

Different approaches to ensure the credibility and consistency of accreditation decisions, lessons learnt from SACSCOC

Abstract

This presentation will share the findings from a postdoc project in the United States under a Fulbright Program from January to September, 2018. The project was designed to learn the management of an accrediting agency, with a focus on ensuring the credibility and consistency of accreditation decisions. The project aimed to critically investigate how an accrediting agency in the United States (in this project it was Southern Association of Colleges and Schools Commission on Colleges – SACSCOC) operates in terms of ensuring the credibility and consistency of accreditation decisions. A qualitative study was applied in this project using documentation, interviews, and observations as the research methods. Eleven lessons have been withdrawn for external quality assurance (EQA) in Vietnam. It is concluded that EQA agencies in Vietnam which have been recently established are definitely in an urgent need of support from other experienced agencies so that they can operate in a responsible manner to ensure the credibility and consistency of accreditation decisions. In its journey to transform and evolve its quality assurance system, Vietnam can learn from current practices at SACSCOC.

Introduction

Education Accreditation Center at Vietnam National University - HCM City (CEA-HCM) is the second center established in 2014, one of the four centers with the mission to carry out education accreditation in Vietnam. At this time of development, the Vietnamese government and the Ministry of Education and Training (MoET) are boosting the process of accrediting higher education institutions through the four centers. One of the biggest issues restricting the CEA-HCM is the lack of professional staff to run the center successfully. Working as a quality assurance (QA) expert for the agency since September, 2016, I have realized that the agency is in an urgent need for management training and experiences of external quality assurance, in particular how to ensure the credibility and consistency of accreditation decisions. Facing difficulties when solving the problems at the agency, I thought of how I could learn more to help the agency, how other agencies elsewhere resolved similar issues. The country first appeared in my mind is the United States. Vietnam adapted the accreditation model from the United States and has received a wide range of support from the United States' government, organizations, and cooperative programs/projects in developing the quality assurance system. This project is intentionally designed to be carried out in the United States under the Fulbright Program. The project is designed to learn the management of an accrediting agency, with a focus on ensuring the credibility and consistency of accreditation decisions. At the same time, it is also designed to create an opportunity for the agency in Vietnam to cooperate with one accrediting agency in the United States for a long-term mutual relationship.

Back ground

Accreditation, a key QA instrument in Vietnam, is managed and organized by the General Department of Educational Testing and Accreditation (GDETA). GDETA was established in 2003 when accreditation was introduced into the system. The establishment of this agency marked the beginning of an accreditation system in the country's higher education. It led the development of legislative frameworks for accreditation, including regulations, standards and criteria, and procedures. It also controlled the pilot institutional accreditation within the scope of Higher Education Projects 1 and 2. This government agency has played a major role in constructing and developing the national accreditation system (Do, Pham, & Nguyen, 2017).

Under the pressure of international and local experts and funding agencies, MoET established two independent accreditation centers based in the two national universities in 2014, the third center in Danang in 2015, and the fourth center under the portfolio of Association of Vietnam Universities and Colleges (CEA-AVU&C) in early 2016. Recently, in mid-2018, another agency, the fifth one, was established as part of Vinh University. Since then, the first three centers have run training programs for reviewers. The reviewing of all higher education institutions for accreditation in the system can be an overload for the accrediting bodies. The first two centers at Vietnam National Universities are starting to conduct first accreditations according to the latest set of standards and criteria published in March, 2014. These centers are planned to operate independently in three years' time. The centers are fully financed by the universities and association they are affiliated with (without direct funding from the government). The establishment of the centers was believed to support the credibility of the accreditation scheme and is a major change within the process. The Ministry of Education and Training (MoET) and GDETA are therefore only supervising and granting licenses for accreditation agencies and setting the framework (Niedermeier & Pohlenz, 2016).

Niedermeier and Pohlenz (2016) also found that the major need for these centers in Vietnam is the establishment of more and better-trained reviewers. Exchange and experts from other countries are expected to support their own assessment improvement. The interview results with the staff of external quality assurance agencies also show that there is a need for training the management of the centers on how to lead an accrediting agency and for providing the staff with knowledge about quality assurance. According to the interviewees from the MoET, "The new centers are under development and many procedures are still unclear and need to be decided upon" (Niedermeier & Pohlenz, 2016, p. 39). These are seen as pilots. The report by Niedermeier and Pohlenz also shows that another concern from the ministry interviewees is how to conduct peer reviews so that they are comparable (especially the outcomes) among the centers.

