



Quality Assurance Framework British Columbia

Green Paper
March 2013

Executive Summary

British Columbia's post-secondary education system offers a range of education and training options for students. To establish quality education as B.C.'s competitive advantage, the province is strengthening quality assurance, which serves as the foundation of the post-secondary education system.

The Ministry of Advanced Education, Innovation and Technology (AEIT) began its review of the quality assurance framework in late 2011 with public consultations beginning in April 2012. During the first phase of the engagement process, students, stakeholders and the public provided feedback on the goals and objectives outlined in an initial discussion paper. Building upon the feedback, AEIT consulted further with stakeholders on specific ideas to improve quality assurance in B.C. including hosting half-day post-secondary education forums to facilitate discussions on quality improvement in the system. An expert advisory committee from the post-secondary system was formed to further advise the Ministry. The committee's expressed views and ideas of best practice informed the development of the proposals set out in this Green Paper.

AEIT's blueprint for improvement is outlined in this Green Paper. AEIT is proposing a quality assurance framework oriented towards continuing quality improvement that is simpler, more strategic, and provides greater flexibility. The reforms include a more comprehensive approach that affords general oversight of all institutions in the B.C. post-secondary education system, streamlined processes, and a "lighter touch" approach for institutions with mature quality assessment practices that are in keeping with the expectations of the Quality Assurance Maturity Model. In the Quality Assurance Maturity Model, the maturity and effectiveness of quality assessment and enhancement processes at an institution determines the level of institutional autonomy and independence from external oversight by the quality assurance governing body.

The new quality assurance framework would better assure students that the education promised to them is the education delivered and that the credentials they earn have value when seeking relevant employment or choosing to pursue further education. The student experience will be enhanced by providing students with data to make decisions about their educational choices, making it easier for students to have concerns relating to the quality of education addressed, and safeguarding tuition in the event of institutional closure.

Through this Green Paper, AEIT is once again inviting British Columbians to participate in government decision-making as we move towards the next stage in the development of policy and regulation as well as potential legislation in 2013.

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1. Introduction

This Green Paper highlights key proposals to improve the quality assurance framework for post-secondary education in B.C. as the system continues to grow and develop. Since the introduction of the current framework in 2003, the post-secondary environment has been typified by continually increasing numbers of education and training programs and expanding degree-granting capacity. In considering the changing environment over the past ten years, the Ministry of Advanced Education, Innovation and Technology (AEIT) began a review of the B.C. quality assurance framework for post-secondary education in late 2011. Several consultative opportunities confirmed that there are many good institutional quality assessment practices in the system and that the current framework has brought the B.C. post-secondary education system to a leadership position in quality assurance across the country and internationally. In order to maintain its leadership role, there is an opportunity to further advance best practices and standards within B.C.'s post-secondary education system.

The proposed quality assurance framework is a proactive approach to continuous quality improvement in B.C.'s post-secondary education system. B.C. is also in the unique situation of having a collaborative post-secondary system where it is possible to embrace opportunities that build on the strengths of different institutions and sectors to enhance system quality.

1.1 Purpose of Quality Assurance

B.C.'s post-secondary system is highly regarded and government must ensure the continued understanding and recognition of B.C. credentials and the mobility of graduates to pursue employment or further studies both in B.C. and around the world. The model proposed would strengthen quality assurance processes and practices, appropriately set and consistently apply standards across the post-secondary education system, and support quality assurance mechanisms such as institutional self-assessment and verification. These changes would benefit students and families, educational institutions, employers, citizens, and government.

Students and families would be better assured that the education promised to them is the education delivered and that the credentials they earn have value when seeking relevant employment and /or when they choose to pursue further education.

Post-secondary education institutions are operating in an increasingly global environment. The delivery of post-secondary education is complex and to remain competitive, institutions—in B.C. and elsewhere—are continuously adapting to changing technological and fiscal realities. Institutions also continue to deal with changing student expectations regarding how and when education is to be delivered. They would be expected to remain supportive of a labour market that continues to need skilled trades and technical personnel while it also transitions from a resource-based industry towards a knowledge-based economy and service sector. In this global

environment, institutions gain recognition and credibility through the demonstration of strong quality assessment practices that are externally validated by government or other competent authorities. The quality assurance framework must support innovation and diversity so that institutions can demonstrate excellence in education and educational outcomes.

Current or potential employers would be better assured that the post-secondary education system graduates students with the right mix of attitudes, skills and knowledge to meet employment needs. The *BC Jobs Plan* predicts that there will be over one million new job openings by 2020 and that an additional 18 percent of the population will require some post-secondary education to fill the upcoming vacancies.

Citizens would gain more assurance that public investment in post-secondary education is oriented toward achieving positive economic and social outcomes for all British Columbians. Public trust of the post-secondary education system increases when citizens derive benefit from the investments in post-secondary education and the value of post-secondary education is clearly articulated.

Government would have increased confidence that the best available evidence had informed its decisions and its policy directions were carried out with consistency and fairness across the post-secondary sector. Government's decision-making processes and the rationale for its decisions would be more transparent to ensure that the post-secondary sector and students have clear information to enable well-informed educational decisions.

1.2 Competitive Advantage

The *BC Jobs Plan* and the *International Education Strategy* confirm that B.C.'s quality education has a competitive advantage in the global marketplace. Students are increasingly mobile and have many educational choices within B.C., Canada, and internationally. B.C. can be proud of its rigorous quality assurance system and the value of a B.C. credential. The B.C. transfer system demonstrates a culture of system cooperation that also recognizes institutional differentiation, the value of program diversity, and transfer pathways. As B.C. enhances its competitive advantage, the province and the sector are able to build on established quality assessment practices that would strengthen the post-secondary education system as a whole.

Internationally, Canada is one of the top study destinations for international students. B.C. and Ontario attract the greatest number of international students, with each province taking turns being the top study destination in Canada. Recently, 90 percent of international students studying in B.C. rated the quality of education as important or very important to their choice of country for study (Citizenship and Immigration Canada, 2010). In 2011, it was estimated that there were 94,000 international students pursuing formal post-secondary education in B.C. This accounted for approximately 15 percent of the overall educational services in B.C. with a direct contribution

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equivalent to \$1.3 billion to the provincial Gross Domestic Product (Rosalyn Kunin & Associates Inc., 2011).

Citizenship and Immigration Canada's planned regulation changes to the *Immigration and Refugee Protection Act* that will have an impact on the International Student Program. Under the proposed changes, international students may apply for a study permit only if they have been accepted into an educational institution that is designated by the Province as meeting quality standards. B.C. has, for some years, focused on quality assurance and pathways for international students through the Education Quality Assurance (EQA) brand. Given the proposed changes to the International Student Program, it is the opportune time to enhance the quality of post-secondary education in B.C. through improvements to the system as a whole.

2. Case for Change

For B.C. to compete on the basis of quality post-secondary education, it is time to explore a quality assurance framework that is oriented towards quality improvement. To position B.C. as a centre of post-secondary educational excellence nationally and internationally, we need a framework that is:

- **more streamlined and easier** for students and families as well as other stakeholders to understand and for institutions and government to administer;
- **more strategic** to enable a differentiated form and level of external oversight reflecting demonstrated maturity of quality assurance practices; and
- **more flexible** to foster and recognize innovation in the system.

