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Accreditation and Expansion in Danish Higher Education

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Abstract

During the last decade, an accreditation system for higher education has been introduced in Denmark. Accreditation partly represents continuity from an earlier evaluation system, but it is also part of a government policy to increasingly define higher education institutions as market actors. The attempts of universities to increase their student enrolments have combined with the logic of accreditation to produce an increasing number of higher education degrees, often overlapping in content. Students' scope for choice has been widened, but the basis for and the consequences of choice have become less clear.

Accreditation and Expansion in Danish Higher Education

1. Introduction

In December 2013, a report on education and innovation was brought out by the Danish Productivity Commission. This is a small expert task force established by government with the mission of analysing Danish productivity development and give recommendation for improving productivity in the private as well as the public sector. The structure and quality of higher education is a prominent theme in the report, and the commission puts forward several critical arguments. One of them concerns the fact that the number of different degree programmes being offered by Danish universities has been growing rapidly in recent years. The commission points out that young people coming from upper secondary education can choose between more than 200 different bachelor's programmes, and comments:

In the perspective of productivity this development is inappropriate, especially if the new programmes provide lower productivity in the labour market. The many degree programmes may also make the educational system more opaque for potential students as well as for employers who should hire them after graduation (Produktivitetskommissionen 2013, p. 123).

The suggestion that new programmes may provide lower productivity relates to the expectation that many new programmes belong to the humanities rather than to technology and science. In the view of the commission, the drivers of the growing number of programmes have been the universities, who compete against each other to

attract students and in the course of this tend to establish programmes that look attractive and exciting to young people rather than programmes that emphasize relevance to employment. This point was quickly taken up by the Minister of Higher Education, who issued a public statement that the number of different programmes in higher education should be reduced. The Minister did not indicate how this was to be done, but there is no doubt that he will expect some kind of plan from another group of experts that he recently established with the mission of doing an overall review of higher education.¹

Curiously, neither the Productivity Commission nor the Minister showed much awareness of the fact that in the Danish education system universities cannot just invent and offer new study programmes. Decisions to establish new degree programmes are strongly centralized. New programmes have to be approved by the Ministry before they can be offered to students. In practice these decisions have been devolved to a small group of personally appointed experts, the Accreditation Council. The decisions are based on a meticulous procedure of accreditation where universities produce comprehensively documented proposals that are evaluated by expert panels against criteria for coherence, teaching resources, research base and not least labour market relevance. While it is no doubt correct that universities compete for students, the accreditation system – which was introduced in 2007 in the wake of a major university reform – has constituted an important arena for this competition. And the rules of this arena may be seen as one of the

¹ This group was established in October 2013 with the mission of giving an overall assessment of the quality and relevance of Danish higher education. It has seven members: three economists, three business executives and one higher education specialist.

reasons why growth in higher education enrolments has at least partly taken the form of new degree programmes.

In this article, I discuss the development of the accreditation system and its impact in Danish higher education. More specifically I try to answer the following two questions: why has the accreditation system been introduced in Danish higher education? And what consequences has the system had for the development of study programmes? I do not present an explicit theoretical framework, but the article draws generally on the tradition of critical policy sociology (see for instance Ball, 2008; Whitty, 2002).

2. The introduction of accreditation

The emergence of accreditation is part of a more general trend, often referred to as New Public Management (NPM). It shifts the emphasis in public policy from implementation via rules and centralized budgets for public activity to implementation via objectives, stronger local management and quasi-markets for public services. There are different varieties of New Public Management, some emphasizing the application of market mechanisms and microeconomics in public services, others emphasizing strong management and systematic quality control (for a good overview, see Tolofari, 2005).

In Denmark, elements of NPM, including quality control initiatives in higher education programmes, were introduced between 1982 and 1993, under liberal-conservative governments. The first initiative was a modernization programme for the public sector in

1983, which was followed by others, for instance a plan for so-called de-bureaucratization. Some of the keywords in this modernization were decentralization of responsibility and competence, rule simplification, better user service, and stronger management. The market approach was less prominent. Education was one of the areas where the modernization initiatives had a strong impact. Bertel Haarder, who was Minister of Education throughout the period held the view that strong organizations and interest groups (not least the teachers) had far too much power over education. Haarder made quality a key general theme for the Ministry of Education and linked it to de-bureaucratization and free consumer choice (Haarder, 1988; Telhaug and Tønnesen, 1992). The scope of the specific initiatives (e.g. mapping relations across educational levels in a number of central disciplines) was often limited, but the discourse had a great impact; quality became a concept that all actors had to consider.

