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Accreditation and Accountability: A Comparison between the United States and Ukraine as an Examination of Voluntary versus Mandated Accreditation

***Abstract.** Using the comparison of higher education accreditation in Ukraine and the United States, this article will explore the perplexing reality that different accreditation policies (centralized mandated versus decentralized voluntary accreditation) can actually expose common problems in higher education. Education's diverse demands challenge those who prefer quantitative data to affirm learning. However relying upon qualitative data encourages some to draw conclusions that are not fully supported by the evidence. The author draws the conclusion that accreditation itself (if it is not reinforced by a strong internal (institutional) quality assurance system) does not ensure academic quality.*

***Keywords:** accreditation, accountability, academic quality, quality assurance.*

The current educational literature is replete with discussions of calls for accountability in higher education. Whether a country uses a centralized structure of accreditation (as in a Ministry of Education), or a decentralized structure (for example, the United States' system of voluntary accreditation), there is on-going debate as to the most effective structure for purposes of quality control and communication. Historically-decentralized, independent higher education institutions in the United States are grappling with increased federal scrutiny and calls for greater accountability. The federal government and institutions are asking how far should a commitment to institutional independence go when it comes to the education of future citizens? On the other hand, historically-centralized educational systems in countries such as Ukraine have been challenged by the Bologna Process to shift their paradigm from a self-contained, top-down model of education to one that is open to influence from other nations. These governments and institutions are questioning the efficacy of a system that

appears to reward outcomes, yet are so self-contained that students are suffering from national educational isolation.

There are clear advantages and disadvantages to both methods of educational accreditation and oversight. Using the comparison of higher education accreditation in Ukraine and the United States, this article will explore the perplexing reality that different accreditation policies can actually expose common problems in higher education. Are these two trends converging in some way that will change practices related to accreditation and accountability internationally?

The United States has no centralized authority exercising control over higher educational institutions across the country. The states assume varying degrees of control over education, but, in general, colleges and universities operate with considerable independence and autonomy. As a result, U.S. educational institutions can vary widely in their missions and the quality of their programs. In order to ensure a basic level of quality, the practice of voluntary accreditation arose in the United States. “Accreditation” is a process that aims to ensure the enduring quality, accountability and improvement of educational institutions and programs of study, based on a continuous review process that is conducted by external evaluators from the higher education community.

“Government control vs. institutional autonomy” is always an issue in the sphere of accreditation. The U.S. has no federal (national) governmental body that supervises higher education institutions or accrediting bodies. Accreditation is not governed by law. However, the federal government can and does make laws that effect how federal money is spent on higher education, and sometimes these laws effect the accreditation process.

A federal law called “The Higher Education Act”, passed in 1965, is “extended” periodically by Congress to include provisions that are relevant to the current state of higher education. Within the last two decades, “extensions” to the law have been added that have required specific actions on the part of accrediting associations:

- During the early 1990’s – a call for the tightening of accreditation standards related to student loan default rates
- During the late 1990’s – a call for the tightening of accreditation standards related to methods of assessing student learning outcomes

States may make laws governing the establishment and operation of educational institutions, and many do. The scope of higher education legislation varies from state to state.

Accreditation is governed by commonly-developed and commonly-accepted “standards of good practice”, not by law. Standards for quality assurance are set by the higher education community itself and monitored by the same community. Accreditation is a sign of commitment by the institution to continuous development and improvement in the context of the dynamic sphere of higher education. It is more than a one-time procedure that is “automatically” renewed. A commitment to accreditation sets the tone for the way an institution operates in its financial, organizational and academic affairs.

There are two types of accreditation:

- Institutional: The institution as a whole is accredited. The accreditation review process focuses on evaluating the institution as an entity.
- Program or professional (specialized): A specific program of study offered by an institution is accredited. The accreditation review process focuses on just one department, program or curriculum.

Two organizations review accreditation bodies and approve them if they meet these organizations’ criteria.

- The U.S. Department of Education (USDE) is the branch of the U.S. government that is responsible for supervising federal (national) programs and for distributing federal funding education. The USDE does not “accredit” or “recognize” institutions. It does review accrediting agencies for purposes related to federal financial support for educational institutions and students. If an accrediting organization is “approved” by the USDE, the institutions that it accredits may be eligible for federal money and the students may be eligible for student financial assistance;

- The Council for Higher Education Accreditation (CHEA), formerly COPA and CORPA, is a non-governmental, private, non-profit membership organization for higher education institutions in the U.S. It has about 3,000 member institutions. CHEA is not an accrediting organization. Members of CHEA help to define standards for the approval of accreditation associations, and recognizes accrediting associations that meet the criteria. For an accreditor to be affirmed by CHEA, it must demonstrate its commitment to advancing academic quality, accountability, purposeful change and improvement, appropriate and fair decision-making, and continuous reassessment of this commitment. CHEA also provides information to the public about accreditation and why accreditation is an important issue.