To enhance confidence in the quality of the post-secondary system in B.C., across Canada and internationally, the quality assurance practices outlined in this document are consistent with best practice in Canada and internationally.

2.1 System Evolution

There has been significant change in the system since 2003/04 when the current quality assurance framework was first implemented. The public system went through a period of reorganization with the establishment of new institutions, designation of some institutions as “teaching-intensive universities” and the amalgamation of institutions. In the private sector, there were four new B.C.-based degree-granting institutions and a decrease in the number of regulated institutions. The decrease was likely due to the deregulation of educational programs and the consolidation of some institutions. The number of career training institutions, for example, decreased, while the number of students studying at those institutions remained relatively steady.

Student mobility has continued to develop, and credit transfer pathway options have been expanding. The B.C. transfer system has admitted new private institutions following their successful completion of the degree quality assessment process and receipt of ministerial consent to offer an associate or higher degree program. As well, outside the transfer system, there has been more openness to student pathways between public and private institutions, especially regarding international and aboriginal students.

Table 1 Overview of the current system

11 Public colleges 7 Public teaching-intensive universities 4 Public research-intensive universities 3 Public institutes	435,045 total students in the public system. 1,900 total education and training programs in the public system.
17 Degree-granting institutions authorized under the <i>Degree Authorization Act (DAA)</i> <ul style="list-style-type: none"> • Public out-of-province institutions • Not-for-profit institutions • For-profit institutions 	7,400 total students in institutions authorized under the <i>DAA</i> . 66 total education programs in institutions authorized under the <i>DAA</i> .
330 private career training schools <ul style="list-style-type: none"> • Accredited institutions • Registered institutions 	51,000 total enrolments in accredited and registered institutions. 2,500 total programs in accredited and registered institutions.
13 private theological institutions ¹	Unknown number of students and programs.
Over 40 Aboriginal-controlled institutes	Unknown number of students and programs.
Unknown number of private language schools	Unknown number of students and programs.
Unknown number of private post-secondary academic (non-degree granting) institutions	Unknown number of students and programs.

2.2 Current Quality Assurance Framework

Quality assurance, as undertaken by government, provides the public with reliable information to indicate that educational programs meet generally accepted educational standards. It also serves students and their families by giving them confidence that institutions deliver on the education promised and that the credential has value. Quality assurance also helps align post-secondary education to the skills, training and attributes employers value.

The quality assurance system is a combination of legislation, regulation, and policy. Currently, there are four bodies that evaluate and monitor the quality of post-secondary education programs in the province:

- **Degree Quality Assessment Board**, an Advisory Board to the Minister;
- **Private Career Training Institutions Agency**, a Provincial Crown Agency;
- **Industry Training Authority**, a Provincial Crown Agency; and

¹ Canadian Pentecostal Seminary; Carey Theological College; Christ for the Nations Bible College; Columbia Bible College; Pacific Life Bible College; Northwest Baptist Seminary; Okanagan Bible College; Regent College; Seminary of Christ the King; St. Andrew’s Hall; St. Mark’s College; Summit Pacific College; Vancouver School of Theology

- **Ministry of Advanced Education, Innovation and Technology**, which evaluates institutions under the Accountability Framework as well as determines suitability for the EQA designation and StudentAid BC (SABC) designation.

The spectrum of quality assurance in B.C. includes a number of separate but related functions, including:

- **Degree authorization** – All institutions undergo an approval process in order to grant degrees and in order for private and out-of-province institutions to be designated a university in the province. The Degree Quality Assessment Board (DQAB) oversees the degree quality assessment process which requires all degree-granting institutions to undergo the same quality assessment process. The process includes a self-study and engagement of external expert reviewers. It also requires all institutions to meet the provincial standards of quality. Within this framework, there is recognition that some institutions have mature internal quality assessment policies and practices. Rather than duplicating the institution's effort in quality assessment, these institutions have exempt status and exercise autonomy and responsibility for program quality assessment and enhancement. These institutions are required to demonstrate a higher and long-standing level of internal quality assessment policies and practices. Currently, the exempt status review is a one-time review with no follow-up reviews. The DQAB also monitors private and out-of-province public institutions operating in B.C. by having yearly visits at select institutions as well as comprehensive reviews and re-approval every five years.
- **SABC designation** – The Ministry of Advanced Education manages all of the student financial assistance programs offered by the Province. Currently the student loan portfolio is valued at over \$900 million. Approximately \$229 million in loans is issued annually. Institution designation is the process through which post-secondary institutions become eligible for government financial assistance programs for students. BC public post-secondary institutions are designated through existing legislative authority. Private institutions must successfully complete a government-mandated quality assurance process, either the accreditation process under the *Private Career Training Institutions Act* or the degree quality assurance processes provided by the *Degree Authorization Act*, as well as be in compliance with the *StudentAid BC Policy*, to be designated. To ensure student and taxpayer protection, continued eligibility for SABC designation is assessed through various performance indicators including student loan portfolio performance, funded student performance and school performance.
- **EQA designation** - This represents the B.C. brand for quality post-secondary education. Established in 2009, it provides a standard trademark that signals the post-secondary institution has completed a government-recognized quality assurance process. The EQA designation is used to promote B.C. as an education destination of choice. The EQA successfully promotes the B.C. system, especially for smaller institutions that are not well

known. Some institutions have questioned its value, and there are certain reservations as to how meaningful EQA is as to whether a designated institution is indeed a quality one.

- **Career Training authorization** – The *Private Career Training Institutions Act* (2003) established the Private Career Training Institutions Agency (PCTIA) in 2004. PCTIA has authority to regulate private career training institutions² in B.C. Private career training institutions must meet Basic Education Standards as a condition of registration. Private career training institutions may also voluntarily commit to higher level standards to achieve accreditation with the agency. In 2011/2012, 50 percent of the PCTIA institutions were accredited. PCTIA carries out its powers and duties in the public's best interest.
- **Accountability Framework for Public Post Secondary Institutions** - The Accountability Framework is a set of performance measures used to assess the achievement of goals and objectives. The Framework guides the measurement of indicators that, for example, indicate whether students receive a quality education relevant to their needs and the needs of the labour market, and whether public post-secondary institutions contribute to the social and economic development of all B.C. residents.
- **ITA Credentials** – The *Industry Training Authority Act* (2003) established the Industry Training Authority in 2004 to lead and coordinate BC's skilled trades system. The ITA issues credentials and sets program standards for skilled trades training programs.

Each of the aforementioned bodies is responsible for a slightly different, yet related area of quality assurance. PCTIA deals with only private institutions and the DQAB works with public and private institutions. The DQAB examines the academic quality of degrees, while the AEIT considers labour market outcomes and financial sustainability. The different mechanisms provide varying degrees of rigour to ensure adherence to quality standards. There are also different tuition protection frameworks to ensure that students can continue their education in the event of institutional closure. The varying requirements could lead to complexity in processes at institutions that offer different types of programs. See Figure 1 for a map of the current quality assurance framework.

2.3 Lessons Learned

In the 10 years since the implementation of the current quality assurance framework, system quality assurance processes have grown increasingly complex. These processes require the same institution to participate in a number of quality evaluations facilitated by different bodies

² Career Training is defined as credentials at the non-degree level, described in the National Occupational Classification scheme as an occupation where the tuition is greater than or equal to \$1,000 and the program is longer than or equal to 40 hours.

with different objectives. The new quality assurance model eliminates these redundancies and draws upon lessons learned from the past to inform opportunities for improvement.