The first result of NMP in higher education was not accreditation but an evaluation system. In 1992, after years of debate, the Ministry of Education established the Evaluation Centre for Higher Education with the mission of evaluating all Danish higher education programmes. The institutions of higher education were obliged to cooperate with the centre on evaluating their education programmes, but the centre did not have authority to initiate evaluations on its own. This authority was placed in the Ministry of Education and especially in the national education councils, which existed at the time within the main disciplines. The policy was to evaluate all long-term further educations at least every 5 years, usually not entire institutions, but rather programmes within a certain discipline, and all institutions that offered the relevant programmes (Rasmussen, 1997).

However, the Evaluation Centre never managed to complete the first round of such recurrent evaluation. In 1999, it was renamed the Danish Evaluation Institute (EVA) and given the broader task to conduct equality assessment and quality improvement of the entire Danish educational system. Evaluation of higher education gradually became a minor part of EVA's work.

In the United States, accreditation procedures have played a large role in higher education for a long time. Higher education in the US is strongly differentiated, much of it is private, and public regulation plays a limited role. Accreditation can be seen as a response to this 'system': it is used widely and is mainly handled by private accreditation organizations (Eaton, 2009). In Europe, where there is a much stronger tradition of publically regulated higher education, interest in accreditation has been limited until fairly recently. The evaluation systems for higher education that were established in Europe in the 1980s focused primarily on auditing and improving the quality of education at existing institutions of higher education. There was no pressure to establish an 'arm's length' between government and evaluation system; the main question was how the government could use information from evaluations in management and resource allocation. It was more or less assumed that all government-supported programmes had a right to exist, so there was no strong need to be able to identify the 'black sheep' among educational institutions.

The situation changed during the 1990s. Within a few years, a strong interest in introducing systems for accreditation of higher education programs manifested itself in

many European countries. The pioneers were Central and Eastern European countries, and Hungary introduced the first system in 1993. Teichler (2007) mentions that after the collapse of the old regimes, many universities hoped to ensure their autonomy via independent evaluation and recognition of study programmes. Another factor was that the transition to a market economy – based on principles established by the World Bank and others – created an interest in private universities, and the establishment of these called for approval procedures.

In the rest of Europe, the interest in accreditation was also associated with an idea of comparable education programmes and educational institutions to accommodate the international mobility of students and other forms of internationalization. The Bologna Process, which also has strong elements of NPM (Stech, 2011; Magalhaes, Veiga, Ribeiro, Sousa & Santiago, 2013), was an important factor in this. Accreditation was a logical response to the focus on mobility, quality and comparable descriptions of education programmes in the Bologna declaration, and accreditation was also directly included in the agenda, for instance in the 2003 Berlin communique, where the ministers recommend ‘accreditation, certification or comparable procedures’ (Bologna Process, 2003). From the late 1990s, the establishment of accreditation systems gained speed. In 1998, they only existed in four Central and East European countries; five years later, they existed in eighteen European countries. Accreditation could be called an organizational recipe (Røvik, 2005), circulating via policy networks across countries.

Schwarz and Westerheijden (2004) have identified some common elements in the systems for accreditation of higher education in Europe: the units that are analysed are normally education programmes (rather than entire institutions). In most countries, the accreditation systems cover all bachelor's and master's programmes. The methods are largely identical across countries. Visits by experts are common and the methods in the accreditation work are very similar to the methods used in the 1980s evaluation systems. The actors who participate in evaluations and decisions are normally government, educational institutions and university teachers. Only in a few places do students and external actors play a visible role. Most countries have established a national accreditation institution with close affiliation to the government, and the conclusions of the accreditation work are officially regarded as advice for the governments.

