

# Mutual recognition of quality assurance decisions on higher education institutions in three regions: a lesson for Asia

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**Abstract** Cross-border higher education resulting in the increased mobility of students, academic staff, programs, institutions and professionals has grown considerably in global times. Therefore, how to ensure that the quality of academic programs has met the local and international standards simultaneously has become a great challenge in many nations. In recent years, the need for close cooperation of quality assurance agencies and acceptance of review decisions called “Mutual recognition” has been promoted by several international quality assurance networks of higher education. Established in 2003, the European Consortium for Accreditation in higher education (ECA), which aims to achieve mutual recognition of accreditation decisions among member countries, is the first such initiative in the world. The main purpose of the paper is to understand the definition of mutual recognition, examine the role of the international quality assurance network in the promotion of mutual recognition and analyze the ECA, ARCU-SUR, and Asia–Pacific Quality Network cases. The implication of mutual recognition for higher education quality assurance of Asian nations and related issues derived from other regions will be discussed in the conclusion.

**Keywords** Higher education · Quality assurance agencies · Mutual recognition

## Introduction

Cross-border higher education resulting in the increased mobility of students, academic staff, programs, institutions and professionals has grown considerably in global times. Therefore, how to ensure that the quality of academic programs has met the local and

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international standards simultaneously has become a great challenge in many nations (the World Bank 2007; Hou 2012). Hence, there are growing global discussions about developing the capacity for reliable quality assurance and accreditation of higher education and comparability of the quality of study programs that has resulted from the mobility of students internationally (Hou 2012).

Hence, the need for close cooperation of quality assurance agencies and acceptance of review decisions called “Mutual recognition” has been promoted by several international quality assurance networks of higher education, such as the International Network of Quality Assurance Agencies in Higher Education (INQAAHE), the European Quality Assurance Register (EQAR), the European Association for Quality Assurance in Higher Education (ENQA), the European Consortium for Accreditation in higher education (ECA), the Ibero- American Network for Higher Education Accreditation (RIACES), the Asia–Pacific Quality Network (APQN), etc.

Established in 2003, the ECA is the first accrediting agency in Europe aiming to achieve mutual recognition of accreditation decisions among member countries, “in order to facilitate international acceptance of academic institutions, degrees and studies” in the European higher education Area (Frederiks and Heusser 2005, p. 5). The other regions also initiated pilot studies for the implementation of mutual recognition, particularly in Latin America and Asia. Supported by the decision of the 2007 meeting of the Ministers of Education, ARCU-SUR’s accreditation schemes under RIACES, have become a foundation for developing mutual recognition in Latin American countries. Encouraged by the ECA experience and RIACES’s action, and aiming at coordinating and promoting cooperation of Asian quality assurance agencies, APQN published the Chiba Principles in 2008 as a basis of mutual recognition of Asian quality assurance agencies. In 2010, the World Bank’s “Global Initiative on Quality Assurance Capacity” (GIQAC) funds provided to APQN made it possible to initiate discussions on mutual recognition (MR) among selected APQN members.

The main purpose of the paper is to realize the definition of mutual recognition, examine the role of international quality assurance networks in the promotion of mutual recognition and analyze the ECA, ARCU-SUR and APQN cases. The implication and the challenges of mutual recognition in Asia and related issues derived from other regions will be discussed as a conclusion at the end of the paper.

### **Cross-border higher education and development of mutual recognition**

Since the beginning of the twenty-first century, globalization has become a powerful force with profound effects on the internationalization of higher education throughout the world (Hou 2012). The major element of internationalization in higher education is “understood as expanding international student mobility” (van der Wende 2011, p. 96). According to “Education at a Glance” by the Organization for Economic Cooperation and Development (OECD), the United States, the United Kingdom, Australia, Canada, France, and Germany hosted more than half of the world’s students who studied abroad in 2009 (OECD 2011; Olds 2011). Latin America and the Caribbean, Oceania, and Asia are the fastest growing regions of study destination, particularly Asian countries with 52 % of foreign students enrolled worldwide (OECD 2011).

Due to the fact that international student mobility in higher education has been growing rapidly, quality assurance and comparability of the quality of study programs has become a growing concern for many nations. Over the past decade, several international and regional

organizations have been discussing international standards of quality, collaboration between higher education institutions and quality assurance agencies, such as the International Association of University Presidents (IAUP), and the International Network of Quality Assurance Agencies in Higher Education (INQAAHE). Even the United Nations Educational, Scientific and Cultural Organization (UNESCO), the World Bank, and OECD are also concerned about the impact of quality enhancement in cross-border higher education on global economic growth (Eaton 2002). Moreover, the ENIC/NARIC Network (European Network of National Information Centres on Academic Recognition and Mobility) supported by the Council of Europe and UNESCO, has been undertaking the academic recognition of “foreign diplomas, degrees and other qualifications” among European nation states (ENIC/NARIC Network 2012). All these actions led the international networks of quality assurance, national quality assurance agencies, and governments to take “mutual recognition” of review decision issues into consideration.