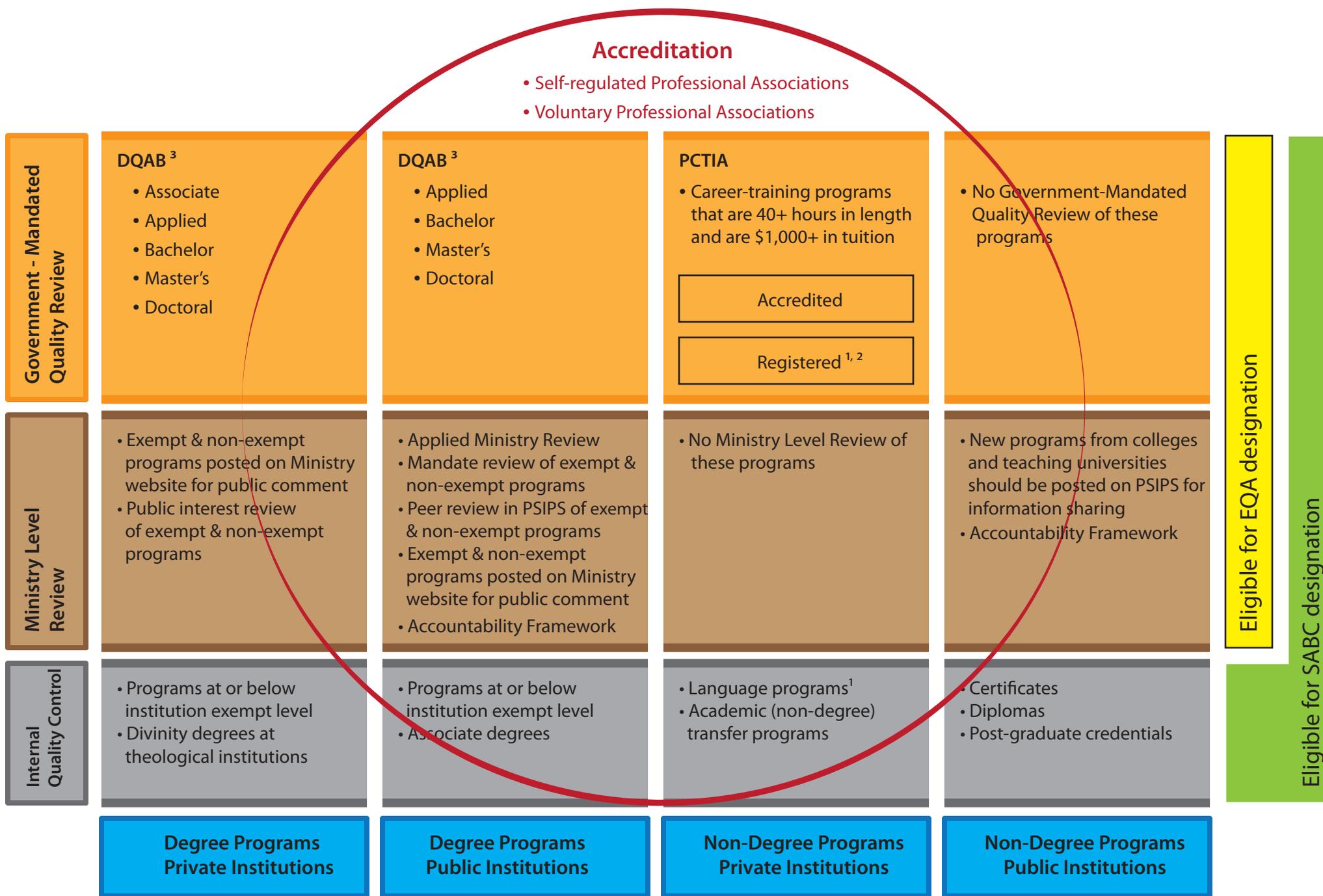
The reforms to quality assurance in B.C.'s post-secondary quality assurance policy have the potential to establish:

- a more coordinated approach to quality assurance of programs and institutions;
- coordination of different mechanisms that currently have differing degrees of rigour to ensure comparable quality standards across the system;
- a transparent system that includes a decision-making rationale and provides clear and complete messages;
- alignment of programs and strategic direction across the system in keeping with institutional mandates;
- consistency of reporting requirements and data collection; and
- processes to enhance government's ability to meet obligations and facilitate broad recognition of BC credentials and quality assurance practices.

There is an opportunity to enhance the system for post-secondary education institutions and other stakeholders as B.C. addresses a changing post-secondary environment. Students and the public can develop a clearer understanding of the quality assurance system. To understand the current system, one must navigate between:

- multiple regulatory bodies recognized by government;
- EQA designation and SABC designation granted by government;
- professional and industry association "accreditation" that can be confused with government validation; and,
- some institutions operating with legislative authority while others do not.

Figure 1: Quality Assurance Framework



Notes:

¹ Not eligible for SABC designation

² Not eligible for EQA designation

³ Review all non-exempt programs and exempt programs only if referred by the Minister.

Legislative Acts	<p>PRIVATES (18)</p> <ul style="list-style-type: none"> • Degree Authorization Act • Private Career Training Institutions Act • Pacific Coast University of Workplace Health Sciences Act • Sea to Sky University Act (Quest University) • Trinity Western University Act 	<ul style="list-style-type: none"> • Canadian Pentecostal Seminary Act • Carey Hall • Christ College of Canada Society Act • Columbia Bible College Act • Northwest Baptist Theological College Act • Okanagan Bible College Act • Pacific Life Bible College Act 	<ul style="list-style-type: none"> • Regent College Act • Seminary of Christ the King Act • St. Andrew's Hall Act • St. Mark's College Act • Summit Pacific College Act • Vancouver School of Theology Act 	<p>PUBLICS (4)</p> <ul style="list-style-type: none"> • University Act • College and Institute Act • Royal Roads University Act • Thompson Rivers University Act
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In some of these cases, government validates institutional programs and in other cases, there is only the perception of government validation. For example, a common assumption is that all institutions operating with legislative authority are evaluated and monitored for program quality. This may not be the case, and neither is it the case that if a program or institution is accredited, it is recognized by government as offering quality programs. Confusion about how the quality assurance system works complicates students' ability to make informed decisions on the quality of a particular program or institution.

For institutions, administrative inefficiencies can potentially be streamlined through policy or regulation change. This benefits institutions by leading to process timeliness and cost benefits without compromising quality for students.

The current quality assurance framework is effective and has ensured that, since 2003/04, the quality of educational programs in most institutions has been maintained or enhanced. It is the opportune time and climate to continue the evolution by making improvements that are consistent with good practices, relevant to the B.C. environment, and facilitate quality enhancement for the system as a whole.

3. Review of Quality Assurance Framework

In late 2011, AEIT initiated an internal review of the quality assurance framework for post-secondary education with the intention of improving institutional quality as well as improving administration of the quality assurance framework. The review identified gaps in the regulatory system that put students and the reputation of B.C.'s post-secondary education system at risk and inefficient processes that could be improved upon. AEIT observed that institutions faced a number of different evaluations of quality, facilitated by different bodies with differing objectives.