Regional accreditation is the most common type of institutional accreditation among postsecondary academic institutions in the U.S. There are about 2700 regionally-accredited institutions in the U.S. There are 6 accrediting associations (Middle States Association of Colleges and Schools (MSA); New England Association of Schools and Colleges (NEASCSC); North Central Association of Colleges and Schools (NCA); Northwest Association of Schools, Colleges and Universities (NW); Southern Association of Colleges and Schools (SACS); Western Association of Schools and Colleges (WASC) whose role is to evaluate an institution as a whole. They are nonprofit, nongovernmental bodies organized by geographic regions.

Each accrediting organization defines its own standards, based on the state of the higher education community and government activities through the Higher Education Act. The following standards for accreditation seem to be common to all of the regional accreditors:

An institution must:

- Have a stated mission and purpose that are appropriate to higher education.
- Have stated goals that are based on the institutional mission and purpose.
- Have clearly-defined, functioning systems and resources – fiscal, organizational, and academic - that support the mission and goals and enable them to be realized.
- Have a system of continuous evaluation of progress toward the status mission and goals, and of planning for future progress.

The Regional Accreditation Process presupposes several steps:

Step 1: Self-assessment according to the standards of the accrediting organization: The institution works with the accrediting organization to conduct a self-study and writes a report documenting how it meets the accreditation standards. If the institution is applying for initial accreditation, during this period the institution is called a “candidate” for accreditation.

Step 2: Peer review: A team reviews the self-assessment. The team is usually made up of practicing educators and administrators at other higher education institutions, and may also include other members. Team members usually work on a volunteer basis; they do not get paid.

Step 3: Site visit based on self-assessment: The team visits the institution as a follow-up to the review of the self-assessment. The visit may include talks with administrators, instructors and students.

A site visit is usually required for continuing accreditation as well as for the initial accreditation process.

Step 4: Review of the team's recommendations and follow-up: After the site visit, the team may work with the institution on any areas that need clarification, additional work, or follow-up.

Step 5: Accreditation organization's decision: The accrediting association makes a decision about the institution's status - approval of initial accreditation; reaffirmation of existing accreditation; probation for an accredited institution that has not continued to meet the standards; denial of initial accreditation or revocation of continuing accreditation to an institution that has been on probation - and it may also make recommendations for further improvement or development.

Step 6: Ongoing review, based on the accrediting organization's timeline for accreditation review. The review process is usually repeated every five years.

Regional accreditation is the most commonly accepted type of accreditation of postsecondary academic institutions in the U.S. It provides:

- a basis for government and private funding of the institution, its programs, and its students;
- public confidence in the authenticity of the value of the education offered;
- a basis of recognition of degrees for academic and employment purposes; student mobility and transfer of credit; etc.

The practice of "regional accreditation" is represented by the Higher Learning *Commission of the North Central Association of Colleges and Schools* that is maintained as a not-for-profit corporation in perpetuity, according to the laws of the State of Illinois. The purpose of the Association is to ensure the improvement of education at all levels through evaluation and accreditation. The association also encourages and supports establishing cooperative relations between the colleges and secondary schools of the region.

The Higher Learning Commission, located in Chicago, is an independent corporation that holds membership in the NCACS and is in charge of accreditation of degree-granting organizations of higher education. The Commission's mission statement is succinct, yet directive: *Serving the common good by assuring and advancing the quality of higher learning*. The Commission's work is guided by the core values of quality, integrity, innovation, diversity, inclusiveness, service, collaboration, and learning, each of which is of equal weight and importance (The Higher Learning Commission. Institutional

Accreditation: An Overview, p.2). The Commission's vision is to be known for its distinctive strengths of integrity, flexibility, creativity, responsiveness, and risk-taking, and for its commitment to work for the common good of society.

The Commission offers an extensive array of programs and services:

- Each affiliated organization is assigned a Commission staff liaison who provides assistance, monitors the organization, and offers other types of counsel.
- To inform all of its constituencies, the Commission publishes in print and electronically a variety of materials, including the *Handbook of Accreditation*, which describes the policies and procedures of the accreditation process; the *Exchanges* newsletter; and various other documents and articles.
- The Commission offers an extensive program on self-study, evaluation, and institutional improvement. (The Higher Learning Commission. Institutional Accreditation: An Overview, p.3)

Colleges and universities are affiliated with the Commission in one of two ways: by gaining and maintaining accredited status, which carries membership in the Commission and in the Association, or by gaining and maintaining candidate status, which is a limited-term, preaccredited status. Currently, nearly a thousand organizations are affiliated with the Commission.

The Commission provides two programs for maintaining accredited status: the Program to Evaluate and Advance Quality (PEAQ) and the Academic Quality Improvement Program (AQIP).

