

Country's New Law on Accreditation

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A bill on accreditation of higher education institutions is currently under consideration of the government. This is indeed welcome. There are serious concerns about the quality of higher education in the country. Several endemic and structural problems plague the country's higher education sector. Of them, near absence of competition that makes institutions complacent is most significant. In a system where demand far outstrips supply and perverse incentives mark the funding and regulatory arrangements, quality of higher education provision gets a raw deal. As a result the principle of *Gresham's Law*, bad private providers driving out the good ones, apply. It is therefore not surprising that there has been a continuous deterioration of academic standards in the country.

Faced with similar situation, several countries have introduced accreditation to assure and enhance quality of higher education provision. Although, accreditation has been around for more than a century, and one can trace its roots to the end of the 19th century, when the first accreditation bodies were formed in the United States, however, its importance begun to be felt only when the size and variety of higher education institutions grew rapidly. A mass higher education system demanded a more formal management of quality than what was needed in small, homogeneous systems of higher education. Even in the US, accreditation had begun to occupy centre-stage in the public discourse on higher education from the early '80s. European countries caught up quickly, as the first formal quality assurance schemes were introduced in Europe in 1984. Now, most countries around the world have adopted accreditation or are in the process of doing so. These are largely based on the US-model of accreditation, but rarely as effective as in the US. Accreditation in India that begun in the '90s based on US-model has not been very successful.

Globally, interest in quality of higher education centers on two basic questions: Are graduates getting the knowledge and skills necessary for a changing economy in the context of improved study programmes to achieve more and better learning? Are higher education institutions spending public money in the right way? Thus, the quality debate is centered on effectiveness and efficiency measures. In India, however, accreditation is expected to do several other things such as address problem of inputs like staff shortage, infrastructure and facilities and tackle corrupt practices of private institutions, particularly in matters of admissions and fees. Such expectations are based on wrong understanding of accreditation goals and are misplaced.

Current arrangements and new law

National Accreditation and Assessment Council (NAAC) – that begun accreditation in 1998 – has so far completed accreditation of only 148 out of the over 480 universities and 3941 out of the over 22000 colleges. National Board of Accreditation (NBA) has so far covered about 20 percent of the eligible programmes in engineering and related areas.

The central government plans a new law on accreditation and set up a national regulatory authority for it. The proposed law provides for mandatory accreditation by a registered agency to assess quality. While, the intent is

right, the bill errs on making accreditation obligatory and overlooks important issue about unit of accreditation and need for graded system for accreditation for various categories of institutions. The law however rightly suggests multiple accreditation agencies and independence of these agencies from the government.

Current system of voluntary accreditation by NAAC is based on the Sukumaran Committee Report (1990) that modified the earlier Gowarikar Committee Report (1987) after three years of consultations. The 1987 report has recommended mandatory accreditation, linking it with all central funding and closure of institutions if not accredited. It had recommended a self-financing body for accreditation, entirely funded from the fees collected from its member institutions. Gowarikar Report was found too radical, thus it was not accepted at that point in time.

Now that we are back to making accreditation obligatory, there is a need to revisit the reason why the 1987 report was not accepted. Universities in India gain their right to exist through a recognition process that needs a law passed by the Parliament or State Legislatures or authorized by the central government under the UGC Act. Thus, according to Gowarikar Committee, accreditation was not assigned the 'gate-keeping' role as in the United States. The position continues to remain the same, thus there appears to be no reason to make accreditation mandatory now. The new law attempts to address the quality issue without understanding of real issues.

Besides, the bill does not specify consequences for an institution not subjecting itself to accreditation. It is believed that penal provisions are part of yet another law that relates to curbing malpractices in higher education. Even if penalties and coercion are brought in through this convoluted route, it is usually not practical to apply such measures, as recent experience with the 'rogue' deemed universities seems to suggest.

It also needs to be recognized that the existing accrediting agencies have limited capacity. There is no way that they can accredit about 22,500 institutions periodically, say every 5 years, as is usually the practice. Currently, NAAC accredits about a few hundred institutions every year. Thus, it is not clear as to how the new law would ensure that all institutions undergo mandatory accreditation and if so, in what time frame?

In sum, mandatory accreditation is neither desirable nor achievable in India. There is no example of mandatory accreditation globally. Instead a voluntary accreditation system as in US with clear consequences is the need of the hour. In some countries however, the word accreditation (as in case of Chile between 1990 and 1998) is used for recognition or approval and hence the confusion. Accreditation is referred to as academic audit in the United Kingdom and Australia.