In another study about quality assurance of quality assurance agencies from an Asian perspective, Hou, Ince, Tsai, and Chiang (2015) discussed the balance between autonomy and dependence of external quality assurance agencies (EQQA) in the region. The study found that most Asian EQAAs reviewed and regulated directly by governments tended to lose their autonomy over quality assurance operation. These authors suggest that the autonomy and independence of the agency will be threatened

when the government maintains bureaucratic control of its internal governance and external review. In order to manage this dilemma, quality assurance agencies have to be more accountable for quality of their work and are obliged to demonstrate that their professionalism in quality assurance will not be affected by this external control.

At this time of development, it is essential for the accreditation centers in Vietnam to find a suitable management model to promote the credibility of the accreditation scheme and to balance autonomy and dependence of the centers, which the project was designed to achieve.

Objectives:

This study aims to critically investigate how an accrediting agency in the United States operates in terms of ensuring the credibility and consistency of accreditation decisions. The contextual and cultural values of Vietnam will be then considered to draw lessons for accrediting agencies in Vietnam.

Methodology

A qualitative study has been applied in this research using documentation, interviews, and observations as the research methods.

Documents to be reviewed included documents related to the operation of an accrediting agency in the United States and in Vietnam but not limited to:

- Mission, vision, objectives of the agency
- Accreditation Standards, guidelines, handbooks, and training manuals
- Policies of the agency: selection evaluation team, roles of different stakeholders' group during the process, ethics, and appeal system.
- Approaches to the self-assessment of institutions and programs
- Approaches to training peer reviewers.

Semi-structured interviews were conducted with the following groups of different stakeholders to ensure the project explored different aspects of making decisions:

- Staff of the accrediting agency
- Administrative staff
- Peer reviewers and chairs

The list of questions to the interviewees covered the issues as follows:

- Resources and expertise required for an accrediting agency and evaluation teams,
- Concepts of quality and quality assurance in the context of an accrediting agency,
- Various methods applied to establish the credibility and to demonstrate accountability of an agency to stakeholders,
- Approaches to the self-assessment of both institutions and programs,
- Approaches to training peer reviewers,

- The importance of site visits and how these can be used to effect in collecting evidence,
- Essential elements to be included in a review report/accreditation report,
- Constructing a text that demonstrates the links between evidence and the conclusions of an accreditation process.

Observations designed to examine a range of activities carried out by the agency, how to design a program for a site visit that focused on collecting evidence for drawing a well-founded conclusion to the accrediting process.

Significance of the project:

The model of education accreditation in Vietnam was adapted from that of the United States, the country with more than 100 years of education accreditation. The new centers established during the last two years in Vietnam undoubtedly could learn much from the United States.

For the development of quality assurance system in Vietnam, more research is needed for possible measures and approaches to ensure the comparability of the accreditation results by these centers as concerned by the Vietnamese ministry interviewees in the Niedermeier and Pohlenz's study (2016). The concern emerges in the context that these centers are working to implement the government policies including the standards for accreditation, guidelines, and training for reviewers. It is crucial to find a suitable management model of these centers from the government perspective. This project contributed to the field of quality assurance of external quality agencies in the world about the Vietnam case.

The study results would directly help CEA-HCM to identify problems and possible solutions to the credibility and effectiveness of the center. If relevant, the model would be then disseminated to other centers in Vietnam through sharing best practices.

The project last but not least may provide insights into the complex systems of accreditation in the United States, the relationships between government, higher education providers, and the accrediting agency. It also helps me gain an understanding of the balance between autonomy and accountability of an external quality agency in order to draw lessons for these agencies in Vietnam.

Brief overview of SACSCOC

I am hosted by the Southern Association of Colleges and Schools, Commission on Colleges (SACSCOC), one of the six regional accreditors in the U.S and the second largest accreditor.

SACSCOC - A regional accreditor

The United States has a system of more than 70 accrediting agencies, which can be categorized into three types:

- Institutional agencies that review and accredit all educational offerings of the college or university.

- Regional (6 regions; 7 commissions) (range in size from 140 to 1080 institutions) (4314 institutions total)

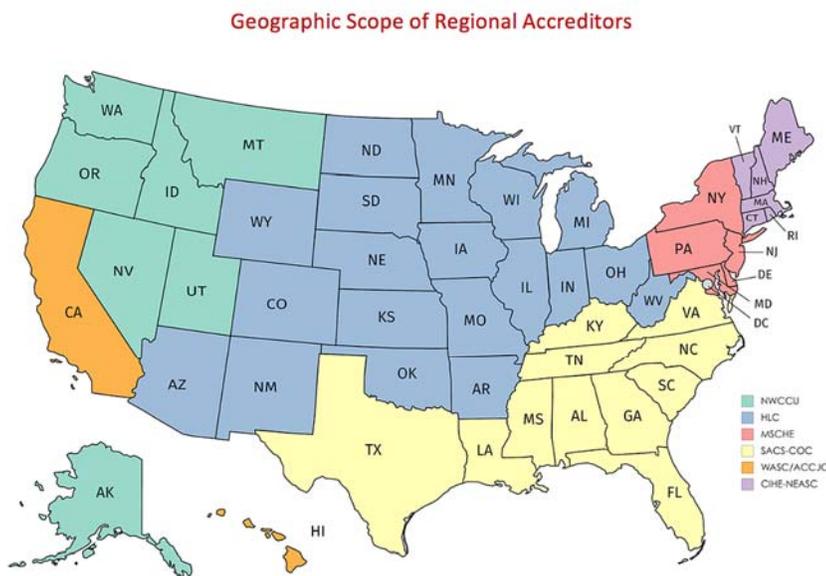
- National (7 agencies) (3,400 institutions) – Religious (4 agencies) (415 institutions)

