



# Accreditation in Spotlight

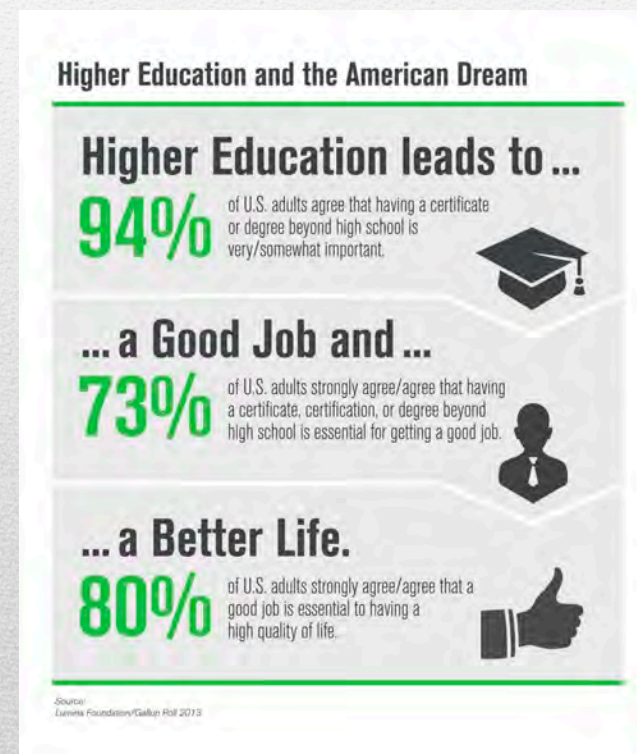
Douglas S. Franklin, Ph.D.

Emeritus Assistant Dean, Ohio University

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- Tensions in American Higher Education
- Trends in American HE
- The “TRIAD of Actors”
- Critiques of Accreditation
- Politics and Accreditation
- Recommended Actions
- Good Practice
- International Relevance

## Key Topics



- Issues in American Higher Education
  - Access (Input)
  - Affordability (Input)
  - Accountability (Process)
    - Transparency
  - Utility (Value) (Output)
    - Liberal Education versus Work Force Training

Accreditation and the  
Federal Future of  
Higher Education



*“We rarely consider accreditation’s political role as a key intermediary in the increasingly complex legal and regulatory terrain between colleges and universities and the federal government..” Eaton, 2010 in AAUP News*

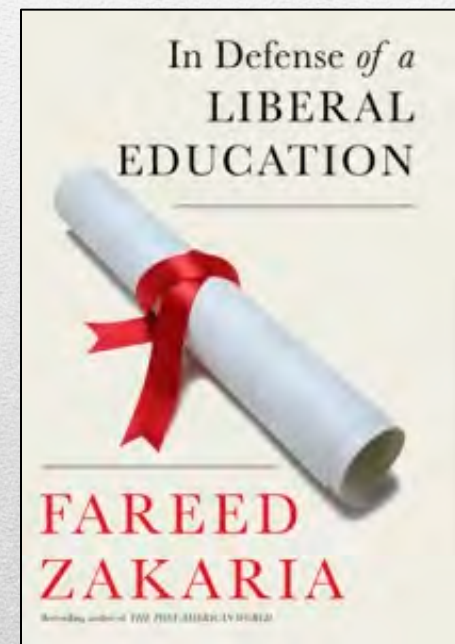
## Tension in American HE

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- *In Defense of Liberal Education* by Fareed Zakaria

- Liberal education teaches you how to:
  - Write
  - Speak your mind
  - Learn
  - Critical Think

*“More than just a path to a career, a liberal education is an exercise in freedom. Above all, it is an expression of the most basic urge of the human spirit—to know.” Zakaria, 2015*



## Tension in American HE

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- Clear Expectations for HE's role in workforce development:
  - Emphasize rigorous use of labor market data and other sources to define goals and priorities;
  - Encourage employers' input in higher education;
  - Require public higher education institutions to collect and publicly report impacts; and
  - Emphasize performance as an essential factor in funding.

“...governors and state policymakers are beginning to move beyond their focus on getting more students to get "degrees" to asking: "Degrees for what jobs?" National Governors Association, 2011



## Tension in American HE

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- Sexual assault and gender issues
- Athletics and Title IX
- Academic freedom
- State and systems oversight
- Governance (intervention on boards, CEOs, public policy)
- Data driven decision making



## Trends in American HE

- Key Issues Facing Institutions of HE
  - Sliding Enrollments
  - Concerns About Cost and Access
  - Questions About Value
  - Focus on Careers and Job placement
  - Declining State Support
  - Collisions Over Campus Climate
  - Defense of Academic Freedom and Free Speech



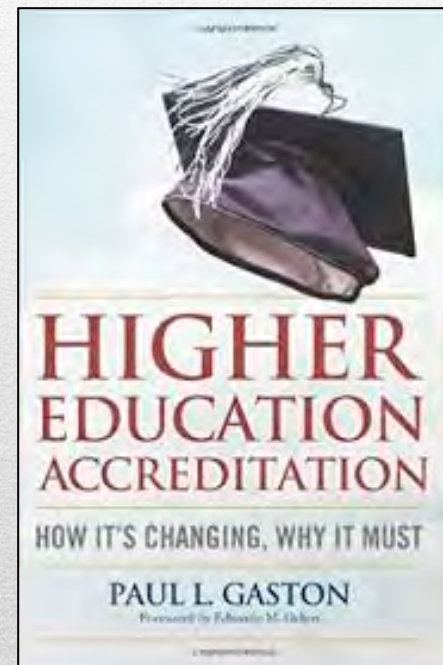
*“Higher education must find substantial ways both to lower student costs and increase the return on (student or family) investment. “  
Rogers & Peterson, 2017, in Inside Higher Education*

## Trends in American HE

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- Changes within American HE
  - Shift in Scale
  - New Institutions, New Challenges
  - Rise of For-profits
  - Other Sectors, Other Standards

*“The most direct response to the expansion of distinct sectors with higher education has been further adaptation of criteria in light of relative rather than absolute standards.”*  
Gaston, 2014, pg., 63.