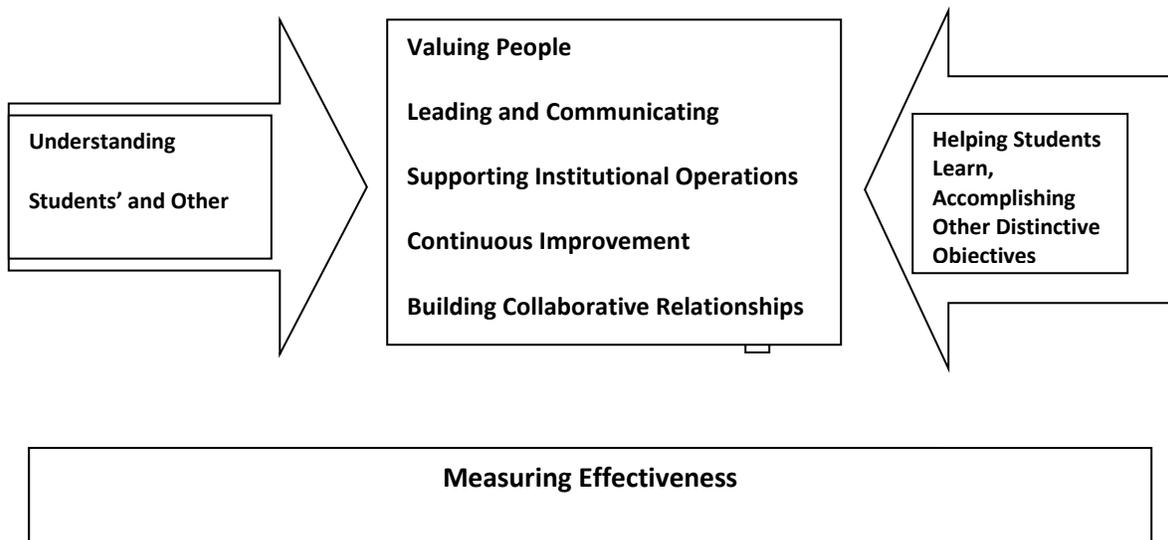
PEAQ employs a five-step comprehensive evaluation process to determine continued accredited status.

1. The organization engages in a self-study process for approximately two years and prepares a report of its findings in accordance with Commission expectations.
2. The Commission sends an evaluation team of Consultant-Evaluators to conduct a comprehensive visit for continued accreditation and to write a report containing the team's recommendations.
3. The documents relating to the comprehensive visit are reviewed by a Readers Panel or, in some situations, a Review Committee.
4. The IAC takes action on the Readers Panel's recommendation. (If a Review Committee reviewed the visit, the Review Committee takes action.)

5. The Board of Trustees validates the work of IAC or a Review Committee, finalizing the action.

Evaluations for initial and continued candidacy and initial accreditation also follow the processes outlined above.

The Academic Quality Improvement Program (AQIP) provides an alternative evaluation process for organizations already accredited by the Commission. AQIP is structured around quality improvement principles and processes and involves a structured set of goal-setting, networking, and accountability activities. AQIP is characterized by its concentration on systems and processes both as the basis for quality assurance and as leverage for institutional improvement. To ensure that its participant organizations maintain this process focus, AQIP created nine criteria that pose challenging questions about groups of related processes. Although the AQIP Criteria examine an organization from a perspective different from the lens used in the Commission’s Criteria for Accreditation, they ultimately permit an institution to create a body of evidence that will allow easy proof that it fulfills the Commission’s Criteria. The figure below shows how the nine AQIP Criteria together describe the interrelationships among systems essential to any effective college or university, using quality to refer to the never-ending improvement of systems and processes in support of mission.



Together, these nine sets of questions analyze interrelationships among systems essential to all effective colleges and universities. To advance the core purpose of all higher education, the AQIP Criteria takes a systemic view, defining and evaluating the key systems or processes within an

organization as they relate to learning, and demanding concrete indicators that measure their effectiveness. Mission-focused and holistic, the AQIP Criteria provide a framework that supports improvement within any organization whose mission targets learning.

AQIP employs the following steps to reaffirm an organization's accredited status:

1. The organization during a seven year period engages in all AQIP processes, including Strategy Forums, Annual Updates, Systems Portfolio Appraisals, visit to review U.S. Department of Education compliance issues.
2. An AQIP Review Panel examines the collective history of the organization's interaction with AQIP and the Commission (i.e., reports of the various processes and activities, organizational indicators, current Systems Portfolio) to determine whether this evidence demonstrates compliance with the Commission's Criteria for Accreditation. The Panel may seek and obtain additional information before making its recommendation.
3. The IAC takes action on the Panel's recommendation regarding both reaffirmation of accreditation and continuing AQIP participation.
4. The Board of Trustees validates the action. (The Higher Learning Commission. Institutional Accreditation: An Overview, pp.4-5)

The Criteria for Accreditation are organized under five major headings. Each Criterion has three elements: Criterion Statement, Core Components, and Examples of Evidence. The *Criteria Statements* define necessary attributes of an organization accredited by the Commission. An organization must be judged to have met each of the Criteria to merit accreditation. An organization addresses each *Core Component* as it presents reasonable and representative evidence of meeting a Criterion. The *Examples of Evidence* illustrates the types of evidence an organization might present in addressing a Core Component.

The Criteria are intentionally general so that accreditation decisions focus on the particulars of each organization, rather than on trying to make it fit a pre-established mold. The widely divergent purposes and scopes of colleges and universities demand criteria that are broad enough to encompass diversity and support innovation, but clear enough to ensure acceptable quality.