- Specialized/Professional agencies focus on professional or specific disciplinary programs within an institution

- 60 and growing (20,000 programs)

SACSCOC is one of six regional accrediting agencies (Figure 1). It is the regional body for the accreditation of degree-granting higher education institutions in the Southern states. The commission ‘serves as the common denominator of shared values and practices among the diverse institutions in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Texas, Virginia and Latin America and other international sites approved by the SACSCOC Board of Trustees that award associate, baccalaureate, master’s, or doctoral degrees. The Commission also accepts applications from other international institutions of higher education’ (SACSCOC, 2018).

The following map shows the service districts of the regional accreditors.



Not shown on map:
WASC/ACCJC: Pacific Region (Guam, American Samoa, the Republic of Palau, the Federated States of Micronesia, the Republic of the Marshall Islands, and the Commonwealth of the Northern Marianas Islands.)
MSCHE: Puerto Rico, the Virgin Islands

Figure 1. Geographic scope of regional accreditors (C-RAC, 2018)

The seven commissions of regional accrediting agencies have established a council, Council of Regional Accrediting Commissions (C-RAC).

Council of Regional Accrediting Commissions (C-RAC)

The purposes of C-RAC are to foster: (a) quality assurance and improvement in higher education through regional accreditation; (b) cooperation among the regional higher education accrediting commissions and with other accrediting organizations in the United States, (c) working relationships with the United States Department of Education, Congress, state entities, higher education associations, and international entities; and (d) public understanding of regional accreditation. Additionally, it formulates guidelines and best practices for the use by regional accrediting commissions and it serves as a voice and advocate for regional accreditation.

Membership of the Council consists of all seven regional accrediting commissions. Here are the full names of the regional accrediting bodies, current chief executive officers, and links to their website:

Name	Acronym	CEO	Website
Higher Learning Commission [Often called by its old name – “North Central”]	HLC	Barbara Gellman-Danley	www.hlcommission.org
Middle States Commission on Higher Education	MSCHE	Elizabeth H. Sibolski	www.msche.org
New England Commission of Higher Education	NECHE	Barbara E. Brittingham	cihe.neasc.org
Northwest Commission on Colleges and Universities	NWCCU	Sandra E. Elman	www.nwccu.org
Southern Association of Colleges and Schools Commission on Colleges	SACSCOC	Belle S. Wheelan	www.sacscoc.org
WASC Senior College and University Commission	WASC-Senior	Jamienne S. Studley	www.wascsenior.org
Western Association of Schools and Colleges Accrediting Commission for Community and Junior Colleges	ACCJC	Barbara A. Beno	www.accjc.org

The Board of C-RAC is composed of the seven Commission Chairs and the Chief Executive Officer of each member Commission. The Board approves the vision of C-RAC, makes major policy decisions, and approves an overall budget. The Board meets at least annually; the executives meet at least monthly, either in person or electronically. The executives carry out the work of the Board. Staff members join in a retreat every other year.

Lesson 1:

Vietnam currently has five accrediting agencies; to ensure the consistency across the agencies in the decision-making process, it is recommended that Vietnam establish a similar council to share best practices and guidelines. There are some public concerns over the consistency of the five agencies relating to the principles, values, methods used, and quality of peer reviewers across the five accreditors in Vietnam. Given that these five agencies are using the same set of standards and procedures, such a council would make it possible to compare the result of external reviews as suggested by some QA experts in Vietnam (Niedermeier & Pohlenz, 2016).

The commission's philosophy of accreditation

Following is SACSCOC's philosophy of accreditation:

Self-regulation through accreditation embodies a philosophy that a free people can and ought to govern themselves through a representative, flexible, and responsive system. Decentralization of authority honors the rich diversity of educational institutions in our pluralistic society and serves to protect both institutional autonomy and the broader culture of academic freedom in our global society.