Beginning in April 2012, AEIT engaged with students, stakeholders and the public on the goals and objectives outlined in an initial discussion paper. Building upon the feedback, AEIT consulted further with stakeholders on specific ideas to improve quality assurance in B.C. including hosting half-day post-secondary education forums to facilitate discussions on quality improvement in the system.

During the summer and fall of 2012, AEIT reviewed over 100 submissions from institutions, students, associations and private individuals and met with over 100 practitioners from the higher education community. The views and ideas received during this consultation period have informed the development of the framework set out in this Green Paper.

Several suggestions were consistently made:

- apply quality assurance across the broad spectrum of institutions and programs in the post-secondary education system;
- make standards, criteria and processes transparent;
- recognize diversity and differentiation in the system;
- focus on increasing efficiency and effectiveness of quality assurance processes; and
- build on the strengths of the current system.

Finally, the consultations indicated the need to engage effectively with the system and partner with institutions in the development of the quality assurance framework.

As well, AEIT considered previous government reports and research relevant to quality assurance, such as:

- ***Degree Process Review Report*** (Stubbs Report) (2011) - Through extensive consultation with stakeholders, the report provides 35 recommendations with the themes of greater transparency, consistency, data collection, process improvements, system coordination and periodic institutional reviews.

- ***Private Career Training Institutions Act Review*** (Watson Report) (2008) – An independent review of the *Private Career Training Institutions (PCTI) Act* was undertaken in the summer and fall of 2007. In addition to enhancing outcomes-based quality assurance and institutional commitment to continuous improvement, the final report recommends streamlining policies, procedures and practices between the PCTI Act and the *Degree Authorization Act* and exploring the potential for a single act.
- ***Canadian Degree Qualifications Framework - Council of Ministers of Education, Canada (CMEC)*** (2007) - The framework describes degree categories and sets out degree-level standards. This framework provides a context for identifying how degree credentials compare the levels and standards among jurisdictions. The intent is to facilitate continuous improvement, educate and train an internationally competitive workforce, and foster international recognition of the quality of Canadian credentials.
- ***Campus 2020: Thinking Ahead Report*** (2007) – The report on higher education in B.C. notes that concern for quality applies to degrees and other credentials and to both public and private institutions. It recommends comprehensive and comprehensible mechanisms for quality assurance.
- ***Designation Policy Framework – Intergovernmental Consultative Committee on Student Financial Assistance*** (2007) - The Framework provides a guide for establishing a common approach to the designation policies implemented in each jurisdiction across Canada. The Framework is guided by four principles: taxpayer protection; accountability and informed choice; consumer protection; and complementarity to other postsecondary education policies.
- ***Organization for Economic Co-operation and Development (OECD)/United Nations Educational Scientific and Cultural Organization (UNESCO) Guidelines for Quality in Cross-Border Education (2005)*** – The Guidelines provide an international framework to protect students and other stakeholders from low-quality provision when operating in another country. As Canada is a member of the OECD, there is an expectation that member countries adopt the guidelines and abide by them.

This Green Paper is the B.C. government's initial response to the feedback from the consultations and sets out the fundamentals for change. In addition to respondents through the consultation process to date, the Assistant Deputy Minister Expert Advisory Committee ("Committee"), established in October 2012, is also providing valuable expert advice to the Ministry on several improvements outlined in the Green Paper.

4. Principles of the New Quality Framework

AEIT proposes a path forward that continues to build on the strengths of the system and the knowledge of quality assurance within institutions. The culture of quality improvement across the system is at various levels of understanding and application. Some institutions in B.C. have mature internal quality improvement practices with over 50 years of experience and have the opportunity to model best practices for institutions that are newer in the sector. A logical next step for the evolution of the quality assurance framework is to adopt a “lighter touch” approach to external oversight for institutions demonstrating mature policies and practices for quality assessment and improvement while promoting and enabling continuous quality improvement for the remaining institutions.

When designing the new quality assurance framework, the following principles were applied:

- The quality assurance framework facilitates the process of quality improvement in the institutions and the system. The framework enables continuous improvement at the institutions by incentivizing good practice and therefore elevating system quality.
- The quality assurance framework requires a minimum administrative burden on institutions and government necessary to achieve the quality assurance goals. Evaluation and approval processes are timely, streamlined and draw upon institutional processes when practical, to minimize the costs to institutions and to government.
- The quality assurance framework works within the context of the institutional mandate as defined by government and the institution, and respects the rights and privileges of institutions. Fidelity to mandate allows institutions to leverage those program areas in which they excel. Coordination of institutions and programming, where appropriate, helps to ensure that students have reliable access to relevant programming.
- The quality assurance framework is based on the maturity of institutional quality assessment policies and practices, reflecting the whole spectrum of quality within the institution, including academic and administrative quality and fulfillment of institutional mission and mandate. Institutions that demonstrate maturity through a history of strong quality assessment would be externally reviewed with less intensity and less frequency. The opposite holds true for institutions that do not have a strong history of verifiable practices.
- The quality assurance framework follows good practice to facilitate national and international recognition. As education becomes more internationalized, so do expectations of an improved post-secondary quality assurance framework. With more international and domestic students studying in B.C., it is important that the education

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received here is recognized by other jurisdictions, that the standards are clear and understandable, and that institutions are meeting Provincial standards. As all institutions in B.C. are not well known internationally, other jurisdictions will look to external validation either from government or from a government recognized quality assurance body.

5. Desired State

In the desired state there is a common, coherent framework that accommodates the spectrum of institutions in the differentiated and diverse B.C. post-secondary education system. The framework covers both public and private post-secondary institutions and requires that all institutions undergo quality assurance processes using clearly articulated standards and criteria that are appropriate to the institution’s mission and mandate. Equitable treatment of institutions engenders public and institutional trust that the assessment and outcomes are fair and that the processes and procedures facilitate consistent decision-making.

In the desired state, the framework is overseen by a single quality assurance structure that relies on expert judgement to conduct institutional and program evaluations using well specified and transparent measures of quality that support a differentiated and diverse system. The evaluation criteria are consistently applied and transparent, to the point where institutions can predict the result before they are externally evaluated. Evaluations are evidence-based and the results inform multiple decisions such as SABC designation, EQA designation and the ability to enrol international students.

Table 2: Current State vs. Desired State

CURRENT	DESIRED
Multiple structures with different mandates	Single quality assurance structure
Multiple evaluations with multiple criteria	Clearly articulated criteria that accounts for differentiation and diversity in the system
Multiple processes	Streamlined processes
Variable reporting requirements	Unified reporting requirements
Multiple definitions of “quality”	Common definition of quality that reflect a differentiated and diverse system
Unclear, potentially inconsistent processes	Transparent processes
Different frameworks for different types of programs and institutions	Common framework accommodating a differentiated and diverse system

Quality assurance will focus on ensuring four areas of quality:

1. **Academic Quality**

In assessing academic quality, evaluations would focus on whether the institution has appropriate policies and procedures for program quality assessment and applies them consistently; whether the institution has the faculty and staff to deliver the proposed program; and whether the institution has the support services and infrastructure to facilitate student success.

2. **Operational Capacity**

In assessing operational capacity, evaluations would focus on whether the institution has appropriate and well functioning governance structures and the financial resources to sustain quality programs.

3. **Student Experience**

In assessing this dimension of quality, the focus would be on the relevance of the skills and knowledge they gained, student satisfaction with the quality of instruction they received, and the impact of their education on their labour market outcomes.