The Criteria Statements and Core Components are presented in "The Higher Learning Commission. Institutional Accreditation: An Overview":

Criterion One: Mission and Integrity. The organization operates with integrity to ensure the fulfillment of its mission through structures and processes that involve the board, administration, faculty, staff, and students.

1a. The organization's mission documents are clear and articulate publicly the organization's commitments.

1b. In its mission documents, the organization recognizes the diversity of its learners, other constituencies, and the greater society it serves.

1c. Understanding of and support for the mission pervade the organization.

1d. The organization's governance and administrative structures promote effective leadership and support collaborative processes that enable the organization to fulfill its mission.

1e. The organization upholds and protects its integrity.

Criterion Two: Preparing for the Future. The organization's allocation of resources and its processes for evaluation and planning demonstrate its capacity to fulfill its mission, improve the quality of its education, and respond to future challenges and opportunities.

2a. The organization realistically prepares for a future shaped by multiple societal and economic trends.

2b. The organization's resource base supports its educational programs and its plans for maintaining and strengthening their quality in the future.

2c. The organization's ongoing evaluation and assessment processes provide reliable evidence of institutional effectiveness that clearly informs strategies for continuous improvement.

2d. All levels of planning align with the organization's mission, thereby enhancing its capacity to fulfill that mission.

Criterion Three: Student Learning and Effective Teaching. The organization provides evidence of student learning and teaching effectiveness that demonstrates it is fulfilling its educational mission.

3a. The organization's goals for student learning outcomes are clearly stated for each educational program and make effective assessment possible.

3b. The organization values and supports effective teaching.

3c.The organization creates effective learning environments.

3d.The organization’s learning resources support student learning and effective teaching.

Criterion Four: Acquisition, Discovery, and Application of Knowledge. The organization promotes a life of learning for its faculty, administration, staff, and students by fostering and supporting inquiry, creativity, practice, and social responsibility in ways consistent with its mission.

4a.The organization demonstrates, through the actions of its board, administrators, students, faculty, and staff, that it values a life of learning.

4b.The organization demonstrates that acquisition of a breadth of knowledge and skills and the exercise of intellectual inquiry are integral to its educational programs.

4c.The organization assesses the usefulness of its curricula to students who will live and work in a global, diverse, and technological society.

4d.The organization provides support to ensure that faculty, students, and staff acquire, discover, and apply knowledge responsibly.

Criterion Five: Engagement and Service. As called for by its mission, the organization identifies its constituencies and serves them in ways that both value.

5a.The organization learns from the constituencies it serves and analyzes its capacity to serve their needs and expectations.

5b.The organization has the capacity and the commitment to engage with its identified constituencies and communities.

5c.The organization demonstrates its responsiveness to those constituencies that depend on it for service.

5d.Internal and external constituencies value the services the organization provides. (The Higher Learning Commission. Institutional Accreditation: An Overview, pp. 5-7)

An organization seeking *initial status* with the Commission participates in the Eligibility Process, the goal of which is to determine whether the organization is sufficiently prepared for a team visit.

Candidacy is a pre-accreditation status. It is the recommended approach for most non-affiliated organizations seeking initial affiliation. In its self-study for initial candidacy, an organization demonstrates that it meets the Eligibility Requirements, documents the degree to which it meets the Criteria for Accreditation, and provides the plan it has designed for its candidacy period. Throughout

the candidacy period, teams evaluate whether the college or university is progressively demonstrating the evidence needed to achieve accredited status by the end of the four-year candidacy period.

In addition to meeting the Criteria for Accreditation or the requirements of the Candidacy Program, all affiliated organizations voluntarily agree to meet obligations of affiliation, including undergoing periodic reviews, submitting required reports, completing annual reports, hosting other required or requested visits, and paying dues and fees. Every organization must have its accreditation reaffirmed not later than five years after it has been initially granted and not later than ten years following each subsequent reaffirmation. Candidate organizations are evaluated biennially. Accredited status is not for a specific period of time but is a continuing relationship with the Commission that is subject to periodic review. The Commission may require focused visits or reports between comprehensive visits; it regularly examines organizational annual reports and other information to see whether changes have occurred (or are anticipated) that would necessitate a change in the timing of the next evaluation. In addition, an organization is required to notify the Commission in writing before initiating any change that might alter its relationship with the Commission and to obtain approval before initiating the change. (The Higher Learning Commission. Institutional Accreditation: An Overview, p.8)

The Higher Learning Commission materials as well as the University of Nebraska-Lincoln self-study report are the evidence of the great value of accreditation for quality assurance. Accreditation provides both public certification of acceptable institutional quality and an opportunity and incentive for self-improvement in the accredited organization. The Commission reaches the conclusion that a college or university meets the Criteria only after the organization opens itself to outside examination by experienced evaluators familiar with accreditation requirements and with higher education. The process of accreditation provides the accredited organization with an opportunity for critical self-analysis leading to continuous quality improvement and quality-oriented changes of the academic environment.