The empowerment flowing from self-regulation promotes both innovation and accountability in achieving the goals of educating and training citizens in a representative democracy. Consistent with these overarching values, accreditation is best accomplished through a voluntary association of educational institutions. Both a process and a product, accreditation relies on integrity; thoughtful and principled professional judgment; rigorous application of requirements; and a context of trust. The process provides an assessment of an institution's effectiveness in the fulfillment of its self-defined mission; its compliance with the requirements of its accrediting association; and its continuing efforts to enhance the quality of student learning and its programs and services. Based on rigorous analysis and reasoned judgment, the process stimulates evaluation and improvement, while providing a means of continuing accountability to the institutions' stakeholders and to the public.

The culmination of the accreditation process is a public statement of an institution's continuing capacity to provide effective programs and services based on agreed-upon requirements. The statement of an institution's accreditation status with SACSCOC also represents an affirmation of an institution's continuing commitment to the Commission's principles and philosophy of accreditation.

The membership expects its peers to dedicate themselves to enhancing the quality of their programs and services within the context of their respective resources and capacities and to create an environment in which teaching and learning, research, and public service occur, as appropriate to the institution's self-defined mission.

At the heart of SACSCOC's philosophy of accreditation, the concept of quality enhancement assumes that each member institution is engaged in ongoing improvement of its programs and services and can demonstrate how well it fulfills its stated mission. Although evaluation of an institution's educational quality and effectiveness in achieving its mission is a difficult task requiring careful analysis and professional judgment, an institution is expected to document the quality and effectiveness of all its programs and services. (SACSCOC, 2018, p. 1)

The major difference between accrediting agencies in Vietnam and SACSCOC in the United States is the autonomy of these agencies. This autonomy underlies the philosophy of accreditation, including self-regulation and decentralization which significantly impacts the way accreditation is perceived and carried out in the two countries.

Although the Vietnamese government has responded to international and local experts and funding agencies to take a more 'independent' approach to forming accrediting agencies, four out five agencies recently established in Vietnam are part of public universities (Do et al., 2017; H. C. Nguyen, Evers, & Marshall, 2017). They are in nature extended arms of the government. Although it is intended that these agencies would be fully independent from the government and not be part of public universities after three years of establishment, it is still doubtful how these agencies are becoming autonomous without a clear action agenda associated with finance to support the agencies' operation and human resources. It is also necessary to argue the autonomy of these agencies because they have to use the QA framework designed by the MoET. The relationship between the government, accrediting agencies, and higher education providers are still blur in the Vietnamese context.

It is necessary for the Vietnamese government to re-visit QA at a conceptual and philosophical level to clearly define the role of QA and then the relationship between these three parties in an attempt to reform higher education. A clear and feasible action agenda is essential for different stages of the reform. One example of this is how the current agencies become autonomous and independent in three-year timeframe. For the time being, it is not clear how the first two agencies become independent in 2018 after three years of establishment, which is due in several months.

As regards the mission of an accrediting agency, Vietnam agencies can also learn from SACSCOC when the Commission's mission not only focuses on quality improvement but also institutional effectiveness. Following is the Commission's mission, vision, and core values.

Mission

The Commission's mission is the enhancement of education quality throughout the region and the improvement of the effectiveness of institutions by ensuring that they meet standards established by the higher education community that address the needs of society and students.

Vision

To serve as the premier model for shaping and ensuring the quality of higher education throughout the world.

Core Values:

- Integrity
- Continuous quality improvement
- Peer review/self-regulation
- Accountability
- Student learning
- Transparency

Lesson 2:

The mission of SACSCOC is to assure the educational quality and improve the effectiveness of its member institutions. The institutional effectiveness part of SACSCOC's mission is worth serious consideration for accreditation during Vietnamese higher education reform. The allowance of the market-led approach in education and the constraints the higher education system is currently facing with the traditional centralized control are seen as contradictory, which substantially limits the way higher education can change and innovate to respond to increasing societal demands domestically and internationally. Evaluation of institutional effectiveness could contribute to the extent to which institutions are accountable to the public and continued state funding (if any). It also allows benchmarks and competition among institutions for quality education. It is noted that adding this to accreditation mission will perhaps require a comprehensive analysis of current accreditation standards.

It is also noted that there are multiple levels of recognition in the accrediting system in the U.S. To demonstrate its accountability, SACSCOC is recognized by both Council of Higher Education Association (CHEA) and U.S. Department of Education (USDE).