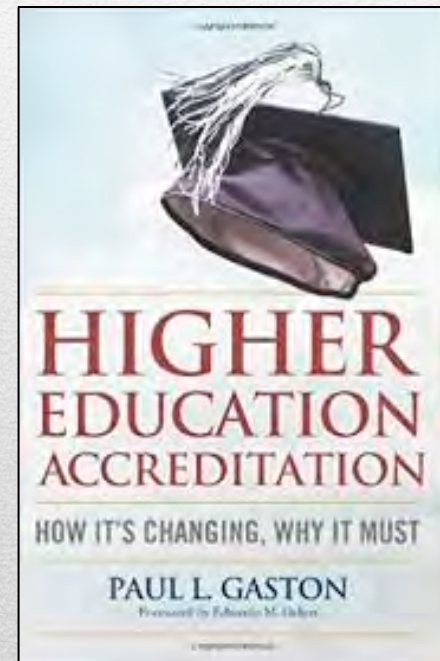
## Trends in American HE

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- Changing Environment
  - Different Student Body
  - Increasing Accountability
  - Un-funding or Under-funding
  - Shifting Stances: Accreditation and Federal Government

*“The most prominent 21<sup>st</sup> century recommendations for change...charge that procedures and protocols developed in the early decades of the 20th century have not kept pace with dramatic changes...in the 21st.” Gaston, 2014, pg.50.*

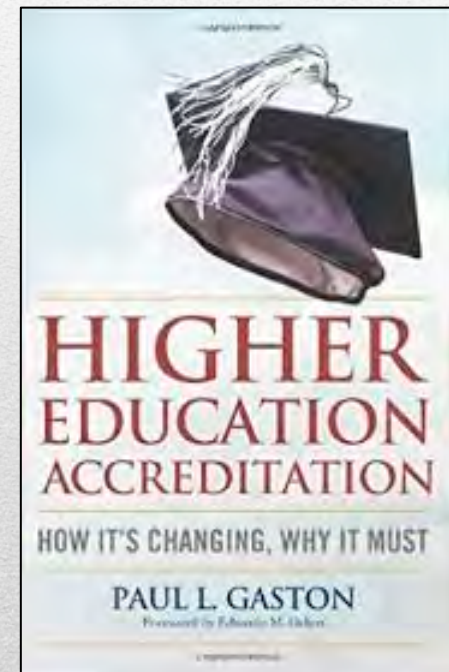


## Trends in American HE

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- Changes in Institutional Operations
  - New Faculty Majority
  - New Technologies
  - Expansion of Distance Learning
  - Competency-Based Instruction
  - New Methods of Budgeting

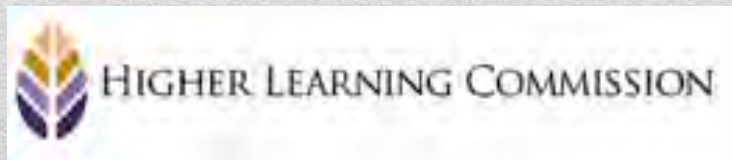
*“...Accrediting organizations have had to consider the operational adjustments institutions have made in response to budget challenges, heightened competition for students and the increasing influence of instructional technology.” Gaston, 2014, pg., 64..*



## Trends in American HE

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- Risk-managed accreditation
- Differential accreditation (by sector)
- Expediting accreditation processes
- Outcomes-focused accreditation and assessment

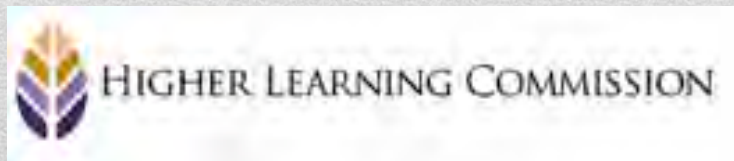


*HLC policies require substantive review of its Criteria for Accreditation every five years. Based on findings of internal analyses of team reports and interim monitoring staff will develop an alpha version of Criteria revisions for review by February 2018 meeting. HLC, 2017*

## Trends Related to Accreditation

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- New business models for higher education and Mergers, acquisitions and partnerships
- Over-regulation from the federal government
- Defining Accreditors Role in Relation to Credit Hour and Other Federal Regulations



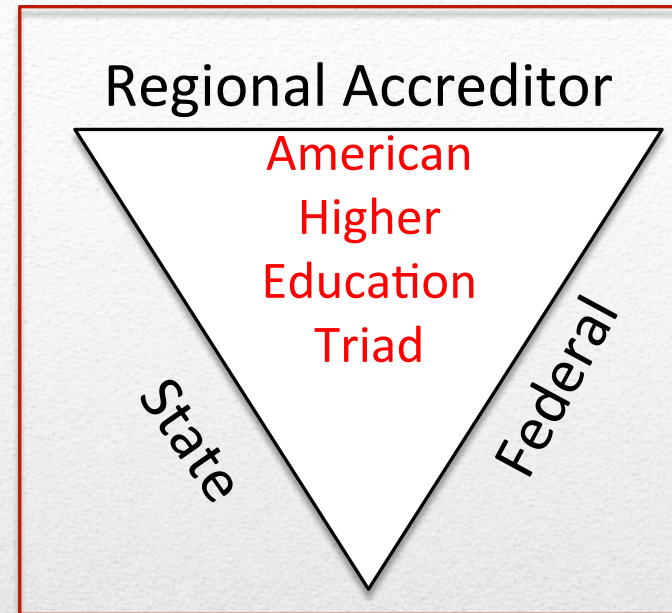
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## Trends Related to Accreditation

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## • Governance

- State government
- Federal government
- Accrediting agencies
  - Regional accrediting agencies
  - National organizations (For-profit and non-degree granting)
  - Specialized accrediting organizations



*"...the **tension** among the triad of actors and their interests is essential and healthy. The collaboration and compromise to address the tension makes for a system that continues to move forward."* Source: Susan D. Phillips Testimony to U.S. Senate Committee on Health, Education, Labor, and Pensions, September 19, 2013

## The "Triad of Actors"

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- NACIQI
  - Authorized by the Higher Education Opportunity Act of 2008.
  - Provides recommendations regarding accrediting agencies that **monitor the academic quality** of postsecondary institutions and educational programs **for federal purposes**
  - Complies with all requirements of the **Federal Advisory Committee Act (FACA)** and **Government in the Sunshine Act**.



National Advisory Committee on Institutional  
Quality and Integrity  
U.S. Department of Education

*“Sunshine is the greatest  
disinfectant” Louis D. Brandeis*

## The “Triad of Actors”: Federal Role

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- Advises the U.S. Secretary of Education on:
  - **Accreditation**
  - Secretary's **recognition process for accrediting agencies**
  - Institutional eligibility for **federal student aid**
- Reaches out to accreditation and higher education communities; researchers and policy makers; and interested members of the public, to **engage in informed deliberation.**



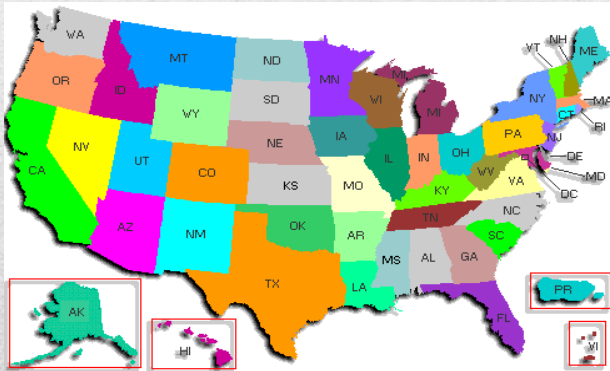
National Advisory Committee on Institutional  
Quality and Integrity  
U.S. Department of Education