According to David Woodhouse (2008), former President of the INQAAHE, mutual recognition (MR) of review decisions is defined as “the recognition by two or more external quality agencies an affirmation by each that it accepts the entire or partial decisions and judgments of the other” (p. 28). Most importantly, such recognition is simply based on the agencies “having comparable aims and procedures” in the quality of scope and activity, so “they would likely reach the same conclusion in reviewing and passing a judgment on an institution, study program or qualification” (Woodhouse 2008, p. 28). In this sense, mutual recognition will mainly benefit various higher education stakeholders, including students, institutions, graduates, quality assurance agencies, and employers. For students, mutual recognition will primarily provide security for students who study abroad and through exchanges or in joint programs. Based on mutual recognition, the quality of the programs and institutions should guarantee that those students will take courses and programs which are accredited. In terms of institutions, mutual recognition is expected to reduce the workloads for them as it would “render concurrent approval and assessment processes superfluous” (Kristoffersen 2004, p. 4). Another positive effect of mutual recognition on quality assurance agencies is that knowledge and understanding of quality assurance procedures and practices will be improved among quality assurance agencies, which will facilitate not only cooperation between quality assurance agencies and higher education institutions, but also cross-border academic activities such as the establishment of joint programs or branch campuses and might enhance global employability. It is notable that mutual recognition will assist graduates who may find that it’s a major aid to practicing in other countries and might enable them to get a job more easily in the global job market. Similarly, this affirmation of education graduate quality is also a benefit to employers (Kristoffersen 2004; Woodhouse 2008).

In general, mutual recognition has been implemented at the program level and within countries, such as the U.S.A., and Australia. The Washington Accord is a successful case though its scope is highly limited. In 1989, the Washington Accord, an international engineering agreement, “governed mutual recognition of engineering qualifications and professional competence” (International Engineering Alliance 2011). All signatories not only recognized the programs accredited by each other but also recommended that graduates of the programs accredited be recognized as “having met the academic requirement for entry to the practice of engineering” (APQN 2010a).

However, there exist a number of obstacles for the achievement of mutual recognition, including different quality assurance approaches, the level of quality assurance culture, use of language, time and money spent, and human resources allocated to achieving the bilateral or multilateral agreements. Therefore, the major global and regional quality

assurance networks aiming at assisting local quality assurance agencies in “determining the standards for institutions operating across national borders” and “facilitating links between accrediting bodies especially insofar as they operate across national borders”, not only recognized “mutual recognition” as an ultimate goal but also started to engage in the issue (Woodhouse 2008; Chueng 2008). Peter Cheung, a former President of APQN, officially declared that

“By 2010 the APQN would like to see that all its full members will recognize each other’s judgments, and all operators of higher education will be subject to the requirements of only one agency—in other words, there will be no quality barrier to the full mobility of students across the region”(2008, p. 37).

In 2001, INQAAHE first set up a working group to develop the concept and content of mutual recognition. Since mutual recognition was listed as one of the most important aims by the European areas, in 2002 the European Association for Quality Assurance in Higher Education (ENQA) carried out a pilot study exploring the method and process of mutual recognition. Five participating Nordic countries prepared a self-study report including ownership of quality assurance agencies, and evaluation methods, followed by an onsite visit on the agencies. Lastly, the expert panel came up with a feedback report on the main strengths and weaknesses identified through the self-study and the visit. However, the feedback report did not address the recognition issues directly but it helped to understand the type of information required to address the issues relevant to mutual recognition (APQN 2010a). After the Bergen Communique of 2005, the most ambitious mutual recognition project developed by ECA aimed to achieve mutual recognitions of accreditation decisions among its members by the end of 2007 (Frederiks 2008). In Latin America, in 2007, ARCU-SUR managed as part of Mercosur’s Education Sector became an accreditation scheme to develop program-based mutual recognition. In Asia, APQN set up a project group to start working with the mutual recognition issue in 2003 and in 2010 officially applied for GIQAC funding to develop and test processes for ascertaining mutual recognition at four quality assurance agencies.