SACSCOC's recognition

The Council for Higher Education Accreditation (CHEA) is a private organization whilst the U.S. Department of Education (USDE) is a federal agency. Each organization has its own recognition standards. CHEA normally reviews accreditors on a 10-year basis while the USDE normally conducts its reviews on a 5-year basis. Recognition by the USDE is required in order for SACSCOC (or any other accreditor) to function as a “gate keeper” for the awarding of federal financial aid. As a department of the federal government, USDE’s primary connection to higher education in America is that of providing federal funds to institutions of higher education and to students who attend those institutions. The Department uses accreditation as a benchmark of quality and the prerequisite standard for the awarding of funds. However, as the role of the federal government in the funding of higher education has expanded, so also has its required oversight of the accreditors in an effort to ensure that federal funds are being properly administered. It is this need for oversight that has led to an expanded federal “recognition” process that accreditors must successfully engage.

CHEA is a private organization that has three purposes: (a) to serve as a national *advocate* for academic quality assurance self-regulation through voluntary accreditation; (b) to provide *service* through leadership in the identification and articulation of issues related to quality assurance and voluntary accreditation, through the development and provision of various data bases relevant to accreditation, and through project, meetings, conferences, and other initiatives; and (c) to *recognize* various accreditors. It has a fifteen-member Board of Directors composed primarily of institutional representatives but with some “public” representation. The regional accreditors played a key role in the creation of CHEA. However, not every regional accreditor currently seeks “recognition” by CHEA.

Lesson 3:

SACSCOC is an independent, not-for-profit, and non-governmental organization. Therefore, to ensure the validity of the accreditation process, there must be some means for the accreditors themselves to establish their own validity. Hence, legitimate accreditors often choose to undergo periodic external review for purposes of certifying the quality of their organizations.

In the Vietnamese context, accrediting agencies are offered licenses to operate from the government, operating in a manner that complies with the other governmental guidelines. As a consequence, perhaps they are not in a situation to demonstrate the validity of accreditation process. However, there is still a need to ensure the consistency of accreditation decisions across the five agencies. If these agencies are becoming independent in a near future, it is also necessary for them to demonstrate their accountability and certify the quality of the agency through similar practices developed in the U.S., recognition, particular if the result of accreditation is associated with continued state funding.

Different approaches used at SACSCOC to ensure the consistency of accreditation decisions

The ownership of accreditation standards

Although it is not a measure used to ensure the consistency of accreditation decisions, the ownership of accreditation standards among the commission staff and member institutions is essential for the credibility of the entire process. Perhaps it is a result of the commission's autonomy in comparison with what has been observed in Vietnam.

Because of the nature of SACSCOC, member institutions of the commission are the agents who engage in the process of developing accreditation standards which are then approved by a delegate assembly. This seems to promote a sense of ownership across member institutions and those involved in a peer review process.

Lesson 4:

It is common in Vietnam that peer evaluators and higher education institutions indicate disagreement with the accreditation standards developed by MoET (Pham, 2018). Therefore, they tend to apply their own belief when judging the level of compliance during evaluation, leading to large disparities in accreditation decisions. This is echoed with other authors found in their studies relating to the widespread criticism of the standards (H. C. Nguyen et al., 2017; K. D. Nguyen, Oliver, & Priddy, 2009; Pham, 2018; Tran, Nguyen, & Nguyen, 2011).

The sense of ownership is obviously important in this peer review process. For the time being, however, there should be a policy from QA agencies to ensure that all peer evaluators interpret the accreditation standards in a consistent way, or at least share similar understandings of the standards. An independent approach in accreditation is appropriate in the Vietnamese context not only to promote the ownership standards used in accreditation but also to align with the government attempts to decentralize the system. This could help avoid the tendency of re-centralization discussed in Asian QA systems (Hawkins, 2016; Mok, 2016). It is also learnt from other countries in the Asian region that QA agencies are increasing operating independently from the government such as ones in Taiwan and Hong Kong.

Application of standards in reaching an accrediting decision

At SACSCOC, accreditation standards are considered as minimum standards that require institutions to comply with. As a result, it is a binary decision: compliance or non-compliance. It is worth noting that there are three types of standards: core requirements, comprehensive requirements, and federal requirements. These three types of standards are now combined to divide standards into 14 sections based on topics. However, the principles of core requirements still apply. They are part of

federal requirements to ensure that minimum standards are maintained for federal aid. The difference between core requirements and other standards is accreditation decisions as a result of non-compliance with the standards. The former will result in immediate sanctions while the latter will lead to a warning status.

Lesson 5:

Vietnamese QA policy regulates that institutions be recognised if they demonstrate that they are in compliance with 80% of the total criteria (49 out of 61). The current results of accreditation indicate that most of non-compliant standards are the ones relating to programs (improvement based on program evaluation, learning outcomes), faculty both in size and quality, physical resources, and research. These are core requirements in the Principles for Accreditation by SACSCOC. In addition, there is also a tendency of applying this 80% to each criterion. One example of this is 80% of faculty are qualified to teach, which is considered as an acceptable percentage.