*“The indisputable transformative moment in the history of accreditation was in 1952, when the federal government and the accreditors struck a deal in which the government made the regional agencies a key arbiter of whether individual colleges and universities should be eligible to have their students receive federal student aid.” (Lederman, D. September 2015.)*

## The “Triad of Actors”: Federal Role

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- Establish **policy and guidelines** for operating within the state (Licensure)
- System **control** in some cases
- Provide **financial support** state institutions
- “Consumer Protection” (Harkin, 2013)



*“states have an **obligation** not only to fund their systems of higher education adequately, but also to provide an explicit policy framework that informs and guides the actions of individual colleges and universities” National Center for Public Policy and Higher Education, 2003*

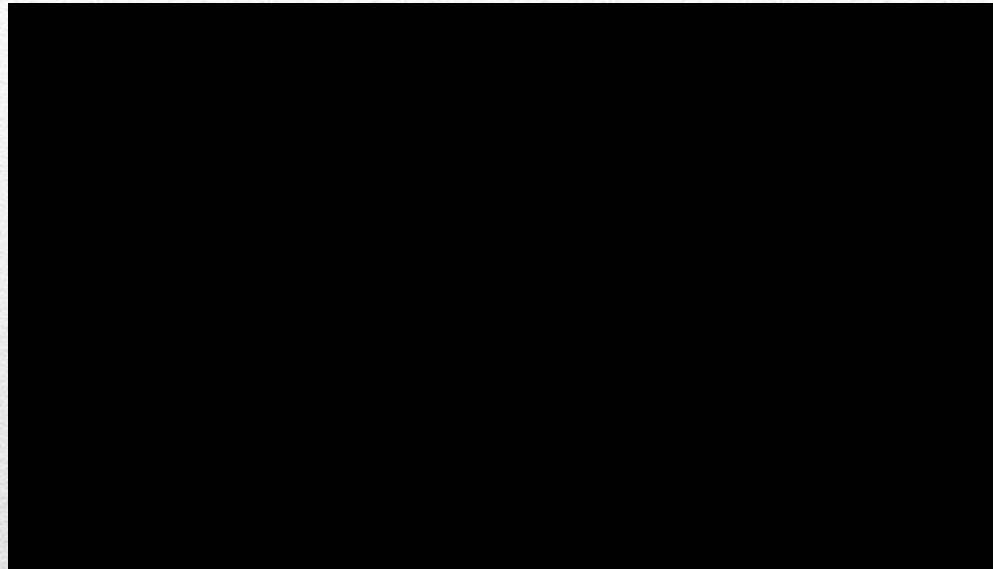
## The “Triad of Actors: States

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- Benefits students:

- Encourages confidence educational activities have been found to be satisfactory.



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*“At its heart, accreditation is a process through which an institution holds itself accountable to the academic community and the larger public, and as such it plays a key role in the success of U.S. higher education.”( AGB, 2008)*

The “Triad of Actors”: Accreditation Agencies

- Assure **Quality**
- Address Issue of **Accountability**
- Ensure **Access** to **Federal and State Funds**
- Engender Private Sector **Confidence**
- Ease **Transfer**



*“Accreditation is the primary means by which colleges, universities and programs **assure quality** to students and the public.”* Source: Council for Higher Education Accreditation, 2012, p.4

## Purpose of Accreditation Agencies

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- **Academic freedom** flourishes in an environment of academic leadership of institutions.
- Higher education enterprise and our society thrive on **decentralization and diversity** of institutional purpose and mission.
- Process (**use of standards**) leads to **status**.

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**DIFFERENT TYPES OF COLLEGES**

**FOR PROFIT**

**Online Institution**  
 Online college is an institution where classes and instruction are done via the Internet. Schools like these include Kaplan University, Strayer University, and University of Phoenix. **For Profit colleges** in general are more career-focused. They receive only a portion of their revenue through student tuition payments, and other revenue through fees paid by government and state education aid programs.

**Campus Institution**  
 Schools which offer both online and campus locations for students to study or take classes like University of Phoenix, DeVry University, Grand Canyon University, Colorado Technical Institute, and Virginia College.

**NON-PROFIT**

**Community College**  
 A smaller, local campus college offering Associates and possible Bachelor's degrees which is funded by tax revenues from the state or locality in which it is located like Salt Lake Community College. **State College Non-profit** - A state-funded institution with a campus location which is funded by tax revenues from the state in which it is located like Palm Beach State College, Park State College, Sonoma State College, and Santa Fe College.

*“Accreditation...is a means to assure and improve higher education quality, assisting institutions and programs using a set of standards developed by peers.”* Source: The Value of Accreditation. CHEA, 2010 pg. 3.

## Underlying Principles of Accreditation

- Accreditation:
  - Is **non-governmental**
  - Rigorous
  - Protects **institutional autonomy** and **academic freedom**
  - Based on **peer review**
  - Serves both institutions and the public
  - Preserves **institutional diversity**



*"US colleges and universities are the most diverse in the world...American Colleges do not operate in isolation from the rest of the world." Source: ACE, 2015*

American Council on Education: Accreditation

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- A process of self regulation that exists solely to serve the public interest:
  - General public in their own personal health, safety, and economic well-being.
  - Government and elected officials at all levels in assuring wise and effective use of taxpayer dollars.
  - Consumer interests of students and their families in "getting what they pay for"