In the Nordic countries, accreditation has had less success. It was discussed in trans-Nordic fora in the years after 2000 (Hämäläinen, Haakstad, Kangasniemi, Lindeberg & Sjölund, 2001), but Finland, Norway and Sweden have generally continued the previous systems of auditing rather than introducing accreditation (ACE Denmark 2011). In Denmark, however, a quality system based on accreditation was introduced. This should be seen in the context of new legislation on universities and other higher education. In the university act of 2004, and in the equivalent legislation for other higher education, one of the objectives was to strengthen the educational institutions' administrative and economic autonomy, including their responsibility for managing their education programmes. Denmark has a long tradition for central control of this area, since the decision has been placed in the relevant ministry (of science or of education), and in principle with the

ministers. Until the 1990s, the decisions were based on advice from different specialist bodies within the different disciplinary fields (often called national educational commissions), where universities and other actors were represented. During the 1990s, this practice was discontinued, and decisions to create and cancel education programmes came to rest exclusively with the civil servants. The introduction of an accreditation system for higher education can be seen as a strategy to move these potentially conflict-ridden decisions out of the ministerial bureaucracy without giving up the centralized decision-making competence.

3. The accreditation system

The Danish Act on accreditation of institutions for higher education was passed in 2007. According to the Act, an accreditation council consisting of a limited number of ministry-appointed experts would be established. Units would be established outside the ministries to handle analytical and administrative procedures in connection with accreditation. For the higher education programmes under the Ministry of Education, the task was placed with EVA, which already had extensive experience with evaluation and higher education. For university education, a new unit called ACE Denmark was established.

The Act required that all higher education programmes in Denmark should be accredited. New education programmes should be accredited before they were offered, and accreditation should be separate for all institutional localities of a programme. Existing programmes should be accredited regularly, the same principle as the 1990s evaluation

system. According to ACE Denmark's original plans approximately 200 education programmes would be accredited every year.

The criteria for accreditation have been defined in executive orders. There have been some adjustments over the years, but for university programmes the following five have remained the key criteria (Ministeriet for Videnskab, Teknologi og Udvikling, 2009):

1. The demand for the study programme in society and on the labour market must be documented.
2. The study programme must be research-based and associated with an active, high-quality research environment.
3. The academic profile of the study programme and learning outcome targets must be coherent and aligned with the national qualification framework.
4. Structure and organization of the study programme, including the physical environment and the teaching, must support the programme profile and targets.
5. There must be continuous internal quality assurance of the study programme, adhering to European standards of quality assurance.

Each criterion is further specified in sub-criteria. For the first criterion, the possibilities for evaluating labour market demand obviously differ for existing and for new programmes. For existing study programmes, the demand must be documented by employment and unemployment statistics, and by an ongoing dialogue with employers and graduates. For new study programmes, it is a question of clearly formulating the occupational aim, to document the demand through surveys among potential employers,

and to document that this demand is not filled by existing programmes. The remaining criteria are identical for existing and new study programmes.

For study programmes at university colleges and business academies, many of the same criteria apply, but university programmes have a special focus on the research base and the quality of the research environment, whereas university colleges and business academies have a focus on practical learning.

The evaluation that precedes the accreditation decision has in many ways followed the model developed by the Evaluation Centre in the 1990s. For each accreditation an expert panel follows the work, participates in visits to institutions and is responsible for the conclusions of the accreditation report. The practical work is conducted by the staff at ACE Denmark and EVA. The institutions whose study programmes are up for accreditation prepare detailed applications after standard templates based on the accreditation criteria. The applications are assessed by the evaluation staff and by the steering group. Based on this and the results from the visit, a report is prepared and the conclusion is a recommendation for accreditation or non-accreditation. The report is the basis of the accreditation council's decision.

The Accreditation Council consists of one chairman plus eight members. Most are appointed by the Minister of Higher Education, but two represent and are appointed by students.

