that for-profits fail to ensure student success and therefore do not adequately safeguard the loan investments made by the federal government (UNITED STATES SENATE, 2012). It is mainly because of publications such as these that total enrollment in the US for the for-profit segment decreased by more than 50% between 2010 and 2017 and currently accounts for only about 5% of all higher education students in the country (NATIONAL CENTER FOR EDUCATION STATISTICS – NCES, 2018).

Very few for-profit institutions are accredited by one of the six accrediting agencies. Most are credited by national entities, many of which created by the institutions themselves to confer a stamp denoting a minimal level of institutional quality. Only a small number of these agencies are officially recognized by the USDE, with the most important being the Accrediting Council for Independent Colleges and Schools (ACICS) and the Accrediting Commission of Career Schools and Colleges (ACCSC) (COUNCIL FOR HIGHER EDUCATION ACCREDITATION – CHEA, s.d.). Although these agencies adopt procedures similar to those described above pertaining the regional accreditors, they have been widely criticized for using lax standards and for turning a blind eye to the persistence of fraud within the sector. The USDE cancelled its approval of the ACCSC in 2016, but it was reinstated a year later (SHIREMAN, 2019).

In addition to approving (or disapproving) the accreditors of for-profit institutions, the USDE instituted, between 1992 and 2016, a series of specific rules

that for-profits must meet to qualify for federal funds. These rules include the following:

1. Student recruiters cannot be paid according the number of students they recruit.
2. At least 10% of an institution's revenues must be derived from sources other than the federal government.
3. Institutions must publicly disclose graduation and job-placement rates and provide information about costs and debt levels.
4. The federal debt default rate for federal loans among the students at an institution must not exceed 40% for a single year or an average of 30% for three consecutive years.
5. The graduates of an institution must be gainfully employed so that that their level of debt does not exceed 30% of discretionary earnings or 12% of total earnings over a four-year period.

Both Halperin (2014) and Shireman (2019) argue that these rules are not sufficient to curtail the abuses of the for-profit higher education industry. In this sense, the significant reduction in the size of the sector subsequent to 2010 can be viewed as a positive tendency.

AN ASSESSMENT OF THE US QUALITY-ASSURANCE APPROACH

The higher education quality assurance model in the US has been viewed both positively and negatively by those who specialize in institutional assessment. It is very similar to the quality assurance frameworks adopted elsewhere in that it values institutional self-evaluation and on-site visits by external commissions composed of academic peers and results in a binary (yes/no) decision concerning accreditation, confirming that minimum standards, previously defined, have been met. However, the approach diverges from the general model elaborated by Van Vught and Westerheijden (1993).

As noted, accreditation in the US does not determine an institution's legal right to exist, and it is conducted by a myriad of non-governmental organizations that operate either nationally or regionally. The quality of the accrediting agency is evaluated by the USDE in order to decide which institutions are deserving of public funds. In contrast, in most other countries, including Brazil, the quality assessment of the great majority of higher education institutions is conducted by the national government via a central agency which coordinates and assumes responsibility for the task. Assessed institutions are able to legally function only if their evaluation confirms that minimum quality standards have been met.

The decentralized, non-official US approach has been widely criticized.[2] According to detractors, the model is overly complex and fragmented and does not pursue standards that are uniform on national scale. The binary decision does not provide incentives for institutional improvement and does not permit interinstitutional comparisons. Even though institutions do not have to be accredited to operate, accreditation has financial implications since it must be conferred by a USDE recognized organization in order for the institutions to qualify for the receipt of public money. The linkage of accreditation to federal funding has led to a greater standardization of nationwide standards, which responds to one set of criticisms, but generates another, since some critics argue that uniformity undermines the recognition of regional diversity and institutional autonomy.

Other widely documented criticisms of higher education accreditation in the US emphasize the need for greater transparency (evaluation decisions are reported, but the evaluation reports are rarely made publicly available), for improved cost-effectiveness, and for expanded use of public (as opposed to academic) representatives on evaluation boards and teams. Many detractors call for an enhanced emphasis on outputs in relation to inputs and for a clearer differentiation between strong and weak institutions (but without using rankings). Others argue that the absence of a system for institutional ranking means that the incentives for institutional improvement are weak and makes institutional comparisons, often crucial for student choice, impossible.

On the other hand, many analysts praise the US model. Since it is relatively independent of governmental intrusions, it protects institutional autonomy and minimizes the likelihood to inappropriate political interference. Also, the fact that institutions are not ranked in terms of quality of often seen as something positive, since a single grading scale does not adequately take into account institutional diversity and does not consider many important variables that are difficult to measure. Also, ranking tend to undermine the holistic viewpoint that the combination of internal and external evaluations is designed to capture.

Another important aspect of accreditation in the US is its concern for student learning. Although the US approach has received criticism for focusing more on inputs than outputs, the issue of learning is prioritized in the documents that the six agencies produce about their evaluation procedures and is especially emphasized within the institutional self-evaluation component. The WASC/WSCUC Handbook, for example, indicates that institutional self-study reports should

2 The above-mentioned criticisms appear in numerous writings and also emerge of Verhine's experience as a research scholar at Stanford University in 2016. Relevant publications include American Council on Education – ACE (2012), American Council of Trustees and Alumni – ACTA (2007), Dickeson (2006) and Guillen; Bennett and Vedder (2010).

devote two chapters to student learning, one dealing with core competencies and performance at graduation and the other providing measures of student success (WESTERN ASSOCIATION OF SCHOOLS AND COLLEGES – WASC, 2013). To meet accrediting agency demands, institutions typically assess learning indirectly, using indicators such as: the rate of student progress, retention and completion; the satisfaction of students, alumni and employers; and the post-graduate success of graduates in the labor market (SHAVELSON, 2009). Some adopt more direct learning indicators, including the analysis of classroom observations, of student essays and senior projects, of the products of task-oriented workgroups, and of video tapes of student argumentation (ROKSA; ARUM; COOK, 2016). Almost all emphasize student evaluations of their professors, via questionnaires, interviews, and/or focus groups. Indeed, in most US institutions, the student evaluations that a professor receives is crucial for both job maintenance and career advancement.