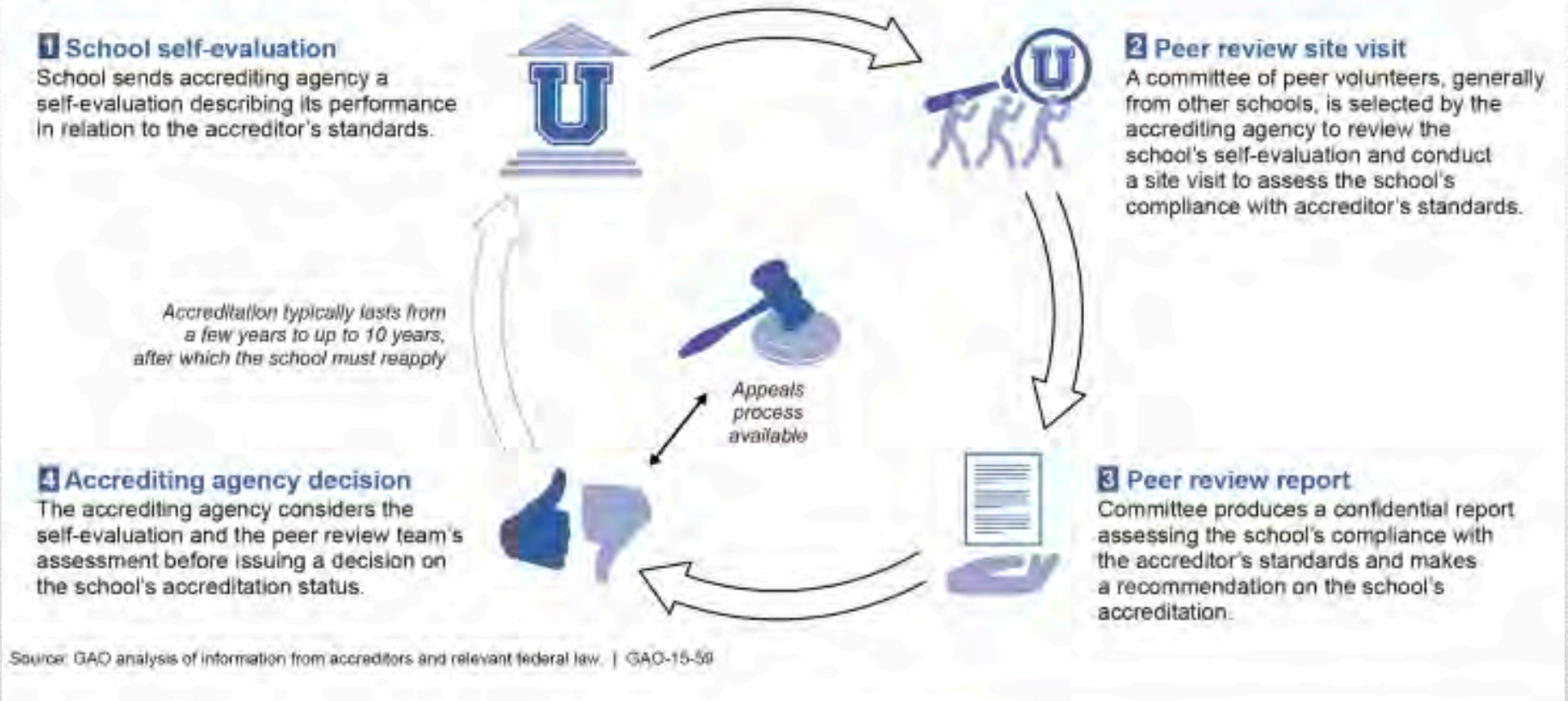
*"The details of accreditation are so arcane and complex that the entire topic is confusing and controversial throughout all of education." Wiley, J., Inside Higher Education, 2006*



Public and Professional Views of Accreditation

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**Figure 1: Sample Accreditation Process**



# Sample Accreditation Process

*“The indisputable transformative moment in the history of accreditation was in 1952, when the **federal government and the accreditors struck a deal in which the government made the regional agencies a key arbiter of whether individual colleges and universities should be eligible to have their students receive federal student aid.**”*

**3** Types of Federal Student Aid

- 1** **GRANTS**  
Free money.  
Grants are usually based on financial need and don't have to be repaid.
- 2** **LOANS**  
Borrowed money.  
Loans are an investment in your future. But remember, they must be repaid with interest.
- 3** **WORK-STUDY**  
Earned money.  
A work-study job lets you earn money while you're in school.

Federal Student Aid  
AN OFFICE OF THE U.S. DEPARTMENT OF EDUCATION

PROUD SPONSOR of  
the AMERICAN MIND™

Learn more at [StudentAid.gov/types](http://StudentAid.gov/types). Apply at [www.fafsa.gov](http://www.fafsa.gov).

*“No one really likes accreditation but no one knows what else to do.”--Kevin Carey, New America Foundation from Lederman, D., Inside Higher Education, 2015*

# Mission Creep?

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- Is accreditation overloaded?
- Are critiques valid?
- Is there a better way to ensure quality?



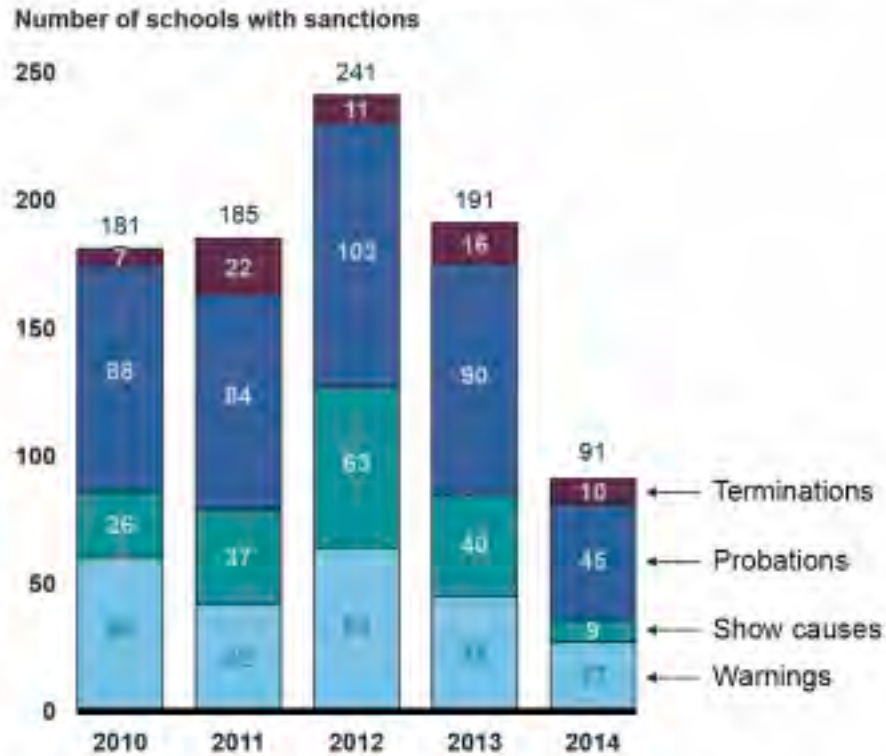
*“Formed and developed for reasons that relate to its history and values, accreditation has been burdened with expectations and duties far beyond either its design or its capabilities. Accreditation is often likened to a pack animal, saddled with more of a load than can reasonably be sustained” (Dickeson, R., 2009)*

## Questions about American Accreditation

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**Figure 5: Number of Schools with Sanctions by Type of Sanction and Fiscal Year, October 2009 through March 2014**