The system described here is now being changed. In the summer of 2013, a new Act on accreditation of higher education was passed by the government, following several years of criticism and debate. The universities had increasingly complained about the amount of work that had to be invested in preparing accreditation applications, work that they often felt was dictated more by bureaucratic procedures than by substantial demands for knowledge and quality. When the 2004 University Act was evaluated five years later, this issue was taken up, and the international evaluation panel commented that the Danish accreditation system had too much emphasis on ex ante control, and reflected too little confidence in universities' ability to maintain educational quality (Ministeriet for Videnskab, Teknologi og Udvikling, 2009a). The following year, an evaluation of ACE Denmark (conducted in connection with its application to join ENQA, the European Association for Quality Assurance in Higher Education) also point out that detailed accreditation reports for individual study programmes are a burden on the institutions and the entire quality system (ENQA 2010, p. 30).

With the 2013 Act, accreditation of existing higher education programmes is replaced by accreditation of whole institutions. ACE Denmark and the accreditation council evaluate each university's procedures for assuring the quality of their education programmes, and if the results are satisfactory, the university is accredited. However, the university is not allowed to establish new programmes on its own. New programmes must be pre-accredited by the Ministry of Higher Education before they can be offered to students. The power to establish new programmes has thus been moved further into the core of the bureaucracy.

It is too early to say what impact the new system will have on Danish higher education. However, this paper is about the impact of the previous system and its impact in the years 2007-2013.

4. Accreditation and higher education expansion

There is no doubt that the number of university degree programmes has grown considerable over the last two decades. As mentioned earlier, the Productivity Commission emphasizes the fact that Danish students in 2013 could choose between more than 200 different university bachelor's degree programmes, which is some 75 programmes more than ten years earlier² (Produktivitetskommissionen, 2013, p. 122). A bar chart showing the available bachelor's programmes in five-year intervals since 1990 shows that there has been a steadily rising number of programmes. This apparently started shortly before the establishment of the accreditation system, and it has continued. The chart also shows that the number of options students have to choose between when applying for university study has grown even more than the number of programmes. In the In the 1990s, many students could enrol in a broader field of study (for instance a foundation course covering several social sciences) and only chose a specific programme (like sociology or business studies) later. Programmes established during the last decade

² Exact figures for this are hard to find. The Ministry of Education and Science does not provide them, and the Ministry's register covers higher education institutions, not programmes. Different policy actors refer to numbers, but do not document them. The round figures given by the Productivity Commission must be regarded as the most reliable.

all have to be chosen from the outset.¹ Students today have many more ‘doors’ to choose between than earlier.

A full picture of the growth must include the other types of university study programmes, the full-time master's programmes (also called candidature programmes in the German tradition) and the part-time master's programmes that are part of the continuing education system for adults. According to the database of the Accreditation Council, the Council processed the following number of applications for new university study programmes in the period 2007-2013: 68 applications for bachelor's programmes, 137 applications for full-time master's programmes and 48 applications for part-time master's programmes (Accreditation Council, 2014). A more detailed breakdown of decisions is not available for the whole period, but only for the years 2007-2011.

Table 1. Accreditation decisions, new study programmes, 2007-2011

	Bachelor's	Full-time master's	Part-time master's	Total
Programme applications	57	108	43	208
Programmes approved	46	84	35	165
Programmes rejected	5	12	3	20
Programmes withdrawn by applicant	6	12	5	23

Source: Ace Denmark 2012, p. 30

Withdrawal of programmes has generally occurred when the accreditation reports prepared by ACE Denmark have been so critical that a rejection by the Council could be expected. By withdrawing an application, a university could consider improving it and

resubmitting it the following year. The system does not allow for rejected applications to be resubmitted.

A considerable number of the submitted applications – forty-three, equalling twenty-one per cent – have either been withdrawn or rejected. There is no reason to assume that the rejection rate fell during the following two years. This considerable amount of wasted work has been a major reason for universities to protest against the system.

Still, very many new³ programmes have been approved and offered to students. All universities have been active in getting new programmes accredited, and the new programmes are fairly evenly distributed over the different academic fields, apart from the health sciences (ACE Denmark, 2012, p. 29).

5. Context and consequences

The growth in the number of degree programmes must be seen in the context of other elements in higher education policy. Two elements have been especially important.