Regarding this, it is again necessary for Vietnam to re-visit the philosophy of QA mechanism in order to identify the credibility of accreditation decisions. Without a clear philosophy of QA, it will be challenging to ensure the consistency of accreditation decisions. Some issues include whether the standards are considered minimum standards or standards for future improvements, the rationality of 80%, and the difference between institutions with different levels of compliance. It is suggested that if 80% remain to be an acceptable percentage to be recognized, it is necessary to classify standards into at least two types: core requirements and comprehensive requirements in which “core requirements are basic, broad-based, foundational requirements. The Core Requirements establish a threshold of development required of all institutions seeking initial accreditation or reaffirmation” (SACSCOC, 2018). There are 17 core requirements in the Principles of Accreditation by SACSCOC, covering the principle of integrity, institutional mission, degree-granting authority, coursework for degree, continuous operation, governing board characteristics, chief executive officer, adequate full-time faculty, institutional planning, student achievement, program content, program length, general education requirements, library and learning/information resources, student support services, financial resources, and financial documents.

The involvement of multiple committees

Because of organizational structure of the Commission, the decision-making process involves multiple steps to reach a final accreditation decision.

SACSCOC is composed of five primary functional units: (1) the College Delegate Assembly, (2) the Appeals Committee, (3) the Board of Trustees, (4) the Executive Council, and the (5) Committees on Compliance and Reports (Figure 2).

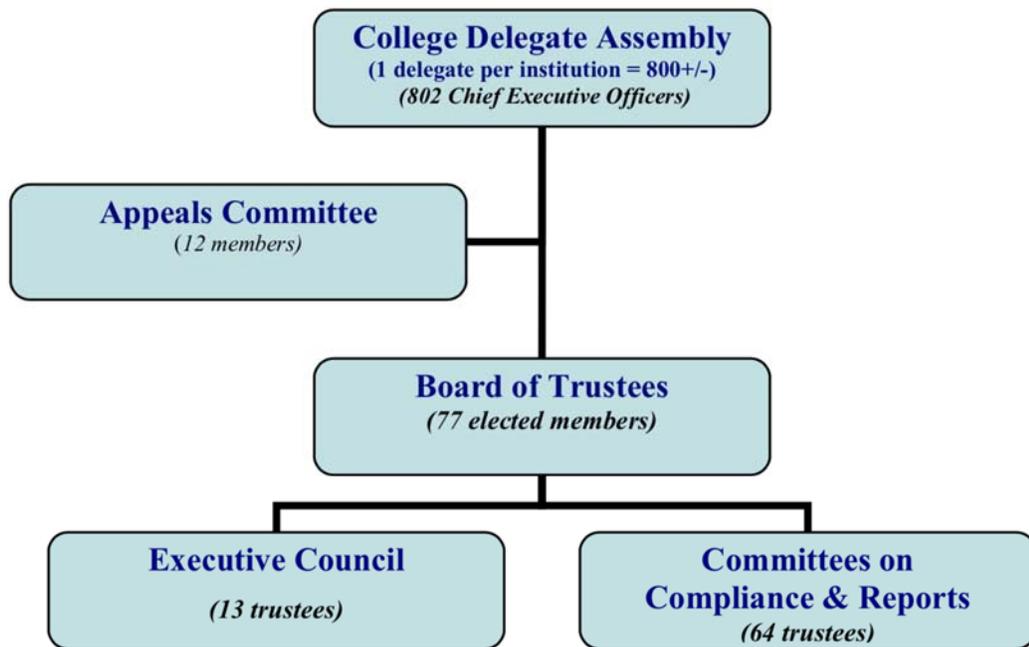


Figure 2. Functional units of SACSCOC (SACSCOC, 2018)

Various discussions among these multiple committees allow the Commission to maintain consistency in reaching accreditation decisions.

Before being reviewed at the SACSCOC Board of Trustees, the review process is conducted at two levels:

- The Off-site Reaffirmation review
- The On-site Reaffirmation review

For off-site reaffirmation committees, they conduct *paper* evaluation of a cluster of three (more or less) similar institutions (to the extent possible) that are seeking reaffirmation of their existing accreditation. The committees review each institutions' completed Compliance Certification (Self-study) and other related documents. The information contained in Compliance Certification is supposed to be truthful, accurate, and complete. The committees are not encouraged to seek further information from the websites or the institution to judge compliance or non-compliance for each applicable standard.

For on-site reaffirmation committees, they conduct an on-site review of the institution giving attention to (a) the institutions' Quality Enhancement Plan (QEP); (b) the institution's extent of compliance with standards judged non-compliance by the off-site

reaffirmation committee; (c) the institution's extent of compliance with USDE linked standards; (d) a sampling of off-campus sites where 50% or more of an educational program is offered (as appropriate); and (e) resources for distance learning (as appropriate). The on-site committee develops and/or edits the final report of its findings noting areas of non-compliance.