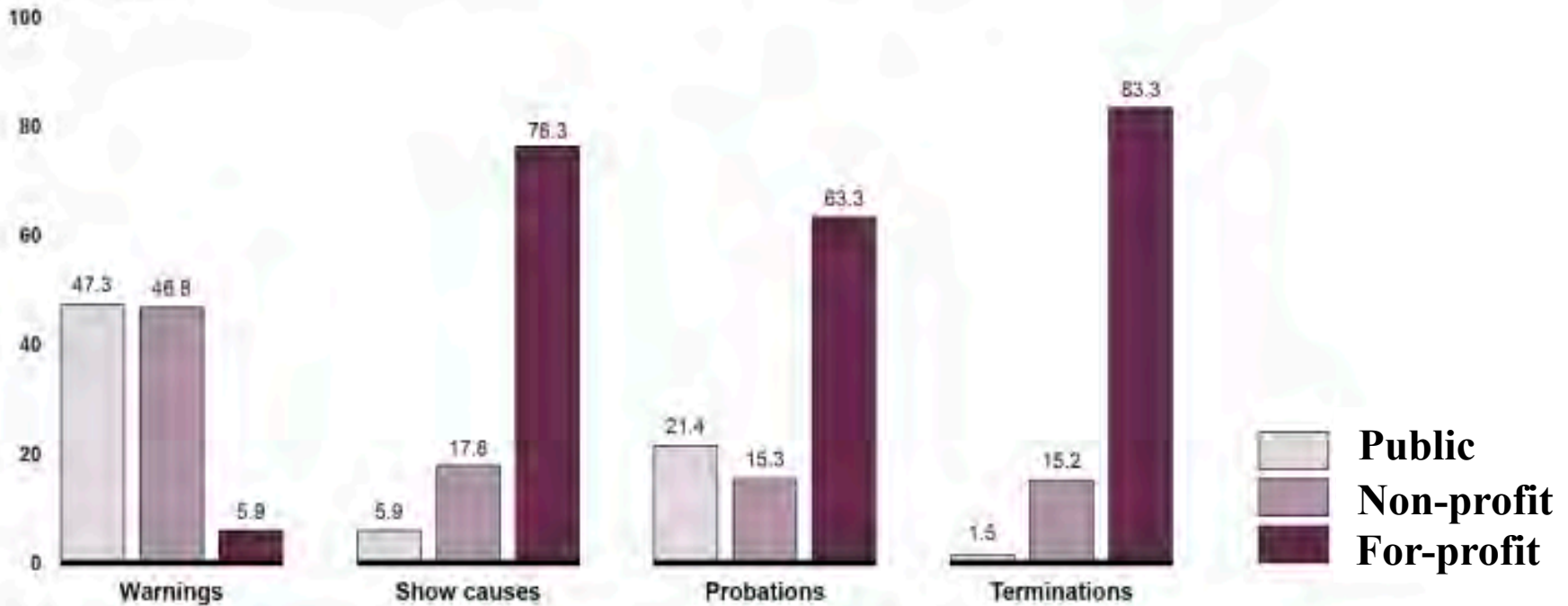


Source: GAO analysis of data from the Department of Education's accreditation database and followup with accreditors. | GAO-15-59

Agencies Terminated the Accreditation of Less Than 1 Percent of Their Member Schools

Figure 6: Sanctions against Schools (percent) by School Type, October 2009 through March 2014

Rate of sanctions

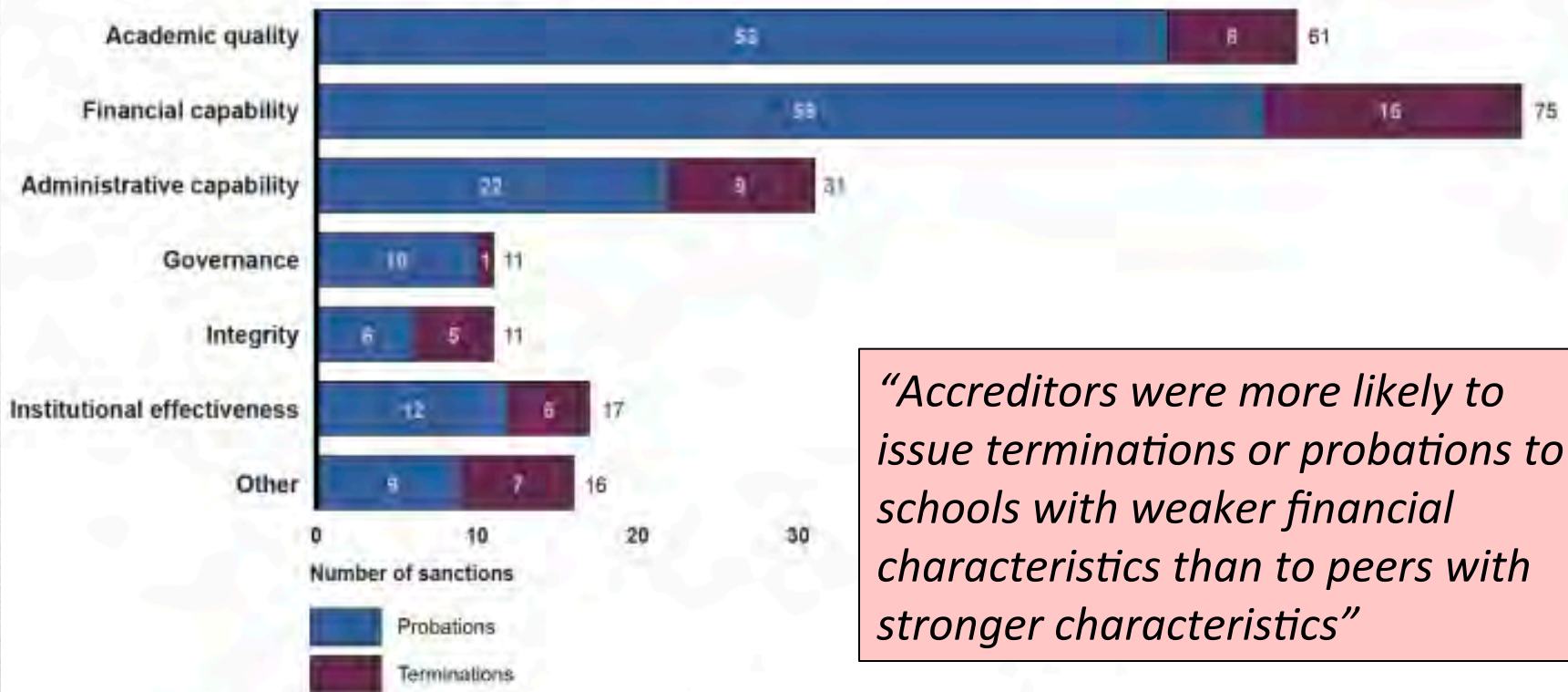


Source: GAO analysis of data from the Department of Education's Integrated Postsecondary Education Data System (IPEDS) database. | GAO-15-59

## Sanctions by Type



**Figure 7: Number of Terminations and Probations Issued by Reason for Sanctions, Based on GAO's Review of Accreditor Standards and Reasons Analysis, Fiscal Year 2012**