“*National*” accreditation refers to accrediting bodies that review and accredit specialized or special-interest institutions across the entire United States. CHEA-Approved National Accreditors are the Accrediting Council for Independent Colleges and Schools (ACICS); Association for Biblical Higher Education (ABHE) Commission on Accreditation; Association of Advanced Rabbinical and Talmudic Schools (AARTS); Association of Theological Schools in the United States and Canada (ATS); Distance Education and Training Council Accrediting Commission (DETC); Transnational Association of Christian Colleges and Schools Accreditation Commission (TRACS). “National”

accreditation has nothing to do with government activity. Institutions with national accreditation generally will recognize degrees/credits from other similar institutions that are recognized by the same accrediting organization. “National” accreditation is not synonymous with “regional” accreditation. Sometimes “nationally-accredited” institutions are also “regionally-accredited”, but generally they are not. Regionally-accredited institutions generally will only accept degrees/credits from other regionally-accredited institutions.

“Program”, “professional” or “*specialized*” accreditation is available for specific programs of study within an institution. For example, Accreditation Board for Engineering and Technology (ABET), American Association to Advance Collegiate Schools of Business (AACSB), American Library Association (ALA) for library science, American Psychological Association (APA), Commission on Collegiate Nursing Education (CCNE), National Council for Accreditation of Teacher Education (NCATE). In some professions, a degree from an “accredited program” is required to be eligible to be licensed or certified to practice the profession. An institution that is “regionally accredited” might offer several “accredited programs”.

In the United States, the evaluation of the accreditation status of a higher education institution plays an important role in the following scenarios, among others:

1. Assessment of an individual student’s educational background for:
 - Admission to postsecondary education
 - Admission to graduate study (master’s or doctoral level)
 - Transfer of credit earned at one institution to another institution
 - Academic eligibility for various purposes, such as scholarships, athletic activity, research grants, internships, etc.
2. An individual’s eligibility for licensure or certification in a profession that requires completion of an accredited program or a program at an accredited institution
3. An individual’s eligibility for employment in a position that requires completion of an accredited program or a program at an accredited institution
4. Student eligibility for financial assistance from the US federal government and State governments
5. Educational institution eligibility for financial assistance from the US federal government and State governments.

With these factors in place, US accreditation acknowledges the vast array of educational institutions within the United States and the disparate missions they serve. The Higher Education Opportunity Act of 2008, in fact, affirmed the role of accreditors in attending to the unique mission of each institution, thereby allowing diversity in how institutions determined appropriate outcomes for their student body. Peer review, then, is not an attempt to standardize higher education, but an effort to encourage continuous quality improvement efforts that are based on the unique contributions of each organization.

The September 2006 report issued by the Commission on the Future of Higher Education was not positive when it came to how U.S. institutions are doing in relation to their accessibility, affordability, and accountability. Of particular relevance to this article was the harsh criticism directed toward accreditation. Spellings' participation in the Texas, and then federal, No Child Left Behind legislation seemed relevant as the report called for greater federal oversight of higher education. The commission concluded that the current state of accreditation "lacks rigor, fails to adequately address student achievement, does not encourage innovation, fails to provide a basis for comparisons among institutions, and does not effectively inform students and the general public about academic quality" (Eaton 2007, p. 19). Members of the higher education community do not necessarily dispute these findings. What they do dispute is the recommended actions and the premises upon which these actions are founded.

And yet, the United States relies upon a voluntary system of accreditation that neither requires specific learning outcomes nor minimal mastery of said outcomes to operate in the higher education arena. As a means to explore this voluntary system of accreditation, a comparison is drawn in this article between the United States' form of voluntary educational accreditation system and the Ukrainian system of centralized regulation.

By the time of its independence in 1991, Ukraine had a highly developed education system. However, it was a closed and centralized system that gave almost no autonomy to institutions of higher education and was isolated from international educational space.

As a result of its transition toward democracy and building the market economy after 1991, it was started the reform of the structure and content of the educational system in Ukraine to meet the challenges of a rapidly changing society. The strategy of reforms was formulated in a national education program in 1992 and implemented in the legal acts passed in 1992 and 1993. Principles of autonomy of institutions of higher education were declared. New state and private colleges and

universities were established. To meet demands of changing labor market some institutions of higher education have moved away from the previously predominant specialization in science and technology toward less specialized degrees and new studies in management, economics, law, and international relations. But because of the absence of an explicit government policy, these changes were taking place randomly on an institution-by-institution basis (The Education Sector in Ukraine, p. 2). The expansion and structural diversification of the education system, especially the emergence of private institutions; the formally granted institutional autonomy, which sufficiently weakens the state quality control of colleges and universities; changes in the content and profiles of academic programs (Webler 2002, p. 8) became key incentives for the Ukrainian state to focus on quality assurance issues.

In May 2005, Ukraine signed the Bologna declaration as a component of realization of the strategy of integration of the Ukrainian higher education in the European educational area. This strategy aims:

- To improve the quality of Ukrainian education at different levels, and especially to move towards lifelong learning;
- To increase students' mobility and employability in the changing national and international labor market;
- To enhance Ukrainian higher education competitiveness and prestige in the European and global educational arena;
- To improve education administration to make it more transparent, accountable and efficient.