The other purpose of mutual recognition is for the quality assurance of quality assurance agencies. Through the process of reaching agreements, quality assurance agencies themselves will inevitably develop a self review mechanism to demonstrate their quality of operations. Quality assurance agencies, to some extent, don’t understand each other, which led to the major obstacles of the implementation according to the international networks’ experiences. So, many of them began to develop good principles and practices, serving the purpose for quality assurance agency’s self-review as well as the preparatory bases of mutual recognition, such as *the Guidelines of Good Practice in Quality Assurance* (GGP) by INQAAHE (2009), *the Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG) by ENQA (2007), *Chiba Principles* by APQN (2010b), and the *Code of Good Practice* by ECA (2004). RIACES also started to develop some guidelines in order to prepare Latin quality assurance agencies to develop internal quality assurance mechanisms (Lemaitre 2008). These principles and guidelines assist quality agencies to understand the quality of the evaluation process and the meaning of the outcomes including the governance, resources, and transparency of the external quality assurance agencies, the standards, composition of the panel, and the decisions and collaboration with other agencies. More and more quality assurance agencies are interested in taking advantage of them. Five quality assurance agencies reviewed by the Board of INQAAHE against INQAAHE’s Guidelines of Good Practice i.e., the Middle States Commission on Higher Education (MSCHE), Tertiary Education Quality and Standards Agency (TEQSA) (previously AQUA), the National Agency for Quality Assessment and

Accreditation (ANECA), the Sistema Nacional de Acreditacion de la Educacion Superior (SINAES), the Commission for Academic Accreditation (CAA), Higher Education Quality Committee (HEQC), Ontario College Quality Assurance Service (OCQAS), and National Accreditation Council of Colombia (CNA) were successfully proved to be comprehensively adhering to the INQAAHE guidelines. Besides, ENQA's members have been requested to review themselves according to the ESG (INQAAHE 2012; ENQA 2011). Founded in 2008 by the European Association for Quality Assurance in Higher Education (ENQA), The European Students' Union (ESU), Association of European institutions of higher education (EUA), the European Association of Higher Education Institutions (EURASHE), and the European Quality Assurance Register for Higher Education (EQAR) published "a register of quality assurance agencies that substantially comply with the European Standards and Guidelines for Quality Assurance (ESG)" in order to "improve trust among agencies" and "facilitate the mutual acceptance of quality assurance decisions" (EQAR 2012).

Since several international networks have been acting ambitiously and played a major role in the issue, many quality assurance agencies have gradually come to value mutual recognition for the quality of cross-border higher education and have worked cooperatively with the quality assurance networks. As Woodhouse (2008) stated,

"With increasing mobility of students, institutions, graduates, and employers across national boundaries, and with most quality agencies being either nationally or sub-nationally based, consideration of the possibilities, difficulties, advantages and drawbacks of mutual recognition of the activities of quality agencies is important both regionally and globally" (p. 31).

To analyze the process and impact of mutual recognition on higher education, three regional cases will be discussed as follows.

### **Establishing mutual recognition in a regional context**

#### **The ECA experience**

The Bologna Declaration signed in 1999 pays specific attention to quality assurance: "Promotion of European co-operation in quality assurance with a view to develop comparable criteria and methodologies". This focused on three main policies: the introduction of the Bachelor's/Master's degree structure; the mobility of students, staff and graduates; the labor market and quality of higher education graduates (Europa 2005; Hou 2012). Mutual recognition of accreditation and quality assurance decisions is regarded as a major tool to enhance the mobility of students and graduates with accredited or quality assured qualifications in the European Higher Education Area (Heusser 2006; ECA 2007).

Against varying backgrounds of 15 accreditation organizations from 10 European countries, including Austria, Belgium [Flanders], Switzerland, Germany, Spain, France, Eire, Netherlands, Norway and Poland, the ECA was established to implement mutual recognition of accreditation decisions among member countries by the end of 2007 (ECA 2008). In 2006, six representatives of ENIC/NARICs in the ECA countries also signed an agreement which would "promote an almost 'automatic' recognition of qualifications based on mutual recognition of accreditation decision" (Frederiks 2008, p. 13). The signing of this agreement is based on the premise that mutual recognition of review decisions linking mutual recognition of degrees will eventually facilitate student mobility in European higher education area.

In order to remove existing barriers in the process and to achieve the goal by the specific deadline, ECA proposed a 4-step roadmap to realize mutual recognition, including the mutual understanding of accreditation organizations, mutual recognition of accreditation procedures, and mutual recognition of accreditation decisions and results (Heusser 2006). Given the fact that mutual understanding among quality assurance agencies is a prerequisite for mutual trust, in the initial stage in 2004, ECA assisted to collect accreditation systems of the members and to compare them through a regional survey. Besides, all members were encouraged to develop a variety of mutual cooperation projects, including exchange of experts and staff, mutual observations of each other's accreditation procedures, and joint accreditation. In addition, ECA drafted some guidelines, including the "Code of good practice" and "Common Principles for the Selection of Experts" to define the internal quality assurance measures of accreditation organizations and ensure the quality of the review decisions. Then it signed the "Code of good practice" that "guarantees comparability of accreditation procedures and defines the internal quality assurance measures of accreditation organization" for the self-review of quality assurance agencies (ECA 2008, p. 4). But ECA indicated that the difference of quality assurance systems at a national level was tolerated and respected, "as long as they would not fundamentally influence the final accreditation decisions" (ECA 2008, p. 5). When all members obeyed the guidelines and good practices, the confidence each quality assurance system had in regards to the quality of each other's accreditation systems was strengthened. As Heusser (2006) emphasized