4. **Fit with Mission and Mandate**

In assessing this dimension of quality, the focus would be on fidelity to mission and mandate, as established jointly by the institution and government.

It will be the responsibility of the quality assurance body to assess academic and operational quality, as it is appropriate to the predetermined mission and mandate of the institution. In the desired state, institutional mission and mandate is a negotiated agreement between government and the institution. The institution agrees to leverage its areas of excellence by undertaking program expansion within the parameters of its mission and mandate. Government assesses mandate alignment for new programs but will not make judgments on the academic or operational quality.

6. Comprehensive Oversight

The new quality assurance model would be applied to the entire post-secondary education system with some adjustments being made to reflect the diversity of the system. This is in keeping with feedback received during the consultations where the post-secondary education system stated clear support for all types of institutions offering post-secondary education to fall within the government mandated quality assurance framework. Under the new framework, students can be assured of their rights and be assured of the validity of their credentials.

The system, as a whole, benefits when all institutions engage in good quality assessment practices. AEIT proposes that the quality assurance framework include these sectors:

- Public post-secondary institutions;
- Private degree-granting institutions;
- Private career training schools;
- Private theological institutions;
- Private language schools;
- Private post-secondary academic (non-degree granting) institutions; and,
- Aboriginal-controlled institutes.

There would be equitable treatment of the sectors, but evaluations and processes would reflect differentiation and diversity in the system. Evaluations would be evidence and expert based, as appropriate to the program, the institution's mission and mandate, and the sector. Evaluation results would reflect the institution's demonstrated quality.

7. Alignment with Mandate

As the single most important investor in public post-secondary institutions and a substantial source of funding for private post-secondary institutions, government has an obligation to ensure public accountability, responsible stewardship and continued confidence in the system and its capacity to meet the social, economic and educational needs of British Columbians. A diverse and differentiated post-secondary education system ensures that a broad range of educational choices and opportunities are available to learners in various stages of their lives.

The institution's mission and mandate establishes the parameters within which the quality assurance body assesses the institution's academic and operational quality. In the public system, the mandate may exist partly in legislation and partly in government guidance. In the private sector, mandate derives from the regulatory process that verifies the quality of a specific educational program. Fidelity to mandate across the post-secondary education system provides a diverse range of educational options and elevates system quality by allowing institutions to focus on program areas where the institution has demonstrated capacity and excellence.

8. Quality Assurance Maturity Model

The heart of the quality assurance framework is the Quality Assurance Maturity Model, which demonstrates organizational commitment to quality assurance. Maturity, as a measure of an organization's capabilities for quality improvement, has its basis in the Capability Maturity Model (CMM) developed by the Software Engineering Institute at Carnegie Mellon University. Maturity is defined as "the extent to which a specific process is explicitly defined, managed, measured, controlled, and effective" (Paulk, Curtis, Chrissis, & Weber, 1993, p. 4). The model describes a developmental path that begins with ad hoc, immature processes and ends with mature, disciplined processes. Institutional maturity increases as organizations *institutionalize* their processes via policies, standards, and organizational structures. Transition from one level of maturity to another is incremental, with each level of maturity providing a foundation to support successive improvements. CMM has been adapted and applied in numerous other fields (see for example Maier, Moultrie, & Clarkson, 2012).

AEIT would adopt the fundamental concepts of CMM, specifically the concept of organizational maturity and a five-level framework, and adapt them for the B.C. context. In the Quality Assurance Maturity Model, the maturity and effectiveness of quality assessment processes at an institution determine the level of institutional autonomy and independence from external oversight by the quality assurance governing body. An institution's maturity level is a reflection of the maturity of its policies and practices in quality assessment and improvement, rather than a reflection of how long the institution has been operating. The quality assurance body would administer the model and undertake assessments of academic and operational quality against the institution's predetermined mission and mandate.

Post-secondary institutions would participate in a self-study process that promotes self-awareness and enables continuous improvement. Participating in these processes would enable B.C. post-secondary education institutions to realize their potential for excellence. By assessing their current state, institutions would be encouraged to measure and promote quality and strive for best practice and continuous commitment to quality. It is expected that there would be post-secondary institutions that have varying degrees of quality that range from a lack or minimal awareness of quality assessments to best practices. Some institutions would be in the defining quality phase, some identifying approaches to measuring quality and some critically comparing themselves against higher education quality throughout the world.

Institutions would undertake a self-assessment to ascertain their level of current practice:

Level 5 Best Practices in Quality Assurance

- I. Organizational focus is on regular reviews of quality assessment processes and other related processes to ensure coherence and continuous quality improvement.

- II. Organization engages in proactive problem identification with a focus to improving process effectiveness through the use of quality improvement metrics and benchmarking against world institutions.
- III. A culture of quality and quality improvement is embedded in the institution.
- IV. Quality assessment of programs is comprehensive, periodic, follows established processes and is externally validated. Institution continually engages in comprehensive program renewal.

Level 4 Good Practice in Quality Assurance

- I. Organizational focus is on systematic application of quality standards, processes and practices.
- II. Organization establishes quality improvement metrics and engages in proactive problem identification.
- III. Responsibility for quality assessment is organization-wide with accountability structures to evaluate and execute established processes.
- IV. Quality assessment of programs is periodic, consistently follows established processes and is externally validated. Institution engages in program renewal.

Level 3 Maturing in Quality Assurance Practices

- I. Organizational focus is on refining and documenting internal quality standards and goals, processes and practices.
- II. Organization engages in primarily proactive problem solving to seek quality improvements.
- III. Responsibility for quality assessment is centralized within the organization and becoming more systematic.
- IV. Internal institutional quality assessment of programs is primarily driven by key quality indicators established by an external body.

Level 2 Basic Awareness of Quality Assurance Practices

- I. Organizational focus is on defining internal quality standards and goals, processes, and practices.
- II. Organization engages in primarily reactive problem solving, often in response to a regulatory body.
- III. Responsibility for quality assessment is dependent upon the individual.
- IV. Institutional quality assessment of programs is inconsistent.

Level 1 Lack or Minimal Awareness of Quality Assurance Practices

- I. Organizational quality processes and practices are informal and ad hoc.
- II. Organization engages in reactive problem solving, often in response to a regulatory body.
- III. Responsibility for quality assessment is informal and is dependent upon the individual.
- IV. Institutional quality assessment of programs is ad hoc.

Key Practices that Influence Maturity Level:

- Self-evaluation and external quality verification;
- Involvement of external experts;
- Internal and external stakeholders are included in the quality assessment and quality improvement processes; and
- Ability to achieve recognized accreditation or certification for professional programs.

As shown in Figure 2, the model instills continuous improvement and provides incentives, such as access to SABC, to institutions that demonstrate a commitment to quality.