Some scholars in the US have also proposed a national test to measure higher education learning (GILLEN; BENNETT; VEDDER, 2010). But the predominant position on the part of those involved in higher education accreditation is strongly against the use of such a measure. The Organisation for Economic Co-operation and Development (OECD) recently abandoned a massive, international effort to create a Programme for International Student Assessment (PISA) like test for higher education students, in part due to the technical difficulties associated with cross--national comparisons and in part because of political disagreements among the participating nations (ALTBACH, 2015). In the US, there are currently a number of higher education examinations on the market, but their usage by institutions or programs is voluntary, and they tend to focus on critical thinking, analytical reasoning, and problem-solving capability rather than on knowledge content (SUSKIE, 2018).

An overview of US approach to higher education evaluation suggests that it tends to be is more flexible and interactive than the highly structured systematic often found in other countries. In the US, instruments are usually open-ended, with a focus on information to be evaluated qualitatively. Also, commission members are selected in accordance with the specific needs and characteristics of the institution and often include professionals that are suggested by the institutions themselves. Interaction between the evaluators and the host institution often extends for several months and includes a considerable amount of time that takes place before and after the on-site visit for data collection and orientation. In the case of WSCUC, for example, a ten-week period separates the off-site and on-site assessment phases, and during the interval the review team usually maintains contact with the institution, requesting clarifications and justifications based on the collected information. On the other hand, the personalistic tendency adopted in the US has been criticized in

the relevant literature for creating a cartel-based system of peer reciprocity that keeps standards low, discourages innovation and serves the interests of higher education institutions over those of the public at large (GILLEN; BENNETT; VEDDER, 2010). This last viewpoint is highly controversial within the US accreditation community, but like other hotly debated issues, it generates reflection as to how accreditation models might be best designed.

FINAL CONSIDERATIONS

Clearly, there is not a best single-model for accrediting higher education institutions. The relative strengths and weaknesses of different national approaches must be judged in light of the socio-historical realities that undergird each country. The experience constructed over time in the US provides a useful background for analyzing, from a comparative perspective, frameworks adopted elsewhere, in order to guarantee and improve the quality of high education on a global scale.

The analyses presented herein offers several recommendations that can be summarized as follows:

a) Accreditation should focus on results rather than inputs, putting an emphasis on what the student learns from his higher education experience.
b) Accreditation should operate efficiently and economically, simplifying the institutional reports and reducing the time between initiating the process and the concluding decision.
c) Accreditation should respect institutional diversity and autonomy, making all judgements in light of the stated mission of the establishment.
d) Accreditation should encourage innovation, especially with respect to discovering new forms of promoting student learning that is conducive to citizenship, entrepreneurship, employability and ethical behavior.
e) Accreditation should be more transparent, making available evaluation reports to the public and strongly encouraging institutions to provide information regarding self-evaluation findings and indicators pertaining to student success.
f) Accreditation should increase the number of non-academic members, from both the public and private sectors, that participate in the review and decision-making processes, thereby increasing the likelihood that such processes serve the public in general.
g) Accreditation should prioritize institutional self-evaluation in order to strengthen an internal, participatory culture that promotes innovation, enhances academic performance, and provides accountability with respect to the community that the institution serves.

h) Accreditation should constantly seek to upgrade and expand its assessment standards to include, for example, student employment outcomes, curriculum internationalization, research funding levels, and partnerships with industry, thereby ensuring that institutions respond appropriately to constant changes in their overall milieu.

i) Accreditation should recognize and build upon standards that are international in scope, so that quality comparisons can be made from a global (rather than just national) perspective.

To effectively implement the above recommendation, efforts should be made to unify, on a national scale, systems for the evaluation and regulation of higher education. The creation of consistent, national higher education quality standards has been hampered in the US as well as in many of countries, by the existence of multiple evaluation frameworks that function parallel to one another. From a comparative standpoint, the evaluation/accreditation network in the US is exceptionally heterogeneous, composed of a myriad of regional and national agencies, separated by type of institution and field of instruction and further divided by whether or not they are officially recognized by federal and/or state governments. This fragmentation of evaluation and regulation procedures has been fostered historically by strong, constitutionally-mandated governmental federalism, and it has been additionally nurtured by an historical *ethos* that values social and political decentralization (ANTONIO; CARNOY; NELSON, 2018). Although efforts have been made in the US to create greater assessment unity, the success of such initiatives has been constrained by deeply rooted social, cultural and political barriers. Thus, the achievement of greater higher education assessment unity requires a strong commitment on the part the Federal Government, acting primarily through its Department of Education, involving the employment of incentives (funding and otherwise), the creation of appropriate national commissions, and the utilization of the "bully pulpit" to make relevant higher education stakeholders aware of the advantages of a unified, national assessment/regulation network. Other counties, especially those based on federalism, should consider similar actions (CARNOY *et al.*, 2018).

In closing, it is important to recognize that although higher education quality assurance has been an important theme for more than 30 years, improvements are clearly necessary, and international comparisons, such as the one provided here, can suggest valuable lessons and promote useful collective reflections.

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