"The strong commitment of its members and good starting conditions allowed the ECA project to make quick progress and to stick to the ambitious schedule of its road map. One of the first steps in the project was to establish 'accreditation profiles' of all ECA members" (p. 3).

15 ECA members started to observe each other's program accreditation procedures and process in 2006. Moreover, two ECA members—the Center of Accreditation and Quality Assurance of the Swiss and Commission des Titres D'Ingénieur in France developed a joint accreditation project of master programs at the Swiss Federal Institute of Technology of Lausanne (Beccari and Remaud 2008, p. 11). In the following year, all members undertook external review in order to assess whether their accreditation procedures and processes comply to the standards of the Code of good practice. The completion of the mutual recognition process occurred ultimately after the outcomes had been approved by the government or a recognition authority in 2007 (Fig. 1).

After the twelve mutual recognition agreements involving eight ECA member countries were signed at the conference in Barcelona, ECA began working towards a European methodology for accreditation procedures of joint programs (ECA 2011). Driven by the Bologna process, European countries are fully supported, with endorsement of their Ministers of Education, by ENQR, ECA, ENIC/NARICs networks to build up mutual trust, mutual recognition of accreditation process as well as mutual recognition of qualification. It can be seen that the completion of mutual recognition rested on not only the ECA members' participation but also on the engagement of a large range of stakeholders, particularly governments and higher education institutions (Heusser 2006; Aelterman 2008; Frederiks 2008).

Encouraged by the ECA case, it initiated many discussions to determine whether the ECA experience could be adopted or learned by other regions, such as for RIACES or APQN members. To sum up, ECA adopted a four-step road map as a basis for the MR initiative which involved 16 European quality assurance agencies, governments, and higher

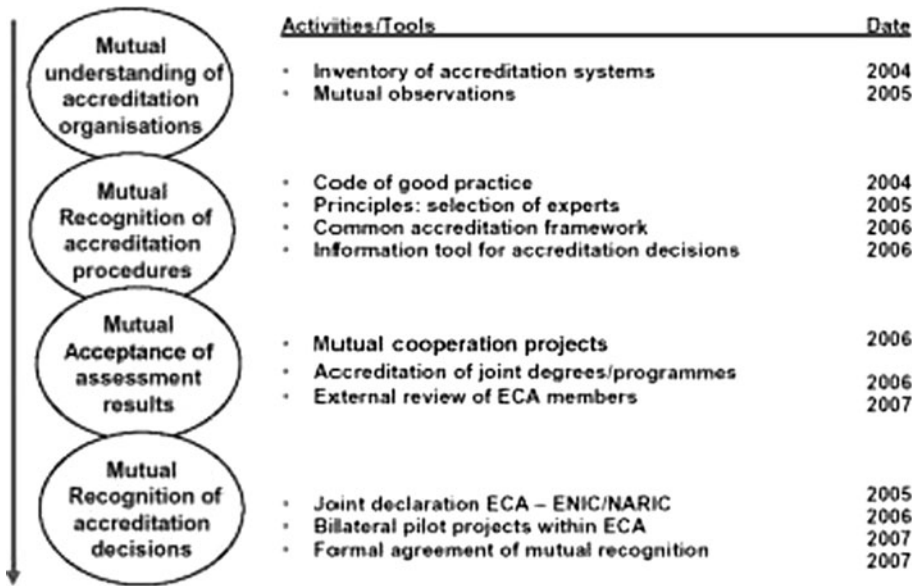


Fig. 1 ECA road map to mutual recognition. Sources ECA (2007)

education institutions. Under the guidelines of the “Code of good practice” and “Common Principles for the Selection of Experts”, ECA members finally reached agreements on the recognition of each other’s program accreditation decisions in 2007.

The ARCU-SUR case

Although quality assurance systems have been developed in Latin America since 1990, there is no common quality assurance model for most nations. To facilitate mobility of students, academic staff and professionals in the region, María José Lemaitre, RIACES’s and INQAAHE President pointed out, “the need for schemes that make it possible to work towards the recognition of studies, qualifications and degrees has been in the forefront of many public policies in the region” (Lemaitre 2008, p. 32). Up to the present, there are three major organizations or agreements signed by Latin American countries which are driving the quality assurance agencies into the first stage of mutual recognition.

