



Federation of  
Post-Secondary Educators  
of BC

Submission to the  
**Degree Quality Assessment  
Board Review**

December 9, 2005

The Degree Quality Assessment Board (DQAB) has requested institutions and stakeholders to participate in a review of its criteria and guidelines for submissions reviewed by the DQAB. The Federation of Post Secondary Educators (FPSE), which represents 10,000 post secondary educators in public and private post secondary institutions in BC, has surveyed its member locals and the following submission is a reflection of their feedback.

At least 11 of the 16 member locals of FPSE are at institutions that have participated in DQAB processes by the fall of 2005: 11 for new degrees (Camosun College; College of the Rockies; Douglas College; Emily Carr Institute of Art and Design; Kwantlen University College; Langara College; Malaspina University College; North Island College; Thompson Rivers University; University College of the Fraser Valley; and Vancouver Community College) and two that have applied for exempt status (Emily Carr and Malaspina University College).

In our response we will discuss the nature and functioning of the Board, and the experiences of faculty in working with DQAB policies and procedures. We conclude with some specific recommendations.

### **The Board**

The mandate of the Board is to make recommendations to the Minister of Advanced Education on such questions as applications for degrees (regular and applied), applications for exempt status (from the DQAB process), and applications to use the word 'university'. An additional task has been added in 2005, with applications as to whether a new degree is required as existing degrees are revised.

The FPSE is concerned that the present composition of the Board is not sufficiently representative of the post education system in BC. The Board consists of 11 voting members and three ex officio members but has no faculty nor student representatives. The Board is also not reflective of the diversity of our system with respect to gender or ethnicity.

### **The DQAB Process**

If we follow the process of obtaining a recommendation, a number of issues arise.

Public institutions that submit a new degree proposal file a Notice of Intent with the Ministry of Advanced Education. The Notice is reviewed by relevant Ministry specialists and is posted for a thirty day feedback period on the Ministry web site in two ways – for public feedback and for a password-protected peer review.

If the Notice of Intent weathers this first stage, it is either approved by the Ministry – if the Notice of Intent comes from an exempt institution – or it is forwarded to the Degree Quality Assessment Board. The Board then requests a full program proposal which is usually accompanied by an external expert review. At the end of this process, with the experts' report, the Board either approves, turns down, or approves with conditions the application – with the Minister giving the final assent (or not) to the Board's recommendation.

Many questioned the utility of the 30-day posting period. Instead of leading to peer feedback that might enrich and/or refine a proposal, the 30-day posting period could be a means to sabotage, block, or otherwise subvert what is perceived as a rival competitor. In fact, some faculty members are concerned that other institutions could "poach" their degree development work. FPSE recommends there be only limited information in the postings on the Ministry website.

In some cases, it might be necessary to open up the feedback to a wider group. For instance, Psychiatric Nursing can draw only on a pool of national expertise for meaningful peer feedback, whether in the posting discussion or as expert reviewers.

When a proposal has been accepted for review by the Board, an external panel of experts is normally appointed. Faculty have found this examination to be helpful since the experts are acknowledged as senior people in their fields. In particular, faculty have appreciated the ability to suggest at least one of the three experts and pedagogical areas to be examined.

However, faculty commented that it would be helpful:

- if some detailed advance notice is given of the areas to be examined (as done by professional examining bodies like RNABC);

- that better criteria be developed around the nine standards for a full program proposal – in fact faculty suggested there was redundancy among the standards, and could be reduced to six or seven standards;
- that the expert conflict of interest policy be amended to screen against selection of experts who have made negative comments in the 30-day web posting comment period. Currently, the conflict of interest policy dwells on personal but not professional conflicts of interest.

### **Delays**

Another concern is the increasing amount of time to apply and get approval for new degrees. The Board began with a commitment to a six-month application/approval process. With the greater volume of applications, including screening degree revisions (mostly from exempt institutions), and what appears to be compulsory expert screening, the Board Secretariat is taking longer and longer to process applications. Even after approval by the DQAB, the wait for an Order-in-Council from the government can take 4 to 5 months. Such delays have substantial impacts on the ability of institutions to plan and market new degrees.