8.1 Quality Assurance Review

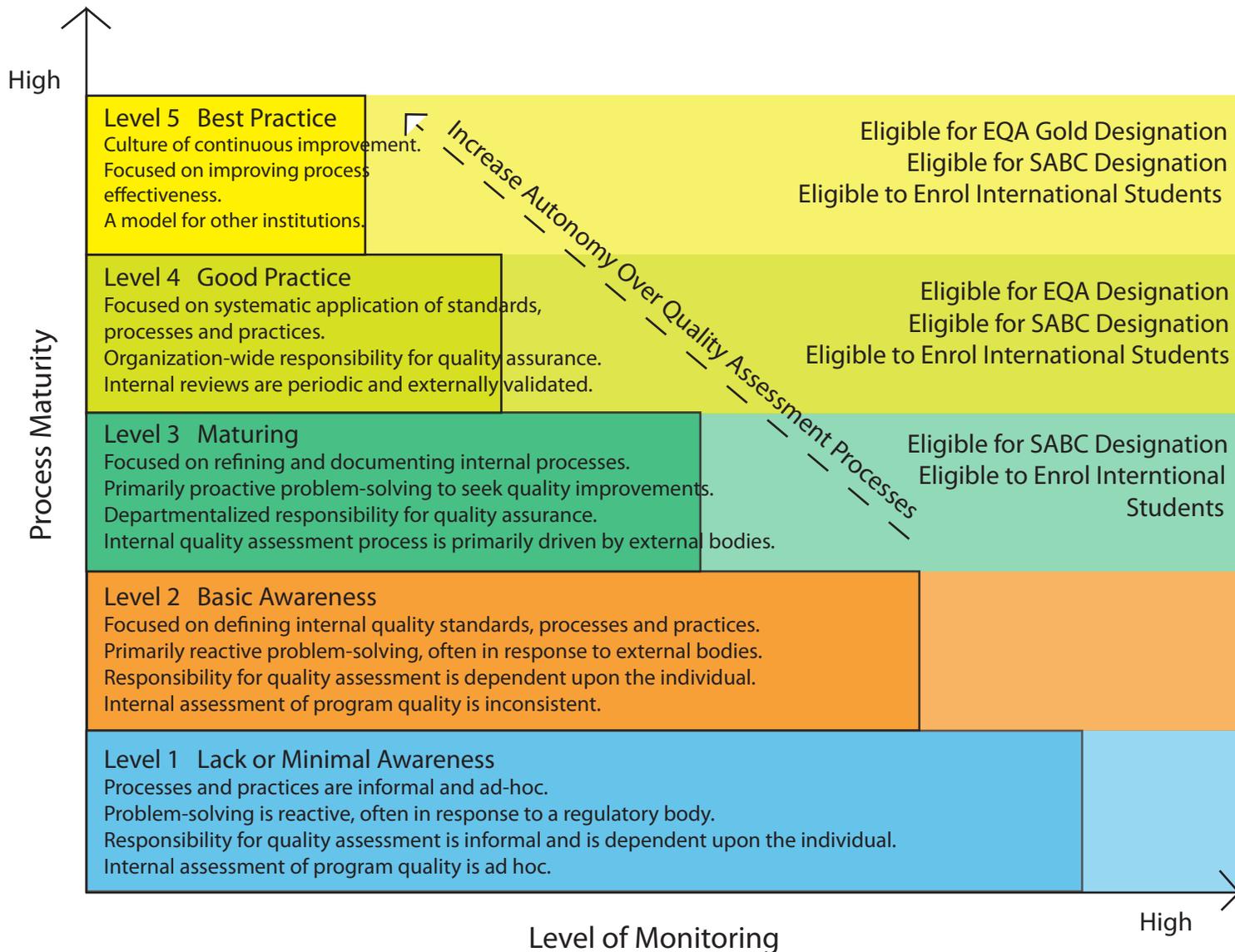
The institution's maturity classification would determine the degree and frequency of external oversight. The quality assurance review process would be based on an evaluation framework. The maturity level of an institution's quality assessment processes and practices would impact both the type of program review and the number of reviews the institution could face. Institutions classified at and progressing to the highest maturation levels would gain greater autonomy and responsibility for program quality assessment.

The proposed levels of evaluation for each maturity level are:

Level 1 and Level 2 Institutions: For these institutions, the emphasis would be on monitoring and reviewing the institutions themselves rather than simply monitoring the internal quality assessment processes and practices. Programs will require quality approval and would be periodically subject to re-review.

Level 3 Institutions: Level 3 institutions, after the initial program approval, would face a process review rather than a program review. These institutions have an internal quality assessment process with some processes for external feedback and verification of quality. However, these processes are not as robust as those institutions in the upper levels, thus the review for these institutions would be more frequent process reviews. Institutions in this level would begin to see a reduction in costs associated with external monitoring.

Figure 2: New Quality Assurance Framework



Level 4 and Level 5 Institutions: Level 4 and 5 institutions would face a process review rather than a program review. As these institutions have mature internal quality assessment processes and practices with well-developed systematized processes for external review and verification of quality, they would face low frequency periodic reviews of their internal quality improvement processes and periodic checks of completed program reviews. These periodic checks would be random, focusing on a certain percentage of completed program reviews every period. The periodic checks would assess the suitability of the institution's internal review processes but would not second guess the review itself. Institutions in these levels would have minimal costs for external quality evaluation.

8.2 Guiding Principles

To guide systematic decision-making, the Assistant Deputy Minister Expert Advisory Committee developed guiding principles to consider when implementing the maturity model. Policies, processes and procedures should be:

- Efficient, timely and effective;
- Transparent at the level of institutions and the quality assurance regulatory body;
- Encouraging and rewarding continuous quality improvement;
- Fair, inclusive and equitable within shared general guidelines for quality assurance practices and standards by respecting different institutional roles, mandates, and capacities;
- Flexible in responding to change, allowing innovation, and recognizing a diversity of institutional approaches;
- Conducive to recognition of credentials by educational institutions and the marketplace (i.e., employees, employers and professional associations) in B.C., Canada and internationally;
- Rigorous in application and reinforcement of quality standards across the system; and
- Guided by best practices in quality assurance, nationally and internationally.

8.3 Maturity Categories

The Committee agreed that institutions should be assessed in areas that are determined to be critical for ensuring institutional ability and capacity to deliver quality programs. Government would use the results of an externally validated self-study report compiled by the institution to determine the level of an institution's quality assurance maturity. An evaluation model would promote good practice in institutional quality assessment, management and improvement. Each set of metrics, using academic and financial measures, provides a different view of the institution.

The Committee proposed the following categories and objectives be used for evaluating institutional maturity:

1. Program Quality

Objective:

- *Institution has strong internal program quality assurance policies, structures and processes for program design, implementation, review and enhancement.*

2. Faculty and Staff

Objective:

- *Institution has the human capital to achieve its mandate and mission.*

3. Governance

Objective:

- *Institution has the governance structure and processes to enable provision of quality education.*

4. Students

Objective:

- *Students are appropriately recruited and receive the education articulated by the institution and are supported to succeed.*

5. Innovation and Change Management

Objective:

- *Institutions are proactive in enhancing educational quality and relevance.*

6. Sustainability

Objective:

- *Institution has the financial resources to implement and maintain high quality programs.*

7. External Stakeholders

Objective:

- *Stakeholders benefit from the social and economic outcomes of higher education.*

Figure 3: Categories of Maturity Assessment



Using multiple measures would help both the institution and the quality assurance body recognize successes and shortcomings. It is anticipated that each institution’s performance would reflect its areas of strength as well as identify areas that require improvement. The results could be used by institutions as a guide for continuous quality improvement. As a monitoring tool, it would provide external accountability by communicating to internal and external stakeholders how the institution translates its mission into practice.