In 1991, four nations, i.e. Argentina, Brazil, Paraguay and Uruguay signed an agreement Common Southern Market (called MERCOSUR) for the purpose of economic integration. However, education became the central issue of MERCOSUR and the Ministers of Education agreed to work together on the harmonization of educational systems. Later on, RIACES, a cross-regional Network was established in Buenos Aires in 2004 and was granted recognition by the World Bank in 2006. With 29 quality assurance and governmental members from eighteen countries in Latin America, the Spanish speaking Caribbean and Spain, it focused on the promotion of quality in higher education, including generating the appropriate conditions for mutual recognition processes.

Developed in 2007, ARCU-SUR is regarded as the leading agency aiming at mutual recognition of the Latin American quality assurance agencies. There are two major ultimate goals for achieving mutual recognition among MERCOSUR’s members: regional

integration and student mobility. At the initial stage, it considered a limited number of degrees and programs including Medicine, Agronomy, Architecture and Engineering, Dentistry, Veterinary medicine, and Nursing which could be officially recognized among members. In contrast to the ECA, participation is voluntary and the programs are required to develop a self-assessment process that considers the learning outcomes of the graduates and regional quality criteria. According to ARCU-SUR's assessment report, only a few programs were involved and the accreditation decisions have not yet been recognized by the members.

Torre (2011) analyzed the ARCU-SUR case and found that the major causes of the unsuccessful experience were the low interest of higher education institutions, and low compatibility of technical and political criteria among members in the region such as the grading system, the organization of curriculum, and its regulatory mechanisms. The most significant factor was that the cultural significance and the role of higher education institutions in national systems were quite divergent in the region.

All in all, ARCU-SUR adopted a program-based approach for their MR initiative. Compared to ECA, it just started the MR exercise by following the INQAAHE guidelines. It will therefore have to engage negotiations with higher education institutions for the long term. Thus, in terms of overcoming the difficulties of the mutual recognition of accreditation decisions, RIACES still made two interesting contributions: first, it helped to harmonize quality criteria in the MERCOSUR programs among RIACES members; and second, it supported the development and strengthening of QA agencies in the Latin American region (Lemaitre 2008).

#### Mutual recognition in Asia- APQN's GIQAC

Established in Hong Kong in 2003, APQN supported by the World Bank and UNESCO aimed at “helping to build alliances between agencies, and assisting countries/territories that do not have a quality assurance agency of their own” (APQN 2010b). According to the APQN, currently, most Asian governments have set up quality assurance systems including developed and developing nations for two major reasons: first, to ensure the quality of the study programs offered by local institutions; second, to enhance higher education institutions' competitiveness globally (APQN 2010b). To respond to the internationalization trend in Asian higher education, like ECA members, APQN members started to think of implementing the concept of “mutual recognition” in order to ensure the quality of cross-border higher education institutions in Asia. Indeed, Association of Southeast Asian Nations (ASEAN) members are expected to have mutual recognition implemented by 2015 following ASEAN charter (Dixon, personal communication, 2010).

In 2004, led by Dorte Kristoffersen, a former Vice President of APQN, APQN conducted a research project to realize the possibilities and challenges for mutual recognition implementation for over all APQN members. It was found that there were currently a number of obstacles to achieving mutual recognition among APQN members, such as the support and acceptance from the varying stakeholders, language, and expenses (Kristoffersen 2004). After initial discussions, in 2005, the project group developed a discussion paper. Discussions continued for the next couple of years but the project did not proceed due to lack of funding (Kristoffersen 2004; APQN 2010a). APQN still continued to work on the preparatory stage of mutual recognition by working groups, annual conferences and drafting the Chiba principles as a basis for mutual recognition.

In 2010, additional GIQAC funds provided to APQN made it possible to initiate more discussions on mutual recognition among selected APQN members—Australian



**Table 1** Planned timelines for observation visits among four selected members

February–March 2011	Two observation visits—NAAC’s QA processes to be observed by NZUAAU and MQA; face to face meeting at the AGM in India; Workshop on MR for APQN members at the AGM
June 2011	Two observation visits—AUQA’s QA processes to be observed by MQA and NZUAAU’s QA processes to be observed by NAAC; mid-term meeting of project team
September 2011	One observation visit by two members—MQA’s QA processes to be observed by AUQA and NAAC. Two observation visits
October 2011	Final meeting of project team

Source Asia-Pacific Quality Network (APQN) (2010b)

Universities Quality Agency (AUQA), Malaysian Qualifications Agency (MQA), Indian National Assessment and Accreditation Council (NAAC), and New Zealand Universities Academic Audit Unit (NZUAAU). The project group held its first meeting at MQA on 21 October, 2010. Two other members of APQN—Australian National ELT Accreditation Scheme (NEAS) and the Hong Kong Council for Accreditation of Academic and Vocational Qualifications (HKCAAVQ)—contributed reflections on the context and challenges of mutual recognition among the selected project group members (APQN 2010a).