*“Accreditors were more likely to issue terminations or probations to schools with weaker financial characteristics than to peers with stronger characteristics”*

Source: GAO analysis of data from the Department of Education's accreditation database and from accreditor notification letters. | GAO-15-58

## Sanctions Issued by Reason

**Table 2: Likelihood of Termination or Probation for Schools with Weaker vs. Stronger Overall Student Outcome Characteristics, by Type of Accreditor, October 2009 through March 2014**

	Was there a significant difference in accreditors' responses to weaker and stronger student outcomes at schools?	
	Nonprofit and for-profit schools	Public schools
All Accreditors	No	No
Regional accreditors	Yes	Yes
National accreditors	No	NA <sup>a</sup>

Source: GAO analysis of school-level student outcome characteristics collected by Education and data from the accreditation database. GAO-15-59

*Accreditors No More Likely to Sanction Schools with Weaker Student Outcomes Than Those with Stronger Outcome Characteristics*

## Sanctions Issued by Reason

- American Council of Trustees and Alumni (ACTA)
  - Can College Accreditation Live Up to Its Promise? (Leef & Burris, 2002)
    - Reduction or elimination of agency authority to enhance institutional autonomy
    - Skepticism of the use of accreditation to advance social priorities
    - Demand for greater transparency
    - Interest in reducing costs and increasing efficiency
    - Questions constitutionality of accreditation agencies role in determining institutional eligibility based on student financial aid



*“Rather than focusing on educational outcomes and other genuine measures of quality..., accreditation concerns itself with a set of input criteria that do not bear directly on student learning” (Leef & Burris 2002, , pg 23, 18.)*

## Calls for Change

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- American Council of Trustees and Alumni (ACTA)
  - Provide extensive and reliable information to parents and students
  - Focus on educational outputs rather than inputs
  - Avoid promoting a political agenda
  - Instigate competition by engaging other regional accreditation agencies
  - Trustees should get “more involved” in institution’s accreditation
  - States should confront traditional prerogatives of accrediting agencies
  - Sever connection between accreditation and federal student aid.



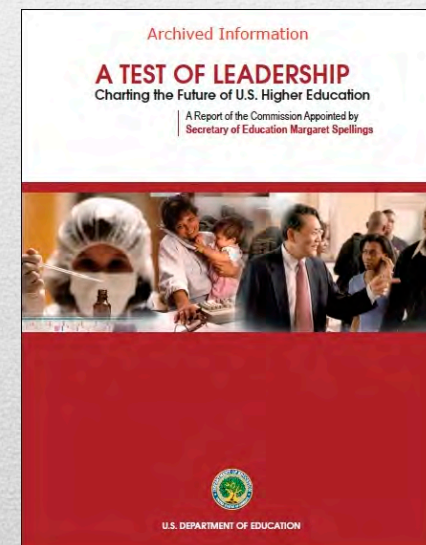
*“Publication of this report (Can College Accreditation Live Up to Its Promise? (Leef & Burris, 2002) created a profile for the discussion that continues today” (Gaston, 2014, pg. 86*

## Calls for Change

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- Spelling's Commission on Higher Education (2005)
  - Focus on educational results (outputs rather than inputs)
  - Encourage innovation
  - Facilitate the comparison of institutions and make that information available
  - **Make accreditation more accountable to the public interests**
  - Expedite the process of review and approval

*“Make performance outcomes, including completion rates and student learning the core of their assessment priority over inputs or process” (USDE Test, 2006, pp 17-220*



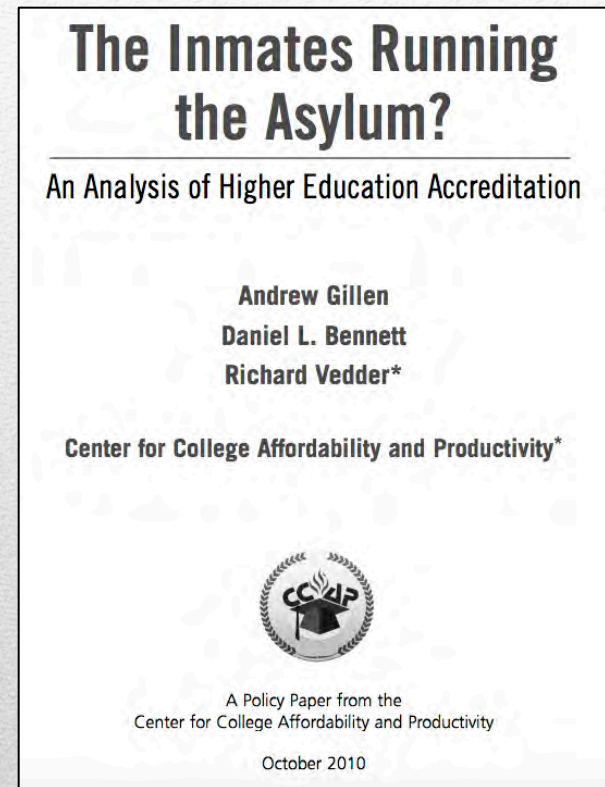
## Calls for Change

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- Accrediting Agencies No Longer Successful:
  - Improving Quality
  - Assuring Quality
  - Meeting Minimal Standards
  - Making Information Available
  - Allowing for Independence and Autonomy
  - Ensuring Institutional Diversity
  - Encouraging Innovation
  - Encouraging “Innovative Colleges”
  - Avoiding Unnecessary Costs

*“The...report ... draws together ... many of the threads that dominate current discussions of accreditation” Gaston, 2014, pg. 95*

## Calls for Change





- Failure to provide adequate guarantees of educational quality
- Over prescription leading to intrusion on institutional autonomy and academic freedom
- Accreditation of sub-standard and fraudulent institutions
- Rising cost of education
- Protectionism and conflicts of interest

*“Critics are asking, how well (accreditation) ensures student learning and educational quality and whether or not it intrudes on institutional missions in pursuit of some broader objective.” Source: A.C.E. 2015*

## Calls for Change

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- Accreditation Reform & Enhanced Accountability Act of 2016
  - Require USDOE to **establish standards for student outcome data**  
Give accreditors the ability **to evaluate college affordability and Pell student enrollment levels.**
  - Strengthen **consumer protections** requiring accreditors to take action to protect students in the face of warning signs of institutional instability.
  - **Increase transparency around accreditation decisions** for students, families, and regulators.
  - **Clean-up conflicts-of-interest** between accreditors and the colleges.
  - Increase accountability **by giving the Secretary more authority to terminate or fine accreditors** that fail to do their job.