To attain those objectives a professional system of quality assurance, which coincides with European standards, is required.

By virtue of the above-mentioned reasons, Ukraine, despite severe economic conditions and the extremely limited state budget, is actively emphasizing the quality of its higher education. For that, it has been looking for a model to combine historical traditions and the specifics of its education system with best European and world practices. Thus, there is a strong interest in quality assurance policies and procedures in Europe and USA, while great value is attached to specifically Ukrainian solutions.

The current national quality assurance system is implemented by means of the licensing and accreditation procedures. While licensing allows academic institutions to provide educational services, accreditation gives them the right to issue "officially recognized" (state) higher education diplomas.

Although the Ukrainian external quality control mechanism seems to be inspired by an American-model accreditation system, the driving forces and the realities behind the evolvement of evaluation and accreditation in Ukraine are different than those in the United States (Turturica 2006, p.162).

First, in the United States, the accreditation of higher education institutions is the exclusive privilege of private, independent, non-governmental accrediting agencies (regional or national in scope). The US Department of Education is only nominally involved in the accreditation of higher education institutions, as it merely compiles and publishes a list of national accrediting agencies that the Secretary of Education has determined to be reliable authorities for assessing the quality of academic institutions and programs.

There is no official document in the United States prescribing the manner in which accreditation of higher education institutions should be carried out. Instead, accreditation in the United States is an entirely voluntary, self-governed peer-review process. Accrediting agencies develop their own standards, which reflect the desirable characteristics for sound academic programs and that assess the quality of studies against these standards.

In Ukraine, despite the considerable degree of declared autonomy of academic institutions, the state continues to keep a de facto monopoly over the higher education sector. Therefore, the evaluation and accreditation of higher education institutions is a state-run, centralized process implemented and controlled by the Ministry of Education.

In Ukraine accreditation is the binding quality control mechanism, which assesses the degree to which the content and quality of studies furnished by licensed academic institutions and the quality of the training of graduates complies with the requirements established by the country's education legislation and state educational standards. In this way an authorized state body (e.g. the Ministry of Education) officially recognizes the ability of an academic institution to render educational services of an acceptable quality and provides it with the right to issue diplomas of higher education (Turturica 2006, p.160). Obviously, academic institutions that have long-term plans to remain on the market always seek to become accredited.

Unlike the USA, the accreditation process in Ukraine is governed by detailed provisions that are set forth in special laws and regulations. A government decree on August 9, 2001 established new procedures for accreditation or recognition of institutions of higher education in Ukraine, including the responsibilities for granting higher education diplomas and the qualifications they were meant to

represent. In addition, on November 29, 2011, the Ukrainian government established a new framework for licensing and accreditation of both state and private institutions of higher education.

In October 1995, the State's Accreditation Committee (DAK) was established within the Ministry of Education by presidential decree to accredit educational institutions at all levels. The DAK has a network of subordinate expert councils that correspond to the existing areas of study in the Ukrainian educational system.

The system of higher education standards in Ukraine comprises national (state), field of study (branch) components and institutional standards. State educational standards, which are adopted by the Ministry of Education, establish the minimum general requirements regarding the quality of higher education, the content of the disciplines, which are normative for all academic programs, the maximum number of in-class hours, and the minimum level of knowledge and skills that graduates must possess regardless of their specialization. These general standards are applicable to all academic programs of study. The standards for specific field of study/academic program (branch standards), which are usually designed by a team of experts from leading universities but are ultimately also adopted by the Ministry of Education, establish the contents of the normative disciplines included in a curriculum, the duration of studies, the minimum qualifications that graduates of that study program must possess including the requirements for their final state evaluation. The institutional standards determine the content of all electives included in the academic programs' curricula. At present, the elective component of the curricula is approximately 30% of the total quantity of hours of studies, including about 21% of the hours for courses selected by a higher institution and 9% of the hours for courses selected by students themselves.

Second, in the US, there are currently two distinct types of accreditation: institutional accreditation and programmatic accreditation. They co-exist, with neither leading automatically to the other.

Accreditation in Ukraine is programmatic-institutional, involving a successive assessment of the quality of separate academic (degree) programs offered by the units (faculties, institutes etc.) of the institution of higher education and the overall quality of studies offered by an institution as a whole. The first step is the accreditation of a specific field of study by the DAK expert councils. Based on the verification of these councils, accreditation takes place at a second level, whereby a definition of the specific status (the level of accreditation)¹ of an institution as a whole is given. The highest (4th) level

¹ According to the "Law on Education" of Ukraine the following 4 levels of the higher educational institutions accreditation are set: Level I - vocational schools and others equaled to them;

of accreditation can be granted to the academic institution as a whole only under the condition that two-thirds of the degree programs offered by its units are accredited with this level.