By learning from the ECA experience that building mutual understanding is the first step to mutual recognition, the four project members mapped out the policies, practices and outcomes of their quality assurance processes and discussed the guidelines for the observations of each other’s quality assurance exercises. The four members compared and analyzed each other in a very comprehensive manner and finally came up with an initially evaluation framework (APQN 2010a).

Currently, APQN engaged in the second phase of the project where each project member agency’s QA exercise is to be observed by the other member of the project team. After all the observation visits have been conducted a final meeting will be held to finalize the report and the next stages (APQN Asia-Pacific Quality Network 2012; APQN 2010a, see Table 1). However, the project outcome for the next phase may change the transformation of AUQA into a new agency “Tertiary Education Quality and Standards Agency” (TEQSA) in July, 2011. In Nov, 2011, TEQSA has announced that all audits in 2012 will be stopped to process. A termination of GIQAC’ funding in 2012 will be also a factor which may affect the continuity of the project.

Driven by the global trend in mutual recognition, many Asian nations suddenly realized the importance of mutual recognition in terms of cross-border qualification recognition and proactively supported mutual recognition. Under the circumstances, there are high expectation of Asian quality assurance agencies to establish a working group to implement the mutual recognition of each other’s accreditation decisions, such as MQA and Higher Education Evaluation & Accreditation Council of Taiwan (HEEACT) (HEEACT 2011). With strong governmental support, some critical barriers, in MQA–HEEACT case, were eliminated in the initial phase.

In the process of mutual recognition, the key questions that are raised are for more mutual understanding, such as the compatibility of objectives, policies and procedures, quality of experts, and building trust in each other’s decisions, creating awareness of the benefits of mutual recognition in their countries, and so on. All in all, quality assurance agencies need to agree on sharing more quality assurance supporting documents from each

other in order to bridge the gap between the various national quality assurance mechanisms.

To conclude, with support of GIQAC's funding, APQN's MR initiative could be continued in 2010. The INQAAHE guidelines and Chiba principles were mainly adopted for quality review of four quality assurance agencies. Driven by the current trend of student mobility and regional integration, several Asian governments are now more willing to support their national quality assurance agencies to engage MR's initiative.

## Discussion

### Comparison of the three cases

In spite of the fact that mutual recognition is the major goal of three networks in Europe, Latin America, and Asia, there are significant differences in terms of the starting year, strategies for implementation and outcomes. ECA was the first organization committed to mutual recognition. APQN began the mutual recognition project in 2004 but this was discontinued due to lack of funding. It reinitiated a pilot study after receiving the World Bank grant again in 2010. Compared with ECA and APQN, ARCU-SUR as a part of the MERCOSUR sector starting mutual recognition in 2007 lacks the authority and the coordinating mechanisms to engage higher education institutions. ECA and ARCU-SUR gave priority to program accreditation rather than institutional assessment. On the contrary, APQN recognized that "confidence in program quality is predicated on institutional recognition", therefore it decided to focus on institutional assessment (APQN 2012, p. 27).

When it comes to approach, ECA's road map clearly stated the procedures, timelines and guidelines for self-review of the quality assurance agency. In contrast, the APQN and ARCU-SUR initial implementation adopted the INQAAHE's Guidelines of Good Practice for the future self-review of QA members. It will definitely require a long-term investment for ARCU-SUR and APQN to reach the current state of ECA. Although there is nothing comparable to the Bologna Process in Asia and Latin America, there is still very high expectation from participating members in both regions. If trust can be built among members through continued communication and interactions, it will be likely to make great progress on mutual recognition in the near future (see Table 2).

### Lessons for Asia

Comparing the above three cases, it can be seen that the ECA approach is more externally-oriented and integrated. There are two important external reasons for ECA members for a need of mutual recognition of accreditation decision. One is to facilitate the mobility of students and graduates in Europe by recognizing each country's accreditation. The other reason is the increasing number of joint programs which are subject to national quality assurance procedures (Frederiks 2008). Therefore, ECA members realized that mutual recognition would not only help them overcome the problems of multiple accreditations of joint programs, to some extent, but also integrate regional quality assurance resources. In addition, ECA linked up closely with EQRA and ENIC/NARICs, which are served as a pilot and a follow-up scheme of mutual recognition. On the one hand, EQAR developed a platform mutual understanding among quality assurance agencies through external review process, and on the other hand, ENIC/NARICs pushed mutual recognition of review decision into a further recognition of qualifications.