### **Exempt Status**

For faculty at the two institutions (Emily Carr and Malaspina) who have participated in the applications for institutional exempt status from DQAB processes, there are concerns over the lack of clarity and substance in the guidelines to doing Organizational Reviews. At Malaspina, for example, the application was turned back for a substantial rewrite that could have been addressed in the initial application if the Board guidelines – particularly in regards to program review – had been more specific. It appears that the Exempt Status Interpretive Note (January 2005) has tried to address some of these concerns. But faculty do not believe enough has been done to clarify the Exempt Status application process. In addition, institutions that have strong, well developed internal processes for degree development should reach exempt status much sooner.

### **Costs related to the process**

The fees that institutions have to pay to participate in the degree approval process are onerous. It seems unfair that exempt institutions are exempt from paying fees as well. These fees are in addition to the substantial internal resources devoted to meeting the Board's requirements. FPSE recommends that the Board be funded by government and that all public institutions be exempt from paying fees to it.

FPSE has heard concerns about the budget implications of the DQAB process. The Notice of Intent to the Ministry must include a budget estimate. However, by the end of the process the budget might need to be revised and there seems to be little opportunity to revise the original budget estimate even though additional necessary resources may have been identified. Instead, the institution is expected to go into existing revenues, from the Department level up, and fund any additional costs for actual degree development and delivery. Many institutions are finding the unanticipated costs of the degree development process onerous, given their limited institutional resources.

### **Use of "university" criteria**

FPSE has gone on record as opposing the use of the term "university" for private, for-profit institutions, mainly because most lack internal governance and quality assurance processes and a core membership of established, secure faculty with academic freedom protection. The name "university" has value and history, and to use this term without the internal quality processes in place could cheapen the title for all institutions currently carrying the name in BC.

The number of private and out-of-province applications to the DQAB for "university" status has increased dramatically of late, and the process of vetting these applications could conceivably draw on the time and resources of the DQAB to the detriment of the BC public post-secondary system.

## **Recommendations:**

The government has emphasized three themes in the Strategic Investment Plan for post-secondary education in British Columbia: access, choice, and quality. FPSE believes a number of concrete changes will help realize these goals.

### **Substantive changes:**

- The Degree Quality Assessment Board should be more inclusive of the whole system and include a significant number of faculty and student representatives. There is a substantial pool of faculty who have extensive internal degree development experience, especially from Education Councils. A move to appoint such faculty would add to the Board's capacity to assess Notices of Intent, to review Expert reports, and to make better informed recommendations to the Minister.
- The Ministry of Advanced Education should fund the full costs within institutions of degree development and degree approval. The FPSE opposes the current user pay system of funding the DQAB. The DQAB should be funded separately to undertake its activities, and fees should be charged only to the private and out-of-province institutions seeking approval of degrees.
- Better criteria need to be developed around the nine standards for a full program proposal – in fact faculty suggested there was redundancy among the standards, and they could be reduced to six or seven standards. Program proposals can be consolidated in fewer standards based on a study of general baccalaureate requirements. The current standards are far too general and need refinement. A Board subcommittee to develop these degree requirements is suggested.
- The work of the DQAB should be focused on assisting the public post secondary education system in BC and not assisting private, for-profit institutions or out-of-province institutions that are seeking only to increase their market share and not serve the needs of BC students.

### **Process Changes:**

- The 30 day web posting of proposals needs to be re-examined. If it is retained, peer reviews should be guided by objective pedagogical and discipline criteria.
- The expert panel process can be improved by following professional association assessment methods (providing more information on the areas to be examined and more input on panel members).
- The conflict of interest policy needs to be clarified in regards to professional conflicts, as well as personal conflicts of interest.
- The degree approval process needs to be streamlined further and more resources need to be assigned to the Board Secretariat to meet the original promise of a six month application/approval process. The process also needs to ensure that innovative degree proposals receive open and fair consideration.
- The Exempt Status application process needs substantial refinement in giving greater detailed guidance to institutions – in particular on program reviews and institutional self studies. In fact, a better rationale for Exempt Status would be appreciated – other than experience.
- The expert conflict of interest policy should be amended to screen against selection of experts who have made negative comments in the 30-day web posting comment period. Currently, the conflict of interest policy dwells on personal but not professional conflicts of interest.
- Advance notice should be given of the pedagogical areas to be examined (as done by professional examining bodies like RNABC).

## **Conclusion**

FPSE appreciates the opportunity to provide feedback and suggestions for the improvement of the DQAB. As major stakeholders in the system, we look forward to participating more fully in the DQAB and we are willing to provide further input or assistance.