Accreditation in Ukraine is a two-stage process. First, the educational unit (institution) must complete and submit to the DAK an internal self-evaluation report containing detailed information about its mission and objectives, physical infrastructure, courses offered, methodological plans of study, the structure of the faculty and student body, and the available library and informational resources. Second, an educational unit (institution) must undergo an external evaluation by an expert committee, which, after reviewing the self-evaluation report, visits the institution seeking accreditation and collects additional information. The experts may also conduct in-class tests of students and interviews with faculty. An expert committee consisting of university professors and administrators is appointed by the Ministry of Education. Following an on-site visit, the expert committee drafts and submits an evaluation report to the DAK, which, based on the expert committee's presentation, makes a recommendation to either grant or refuse a positive evaluation. The decision is presented at a broader meeting of the Ministry of Education, and a final decision on the issue of accreditation is adopted. The accredited institution receives an accreditation certificate indicating its category (university, academy or institute), level of accreditation, and the fields of study for which it may issue state-recognized diplomas (Kremen and Nikolajenko, 2006, pp. 39-44).

In Ukraine, the first accreditation must be performed during the year of graduation of the first graduating class which seems to be a clash with democratic notions of legal guarantees, both for higher education institutions that have offered new degree programs, hired teachers, and admitted students, and especially for students who begin a course of study without knowing whether they will be able to take an examination and obtain a degree at all after its completion (Webler, 2002, p. 16). Repeated accreditation should take place every 5 years to assess whether the quality of offered programs remains at an acceptable level.

Third, the status of an 'accredited' institution or program in the US has come to bear many favorable consequences for its holder, in particular, 1) it helps to attract a greater number of students who seek the best institutions or programs that fit their academic goals; 2) it makes it eligible to participate in the federal student financial assistance programs administered by the US Department of

Level II - technical schools and colleges;

Level III, IV - universities, academies, institutes, conservatories.

The levels of accreditation represent the hierarchy of degrees according to the qualification of graduates (levels of proficiency): Junior Specialist, Bachelor, Specialist and Master (Закон України «Про вищу освіту» 2002, р. 32-33)

Education; 3) it increases the mobility of students, who are able to transfer credits earned from one accredited institution to another. Accreditation also serves as a useful ‘diagnostic tool’ for academic institutions, helping them define goals for self-improvement, thus stimulating a general rising of standards of higher education quality (Turturica, 2006, p.163-164).

Unlike the US accreditation system, which is a rather formative, process-oriented evaluation aimed at optimization and hence continuous quality assurance through a developmental process, the Ukrainian procedure of accreditation seems to be a summative type of quality control, which is oriented toward decision-making on quality matters and, under some circumstances, applies negative sanctions (i.e. withholding ‘official’ recognition of diplomas issued by licensed academic institutions) (Webler 2002, p. 12-13). At the same time, positive accreditation offers some benefits to the Ukrainian institutions of higher education. An ‘officially’ recognized diploma grants its holder the right to be employed by state bodies and to pursue post-graduate studies at accredited institutions. The four-level accreditation procedure affords greater flexibility, considering the ongoing expansion of Ukrainian higher education, because it allows academic institutions to offer degree programs at different levels under the same roof, which would be quite advantageous in many respects, especially by virtue of increasing competition for students enrollment. Accreditation is a prerequisite for state subsidies. Academic institutions, to which the highest (4th) level of accreditation is granted, get total state financing. This regulation seems to be a system of incentives to encourage quality. However, this system of incentives sends out false signals from the point of view of the whole of state educational policy. In fact, its effect is to decimate the “middle” level of the Ukrainian educational system, i.e., engineering schools and professional schools (2nd and 3rd level) (Webler, 2002, p. 16).

Unlike the US, in Ukraine there are no strong incentives for institutions of higher education to monitor and enhance their **internal** quality. For Ukrainian students and their families, a higher education diploma is important for avoiding unemployment and finding reasonably well-paying jobs. Both program quality and the type of specialization take second place to the simple priority of obtaining a diploma “at any price.” The Ukrainian accreditation system also does not emphasize continuous institutional quality improvement efforts. A fragmented structure of the national education system and the high economic stakes involved has created problems in controlling outputs. Enrollments are strictly limited by state licenses; therefore the competition for potential students has little impact on institutional quality assurance policy. A lot of small, specialized, higher education institutions lack experienced staff and other resources to offer programs which meet high academic standards and changing market demands: many of them operate simply as “degree mills.” Meanwhile, the large,

widely recognized institutions do not have an incentive to innovate, because their student's enrollment is still high enough (The Education Sector in Ukraine, p. 2).

Shortcomings in the implementation of licensing and accreditation system as the main quality-assurance mechanism in Ukraine (with a top-down bureaucratic approach, lack of transparency, rigorousness, and objectivity) have significantly impaired their ability to filter out poor quality academic institutions, which still exist in the country. In the early 1990s in particular, the licensing process was performed as a pure formality, allowing almost anyone who wanted to open a university to do so. Additionally, accreditation procedures are not always carried out in an impartial and meticulous manner. DAK officials often limit themselves to a 'checklist' approach², failing to thoroughly assess the actual quality of the offered programs of study. The latter may be due to both the limited time period that expert committees spend on evaluating academic institutions and to an insufficient number of well-trained independent evaluators included in programmatic accreditation. As a result, even some of the 'accredited' academic institutions frequently fail to provide education of a quality required by state educational standards (Turturica, 2006, p.162).