Institutions would continue to define and implement their own internal quality assessment and improvement processes in accordance with their mission and institutional culture. Also, in keeping with their maturity classification, all institutions would undergo assessment or monitoring based on common standards and criteria that are adaptable to the diverse and differentiated contexts of individual institutions. A coherent framework would enable good practices in B.C.’s post-secondary education quality assurance and mitigate high risk practices that might lead to institutional failure or damage to the reputation of the system.

9. Designation and Accreditation

The framework would base eligibility for EQA designation and SABC designation on the institution's maturity classification. The framework also builds in designation to enrol international students with eligibility based on the institution's maturity classification (see Figure 2). This supports changes to the federal government's International Student Program, which require the provinces and territories to designate institutions eligible to enrol international students and only students attending designated institutions will be issued a student visa.

Beginning at Level 3, institutions automatically qualify for SABC designation and designation to enrol international students. Beginning at Level 4, institutions automatically qualify for EQA designation. The model streamlines the processes for determining designation thereby reducing the regulatory burden for institutions and lessening the administrative effort for AEIT.

Throughout the consultation process, institutions voiced a desire for accreditation to signal that an institution has successfully completed the recognized quality assurance process. Previous government reports, *Campus 2020* (2007) and the *Degree Process Review* (2011), have also raised the issue of accreditation and the need to explore an accreditation system for B.C. An accreditation process may eventually be built into the quality assurance model where the length of institutional accreditation can be tied to the level of institutional maturity in quality assessment. Additional discussion is needed to explore this idea.

10. Qualifications Framework

B.C. post-secondary system degree level credentials (associate degrees through doctoral degrees) already follow well-established general credit and outcomes guidelines that are in keeping with the Council of Ministers of Education, Canada (2007) *Ministerial Statement on Quality Assurance of Degree Education in Canada*. Shared understanding and implementation in practice across B.C. institutions have helped to facilitate a well-articulated system for degree level education. AEIT has begun working with the system to develop general credit and outcomes guidelines on a system-wide basis for the broad range of certificates and diplomas that are available. The guidelines have been developed to provide greater understanding about the credentials, their primary purposes, range of duration, and intended outcomes.

To help clarify credential entry and exit points and program progression pathways across institutions and sectors where appropriate, and to enhance understanding of B.C. credentials outside our jurisdiction, AEIT is working with institutions and other stakeholders to develop a framework for recognition of general outcomes achieved by sub-degree level post-secondary credentials in B.C. An integrated Qualifications Framework would add the guidelines and outcomes that are developed for sub-degree credentials to those existing for degree-level education in order to provide a comprehensive overview of B.C. post-secondary credentials.

11. Student Protection

There will be a continued commitment to strong student rights and safeguards. In the maturity model, monitoring and enforcement efforts focus on institutions at lower levels of the Quality Assurance Maturity Model to ensure these institutions have the capacity to deliver the educational programs articulated in their public materials. While external oversight for institutions with more mature quality assessment practices will be less intensive, they will need to demonstrate that their programs continually meet or exceed Provincial quality standards.

AEIT will propose basic principles for tuition refund policies across the entire post-secondary education system. Students attending public institutions are assured of tuition protection in the case of institutional closure given public stewardship of the post-secondary education system. 23 of the 25 public post-secondary institutions are insured through the Province's overall insurance program offered by the Ministry of Finance. The remaining institutions participate in a cross-Canada insurance program with other universities. These programs offer the types of insurance coverage required in the day-to-day operations of public post-secondary institutions, and therefore, institutions generally do not need additional insurance coverage.

To provide students in the private post-secondary education system with an equivalent level of tuition protection in the case of institutional closure, a sector fund consisting of contributions from private post-secondary institutions will be continued in the new quality assurance framework. All private institutions under the new Quality Assurance Framework, such as theological institutions, private language schools, Aboriginal controlled institutes, private post-secondary academic (non-degree granting) and private career-training institutions, will contribute to the sector fund. Students attending these institutions will have their tuition protected in the event of institutional closure. Claim processes for the sector fund will be transparent and timely, and eligible students can request a partial or full tuition refund in the event of an institution's closure prior to program completion or if the institution has been found to have misled the student. In the case of institutional closure, students will also be assisted in finding an alternative institution to complete their program to mitigate the student's lost time and money.

To secure student tuition, an "insurance model" would be used where private institutions would contribute a percentage of tuition revenue into a sector fund. A single model for tuition protection would streamline the financial protection for students by expanding the insurance model under the *Private Career Training Institutions Act* to apply to institutions under the *Degree Authorization Act* as well as to institutions that were not previously regulated. Currently, there varying levels of tuition protection for students depending on the type of educational program (see Table 3).

Table 3: Current Tuition Protection for Students

	Financial Instrument		Tuition Protection	
	Student Tuition Completion Fund (“insurance model”)	Bond	Tuition Refund Institution Closes	Tuition Refund Student is Misled
<i>Private Career Training Institutions Act</i> Career-Training Institutions	✓	✗	✓	✓
<i>Degree Authorization Act</i> Private Degree-Granting Institutions	✗	✓	✓	✗
Private Language Institutions & Other Unregulated Institutions	✗	✗	✗	✗

Under the new model, students attending a private post-secondary education institution can expect consistent standards of tuition protection and expect timely tuition refunds, which is not the case currently with the bonding mechanism under the *Degree Authorization Act* or no regulated tuition protection for students studying at English as a Second Language schools.

Streamlining the financial protection requirements is also advantageous to institutions. Institutions that offer both career and academic programming will realize reduced administrative costs and burdens. Private degree-granting institutions will not have their assets tied up as can be the case with the current bonding mechanism under the *Degree Authorization Act*. Under the new model, all private institutions would be expected to meet the same provincial standards for tuition protection. A single model of administering tuition protection supports consistent decision-making for students and institutions, making BC a more attractive destination for learners and businesses.

In keeping with the maturity model, institutions’ contributions to the fund would recognize the institution’s demonstrated commitment to quality. Institutions would contribute a percentage of tuition revenue to the fund; however, institutions at higher maturity levels would contribute at a discounted rate that reflects the maturity of the institution’s quality assessment and improvement processes. As institutions’ quality assessment and improvement policies, standards and practices mature, the financial contributions and compliance costs would reduce, providing incentives for continuous improvement of the sector.

Protections for international students would be enhanced by expanding the regulatory scope to include a broader range of institutions, such as private language schools where the majority of international students are enrolled. Under the new model, private language schools would

meet Provincial standards of quality and would be held to Provincial standards for protection of student tuition. In addition, only institutions that demonstrate at least a Level 3 maturity would be designated by B.C. as eligible to enrol international students in order to ensure international students have the best possible education experience.

Public and private institutions would also be expected to have a complaint process that is easily accessible to students and clearly outlines the process to resolve complaints relating to the quality of education that is delivered. The complaint process will be underpinned by commonly agreed upon principles and informed by best practices found in the BC post-secondary education system. Students, regardless of the institution they are attending, will have a mechanism at the institution to have their concerns addressed. Beginning in 2013, students will also have access to a comprehensive website that outlines clear information on the avenues available to students should they have concerns regarding the quality of their post-secondary education. The website will cover all types of institutions and provide links to avenues for assistance at each institution, making it easier for students to pursue resolution to their concerns.