## Politics and Accreditation

CONGRESS.GOV

- Amendment to the Reauthorization of the Higher Education Act
  - Disclosure requirements for employment of graduates
  - “Risk-sharing” measure requiring (academic) programs to fund 10 percent of defaulted student loans.
  - Allow states that opt in to the alternative accrediting model
    - Set standards for minimum credit hours and minimum classroom time for a program to qualify for federal aid.
    - Accredit alternatives like apprenticeship programs,



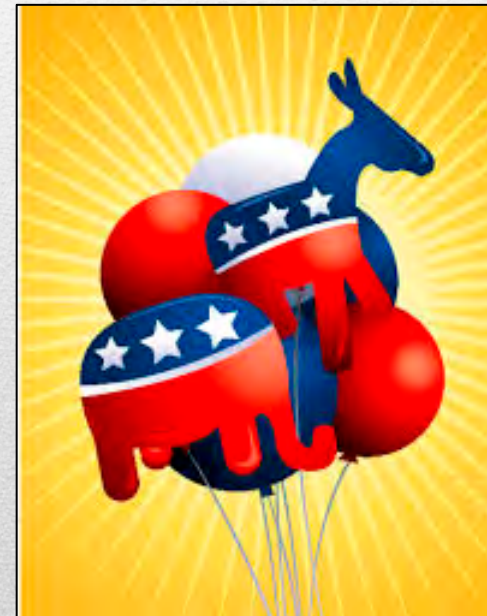
*“bill would allow states, local employers and students to quickly meet needs for **work-force training** without altering the existing accreditation system”. DeSantis, in *Inside Higher Education*, November 2017*

## Politics and Accreditation

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- Political impact
  - Overturning previous administration goals
  - Loosening pressure on for-profits
  - Focusing on **workforce training** and away from 4 year degrees

*“the increasing diversity of the student population -- and the relatively small proportion of students enrolled full-time at four-year institutions -- points to the need for greater attention to alternatives involving skills training”* Betsey DeVos, US Sec of Education, November 28, 2017

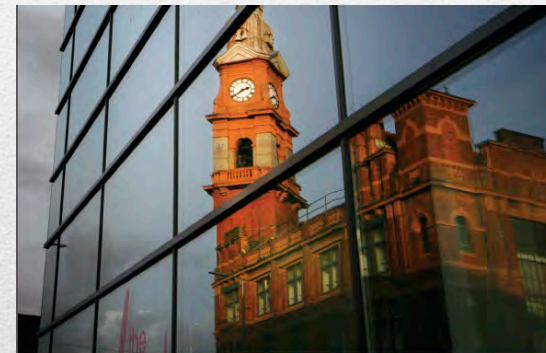


## Politics and Accreditation

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- No simple solution
- Room for improvement at even the best institutions
- Increase transparency of accreditation and clearly communicate results
  - Make all the information and reports publicly available
  - Encourage and support institutional diversity

*“The Department of Education should not impose its vision of postsecondary education outcomes on colleges and universities and neither should accrediting organizations.”* ACE Task Force on Accreditation, 2015



**Assuring Academic Quality  
in the 21st Century:  
*Self-Regulation in a New Era***

**ACE** American  
Council on  
Education™  
Leadership and Advocacy

## Recommended Actions

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- Adopt a more “risk-sensitive” approach to regional accreditation
  - Adapt accreditation based on historical performance
  - Encourage and support institutional diversity



*“The Department of Education should not impose its vision of postsecondary education outcomes on colleges and universities and neither should accrediting organizations.”* ACE Task Force on Accreditation, 2015

## Recommended Actions

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- Take prompt, strong, and public action against substandard institutions
- Adopt a more “risk-sensitive” approach to regional accreditation (adapt accreditation based on historical performance)

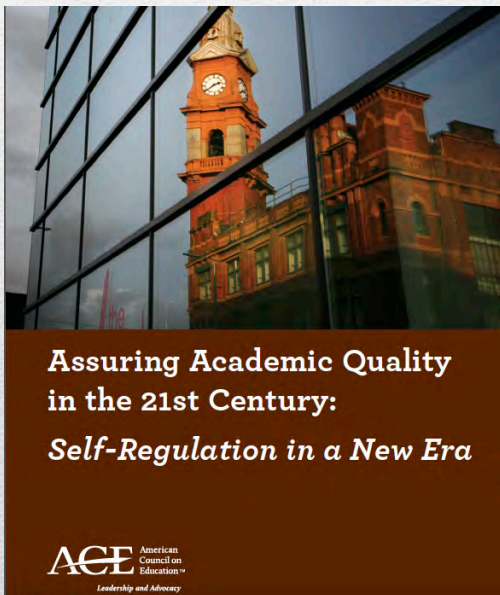
*“External criticisms of colleges and universities often focus on matters like low retention and graduation rates and questionable levels of student achievement. All regional accreditors give considerably more attention to these issues than they did a decade ago.” ACE. 2015*



## Recommended Actions

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- Seek common terminology, promote cooperation and expand participation
- Enhance the cost-effectiveness of accreditation



*“A first step toward enhancing the cost-effectiveness of accreditation is to determine more precisely what makes accreditation expensive and the task force urges accreditors to examine this issue carefully.”*

## Recommended Actions

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## How to reinvigorate HE for the 21<sup>st</sup> Century (November 2017)

- Fully authorize **competency-based education** and allow **student-centered models** of higher education
- **Create Lifetime Learning Accounts** ...“bank account” for all student aid, including grants, scholarships, and student loan lines of credit
- **Enhance today’s accreditation system** with a set of quality assurance entities, which would certify the providers of higher learning ...eligible to receive ...payments from

### **Lifetime Learning Accounts**

*“Instead of regional accreditors, the governing bodies should oversee schools with like profiles. Right now, small liberal arts universities are reviewed by the same entities that evaluate the major research institutions, and they're totally different business models” OED, 2017*

## Recommended Actions



- Goals for Regulatory Relief for Accreditation
  - Protect Students
  - Advance Innovation
  - Sustain the Strength of Accreditation

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*"The federal government maintains an extensive scrutiny of accreditation, a process known as **"recognition,"** because **accredited status is a requirement for institutions and programs to obtain and maintain eligibility for federal funds.**" CHEA, 2017*

## Recommended Actions

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- Relief with Regard to:
  - Federal Regulation
    - Rethink requirements to become an accreditor
    - Streamline what is considered substantive change
    - Remove definition of credit hour
    - Eliminate the requirement for confidentiality

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*“Changes ... will enable accrediting organizations to ... embrace innovation without fear of reprisal or loss of recognition, provide greater flexibility to institutions and programs..., and diminish barriers to the establishment of new accrediting or quality assurance bodies.” CHEA, 2017*

## Recommended Actions

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- Relief with Regard to:
  - Sub-Regulation-Dear Colleague Letters
    - Eliminate requirement for common definitions
    - Remove USDE final oversight of accreditor actions
    - Remove USDE oversight of differentiated view

CHIEA<sup>®</sup>



The USDE Transparency Agenda, (attempted to) strengthen the accountability of accreditation impacting institutional diversity. Accreditors can be held accountable without such standardization by insisting accreditors maintain flexibility to design their own innovative practices.