Some of the above-mentioned shortcomings are, to some extent, due to the relatively short period of time since the establishment of licensing and accreditation mechanisms in Ukraine. Accordingly, DAK and expert committees simply lack experience in implementing the standards and procedures. Besides, the Ukrainian quality control system seems to be too complex to meet the requirements of transparency in procedures, demands and evaluation criteria.

Conclusion

This comparative research lets us draw a conclusion that accreditation itself (if it is not reinforced by the strong internal (institutional) quality assurance system) does not ensure academic quality. The case of the US and Ukraine's methods for accreditation points to the shared challenges they face when it comes to program accreditation. Education's diverse demands challenge those who prefer neat boxes and quantitative data to affirm learning. By relying upon qualitative data encourages some to draw

² The Ministry of Education of Ukraine attempts to define quality by ineffective means of long lists of criteria for measuring quality of educational services (Most criteria must be met 100 percent in any case), as well as by adopting detailed standards for each academic discipline in written form and measuring correspondence of content of offered courses and proficiency of graduates to those standards. Meanwhile, a structural evaluation of academic courses, an analysis of the teaching and learning process (scientific soundness, teaching critical thinking, the amount of reflection a course permits, correspondence of course content to objectives of qualification, etc.), as well as integral linking of research and teaching are not considered as an important indicators in accreditation and quality control procedures.

conclusions that are not fully supported by the evidence. Independent institutions who rely upon a voluntary system of accreditation can continue a “business as usual” approach when there are not particularly high stakes involved in the accreditation outcome (for the vast majority of US institutions). Centralized educational systems can become complacent in the bureaucracy of education, neglecting the demands to be nimble in an accelerated economic and political environment.

The quality assurance system that is functioning in Ukraine is clearly an attempt to reflect a multitude of interests, perspectives, and establish mutual checks in one comprehensive collegiate system. The role and participation of state bodies in this procedure is unusually high by comparison with the US and Western European standards. Some of the structures that in the West enable colleges and universities to realize principles of academic freedom are just now being created for the first time in Ukraine. National professional societies of scholars in a discipline, which are otherwise the norm and are proactive in matters of the promotion of quality and standards, are yet in the stage of getting established.

Nowadays, the development and harmonization of an European quality evaluation and accreditation mechanisms in the light of the Bologna process is a topic of discussion in Ukraine, which is revealing controversial opinions and even a prevailing resistance against the establishment of quality assurance procedures implemented by independent agencies. This is largely because such an evaluation and accreditation system would eventually curtail the existing competencies and control of the Ukrainian government over higher education institutions.

Recommendations

While the legislative framework for the evaluation and accreditation of academic institutions in Ukraine is rather comprehensive and well drafted, state authorities should make diligent efforts to improve the implementation of these important quality-assurance mechanisms:

1. To attain goals of increasing the mobility and employability of students and the competitiveness and prestige of the Ukrainian higher education in the international arena, state educational authorities must be especially demanding and rigorous in monitoring the quality of the academic programs that are offered. Teams of university professors, non-academic professionals and employers appointed by the Ministry of Education must ensure a more focused and meticulous inspection of academic programs as compared to the current review carried out within the programmatic-institutional accreditation process. These teams of experts should also develop

handbooks containing guidelines and recommendations for ongoing quality improvements, emphasizing the areas that must be considered most carefully. The evaluation results should be widely disseminated, thus providing valuable information to prospective students, their parents, and the public about the quality of studies at different universities throughout the country.

2. General and specialized standards for higher education programs should be revised to be less prescriptive in terms of study programs content and more open to changing labor market demands. The procedure for designing curricula should be decentralized: this responsibility should be delegated to universities; the elective component of the curricula should be dominant. A novelty would be to introduce a requirement that academic institutions establish and operate active career services for students, a factor which may be considered during institutional evaluation and accreditation, along with the employment rate of its graduates.

3. While the governmental educational authorities currently keep a monopoly over academic quality assurance policy and procedures in Ukraine, a more active involvement of non-governmental bodies in these processes should be stimulated. The licensing and quality control of higher education institutions should be anchored as far as possible in the society. In particular, national and local professional associations and other civil society players which are emerging now in Ukraine may be encouraged to assist with designing and improving of educational standards. Students and alumnae may also be involved in the accreditation process, which in turn would offer a more complete and informative perspective on the quality of reviewing programs of study. The government's education policy can gain considerable additional legitimacy in this way.

4. Eventually, Ukrainian state authorities may consider delegating the accreditation of academic programs to independent accreditation agencies with well-trained and experienced evaluators, including university professors and administrators, scholars and representatives from different areas in the labor market. Accreditation of academic programs by these independent agencies may serve as the basis for state accreditation of institutions of higher education. This model is working well in some European countries, where state control over higher education was also traditionally very strong.

5. Ukraine needs to cooperate with Western European countries, where many efforts have been undertaken at the national and transnational level to harmonize quality assurance policies and accreditation procedures in the context of the Bologna process. This will result in a more rapid integration of Ukraine into the European higher education space.

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