Lesson 6:

The current practice at QA agencies in Vietnam is that on-site committee is the only committee who conducts both paper evaluation and on-site evaluation. It is believed that the committee is not allowed to make judgements of compliance or non-compliance based on the institution's self-study report. The committee is suggested to read more information on the internet and websites to understand more about the institution. This practice gradually shapes the belief that it is the responsibility of the committee to seek different sources to understand the institution under review. Although it is an interactive process between the committee and the institution, the current practice in Vietnam to some extent influences the perception associated with the compliance certification, the responsibility of institutions for the completeness of its self-study report.

Vietnam can definitely learn from the current practice of SACSCOC to form an off-site committee to promote self-regulation for the institution that the institution ensures the completeness of its compliance certification and to also avoid full workload of the process on only one committee.

Lesson 7:

CEA-HCM develops almost a uniform format for the onsite program, including the campus to visit, persons to be interviewed, and classrooms to be visited. It is observed that the majority of the four day and a half onsite visit is for interviewing different groups of people: support staff, administrators, faculty, board of rectors, self-evaluation team, students, alumni, and employers recruiting alumni of the institutions. The findings of these interviews have been of limited use in judging the institution's extent of compliance with the standards.

At SACSCOC, each committee organizes its own program during the onsite visit based on the suggested program by SACSCOC. The chair of the onsite committee works with the committee's members to identify questions to be asked and persons for interviews, focusing on standards identified as non-compliance by the off-site committee and DoE linked standards. It is noted that the on-site committee spends time discussing the institution's Quality Enhancement Plan (QEP) (one standard in the Principles), which is not reviewed by the off-site committee.

The discussions during the on-site visit is open and interactive between the committee members and the institution. It is observed that the interviewees are free to ask the committee members questions including the current practices of their home institutions or students' asking about the purposes of the visit.

Discussions across various committees and SACSCOC staff

At SACSCOC, the review process is organized in a manner that allows discussions across various off-site, on-site, and C&R committees. The chairs of these committees bring issues raised by their committee members to the meeting with other chairs and SACSCOC staff to ensure a similar interpretation of the standards (particular offsite and C&R committees). These meetings offer them opportunities to discuss cases and compare notes regarding the application of standards and requirements. This helps to ensure quality control and appropriate consistency across the various committees.

Lesson 8: The current practice of accreditation in Vietnam (one institution at a time) does not allow this happen. Significant disparities have been observed and reported recently.

The role of SACSCOC staff

SACSCOC staff members have a unique role in the process. They serve as a consultant to both institutions and committees. This service may include advice related to interpretation and application of the *Principles*, the commission policies, guidelines, procedures, training, and reporting protocols. Staff members are in a unique position to help ensure consistency and quality of the system of peer review.

SACSCOC has 11 vice presidents. Each of them is assigned to a certain number of institutions to support them during the process. They can organize some advisory visits to the assigned institutions when required. The visits can be conducted in person or using tele/video conferencing methodologies. They also host various conference calls to support both off-site and on-site committees. They present in all different committees, non-voting. The support usually takes the form of reader-staff consultations, insights relative to the institution being reviewed, clarification of decision options available to the committee, and a voice of consistency for the process. Vice Presidents are also expected to write confidential briefing memo for each institutional case being considered by C&R Committees. These memos normally include background information on the institution, listing of materials available for review by assigned committee members (readers), staff analysis, and decision options available to the committee.

Lesson 9:

Only if are the Vietnamese QA agencies fully independent in operation, staff members at the agencies have a limited role during the entire process. Some of them are eligible to be peer evaluators because they are part of public universities and certified by MoET to be evaluators. CEA-VNU usually assigns one staff as a controller during the onsite visit, but his/her role is not yet clearly defined.

Issuance of handbooks and guidelines

The issuance of these handbooks and guidelines by SACSCOC provides guidance to evaluators so that they understand the expectations of the accreditation standards.

Lesson 9: Although the MoET is responsible for preparing QA guidelines, they are insufficient. There are only three guidelines from the government and seem to not cover

many other aspects in understanding the standards used in Vietnam. It is necessary to issue more handbooks and guidelines for QA practices in Vietnam.

Training

The Commission organizes several trainings and workshops and conference calls with various committees. Conference calls are critical to training the committee and to creating a sense of community in the context of remote review activities. This will add a new dimension to quality of evaluator's professional judgements. The training and workshops include but not limited to training for chairs, for new trustee members, for academic evaluators, institutional effectiveness evaluators.