## Recommended Actions

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- Relief with Regard to:
  - Federal Law
    - Oppose legislation that would expand regulation
    - Rethink role of NACIQI
    - Revise Negotiated Rulemaking to ensure transparency
    - Require consultation with academics and accreditors for Dear Colleague letters.

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*The federal ...oversight of accreditation is cumbersome, redundant, often ad hoc and ... inefficient. These proposed changes... will result in future law and regulation that is more effective and responsive to the needs of students, eliminate unnecessary regulation and sustain and enhance greater opportunity for innovation in accreditation. CHEA, 2017*

## Recommended Actions

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- Degree Qualifications Profile (DQP)

- Broad and Integrative Knowledge
- Specialized Knowledge
- Intellectual Skills
- Civic and Global Learning
- Applied and Collaborative Learning



Good Practice in Accreditation

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- DQP Quality Collaboratives Project
  - The Degree Qualifications Profile 2.0
  - Association of American Colleges and Universities
  - Selected State Systems and Partner Institutions
  - Advisory Groups

*“... incorporates virtually all of AAC&U’s Essential Learning Outcomes...(and) builds on the national consensus on the broad set of learning outcomes linked to successful student preparation for success in life, as engaged citizens, and productive members of a global society.” Source: [www.aacu.org/qc/dqp](http://www.aacu.org/qc/dqp)*

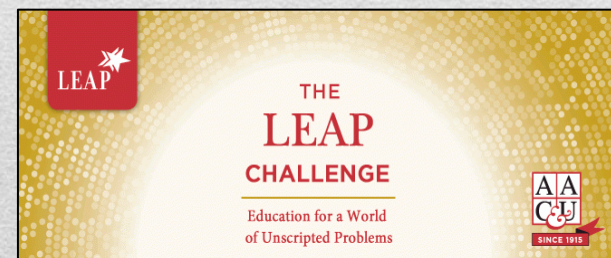


## Good Practice in Accreditation

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- AAC&U's Essential Learning Outcomes
  - Knowledge Human Cultures and Physical Natural World
  - Intellectual and Practical Skills
  - Personal and Social Responsibility
  - Integrative and Applied Learning
- Tools for development
  - College Learning for the New Global Century
  - LEAP Principles of Excellence

*"...is organized around a robust set of "Essential Learning Outcomes"... (and) provides a new framework to guide students' cumulative progress through college.*



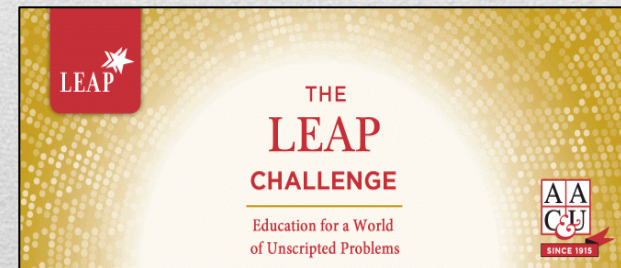
## Good Practice in Accreditation

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- LEAP Principles of Excellence
  - Aim High-and Make Excellence Inclusive
  - Give Students a Compass
  - Teach the Arts of Inquiry and Innovation
  - Engage the Big Questions
  - Connect Knowledge and Action
  - Foster Civic, Intercultural and Ethical Learning
  - Assess Student' Ability to Apply Learning to Complex Problems

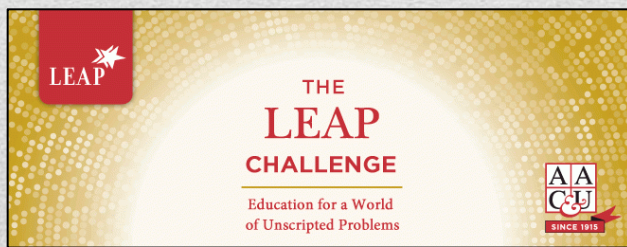
*"Informed by a generation of innovation and by scholarly research on effective practices in teaching, learning, and curriculum, the LEAP Principles of Excellence offer both challenging standards and flexible guidance for an era of educational reform and renewal." AACU.org*



## Good Practice in Accreditation

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- LEAP State Initiative
  - Quality Collaboratives (QC)
  - Faculty Collaboratives (capacity building to engage and mobilize faculty to lead transformational change)
  - Future Work
    - DQP Tuning
    - General Education Maps and Markers (GEM)
    - VALUE/Multi-state Collaborative to Advance Learning Outcomes Assessment



*“Builds on the LEAP framework of (ELO) and the (DQP) developed by Lumina Foundation. Using this framework, two- and four-year campus partners in nine states are designing ways to assess student competencies or proficiencies in order to facilitate more effective student transfer.” Source: AACU.org*

## Good Practice in Accreditation

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- National Commission on Academic Accreditation and Assessment-Kingdom of Saudi Arabia (NCAAA)-  
Domains of Learning
  - Knowledge
  - Cognitive Skills
  - Interpersonal Skills and Responsibility
  - Communication, Information  
Technology and Numerical Acuity Skills
  - Psychomotor Skills

*“ The growing size and diversity of the post-secondary system has increased the need to ensure clear and common understanding of the knowledge and skill developed by students with qualifications from different institutions.” KSA NCAAA.NQF*



## Good Practice in Accreditation

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- Domains of Learning
  - Critical Thinking
  - Self Awareness
  - Communication
  - Diversity
  - Citizenship
  - Membership and Leadership
  - Relationships

*“A new way of measuring student growth, learning, and development is emerging that can directly improve overall college student retention and graduation rates while positively affecting higher levels of holistic student performance.” UnLOA.com*



*Measuring College Behaviors  
Beyond Academics*

## Good Practice in Accreditation

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- Accreditation efforts must ensure institutions of HE:
  - Focus on **outcomes and outputs** rather than inputs
  - Balance quality assurance with continuous quality improvement
  - Engage in robust self evaluation and peer review



*“accreditation is not a one-size-fits-all rote proposition. Almost any alternative to accreditation must, by necessity use a single (and therefore simple) template to judge all institutions. Such an approach would undermine the central characteristic of American higher education. (ACE, 2015)*

International Relevance and Recommendations

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- Accreditation efforts must ensure institutions:
  - Calibrate accreditation efforts with societal needs
  - Balance truth searching with the societal needs
  - Adopt a philosophy of transparency
  - Meet governmental and political expectations where applicable

*“, it has become the norm that **both universities and quality assurance agencies are subject to external scrutiny**. Yet it is becoming increasingly difficult to assess quality and to demonstrate the impact of external quality assurance.” Valeikienė, A.  
November 17, 2017*



## International Relevance and Recommendations

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Thank You

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