**Table 2** Comparison of MR among ECA, ARCU-SUR, and APQN

	ECA	ARCU-SUR	APQN's GIQAC
Starting year	2003	2007	2004/2010
Number of participants	16 ECA members	Medicine, Agronomy, Architecture and Engineering, Dentistry, Veterinary medicine, Nursing programs	4 members, AUQA (Australia), MQA (Malaysia), NAAC (India) and NZUAA (New Zealand).
Type of MR	QA agency based	Program-based	QA agency based
Purpose	1. Student mobility 2. Regional integration	1. Student mobility 2. Regional integration	1. Student and professional mobility 2. Regional integration
Guidelines	1. Code of good practice 2. Common principles for the selection of experts	1. INQAAHE's guidelines of Good Practice	1. Chiba principles 2. INQAAHE's guidelines of good practice
Focus	Program accreditation	Program accreditation	Institutional assessment
Approach	4- step road map	1. Harmonize quality criteria 2. Support for the development and strengthening of QA agencies	Pilot study to test methodology
Level of achievement	1. Complete agreements on accreditation decisions among 16 members. 2. Start the MR of Joint programs		1. Complete an evaluated framework 2. Complete observation visits 3. Report due June 2012

Source the author

Learning from ECA, ARCU-SUR's program-based MR project was initiated by national governments committed to economic and political integration. It was believed that accreditation decision regarded as a fast track to mutual recognition of degrees in Latin America would facilitate regional student mobility in Latin America like in Europe. But ARCU-SUR's MR has not worked as successfully as the ECA approach. According to UIS-UNESCO, more than 74 percent of students in Latin America and Caribbean still choose to study in North American and Western Europe, compared to 23 % within the region (UIS-UNESCO 2010). The regional mobility rate did not increase because most participating members would not consider MR as their first priority. However, ARCU-SUR has continued to encourage more bilateral initiatives among MERCOSUR members.

As to APQN, its approach is slightly different from ECA and MERCOSUR. It can be called a "capacity building" model. As noted, APQN was triggered by the international QA network rather than by the members' states, which focuses on mutual understanding, trust, and comparability. At present, an agreed QA framework and guidelines has not been reached among APQN members yet. Moreover, without the strong incentives of economic integration and governmental engagement, the sustainability of the MR project, affected by the termination of GIQAC funds in 2012 and the lack of political support from high-ranking ministerial meetings, becomes the critical issue in the implementation process.

To further the MR project among the four elected agencies and to be able to apply to the other APQN members, the project team summarized three key areas for improvement.

First, clarification is needed as to whether the reviews are full accreditation reviews (i.e for compliance purposes) or are primarily enhancement focused. Second, there are areas where the project members were not sure that they knew enough about each other. Hence, there is a need to observe the implementation of the quality assurance processes of each other. Third, rigor of the quality assurance processes and procedures, transparency in decision making and integrity of quality assurance are seen as the leading criteria for building 'trust'. Like in ECA, there are gaps between the quality assurance frameworks of members, and members need to seek more information to bridge the gaps.

When studying the ECA and ARCU-SUR cases, it is clear that mutual recognition requires, indeed, agreement among governments that these principles are relevant. Hence, the external factors including the political and legislative contexts cannot be ignored in the APQN case. Therefore, "demonstrating the benefits of mutual recognition and making fact based statements on the benefits of mutual recognition are seen as strategies to convince the governments of the benefits of mutual recognition" and to involve them in the next phase (APQN 2010a).

International organizations like APQN, and INQAAHE can play a significant role in such matters. Certainly, good practice statements published by the networks provide a good foundation to move toward mutual recognition. Instead of the Chiba principles, the INQAAHE GGP's are used as the point of reference for the self-review of the four selected members. Undoubtedly, they can be used to strengthen communication between the quality assurance agencies and universities in different countries and also to help capacity-building of the emerging quality assurance agencies (Jiang personal communication, 2010). As Kristoffersen mentioned, "the international networks can provide basic research and facilitate the cooperation between quality assurance agencies" (personal communication, 2010).

As Asian nations have generally recognized that mutual recognition has brought many benefits, such as a growing student mobility rate of 43 % within the region, the APQN project will still have a great chance to be applied to other members (UIS-UNESCO 2010). But Louise Zak, Associate Director of the New England Association of Schools and Colleges in the US, indicated that APQN members should realize the big challenges they are facing at this stage, such as "finding a good place or places to start; having some overarching framework so that the early pioneers in such efforts can lead the way for others; having sufficient involvement from others to help steer the course; and having sufficient financial support so that the early efforts are well grounded and not conducted hastily" (personal communication, 2010).