These all aim at ensuring the consistency of interpretation and application of the principles.

Lesson 10: To be eligible to involve in the accreditation process, peer evaluators in Vietnam are required to take approximately a two-month training program designed by MoET and take an examination hold by MoET to be certified evaluators. However, this training alone is insufficient to ensure the consistency of accreditation decisions across the various committees and across the agencies. Another comprehensive approach should be applied considering appropriate lessons from the U.S. to ensure consistency of accreditation decisions.

The selection of committee members

The commission staff member assigned to the institution normally selects the evaluation committee members, especially chair of the committee. The Coordinator for Training and Research normally selects members of the off-site reaffirmation committee in consultancy with other staff members. The committee has 8 to 10 members depending on the complexity of the institution and the number of institutions in a cluster. They are required to be from peer institutions regarding the level (1-6) of the institutions and governance (public/private). All types of committees should have evaluators with expertise related to the context and specific issues being reviewed. Expertise and no conflict of interest are prime criteria. Other criteria to consider for the selection include similar mission and size and diversity (demographic and committee experience).

The composition of review committees (8-10):

- Committee Chair
- Governance/Administration
- Academic programs (2-4)
- Financial/Administrative services
- Institutional Effectiveness
- Student Services
- Lead QEP Evaluator (for onsite only)

- Library services

Furthermore, for certain standards, there will be two readers: primary reader and secondary reader to minimize personal bias and experience during the review process.

Lesson 11: To be eligible to serve in a committee member, evaluators in Vietnam are required to pass a two-month training and/or an examination organized by MoET, their role at the home institution is not considered during the selection. This likely affects their professional judgement associated with the standards assigned to them during evaluation. CEA-VNU is attempting to train qualified evaluators so that they are confident to be a committee member. Out of more than 100 evaluators, it is reported that only more than 30 are active (perhaps are considered to be competent to join the committee). In the long run, it is necessary for the QA agencies to classify evaluators in terms of their expertise.

Allowing institutions responding to committee's reports

Institutions are offered two opportunities to respond in writing to the report of off-site and on-site committees at SACSCOC.

- After the off-site review, the institution is invited to produce a Focused Report addressing the preliminary findings.
- After the on-site visit, the institution is invited to correct factual errors only in the report before the committees finalize it. Later on, it is required to respond to all recommendations made in the report of the reaffirmation committee.

Committee evaluations

SACSCOC expects its staff to evaluate chair and committee members after a review using a 5 likert scale. Such evaluations are posted on the individual's file in the Registry along with comments, as appropriate. This ratings and comments would be considered for next selection. Also, the chair submits a performance evaluation for each committee member, and this information is also posted to the Registry.

The practice of evaluating committee members and chairs is highly suggested for QA agencies in Vietnam. In order to do that QA agencies in Vietnam has at least one qualified staff capable of such evaluation.

Conclusion

QA agencies in Vietnam which have been recently established are definitely in an urgent need of support from other experienced agencies so that they can operate in a responsible manner to ensure the credibility and consistency of accreditation decisions. In its journey to transform and evolve QA system, Vietnam can learn from current practices at SACSCOC as analyzed in this report.

References

- Do, T. N. Q., Pham, T. H., & Nguyen, K. D. (2017). Quality assurance in the Vietnamese higher education: A top-down approach and compliance-driven QA. In M. Shah & T. N. Q. Do (Eds.), *The rise of quality assurance in Asian higher education (1st Ed)*. India: Chandos Publishing.
- Nguyen, H. C., Evers, C., & Marshall, S. (2017). Accreditation of Viet Nam's higher education: Achievements and challenges after a dozen years of development. *Quality Assurance in Education*, 25(4), 475-488.
doi:<https://doi.org/10.1108/QAE-11-2016-0075>
- Nguyen, K. D., Oliver, D. E., & Priddy, L. E. (2009). Criteria for accreditation in Vietnam's higher education: focus on input or outcome? *Quality in Higher Education*, 15(2), 123-134.
- Niedermeier, F., & Pohlenz, P. (2016). State of affairs and development needs- Higher education quality assurance in the ASEAN region. Indonesia: DAAD.
- Pham, T. H. (2018). Impacts of higher education quality accreditation: a case study in Vietnam. *Quality in Higher Education*.
doi:<https://doi.org/10.1080/13538322.2018.1491787>
- SACSCOC. (2018). The Principles of Accreditation: Foundations for Quality Improvement. Retrieved from <http://www.sacscoc.org/pdf/2018PrinciplesOfAcacreditation.pdf>
- Tran, N. D., Nguyen, T. T., & Nguyen, M. T. N. (2011). The standard of quality for HEIs in Vietnam: A step in the right direction? *Quality Assurance in Education*, 19(2), 130-140.