Academic audit is done by the Quality Assurance Agency in the United Kingdom and by the Australian Universities Quality Agency. This is closely linked to government grants. This works well since both are essentially public systems with large financial dependence of the government. Specific and clear consequences are thus necessary to encourage universities and colleges to submit themselves for academic audit or accreditation. In such a situation, over time, accreditation becomes *de facto* mandatory, even though it might be

legally voluntary. This follows the simple logic, 'what gets rewarded gets done'. This strategy is also being adopted by the Unique Identification Authority of India in assigning unique identities to citizens on voluntary basis.

US-Model of accreditation

Even though voluntary almost all institutions in the US are accredited or if new in the process of getting accredited. Accreditation has significant consequences and play 'gatekeeper' role for federal grants that forms a significant part of revenue stream for all higher education institutions. Federal grants form a bulk of the research funds for research-intensive institutions and major source of government money through student financial aid for all accredited institutions. Accreditation is important for degree- recognition and credit-transfer across institutions. It is pre-requisite for employment of graduates in several cases. Government agencies, foundations and other organizations limit access to many benefits and opportunities to accredited institutions alone.

The US has two types of accreditation. Institutional accreditation that is organized regionally under six agencies and every institution is accredited by one of them. Programme accrediting agencies have national jurisdiction. Not all programmes are accredited. Whereas most programmes have just one accrediting agency, there are a few that have more than one. Thus, an accrediting agency for a particular institution or a specific programme is usually uniquely defined; multiple agencies as though they exist rarely compete with each other as is commonly believed.

US accrediting agencies are independent, non-profit associations that have modest budget and staffing. They are financially independent and rely mainly on annual fees from their member institutions.

Way forward

From above, it is clear that voluntary *and not mandatory* accreditation with clear and significant consequences is the way forward. For this purpose, there is need for a holistic approach and funding and regulatory arrangements need to be reviewed while designing an effective accreditation system.

Considering the mammoth task of accrediting about 22500 institutions, one cannot perhaps move forward unless a basic classification of the institutions is done to identify their common characteristics in terms of their size, offerings, research intensity and so on. This would enable adoption of a decentralized approach with multiple agencies working in tandem with each to assure and accredit quality of higher education in the entire country.

With mass expansion of higher education, such classification is common in several countries. For mass systems serving multiple functions, classification becomes a way of articulating and systematizing different institutions that may serve different functions and thus maintain system diversity pursued as a goal by itself.

Once the institutions are suitably grouped, several agencies would be required to accredit them periodically. It would be naïve to presume that private accreditation agencies will suddenly emerge and take responsibility for

accreditation as soon as a system of registration of such agencies is put in place. Almost all countries other than the US have government-sponsored agencies. Only the US has independent non-governmental agencies, but these are mostly membership-based association and have evolved over the past hundred years or so. Elsewhere, experience with private accreditation bodies is new and limited. Chile that has one of the most market-oriented systems of higher education in the world allowed private accreditation agencies last year. Initial response from the private sector has been lukewarm.

In India, responsibility of accreditation could be assigned at various levels. For instance, accreditation of arts and science colleges in the States (other than those affiliated to the Central institutions) may devolve on the States. Specialized stand-alone institutions offering programmes in particular areas of study, such as engineering, architecture, pharmacy, nursing could be accredited by the concerned professional agency avoiding duplication of efforts. There is possibility of roping in private agencies for specialized programmes of study like insurance, maritime education and so on. Credit-rating agency, CRISIL is already accrediting maritime institutions on behalf of the Director-General of Shipping. There could be a few more opportunities like this.

The universities around 480 and the remaining about 2000 colleges could be accredited by NAAC. For which, NAAC may have to be re-organized into five independent regional accreditation councils. Based on objective criteria, some top and established research-intensive institutions could be declared as self-accrediting universities. In addition, several other institutional arrangements, such as a national qualification framework, subject benchmark committees, national protocols for approval of new institutions, graduate destination surveys, and course experience surveys would be required to create a comprehensive system to assure and enhance quality of higher education provision. It is important to plan and put in place a multi-layer institutional arrangement to maintain academic standards in Indian higher education to make new law on accreditation effective.

Conclusion

In sum, there is a need for clear consequences and multiple agencies with clear mandates for effective accreditation. Expectations from the accreditation process have to be grounded in reality. A classification of institutions would enable in designing a graded system of accreditation with multiple agencies to review and accredit all institutions periodically. A detailed roadmap for accreditation is thus far more important than enacting a law; else this could another case of failed legislation.

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