One element is the strengthening of market relations and processes in the governance of higher education. The 2004 university reform stressed that universities were to have a higher degree of autonomy and control over their own activities and budgets. The state should not govern higher education directly, but rather indirectly through negotiations

and through rewarding best practices. In fact this autonomy is limited, because Danish higher education is funded almost exclusively by government, and because centralized decision-making is maintained in many ways. Still, the 2004 reform and subsequent government initiatives have encouraged the emergence of a quasi-market, where universities and other higher education institutions compete for students on one hand and for different kinds of extra funding on the other. The number of students is important for university income, for although Danish higher education is free and students do not pay tuition, costs are covered by the state according to the so-called taximeter principle, whereby the university is paid for each student passing exams. Especially in the decade of the liberal-conservative governments from 2001, this was accompanied by a withdrawal of government from general public education policy. Issues such as social equality in education, and the balance between higher education access and labour market demands, were sometimes debated and investigated, but not taken up in government policy. Very much in line with neo-liberal ideas, the assumption seems to have been that the individual action of higher education institutions and of students could and should drive the fulfilment of society's needs for higher education (Ball, 2008, p. 45).

Another important element is the call for more graduates. Since the turn of the century, governments have increasingly emphasized the role of education in economic growth and in Danish national competitiveness. A milestone was the work of the so-called Globalization Council, a high-level task force established by government with the mission of developing a strategy for Denmark in the face of globalization. The Council's 2006 report argued strongly for improvement of education as the main element in such a

strategy (Globaliseringsrådet, 2006). The present Social Democratic government has continued this line of policy; one of its objectives is that sixty per cent of each cohort should achieve a higher education degree, and as part of this, twenty-five per cent should achieve a master's level university degree. At a more general level, this government has emphasized the supply side of the labour market as a driver of economic growth. It assumes that the presence of more skilled manpower will encourage companies to invest in new initiatives and thus create employment. And it warns that people who do not acquire the necessary skills will be a burden for the welfare state and risk marginalization. Economists debate the merit of this approach, but there is no doubt that it has inspired government to focus on expanding enrolments in education and encouraging universities to follow this up.

This is the environment in which the accreditation system has worked. The growth in the number of degree programmes must be seen against this background. The new economic autonomy of universities and the strengthening of a higher education quasi-market leads to increased inter-university competition, and this leads universities to expand their educational activities. This can happen in two ways: increasing enrolment in existing programmes, and offering new programmes. Relying on existing programmes is a cautious strategy that can work if these programmes have a good reputation and continue to attract students. Establishing new programmes is a more active strategy, with which the university can aim at new groups of students and also try to exploit the publicity value of doing something new. Generally universities try to do both, so there is a constant pressure to establish programmes in new or redefined fields of knowledge, and to do so

before competing universities do. This also responds to demands from inside universities, where groups of academics often want study programmes established in their specific fields.

This is of course not found only in Danish higher education. Universities in many countries act in this way, trying to use their opportunities to attract students. A curious example is the master's programme, 'The Beatles, Popular Music & Society', offered by Liverpool Hope University (2013). This illustrates the problem pointed out by the Productivity Commission and others: programmes may become so narrow in their field of knowledge that their reference to the labour market is hard to see.

In Danish higher education, universities cannot offer new degree programmes without having them accredited. The accreditation system is an instrument that the state can use to control the number of degree programmes being offered. But in fact this seems not to have happened. As an arena for competition between higher education institutions, the accreditation system has in fact tended to accelerate the growth in the number of programmes. It is part of the logic of the system that existing degree programmes are owned by the universities who have previously been given the right to offer them – in most cases a right given before the introduction of the accreditation system. So if a university wants to expand its educational activity in an academic field more or less occupied by study programmes at other universities, it must try to invent a degree programme which reshapes or combines the knowledge relevant to this field in a new way and with a new title – and try to get this accredited. The accreditation system does

not in itself drive inter-university competition and the emergence of new programmes, but it regulates it in a way that has added to the growth in the number of degree programmes.