12. Governance

In June 2012, the Ministry sent consultation workbooks to approximately 395 stakeholders. Included in the guide were specific questions regarding the possible structure of a new governance body to administer the quality assurance framework. The comments received indicated that a single structure would be most effective.

The general principles relating to the capacity and structure of the program quality review are:

- A program review body with an internal structure reflecting sector differentiation.
- A balance of expertise across the various educational sectors, with sufficient degree of sector-specific and degree-level appropriate expertise, to provide oversight for each sector/type of program.
- A variety of expertise at various program or credential levels, that is also reflective of the diverse B.C. post-secondary system.
- Broad understanding of the post-secondary system, specific programs and sectors.
- Access to outside expertise as required.

In addition, government has a clear need to review programs with respect of institutional mandate and provincial need.

12.1 Responsibility of Government

A key consideration in determining a governance structure for quality assurance is the role and responsibilities of government in ensuring standards and operations are in the public interest.

The following are government's prime objectives for a new Quality Assurance Framework and governance structure:

- **Efficient processes streamlined with related government functions** - Government determines suitability for other designations or benefits provided to the institution such as EQA designation, SABC designation and designation to enrol international students. The goal is to build the framework so that the objectives of related reviews are encompassed under a single framework.
- **Public interest served in the setting of policy, standards and indicators** – Strengthening quality across the post-secondary education sector requires government to set policies, standards and indicators to ensure that the public interest is served.
- **Neutral evaluative and decision-making processes** – The Quality Assurance Framework must meet international expectations and respect the academic independence in knowledge development within institutions. The process of review must be expert-led, transparent and neutral.

- **Reasonable, incentivizing costs to institutions** – The governance structure operates effectively while ensuring the reasonableness of financial costs to the institution. The funding model would be based on the graduated maturity model. Institutions with mature quality assessment practices would have lower fees and costs, while institutions with developing quality assessment practices would have relatively greater costs.
- **Investigation, audit and regulatory decisions effectively carried out** – The continued success of the Quality Assurance Framework requires effective monitoring and reviews on a regular basis and more substantive investigation when necessary. Generally, the depth and breadth of reviews would be relative to the maturity level of the institution.
- **Operations primarily focus on the benefits for students and the public interest** – Students have the benefit of information to make their educational choices and receive the education promised for personal learning and expertise. In addition, benefits are realized by their families, their employers and society.
- **Maintain appropriate levels of institutional autonomy** – The legislative rights and privileges of institutions would continue to be respected under the new Quality Assurance Framework.

12.2 Governance Structure

Governance of the new Quality Assurance Framework will involve cooperation between government and a program review body.

Government would:

- Ensure that government's key objectives are accomplished by setting policy, standards and indicators that institutions are required to meet in the maturity model.
- Establish the quality assurance maturity level of individual institutions.
- Set broad mandates for public institutions and ensure effective system coordination in the delivery of post-secondary programs.

A program review body would:

- Review institutions against government's established standards and advise government and the institutions of the results.
- Provide sound advice and recommendations to government for decision. Membership would be comprised of individuals who have demonstrated a commitment to the principles and practices of quality assurance in post-secondary education.

12.3 Financing

A cost neutral model would be most effective to implement a system that enhances and strengthens quality assessment practices across the post-secondary education sector into a

unified quality assurance system. For government, this model signifies the best fit for success, and would ease implementation and review going forward. In addition, this model helps the system realize efficiency, consistency, financial prudence and transparency.

Ministry staff would continue to establish policy, review programs for system coordination and institutional alignment with mandate, establish institutional maturity levels and make recommendations to the Minister for final decision.

The new framework would operate as a user-pay system where fees would be collected for operational purposes, including program reviews. The amount of costs recovered from the institution may vary by maturity classification. This would provide incentives for institutions to voluntarily develop their quality assessment processes in order to lower the level of external monitoring and related costs. This cost neutral system that generates revenue through user-pay would help the system realize efficiencies, consistencies and accountabilities

13. Next Steps

Government has been holding conversations with British Columbians on how to ensure quality in our post-secondary education since spring of 2012. Stakeholder views and ideas were used to inform development of the new framework outlined in this Green Paper. The Ministry is now preparing for implementation of the new quality assurance framework.

Beginning in March 2013, the Ministry will undertake consultations to gather feedback and input on the Green Paper and implementation of the new quality assurance framework. Stakeholder input will be used to inform policy directions and possible legislation in fall 2013. It is expected that the ministry will complete work on the new quality assurance framework during the summer of 2013. A phased implementation of the framework will begin in fall 2013.

13.1 Stakeholders

Development and implementation of the new quality assurance framework is dependent upon the involvement of the stakeholders. Stakeholders will be invited to directly participate in consultations and ministry staff will continue to meet with the sector. Stakeholders will be kept informed about the progress and developments of the consultations, and development and implementation of the quality assurance framework. Stakeholders will be consulted at the executive level, the institutional level, and the individual level.

14. Glossary

Accreditation: The process of external quality review used in higher education to scrutinize colleges, universities, and higher education programs for quality assurance and quality improvement. Success results in an accredited institution and/or program.

In the BC context, accreditation is used by the Private Career Training Institutions Agency (PCTIA) and by the Industry Training Authority (ITA). Under the PCTIA bylaws, accreditation describes a voluntary process by which a Registered institution meets additional quality standards in excess of registration requirements. Under the ITA bylaws, accreditation is granted to programs that follow national standards.

Career Training: Under the *Private Career Training Institutions Act* career training is defined as credentials at the non-degree level, described in the National Occupational Classification scheme as an occupation where the tuition is greater than or equal to \$1,000 and the program is longer than or equal to 40 hours.

Degree Quality Assessment Board (DQAB): The DQAB was established to oversee the quality review process and make recommendations to the Minister on whether the criteria established by the Minister have been met for new degree approval (all institutions) and use of the word university (private and out of province public institutions).

External Evaluation: The process carried out by the quality assurance body to evaluate the quality of an institution using data, information and evidence. The process generally includes analysis of a self-study report, a site visit, and an evaluation report.

Industry Training Authority: The Agency responsible for leading and coordinating the skilled trades training and credentialing system for the province.

International Student: A temporary resident who is in Canada principally to study and who has been issued a study permit by Citizenship and Immigration Canada (with or without other types of permits).

Private Career Training Institutions Agency (PCTIA) – Under the *Private Career Training Institutions Act*, PCTIA has the authority to regulate private career training institutions in B.C. This includes responsibility for establishing standards of quality for voluntary accreditation and enforcing basic education standards for all registered institutions.

Quality Assessment: The measurement of programs against established criteria and minimum standards.

Quality Assurance: A systematic review process of an institution or program to determine that established standards of education, knowledge, teaching and/or financial status and capacity are being maintained and enhanced. It is an ongoing evaluative process that includes assessment, monitoring and improving quality. It often includes a self-study and a component of external verification.

Quality Improvement: Quality improvement is taking deliberate actions to bring about continual improvement of processes and performance.

Registration: In B.C., when a private institution offers a career training program with \$1000 or more in tuition and 40 hours or more in duration, it must be registered with the Private Career Training Institutions Agency (PCTIA). Registration requires the institution to meet basic education standards as set in the PCTIA Bylaws.

Self-Study: A systematic assessment institutions undertake to measure the current condition of institutional quality. The self-study provides a clear sense of institutional areas of excellence as well as areas in need of improvement.

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