Some issues: multi-regional mutual recognition and the US approach

According to the discussion above, it was found that mutual recognition was implemented only within the defined region. No mutual recognition cases have been reached out of region except for professional accrediting bodies. This reality reflects a dilemma that bilateral or multilateral mutual recognition agreements may not likely cater to the areas where students are most interested in going to. As Heusser (2011) admitted that the ECA case didn't respond to the current situation that an increasing number of Latin American and Asian students are choosing to study in Europe (INQAAHE 2011). In other words, European quality assurance agencies need to broaden their scope beyond the region to Latin American and Asian quality assurance agencies. Based on the notion that mutual recognition is helpful to students in their mobility and to employers, multi-regional mutual recognition will be definitely resonant in the future.

The other issue is the US approach to mutual recognition. US accrediting organizations review colleges, universities and programs in 50 states and a number of other countries. Accreditation in US serves several purposes, including assuring quality, access to federal funds, easing transfer, and engendering employer confidence (Eaton 2003). The decisions of a US accreditor are accepted and recognized, not only in its own region but also in other regions (Woodhouse 2004). Broadly speaking, mutual recognition in a more general sense refers to “an extension of such acceptance of the decisions of other agencies across national borders, with the hope of achieving similar benefits for institutions and their students and graduates” in terms of mobility, credit transfer or acceptance of qualifications (Woodhouse 2004, pp. 82–83). Without adoption of mutual recognition, on the contrary, US accreditors have directly conducted accreditation on non-US programs and institutions in 18 countries (CHEA 2010). Philip Altbach criticized US accreditation across-borders as “intellectual arrogance”, which is likely to pressure those programs and institutions seeking US accreditation into compliance with US standards in sacrifice of their own cultural features and innovation (Green 2011).

Hence, reviewing the US approach to mutual recognition with other quality assurance agencies in foreign countries, Zak commented clearly, “However, we have not encountered such a question. We have had a cooperative visit to one of our institutions operating in another country, jointly with the quality assurance agencies in that country” (personal communication 2010). Therefore, how to engage US accreditors in meaningful mutual recognition discussions will be an issue for quality assurance agencies in all regions.

## Conclusion

At the end of 2010, ECA members moved a further step by launching the “Multilateral Agreement on the Mutual Recognition of Accreditation Results regarding Joint Programmes” (MULTRA) (ECA 2011). While the ECA experience is a great lesson for Asian nations, it may not be completely applicable. There are some significant differences due to the diverse nature of national quality assurance frameworks, the different level of quality assurance agencies’ capacity building, and no common ground on quality indicators. Hence, the success of mutual recognition still rests on the mutual confidence of the quality of the quality assurance agencies in each other’s country. Although Chiba principles were published by APQN, they were not completely adopted by Asian quality assurance agencies as a basis for mutual recognition implementation.

Lack of funding is another challenge for mutual recognition among Asian nations. With the World Bank’s GIQAC fund, APQN required to work on its project. According to Jan Cameron, APQN’s project leader of mutual recognition, “Networks which are primarily comprised of voluntary participants do not necessarily have the funds themselves to resource significant development projects” (personal communication 2012). Zak (2010), Yonezawa (2010) and Kristoffersen (2010) all suggested independently that quality assurance organizations like the World Bank, INQAAHE and APQN should definitely have a significant role to play in this matter. In addition, several challenges for Asian nations still exist, particularly the engagement of the relevant governments. As Stella indicated, the mutual recognition process needs to involve both governments and recognition bodies; this has been highlighted in the process of the mutual recognition (APQN 2010a). This is important given that it is usually up to governments, rather than quality assurance agencies, to establish educational relationships between countries

(Cameron 2012, personal communication). ECA's case provides further evidence of the significant role of government in reaching mutual recognition.

To conclude, global trends in monitoring the quality of cross-border higher education are leading quality assurance development to convergence. Different regions have their own ways to respond to the quality assurance of cross-border education, but "mutual recognition" has become a common goal for quality assurance agencies all around the world. "Exceptionalism" will not apply to one single nation. It can be foreseen that multiregional mutual recognition will be the focus. Although the road to the success is quite long and complicated, the end result will be worth the investment on behalf of students and institutions, agencies and governments. The faster student mobility grows in Asian nations and other regions, the more important mutual recognition will be in terms of quality of cross-border higher education. As Neubauer (2011) stated clearly:

As quality assurance agencies, our ultimate justification is working with all higher education sectors to ensure that teaching, research, and services are of high quality, that institutions are engaged in continuous quality improvement, and that students are the ultimate beneficiaries of our efforts.

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