While the accreditation system has promoted differentiation in the university degree structure, it has influenced the structure and curricula of study programmes in another way, which can be called normalization. With inspiration from Michel Foucault's concept of governmentality and his analyses of the correlation between knowledge procedures and exercise of power (Foucault, 1980, Peters, Besley, Olssen, Maurer & Weber, 2009), we can see how the evaluation and accreditation systems, with their standardized procedures, standard set of criteria, and emphasis on detailed documentation may serve as tools to adapt higher education programmes to a common set of norms for higher education, a 'standard model'. Such a model will generally be composite: it will include widespread implicit conceptions of higher education (in university education, for instance, conceptions of the relationship between teaching and research), and accepted formal frameworks and principles for study programmes.

An example is the qualification framework for higher education, defined by the Danish state on the basis of common EU policy, which has to be incorporated in study programmes for all higher education. The qualification framework has been passed into policy, but its principles and concepts are debatable and not without internal contradictions. In principle, it is up to the institutions of higher education to implement the qualification framework, but in reality it is governed by the accreditation system. It is

a standard element in accreditation applications that the institutions describe how the study programmes fulfil the principles of the qualification frameworks, and study programmes must be appended to the applications. Regardless of the extent of control with the submitted study programmes, the procedure itself forces institutions to adapt to the principles and concepts of the qualification framework with a minimum of independent critical judgement.

6. Conclusion

The Danish system of higher education accreditation was introduced in the wake of the 2004 university reform, emphasizing the institutional self-management of universities, but in many ways it represents continuity from the evaluation system operated by the Danish state during the 1990s. The re-introduction of such a comprehensive system of institutional accountability must be seen as part of a government policy to increasingly define higher education institutions as market actors.

The starting point for this article was the strong criticism that has recently been levelled at the multitude of higher education degree programmes. The growth in the number of programmes has occurred especially since 2000, and I have tried to demonstrate that it has not only been the result of expansionist strategies pursued by the universities, but also a logical result of government policy and the workings of the accreditation system. The question is, however, how the consequences should be evaluated. The recent criticism has focused on the relations of the programme structure to potential students on one hand and

employers on the other. The Productivity Commission argues that the multitude of degrees makes it hard for students to find their way in higher education. Students generally have too little relevant information on the employment prospects of different degree programmes, and for this reason they are easily lured into choosing new programmes that look appealing but whose employment prospects are at best uncertain (Produktivitetskommissionen 2013, p. 122). The multitude of degrees also makes it difficult for employers to recruit because it is hard for them to assess the real skills offered by the different degrees.

Both criticisms are true, but other aspects are relevant as well. Traditional university degree programmes typically reflect the structure of the main scientific disciplines and in presenting themselves they do not give much indication of specific topics or of the types of job they could lead to. In a situation where government wants to increase the number of graduates from higher education, offering new programmes that emphasize relevant contemporary knowledge as well as employment possibilities may make more young people – and not least young people from non-academic families – aware of the possibilities and interested in enrolling. New programmes may also represent new areas of knowledge that have crystallized in research, often across traditional disciplinary boundaries. This is one of the merits of the accreditation procedure: because the process starts with a university defining or redefining a field of knowledge as the basis for a degree programme, new developments in research can be brought into play without being censored from the outset by the traditional expectations of employers.

Assurance of quality in education is important for the state, for the educational institutions, for the students, and for society at large. There is no doubt that the evaluation and accreditation systems have had an important role in making the educational institutions focus on quality and make use of quality assurance tools. But although the evaluation and accreditation systems have had positive effects on the quality of education, they have required disproportionate investments and resources, both in the evaluation agencies and at the educational institutions. The same positive effects could probably have been achieved with far less resources with a simpler and indicator-based quality control at all institutions of higher education, and with thorough evaluations and accreditations reserved for endangered or strategically important study programmes. This lesson could be drawn already from the 1990s evaluation system. Nevertheless, the state once again introduced a comprehensive recurrent system with the accreditation system, and it can only be understood in a broad context of education policy and neo-liberal construction of educational institutions as market actors.

The accreditation system in Danish higher education has not been without merits, but its main role has been to constitute an institutional arrangement for increasing market-based governance of higher education, a governance where competition between providers is expected to drive the fulfilment of society's needs for higher education.

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